DRAFT
ENVIRONMENTAL IMPACT REPORT

FASHION SQUARE EXPANSION PROJECT
ENV 2007-9914-EIR
SCH # 2007071103

LEAD AGENCY:
LOS ANGELES DEPARTMENT OF CITY PLANNING
6262 VAN NUYS BOULEVARD, SUITE 351
VAN NUYS, CALIFORNIA 91401

APPLICANT:
SHERMAN OAKS FASHION ASSOCIATES, LP
11601 WILSHIRE BOULEVARD, 11TH FLOOR
LOS ANGELES, CALIFORNIA 90025

SEPTEMBER 2008

TABLE OF CONTENTS

TABLE OF CONTENTS (CONTINUED)

TABLE OF CONTENTS (CONTINUED)

APPENDICES – VOLUME I
(UNDER SEPARATE COVER)

TABLE OF CONTENTS (CONTINUED)

APPENDICES – VOLUME II
(UNDER SEPARATE COVER)

LIST OF FIGURES

FIGURE

LIST OF FIGURES (CONTINUED)

FIGURE

LIST OF FIGURES (CONTINUED)

FIGURE

LIST OF TABLES

TABLE

LIST OF TABLES (CONTINUED)

TABLE

LIST OF ACRONYMS AND ABBREVIATONS

>	Greater than
<	Less than
°F	Degrees Fahrenheit
$\mu g/m^3$	Milligrams per million
AB	Assembly Bill
ACM	Asbestos containing material(s)
ADT	Average daily traffic
AFY	Acre-feet per year
a.m.	Morning hours (between 12:00 midnight and 12:00 noon)
APWA	American Public Works Association
AQMP	Air Quality Management Plan
ASHRAE	American Society of Heating, Refrigerating, and Air-Conditioning Engineers
AST	Aboveground storage tank(s)
ASTM	American Standard Test Methods
ATCS	Adaptive Traffic Control System
ATSAC	Automated Traffic Surveillance and Control
Basin	South Coast Air Basin
BFI	Brown-Farris Industries
BID	Business Improvement District
BMP	Best Management Practice(s)
CAA	(Federal) Clean Air Act
CAAQS	California Air Quality Standards
Cal-OSHA	California Occupational Safety and Health Administration
Cal-Sites	State Hazardous Waste Sites
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCAT	California Climate Action Team
CCTV	Closed circuit television

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
cf or CF	Cubic feet
CGS	California Geological Survey
CH_4	Methane
CiSWMPP	City's Solid Waste Management Policy Program
CIWMB	California Integrated Waste Management Board
CMA	Critical movement analysis
CMP	(Los Angeles County) Congestion Management Plan
CNEL	Community noise equivalent level
CO	Carbon monoxide
CO_2	Carbon dioxide
Community Plan	Van Nuys-North Sherman Oaks Community Plan
CORRACTS	Corrective Action Report
Cortese List	Hazardous Waste and Substances Site List
CPI	Catchment productivity index
CPTED	Crime Prevention Through Environmental Design
CUB	Conditional Use Permit for the sale or consumption of alcoholic beverages
CUP	Conditional Use Permit
CWA	(Federal) Clean Water Act
CWMP	Construction Waste Management Plan
D/C	Demand to capacity
dB	Decibel(s)
dBA	Decibel(s), A-weighted
DDT	Dichloro-Diphenyl-Trichloroethane
DEIR	Draft Environmental Impact Report
Delta	Sacramento-San Joaquin River Delta
DOI	U.S. Department of the Interior

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

DTSC	(California) Department of Toxic Substances Control
DU	Dwelling unit
DWP	(Los Angeles) Department of Water and Power
DWR	(California) Department of Water Resources
EAF	Environmental Assessment Form
EB	East-bound
EIR	Environmental Impact Report
EMFAC	Emissions Factors model
EPA	Environmental Protection Agency
ESA	(Phase I) Environmental Site Assessment
FAR	Floor area ratio
FDA	Food and Drug Administration
FEIR	Final Environmental Impact Report
FHWA	Federal Highway Administration
FPPP	Fire Protection and Prevention Plan
FRA	Federal Railway Administration
GBIS	Glendale-Burbank Interceptor Sewer
GHG	Greenhouse Gas
GLSF	Gross leasable square feet
gpd	gallons per day
gpy	gallons per year
Green Plan	Green LA: Action Plan
HAZNET	Hazards network
HR	U.S. House of Representatives
HTS	Hyperion Treatment System
HVAC	Heating, ventilation and air conditioning
HWA	Health and Welfare Agency
HWTP	Hyperion Water Treatment Plant
IRP	Integrated Resources Plan
I-405	Interstate 404 / San Diego Freeway

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

IS	Initial Study
ITE	Institute of Transportation Engineers
kWh	Kilowatt hour(s)
KwH/yr	Kilowatt hour(s) per year
LA	City of Los Angeles
LAA	Los Angeles Aqueduct
LADOT	(City of) Los Angeles Department of Transportation
LADWP	(City of) Los Angeles Department of Water and Power
LAFD	(City of) Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	(City of) Los Angeles Police Department
LARRMP	Los Angeles River Revitalization Master Plan
LARWQCB	Los Angeles Regional Water Quality Control Board
LA-UWMP	Los Angeles Urban Water Management Plan
LEED	Leadership in Energy and Environmental Design
Leq	Equivalent noise level
LOS	Level of service
LST	Localized Significance Thresholds
LUST	Leaking Underground Storage Tank
MDP	Major Development Project
Metro	(Los Angeles County) Metropolitan Transportation Authority
MGD	Million Gallons of wastewater per day
MM	Mitigation measure(s)
MMP	Mitigation Monitoring Program
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MTA	(Los Angeles County) Metropolitan Transportation Authority
MWD	Metropolitan Water District
NAAQS	National Ambient Air Quality Standards
NACAA	National Association of Clean Area Agencies

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

NAP	Not a part
NB	North-bound
NIH	National Institutes of Health
NO	Nitrogen oxide
NO_2	Nitrogen dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NO_X	Nitrogen oxide(s)
NPDES	National Pollution Discharge Elimination System
NPL	National Priority List
NPP	Neighborhood Protection Program
NPS	National Park Service
NRC	Nuclear Regulatory Commission
NRDC	Natural Resources Defense Council
NTMP	Neighborhood Traffic Management Plan
O	Oxygen
O_3	Ozone
OPR	(California Governor's) Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PAH	Polycyclic aromatic hydrocarbon(s)
Pb	Lead
PCB	Polychlorinated biphenyl(s)
PCE	Passenger car equivalent
PDF	Project design feature
p.m.	Afternoon hours (between 12:00 noon and 12:00 midnight)
$PM_{2.5}$	Particulate matter at 2.5 microns
PM_{10}	Particulate matter at 10 microns
ppd	Pounds per day
ppm	Parts per million
PPV	Peak particle velocity

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

Proposed Project	Fashion Square Expansion Project
PSC	Professional Security Consultants
psi	pounds per square inch
PWPT	Pollock Wells Treatment Plant
RCP	Regional Comprehensive Plan
RCRIS-TSD	Resource Conservation and Recovery Information System – Treatment, Storage and Disposal Facility
RIO	River Improvement Overlay
RMS	Root mean square
RTP	Regional Transportation Plan
RUWMP	Regional Urban Water Management Plan
SB	Senate bill
SB	South-bound
SCA	Standard condition(s) of approval
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
sf or SF	Square feet
SO_2	Sulfur dioxide
SO_X	Sulfur oxide(s)
SRRE	Source Reduction Recycling Element
SUSMP	Standard Urban Stormwater Mitigation Plan
SWIRP	Solid Waste Integrated Resources Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic air contaminant(s)
TCP	Traffic Control Plan
TDM	Transportation Demand Management
TIA	Traffic Impact Assessment
TMDL	Total Maximum Daily Load(s)
TSM	Transportation system management

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

TSS	Total suspended solids
TWRP	Donald Tillman Water Reclamation Plant
ULI	Urban Land Institute
URBEMIS	Urban Emissions Model
US 101	U.S. Highway 101 / Ventura Freeway
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USGBC	United States Green Building Council
USGS	United States Geologic Survey
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
V/C	Volume-to-capacity (ratio)
Vdb	Decibel notation
VMT	Vehicle miles traveled
VOC	Volatile organic compound(s)
WB	West-bound
WFP	Wastewater Facilities Plan
WSA	Water supply assessment

I. SUMMARY

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this Environmental Impact Report (EIR) contains a brief summary of the Proposed Project, the requested land use approvals and the anticipated environmental consequences of those actions. More detailed information regarding the Proposed Project and its potential environmental effects are provided in the following sections of this EIR.

A. SUMMARY OF PROPOSED ACTION

The Applicant seeks approval of to expand the existing Fashion Square shopping center. Implementation of the shopping center expansion requires various approvals, including but not limited to: a zone change to bring the entire site to (T)(Q)C2-1L; Conditional Use Permits to permit major development exceeding 100,000 square feet of non-residential use; to permit height, setback and operational modifications to commercial corner requirements; allow the sale/consumption of alcoholic beverages, shared parking approval; site plan review to approve the building design and access improvements as proposed; lot line adjustments; and other miscellaneous approvals and permits as necessary for construction and project operation. The specific requested entitlements and approvals are as follows:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L.

- Site Plan Review for the modification of two existing parking structures, reconfiguration of site driveways and internal circulation, construction of 280,000 GLSF retail space within a new two-level structure with subterranean parking, and construction of two new parking structures, one six-level (one level at grade plus five levels above grade) and one four-level (one level at grade plus three levels above grade).

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 280,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP).

- Conditional Use Permit for Commercial Corner development and deviation from select development standard requirements including: (1) the 45-foot height limit to provide a building and parking structure with maximum height of 75 feet, which is no taller than the existing Macy's building, (2) allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight, (3) a requirement to provide a five foot landscaped area immediately adjacent to all street frontages; (4) the requirement to provide a minimum of fifty percent coverage with transparent windows along the first floor retail, and instead provide no glass along the Riverside Drive frontage; and (5) the restriction on tandem parking by providing tandem parking spaces.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB).

- Request for Shared Parking Review.

- Zone Variance to reduce on-site parking below code requirements during construction.

- Haul Route approval from the Building and Safety Commission for construction phase operations.

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Proposed Project.

I. SUMMARY

B. LOCATION AND BOUNDARIES

The project site is located within the existing Fashion Square shopping center located at 14006 Riverside Drive in the Sherman Oaks community of the City of Los Angeles. The project site, which is roughly rectangular in shape and totaling approximately 28.8 acres in size, is bordered by Riverside Drive to the north, Hazeltine Avenue to the west, the Ventura Freeway (US 101) to the south, and Woodman Avenue to the east. The project site lies within the Van Nuys-North Sherman Oaks Community Plan (Community Plan) area.

I. SUMMARY

C. PROJECT BACKGROUND

1. PREVIOUS APPROVALS AND DEVELOPMENT HISTORY

The 28.8-acre project site is currently developed with the existing Westfield Fashion Square shopping center, which is comprised of approximately 867,000 GLSF of retail shops and restaurants, and parking uses within multi-level parking structures and surface lots. The shopping center has been a vital commercial and retail portion of the Sherman Oaks community since its initial construction in the early 1960s.

The shopping center was originally constructed during the 1960s in a series of freestanding one-, two- and three-story stores. In 1987, under case CPC 86-743 ZC, the shopping center was approved for 855,000 gross leasable square feet (GLSF) of retail uses, of which only 826,000 GLSF was constructed in order to expand and enclose the previously built "outdoor" mall. In 1995 under case ZA-95-0899-CUZ, the shopping center was approved for an additional 120,000 GLSF of development, for a total entitlement of 975,000 GLSF across the entire project site. In 1996, under the 1995 entitlement, Bloomingdale's department store built approximately 41,000 square feet of new gross leasable area, leaving a current remaining unbuilt entitlement of approximately 108,000 GLSF for the shopping center. To date, a total of approximately 867,000 GLSF has been constructed at the shopping center.

2. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Areas of known controversy, including issues raised by some members of the community, include: neighborhood intrusion, traffic trip generation, traffic circulation, noise, parking supply, climate change, urban decay, construction-related impacts, effect on property values, and on-site alcohol consumption. Concern over property values, in the absence of a tangible physical environmental impact, are not issues required to be addressed under CEQA, and therefore are not directly evaluated in this EIR. The remaining areas of known controversy noted above are analyzed, either as direct or indirect (secondary) effects, in Section IV: Environmental Impact Analysis of this DEIR.

I. SUMMARY

D. ENVIRONMENTAL IMPACT REPORT PROCESS HISTORY

1. OVERVIEW OF THE CEQA PROCESS

The California Environmental Quality Act (CEQA) (Public Resources Code, Sections 21000-21177) requires that all public agencies within the State of California, having land use approval over project activities that have the potential to affect the quality of the environment, shall regulate such activities so that impacts to the environment can be prevented to the extent feasible. When it is determined through preliminary review that a project may likely have one or more significant effects upon the environment, then an EIR must be prepared.

The EIR should disclose all known potentially significant impacts; identify feasible means to minimize or mitigate those effects; and consider a number of feasible alternatives to the project that might further reduce significant impacts while still attaining the project objectives. Pursuant to CEQA Guidelines Section 15121, the EIR is primarily an informational document intended to inform the public agency decision-makers and the general public of the potentially significant effects of a proposed project.

2. PROPOSED PROJECT EIR PROCESS

This EIR has been prepared at the direction and under the supervision of the Los Angeles Department of City Planning, as the Lead Agency, in accordance with CEQA and the Los Angeles CEQA Thresholds Guide (2006).

An Environmental Assessment Form (EAF) and Initial Study were prepared. The Proposed Project application and an Initial Study were reviewed by the Los Angeles Department of City Planning initially determined that the Proposed Project warranted a Mitigated Negative Declaration (MND). However, comments requesting the preparation of an EIR were received during the public review period for the MND. Consequently, the City and the Applicant agreed that an EIR would be prepared.

Subsequently, a Notice of Preparation (NOP) was issued for the Proposed Project on July 19, 2007 to solicit comments on the proposed scope of the EIR. The NOP was circulated for a 30-day period. Written comments were received on the NOP and have been reviewed and incorporated into this EIR to the extent feasible. In addition, a Public Scoping Meeting was held on August 6, 2007, at the Marvin Braude Constituent Service Center in Van Nuys, California. At this scoping meeting public testimony was taken on the potential environmental impacts of the proposed Project. A copy of the NOP and all written comments received relating to the NOP are attached as Appendix A: Notice of Preparation (NOP), Written Comment Letters and Scoping Meeting Comments.

I. SUMMARY

E. PROJECT DESCRIPTION

1. OVERVIEW OF PROJECT OBJECTIVES

The intent of the Proposed Project is to revitalize the economic viability and function of the shopping center as a commercial center within the community, to improve access and circulation both on-site and within the immediate surrounding area, and to enhance the aesthetic and pedestrian orientation of the shopping center. The objectives of the Proposed Project are stated as follows:

- To establish and enhance the long-term sustainability of the shopping center through a higher utilization of the commercial center site and modernization of facilities.
- To improve site access and circulation through an updated site circulation plan that reflects modern development practices.
- To enhance on-site pedestrian safety through improved internal vehicle circulation configuration.
- To develop a project consistent with the City' Urban Form Guidelines with special emphasis on creating and encouraging a greater pedestrian environment, especially along Riverside Drive and Hazeltine Avenue.
- To enhance traffic flow and safety concerns along adjacent roadways through improved site access.
- To incorporate a community-friendly design that integrates visually with adjacent uses yet simultaneously affords appropriate neighborhood protection from traffic activity.
- To provide a greater range of stores to enhance the neighborhood shopping opportunities for the Sherman Oaks area.
- To provide greater variety and improved quality of restaurants in the shopping center.
- To conform to the goals, objectives and policies of the Van Nuys-North Sherman Oaks Community Plan.
- To develop a commercial project that is able to be LEED certifiable and enhance sustainability.

2. OVERVIEW OF PROPOSED DEVELOPMENT

The Fashion Square Expansion Project (Proposed Project) is proposed by the Applicant, Sherman Oaks Fashion Associates (an affiliated company of Westfield), in their application dated July 2007.

The Applicant requests approval to construct 280,000 gross leasable square feet (GLSF) of new retail/restaurant commercial space and additional structured parking, resulting in a cumulative total buildout on the 28.8-acre project site of 1,147,000 GLSF of commercial space and a total of 5,148 parking spaces (combined surface and structured parking). Total new uses are anticipated to include 240,000 GLSF (i.e., 355,227 gross SF) of new "in-line" retail space and 40,000 GLSF (i.e., 71,329 gross SF) of new restaurant space, in addition to approximately 1,235 new parking spaces.

The Proposed Project would entail the construction of approximately 108,000 GLSF of available unbuilt entitled uses (per a previous approval in 1995) and the development of an additional 172,000 GLSF (new entitlement under the current request), to account for the proposed total of approximately 280,000 GLSF of retail and restaurant uses under the Proposed Project. The actual building area proposed will be larger than the total gross leasable area. Accounting for mechanical/electrical equipment rooms, emergency access, tenant storage space, corridors, and other City requirements, 280,000 GLSF is equivalent to approximately 426,556 net square feet or approximately 482,740 gross square feet.

The proposed retail expansion building and "main" six-level parking structure will be constructed primarily on the southerly portion of the project site in the underdeveloped area between the existing shopping center (located immediately adjacent to the Riverside Drive frontage) and the Ventura (US 101) Freeway at the south. This area is currently occupied by a portion of the Bloomingdale's parking structure and surface parking. A second four-level "east" parking structure will be constructed on the eastern portion of the project site (adjacent to Woodman Avenue) on an area currently developed with surface parking. The Proposed Project design would extend the parking structure to the south. Figures showing the proposed site plan are provided in Section II: Project Description of the DEIR. In summary, the Proposed Project consists of the following elements:

- Demolition of the three-level parking structure southerly of the mid-section of the existing mall;
- Modification of the existing Hazeltine Avenue (Bloomingdale's) parking structure in the southwest quadrant of the project site to facilitate internal access;
- Re-opening and re-activation of vehicular driveway and tunnel easterly of Bloomingdale's department store leading from Riverside Drive to rear parking structures;
- Demolition of paved surface parking area in the southern and eastern portions of the project site;

- Closure of two existing driveways along Riverside Drive and creation of two new driveways, including a new consolidated driveway directly across from Matilija Avenue and re-activation of an old driveway just east of Bloomingdale's department store;

- Reconfiguration of one of two existing driveways along Hazeltine Avenue;

- Construction of a new dedicated internal access road between the reconfigured Hazeltine driveway (Bloomingdale's end) and the new Riverside driveway (Macy's end);

- Reconfiguration of existing Woodman Avenue driveway to permit ingress (right-turn only) access only;

- Construction of a traffic control median (i.e. "pork chop") at Matilija Avenue and Riverside Drive to permit right-turn only ingress/egress access to Matilija Avenue;

- Construct a new 280,000 GLSF two-level retail building, above one level of subterranean parking, expansion to the southern edge of the existing shopping center structure between Bloomingdale's and Macy's, and including one level of roof-top parking;

- Construction of a new six-level (one level at grade plus five levels above grade) parking structure south of the existing Macy's building and its related parking structure. This six-level main parking structure will be set back behind the existing Macy's parking structure and approximately 300 feet offset from the frontage of Riverside Drive. The top of the structure would be and maximum height of 75 feet and would extend no higher than the top of the existing Macy's building;

- Construction of a new four-level (one level at grade plus three levels above grade) parking structure at the eastern portion of the project site currently covered with surface parking, adjacent to Woodman Avenue and southerly of the adjacent not-a-part parcel.

- Reconfiguration and restriping of remaining parking areas to facilitate efficient access/circulation and maximize available parking space;

- Implementation of new landscaping along Riverside Drive and Hazeltine Avenue frontages, along Woodman Avenue street frontage, internal to the project site within the parking areas and along driveways, and integrated into the design of new architecturally enhanced building facades;

- Installation of four bus shelter units at existing route stops located at Riverside Drive/Hazeltine Avenue and Riverside Drive/Ranchito Avenue; and

- Installation of new directional and tenant signage, and new security, ambient and accent lighting.

I. SUMMARY

F. ENVIRONMENTAL SETTING

1. GEOGRAPHIC SETTING AND ACCESS

The project site is located within the Sherman Oaks community within the City of Los Angeles, approximately 13 miles northwest of downtown Los Angeles. Regional access to the Fashion Square shopping center is provided by US 101 (Ventura) Freeway. Local access is provided via Hazeltine Avenue, Riverside Drive, and Woodman Avenue.

The Los Angeles River is on the south side of the Ventura (US 101) Freeway, but crosses to the north side of the freeway just west of Hazeltine Avenue. The River is a concrete channelized structure in this area. The project site is located on a relatively flat parcel that slopes (downgrade) gently from the northeast to the southwest, with an overall elevation relief of 22 feet differential from the east/west elevation.

The shopping center has historically maintained a contractual arrangement with several area schools to provide for overflow parking of school events. Currently, during schools days (7 a.m. to 4 p.m.), Fashion Square makes available 100 parking spaces in the east surface parking lot for Buckley High School and 60 parking spaces for Notre Dame High School at the same location. These parking spaces are on a month-to-month agreement and are not made available to students on the weekends or during the highest peak holiday periods.

2. EXISTING DEVELOPMENT AND SURROUNDING LAND USES

The project site is located within an established urban setting that includes a mix of retail, office and low to medium density residential uses. The project site is currently developed with the existing shopping center consisting of retail shops, restaurants and parking uses contained within three multi-level parking structures, surface parking lots, a two-story mall and two three-story anchor stores.

The project site is surrounded by developed properties on all sides. Land uses immediately to the north, across Riverside Drive, include multi- and single-family residential properties. To the west, land uses include an office building west of Hazeltine Avenue, and retail, office, and City of Los Angeles Department of Water and Power uses at the north side of the intersection of Riverside Drive and Hazeltine Avenue. To the south, the site is bordered by the Ventura (US 101) Freeway. To the east, land uses include commercial along Woodman Avenue, south of Riverside Drive as well as the Notre Dame High School on the northeast corner of the intersection of Riverside Drive and Woodman Avenue.

3. OVERVIEW OF PLANNING CONTEXT

The Van Nuys-North Sherman Oaks Community Plan (Community Plan) is the guiding community plan for the project site and surrounding area. According to the Community Plan, the project site is currently designated as Community Commercial. The Community

Commercial designation is within Height District 1L, which permits structures up to six stories in height. Surrounding properties are designated a mix of commercial, residential and public facility land uses through the Community Plan.

The project site is currently zoned (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L. All of the existing zones tied to the project site are permitted under the existing Community Commercial General Plan designation. The C2 zone permits a wide range of commercial retail uses to address community needs. P is an automobile parking zone that provides for public/private parking within surface and/or subterranean lot areas. PB is a parking building zone that permits public/private parking within above-grade parking structures, as well as surface and below-grade parking.

4. OVERVIEW OF PHYSICAL SETTING

The climate in the project region is a characterized as Mediterranean, which is semi-arid and exhibits a wet-dry cycle of dry summers and a winter rainy season. The strength and location of a semi-permanent, subtropical high pressure cell over the Pacific Ocean is the primarily influence on the climate in the project region. Temperatures range from the low 40's during winter nights to the high 90's and low 100's during summer afternoons.

The project site and surrounding area is characterized as an urban, developed commercial and residential area. The project site and all surrounding properties have undergone disturbance previously resulting from development of the existing shopping center, additional commercial uses at the adjacent intersections of Riverside Drive and both Hazeltine Avenue and Woodman Avenue, as well as the surrounding residential uses.

Vegetation on the site is limited to landscaping associated with existing development and a block of trees that currently buffer the site from the adjacent Ventura (US 101) Freeway to the south.

The visual character of the project site and surrounding area is that of a fully developed urban corridor, developed with a mix of retail, commercial, and residential uses. Typical residential development in the area ranges from one to four stories in height. Surrounding office and retail uses are typically between one to four stories in height as well, except for the six-story Sunkist building to the west and the 10-story office/financial building on the north side of Riverside Drive at Woodman Avenue. Existing buildings on the project site range between approximately 49 to 73 feet in height. Because of the relatively low height of most development within the project area, long-range viewsheds are relatively unobstructed; however, the close relative proximity of development within this urban area obstructs these views. Existing light sources come from both development at the project site and surrounding retail and residential uses.

Regional access to the shopping center is provided by US 101 (Ventura) Freeway. Local access is provided via Hazeltine Avenue, Riverside Drive, and Woodman Avenue. Nonetheless, analysis of 18 study intersection in the project area (see Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access of this DEIR) found that 16 of those intersections are presently operating at acceptable levels of service (i.e., level of service D or better) during peak hours. Two intersections in the immediate project area, Van Nuys Boulevard at the US 101 EB

Ramps and Woodman Avenue at Riverside Drive, operated below acceptable levels of service (i.e., level of service F) during the peak hours.

The project area, being fully urbanized, is fully serviced for all public utilities and public services. Electricity at the project site is currently provided by the City of Los Angeles, Department of Water and Power (LADWP). LADWP owns the electrical power generation plant and, as such, electrical service within the LADWP service area has not been affected by the recent statewide energy shortage. Natural gas at the project site is currently provided by the Southern California Gas Company (Gas Company). The project site is located within the Hyperion Water Treatment Plant (HWTP) Service Area.

I. SUMMARY

G. MAJOR IMPLICATIONS OF PROJECT IMPLEMENTATION

Based on the Initial Study, preliminary MND and NOP process, it was determined that implementation of the Proposed Project may, either by itself and/or in conjunction with past, present and reasonably foreseeable future development in the project vicinity, have a significant environmental effect in the following areas: Aesthetics/Visual Resources, Air Quality, Geology/Soils, Hazardous Materials/Man-Made Hazards, Water Resources (Water Quality and Water Supply), Land Use/Planning/Urban Decay, Noise, Public Services (Fire and Police), Public Utilities (Solid Waste), and Traffic/Circulation/Access. Section IV: Environmental Analysis of this EIR includes a detailed analysis for each of these environmental topics.

This EIR includes analysis of the above environmental impacts and recommends mitigation measures to reduce potentially significant impacts. In accordance with CEQA Guidelines Section 15128, other possible effects of the project which were determined to be not significant through the Initial Study review are not discussed in detail in this EIR. Those possible effects which did not warrant detailed analyses are identified in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant of this DEIR.

The Summary Sheet on the following page provides snapshot of the net conclusions for the analysis. The Impact and Mitigation Measures Summary Matrix on the following pages outlines the environmental impact analysis provided in this DEIR. Mitigation measures and a monitoring program are recommended to reduce or eliminate significant impacts where possible.

Based upon the analysis in Section IV: Environmental Impact Analysis, with implementation of mitigation measures, the Proposed Project will not result in a significant environmental effect with regard to the issues analyzed herein, except for potentially significant short-term construction phase air quality with respect to $PM_{2.5}$, PM_{10} and NO_x.

Further, irreversible environmental changes will not occur as a result of project implementation. The site has been committed to urban use for many years, and the Proposed Project uses are consistent with City planned land uses for the site. Thus, development of the site is not considered a new commitment to urban development and does not represent the conversion of undeveloped land.

However, construction of the Proposed Project will require the consumption of natural resources and renewable and nonrenewable materials, including building materials (e.g., wood and metal) and fossil fuels (e.g., gasoline, diesel fuel, and natural gas). Once operational, the Proposed Project uses will require consumption of natural resources and renewable and non-renewable materials such as electricity, natural gas, potable water, and fossil fuels for project-generated vehicle trips. The commitment of resources associated with the Proposed Project is consistent with planned future development within the City of Los Angeles. The use of resources represents a very small percentage of the resources to be utilized by development City-wide.

Additionally, the Proposed Project provides public benefits, such as a reduction in the improvement to local adjacent roadways, implementation of neighborhood protection and traffic calming measures, enhancement of aesthetic conditions at the project site, and improved economic vitality resulting in increased tax revenues for the City.

The Proposed Project is not expected to generate growth in the area beyond the intensification of the project site. Construction of the proposed 280,000 GLSF of retail/restaurant commercial uses will result in an increase in short-term construction and long-term employment opportunities. While the Proposed Project would create new job opportunities, the City of Los Angeles and surrounding areas include a large employee base and new jobs in this area would offer employment opportunities closer to those who may reside in the Van Nuys/Sherman Oaks area. The Proposed Project would physically and may economically revitalize the underutilized shopping center. Surrounding land uses and businesses may experience secondary effects of the economic revitalization.

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

SUMMARY SHEET

(Article IV – City CEQA Guidelines)

POSSIBLE IMPACTS (Check where a Yes is appropriate)

A–Significant Adverse Impact; **B**–Mitigation Measures Available; **C**–Unavoidable Adverse Impact	**A**	**B**	**C**
1. AESTHETICS Will this project result in a diminishment or obstruction of a publicly available scenic vista, or in the creation of an offensive site visible to the public?	X	X	
2. AIR			
a. Increased mobile or stationary air emissions or air quality?	X	X	X
b. Creation of objectionable odors?			
3. ANIMAL LIFE			
a. Reduction of the numbers of any unique or endangered species of animals?			
b. Introduction or increase of any new animals?			
c. Impact on any existing animal habitat?			
4. CULTURAL RESOURCES Will this project impact or alter any archaeological, paleontoiogical or historical site, structure, or object?			
5. EARTH			
a. Change in topography or ground surface relief features?			
b. Increase in wind or water erosion?			
c. Unstable or hazardous geologic or oil conditions?			
6. ENERGY			
a. Use of additional amounts of fuel or energy?			
b. Increase in demand upon existing sources of energy or required development of new sources of energy?			
7. HOUSING Any increase in the demand for housing or reduction in existing housing?			
8. LAND USE Alteration of the present or planned land use of the area?	X	X	
9. LIGHT Will proposal produce light or glare?			
10. NATURAL RESOURCES			
a. Increase in consumption of any national resource?			
b. Depletion of any non-renewable natural resource?			
11. NOISE			
a. Increase in existing noise levels?	X	X	
b. Exposure of people to noise levels?	X	X	
12. PLANT LIFE			
a. Reduction of the numbers of any unique or endangered species of plants?			
b. Reduction of existing mature trees?			
c. Change in diversity of species?			
13. POPULATION Any increase or alteration of the distribution, density of growth rate of the population?			
14. PUBLIC SERVICES			
a. Increase in demand for fire, police or other governmental services?			
b. Impact on school or recreational services?			
c. Increase in maintenance of public facilities including roads?			
15. SAFETY			
a. Creation of any health hazard?			
b. Potential risk of explosion or release of chemicals or radiation in event of accident?			
16. TRANSPORTATION/CIRCULATION			
a. Increase in traffic volume or change in circulation patterns?	X	X	
b. Increase in parking demand (not met by onsite parking provided by the project)?			
c. Increased hazards to vehicles, bicyclists or pedestrians?			
d. Impact on existing transportation systems?			
17. UTILITIES			
a. Demand on water, gas, power or communication systems?			
b. Impact on sewer or solid waste disposal?			
c. Impact on storm water drainage?			
18. WATER			
a. Change in absorption rates, drainage patterns, or surface runoff?			
b. Alteration to direction of any water course?			
c. Reduction in amount of water available for public water supplies?			
d. Exposure to flood hazards?			
OTHER			

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
AESTHETICS AND VISUAL RESOURCES			
Visual Quality and Character. The new Proposed Project development would be consistent with the type and height of existing development on the site and would not substantially change the existing commercial nature of the site and project area. Therefore, the project will result in a less than significant impact to visual character from the east. During construction activities for the Proposed Project, the visual character of the project site will reflect short-term changes as some of the construction activities (including the tunnel reactivation) will be visible from adjacent land uses. Although construction-related structures and activities would create a notable change to the visual character, these changes would extend only for the duration of the construction activities (approximately 24 months). **Views.** Based on the type and design of the proposed development, the lack of significant views or scenic vistas identified by the Community Plan in the project area, the lack of protected or recognized views in the project area, and the location of the proposed development within the envelope of the existing site development, the	**AES-1:** As required by LAMC Section 12.40, the site will be required to prepare a Landscape Plan which will address replacement of removed trees. **AES-2:** The owners shall maintain the subject property clean and free of debris and rubbish and to promptly remove any graffiti from the walls, pursuant to LAMC Sections 91.8101-F, 91.8904-1, and 91.1707-E. **AES-3:** A minimum of one 24-inch box tree (minimum diameter of two inches and a height of eight feet at the time of planting) shall be planted for every four new surface parking spaces. **AES-4:** The Final Expansion Project Landscape Plan, which will be reviewed and approved by the City of Los Angeles, shall incorporate clinging vines and bamboo screening, which provide a variety of textures and colors, along exterior walls visible along the Riverside Drive and Hazeltine Avenue frontages. **AES-5:** The Final Expansion Project Landscape Plan shall include the installation of healthy mature trees for all replacement trees and new landscaping along Riverside Drive.	With implementation of the standard conditions and project design features identified, the Proposed Project would not result in significant impacts to the general visual character and views. Impacts associated with lighting and glare impacts would be reduced to less than significant levels. Construction impacts would be short-term and would not be significant. Implementation of recommended mitigation measures identified, although not required to reduce significant impacts, would further minimize the effects of the project and reinforce the effectiveness of the standard conditions and project design features already required/incorporated into the Proposed Project. Due to the distance between the project site and the nearest related project, approximately 1,000 feet; the fact that there is no property with a direct line of site of both the project site and any related project site; and finally that none of the related projects have unique lighting requirements, there is no potential for a significant cumulative light impact.	1. Pre-construction 2. Department of Building and Safety 3. Department of City Planning 1. Occupancy 2. Department of Building and Safety 3. Department of City Planning 1. Construction 2. Department of Building and Safety 3. Department of City Planning 1. Pre-construction 2. Department of Building and Safety 3. Department of City Planning 1. Pre-construction 2. Department of Building and Safety 3. Department of City Planning

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
Proposed Project would result in a less than significant aesthetic impact due to a substantial adverse effect on views into and out of the project site. **Light, Glare and Nighttime Illumination.** Due to the existing developed nature of the project site with commercial uses that are similar to the Proposed Project and other existing commercial development in the area, and the design of the Proposed Project's new lighting and glare source components, the intensity and type of nuisance light and glare sources of the Proposed Project will not substantially change from existing conditions. The majority of residential uses along and north of Riverside Drive would experience no measurable change in nighttime illumination, lighting or glare due to the Proposed Project. However, new light and glare sources in the vicinity of the proposed consolidated project driveway at Riverside Drive and Matilija Avenue would be introduced and could impact a limited number of residents. However, due to the relative orientation of the residential structures to the driveway, the existing vehicle activity within the vicinity, and the limited hours of operation at the shopping center, nuisance light from project-related vehicle headlights is	**AES-6:** New project landscaping along Riverside Drive would provide an opportunity to visually activate this frontage and minimize building massing. A combination of landscape, hardscape, and building finish elements would create a vibrant urban atmosphere that offers more pedestrian-friendly linear banding and gives a fresh, updated look to the shopping center. The landscape plan would incorporate specimen accent plantings, including distinctive palms, large canopy trees, evergreens, seasonal color trees and bold median plantings. The landscape concept also incorporates various hardscape features, including the integration of street furnishings along the Riverside Drive frontage. Street furnishings, including treated wood benches and cast-in-place concrete seating with integral lighting and water features, would add to the visual interest and appeal of this frontage. **AES-7:** Directional and security lighting will be required for safety purposes. Through a new plan, lighting can enhance safety along the Riverside Drive and Hazeltine Avenue frontages and add to the perceived security of the neighborhood in general. Lighting would be incorporated into the streetscape environment at several levels,		1. Pre-construction 2. Department of Building and Safety 3. Department of City Planning 1. Occupancy 2. Department of Building and Safety 3. Department of City Planning

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
anticipated to be less than significant. Lighting sources project-wide are consistent with the commercial nature of this portion of community and will not substantially increase ambient illumination levels.	including the use of bollards, wall reveals, seating areas, and crosswalks. The use of plaza strip lighting will afford additional security lighting but with a park-like feel and without significant light intrusion to the surrounding neighborhood. As consistent with safety concerns, the Proposed Project will incorporate low-level lighting that is directed downward and shielded to prevent spillover of light toward sensitive uses.		
	AES-8: The Riverside Drive building surfaces would be refreshed with a new graphic design treatment that would consist of small visual mosaics of color and pattern that effectively serve to visually minimize the massing of the long linear wall along the frontage. It is intended that a combination of landscaping, hardscaping and building finish elements would create a vibrant urban atmosphere that offers more pedestrian-friendly linear banding and gives a fresh, updated look to the shopping center.		1. Construction 2. Department of Building and Safety 3. Department of City Planning
	AES-9: All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the		1. Occupancy 2. Department of Building and Safety 3. Department of City Planning

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	Planning Department.		
	AES-10: The trees shall be dispersed within the parking area so as to shade the surface parking area and shall be protected by a minimum 6-inch high curb and landscaping.		1. Construction 2. Department of Building and Safety 3. Department of City Planning
	AES-11: Outdoor lighting shall be designed and installed with shielding, so that the light sources for the Proposed Project are shielded from spillover to adjacent residential properties.		1. Construction 2. Department of Building and Safety 3. Department of City Planning
AIR QUALITY			
Construction Activity. Construction of the Proposed Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Fugitive dust emissions would primarily result from demolition and site preparation (e.g., excavation) activities. Nitrogen oxide (NO_X) emissions would primarily result from the use of construction equipment. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). The estimated localized daily emissions	**AQ-1:** The Proposed Project will comply with applicable CARB regulations and standards. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels. **AQ-2:** The Proposed Project will comply with applicable SCAQMD regulations and standards. The SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing	**Construction.** Implementation of the mitigation measures would ensure that fugitive dust emissions (i.e. $PM_{2.5}$ and PM_{10}) would be reduced by approximately 61 percent. However, localized $PM_{2.5}$ and PM_{10} emissions would still exceed the SCAQMD significance thresholds. Mitigation Measures would reduce regional NO_X emissions by at least 40 percent. The mitigation measures although difficult to quantify would also reduce NO_X emissions. Regional construction emissions of VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10} would be less than the SCAQMD significance thresholds. However, regional NO_X emissions, localized $PM_{2.5}$ and PM_{10} concentrations would exceed the SCAQMD significance thresholds. As	1. Pre-construction 2. Department of Building and Safety 3. South Coast Air Quality Management District 1. Pre-construction, Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
associated with each construction phase would exceed the SCAQMD localized thresholds for $PM_{2.5}$ and PM_{10} and, as such, localized construction emissions would result in a significant impact without incorporation of mitigation measures. **Long-Term Operation.** Long-term project emissions would be generated by area sources, such as natural gas combustion and consumer products (e.g., aerosol sprays) and mobile sources. Motor vehicle trips generated by the Proposed Project would be the predominate source of long-term project emissions. According to the traffic report, the Proposed Project would generate 4,964 net daily vehicle trips during the weekday and 6,252 net daily vehicle trips during the weekend. The daily weekday vehicle miles traveled would be approximately 24,075 and the daily weekend vehicle miles traveled would be approximately 30,320. Weekday and weekend operational emissions would not exceed SCAQMD significance thresholds and, as such, would result in a less than significant impact. CO concentrations in 2012 are expected to be lower than existing conditions due to stringent State and federal mandates for lowering vehicle emissions. Accordingly, increases in	programs designed to attain and maintain State and federal ambient air quality standards in the district. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. **AQ-3:** The Proposed Project will be designed to reduce exposure of sensitive receptors to excessive levels of air quality. The Proposed Project is designed and will be built and operated in a manner consistent with the requirements to achieve Leadership in Energy and Environmental Design (LEED) certification from the United States Green Building Council. LEED is a green building rating system that was designed to guide and distinguish high-performance commercial projects. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. The Proposed	such, regional NO_X construction emissions would result in a significant impact, even with the implementation of mitigation measures. Localized construction emissions from the Proposed Project would also result in significant impacts even with implementation of all feasible mitigation measures. The Proposed Project would be considered to have a significant unavoidable regional and localized construction air quality impact. **Operational.** The project-related operational emissions would result in a less than significant impact without mitigation.	1. Pre-construction 2. Department of Building and Safety 3. South Coast Air Quality Management District

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
traffic volumes are expected to be offset by increases in cleaner-running cars as a percentage of the entire vehicle fleet on the road. Weekday eight-hour CO concentrations under "project" conditions would range from approximately 3.5 ppm to 3.7 ppm. Weekend one-hour CO concentrations under "project" conditions would be approximately 5 ppm at worst-case sidewalk receptors. Weekend eight-hour CO concentrations under "project" conditions would range from approximately 3.5 ppm to 3.7 ppm. The State-wide one- and eight-hour standards of 20 ppm and 9.0 ppm, respectively, would not be exceeded at the study intersections. Thus, a less than significant impact is anticipated. CO concentrations at sensitive receptor locations are expected to be much lower than CO concentrations adjacent to the roadway intersections. Sensitive receptors that are located away from congested intersections or are located near roadway intersections with better Level of Service (LOS) would be exposed to lower CO concentrations. Thus, no significant increase in CO concentrations at sensitive receptor locations is expected, resulting in a less than significant impact. **Consistency with Adopted Plans and Policies.** The Proposed Project, which	Project will implement a variety of design and operational features to achieve LEED certification. As a result, the Proposed Project would be proactive in reducing GHG emissions. Examples of design features to be implemented for the Proposed Project in order to achieve LEED certification include, but are not limited to, the following or their equivalent: • A construction activity pollution prevention program. • Encouraging the use of mass transit. • Providing transportation amenities, such as alternative fueling stations, carpool/vanpool programs, bicycle racks, and showering/changing facilities. • Implementing a stormwater management plan that reduces impervious cover, promotes infiltration, and captures and treats the stormwater runoff from 90 percent of the average annual rainfall using acceptable best management practices. • Adopting site lighting criteria to maintain safe light levels while avoiding off-site lighting and night sky pollution, minimizing site lighting where possible, and reducing light pollution. • Providing tenants with a description of the sustainable design and construction features incorporated in the core and shell		

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
would add 788 employees, represents less than one percent of the 121,694 new employees projected in SCAG's RTP between 2007 and 2010 for the Los Angeles City subregion. Such levels of housing, population, and employment growth are consistent with housing forecasts for the subregion as adopted by SCAG. The Proposed Project is consistent with growth assumptions included in the AQMP and, as such, the Proposed Project would comply with Consistency Criterion No. 2. The Proposed Project is consistent with the AQMP. **Climate Change Gas Emissions.** Greenhouse Gas (GHG) emissions would result from the combustion of fossil fuels that would provide energy for the Proposed Project. The Proposed Project would include 280,000 GLSF of new development, which would use approximately 1,096,852 kilowatt hours (kWh) per year. As such, proposed shopping center uses at buildout would potentially consume approximately 4,493,177 kWh per year. The Proposed Project will be designed with various features so the project achieves Leadership in Energy and Environmental Design (LEED) certifiable. Implementation of the LEED program would directly reduce	project. • Using high-efficiency irrigation technology or reducing potable water consumption for irrigation by 50 percent by using a combination of plant species factor, irrigation efficiency, use of captured rainwater, use of recycled wastewater, and use of water treated and conveyed by public agency specifically for non-potable uses. • Employing strategies that, in aggregate, use 20 percent less water than the water use baseline calculated for the building (not including irrigation) after meeting the Energy Policy Act of 1992 fixture performance requirements. • Designing the building envelope and building system to maximize energy performance. • Selecting refrigerants that reduce ozone depletion while minimizing direct contributions to global warming. • Implementing a construction waste management plan that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or commingled. The waste management plan would include recycling and/or salvaging at least 50 percent of non-hazardous construction and demolition debris.		

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
project-related energy use. LEED certifiable results in a minimum energy efficiency savings of approximately 10.5 to 14 percent over California Title 24 Energy Design Standards. The Proposed Project would generate 1,807 tons per year of CO_2 emissions. LEED certifiable construction would reduce CO_2 emissions to 1,761 tons per year. The Proposed Project would increase electricity consumption-related emissions of methane (CH_4) by 0.1 tons per year and NOx by 0.6 tons per year. LEED certifiable construction would reduce CH_4 and nitrous oxide N_2O emissions by 0.01 and 0.06 tons per year, respectively. The provision of potable water to commercial consumers requires large amounts of energy associated with source and conveyance, treatment, distribution, end use, and wastewater treatment, which in turn contribute toward GHG emissions. Land uses associated with the Proposed Project would require approximately 261,486 kWh per year of electricity for water consumption. Implementation of the LEED program would directly reduce project-related water consumption. The Applicant is committed to reducing interior water usage by 20 percent and exterior water usage by 50 percent. The resulting Proposed	• Using materials with recycled content such that the sum of post-consumer recycled content plus one-half of the pre- consumer content constitutes at least ten percent of the total value of the materials in the project. • Using a minimum of ten percent of the total materials value on building materials or products extracted, harvested, or recovered and manufactured within 500 miles of the project site. • Adopting an indoor air quality management plan to protect the HVAC system during construction, control pollutant sources, and interrupt contamination pathways. • Specifying low-volatile organic compounds paints and coatings in construction documents. • Designing the building with the capability for occupant controls for airflow, temperature and ventilation. Strategies will include underfloor HVAC systems with individual diffusers, displacement ventilation systems with control devices, and ventilation walls and mullions. **AQ-4:** The Proposed Project would install carbon monoxide and airflow measurement equipment that would transfer the information to the HVAC system and/or Building Automation System to trigger corrective action, if		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
Project water consumption would be 9,800 gallons per day (gpd), or 3,577,000 gallons per year. Therefore, energy use associated with water consumption at the Proposed Project would be reduced to approximately 242,783 kWh per year. The Proposed Project would generate 105 tons per year of CO_2 emissions. LEED certifiable construction would reduce CO_2 emissions to 98 tons per year. The Proposed Project would increase water consumption-related emissions of CH_4 and NOx by less than 0.0001 tons per year. LEED certifiable construction would reduce CH_4 and N_2O emissions by 0.002 and 0.01 tons per year, respectively. Daily operational activity associated with the Proposed Project would require natural gas consumption. The Proposed Project would generate 1,979 tons per year of CO_2 emissions. The Proposed Project would increase natural gas consumption-related emissions of CH_4 and NOx by less than 0.5 tons per year. LEED certifiable construction would not substantially reduce natural gas consumption CH_4 and N_2O emissions. GHG emissions from mobile sources are a function of vehicle miles traveled (VMT). The existing shopping center generates 24,049 tons per year of CO_2	applicable, and/or use the measurement equipment to trigger alarms that inform building operators or occupants of a possible deficiency in outdoor air delivery. Installation of such a system in areas where carbon monoxide concentrations may escalate (such as in the vicinity of loading docks or valet parking drop-offs) would improve both indoor and localized "hotspot" air quality. **AQ-5:** The Proposed Project would provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities. **AQ-6:** The Proposed Project would provide a shuttle service connecting the site to a nearby Orange Line station (e.g., Van Nuys Boulevard). This service could be provided by either the provision of a private shuttle or the funding of extended hours for the existing Los Angeles Department of Transportation (LADOT) DASH line. The Orange Line shuttle would		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District 1. Occupancy 2. LADOT 3. South Coast Air Quality Management District

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
emissions from mobile sources and the expansion would generate an additional 4,743 tons per year. The Proposed Project would generate 28,792 tons per year of CO_2 emissions. The Proposed Project would generate 52 tons per year of CH_4 emissions and 955 tons per year of N_2O emissions. Adherence with LEED certifiable criteria would reduce CO_2 equivalent emissions by 48 tons per year for the Proposed Project. Total CO_2 equivalent emissions would be 31,745 tons per year. It should be noted that approximately 88 percent of GHG emissions would result from mobile sources. Net CO_2 equivalent emissions would be 5,068 tons per year. The Proposed Project would be consistent with applicable GHG reduction measures recommended by the California Climate Action Team. The Proposed Project will also achieve LEED Basic certification. As a result, the Proposed Project's energy efficiency would be at least 10.5 to 14 percent beyond Title 24 requirements. The Proposed Project would also comply with all applicable regulations and policies set forth by State and local agencies to comply with all global warming legislation, including Assembly Bill (AB 32). Also the project will comply with the City's Green LA Action Plan. The Proposed	complement existing transit services (i.e., the LADOT DASH service) such that the shuttle would operate during hours when other public transit services connecting the site to the Orange Line are not available (e.g., during weekdays evenings and general weekend hours). The shuttle would operate during regular shopping center hours corresponding with periods of peak parking demand at the site and peak holiday season demand (i.e., everyday during the holiday shopping period between November 15 and January 1, and every Saturday/Sunday throughout the year). **AQ-7:** During construction activity, water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes. **AQ-8:** During construction activity, track-out shall not extend 25 feet or more from any active construction operations, and track-out shall be removed at the conclusion of each workday. **AQ-9:** During construction activity, a wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site.		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District 1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District 1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
Project would actively reduce on-going emissions through compliance with reduction strategies. The Proposed Project would result in a less than significant impact on climate change.	**AQ-10:** All haul trucks hauling soil, sand, and other loose materials shall maintain at least six inches of freeboard in accordance with California Vehicle Code Section 23114, and such trucks shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).		1. Construction 2. Department of Building and Safety, Department of Public Works-Bureau of Street Services 3. Department of Building and Safety, Department of Public Works-Bureau of Street Services
	AQ-11: During construction activity, traffic speeds on unpaved roads shall be limited to 15 miles per hour.		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District
	AQ-12: During construction activity, operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District
	AQ-13: Heavy equipment operations shall be suspended during first and second stage smog alerts.		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District
	AQ-14: On-site stock piles of debris, dirt, or rusty materials shall be covered or watered at least twice per day.		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District
	AQ-15: Heavy-duty equipment shall be equipped with a diesel oxidation catalyst capable of reducing NOX emissions by 40 percent.		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District
	AQ-16: Contractors shall maintain equipment and vehicle engines in good		1. Construction 2. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	condition and in proper tune per manufacturers' specifications.		3. South Coast Air Quality Management District
	AQ-17: Contractors shall utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District
	AQ-18: Heavy-duty construction shall be prohibited from idling in excess of five minutes, both on- and off-site, to be consistent with State law.		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District
	AQ-19: Construction parking shall be configured to minimize traffic interference.		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District
	AQ-20: Construction activity that affects traffic flow on the arterial system shall be limited to off-peak hours, as feasible.		1. Construction 2. Department of Building and Safety 3. South Coast Air Quality Management District
GEOLOGY AND SOILS			
Groundshaking and Liquefaction. The project site could be subjected to strong ground shaking in the event of an earthquake. The potential for exposure to strong seismic ground shaking at the project site would not be greater than normal seismic risk as compared to other areas in Southern California. Buildings constructed under the Proposed Project will be constructed in compliance with current	**GEO-1:** Design and construction of the project shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety. **GEO-2:** All grading and earthwork shall be performed in accordance with the Grading Ordinances of the City of Los Angeles and the applicable portions of the General Earthwork	Based on standards of acceptable risk reflected in the City of Los Angeles Building Code, the Uniform Building Code, and performance review procedures of current standard engineering practices, no significant geology impacts would occur as a result of the Proposed Project with implementation of the applicable standard conditions of approval, project design features and	1. Pre-construction 2. Department of Building and Safety 3. Department of Building and Safety 1. Pre-construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
seismic standards in the Uniform Building Code.	Specifications in an approved Geotechnical Report.	recommended mitigation measures.	
Soil and Slope Stability. The project site and soil conditions, with the exception of the existing structures, undocumented fill, seismic-induced settlements and expansive clayey soils, appear to be conducive to the development of the Proposed Project if developed in accordance with standard geotechnical engineering practices that take the underlying soil conditions into account.	**GEO-3:** All earthwork and construction shall be completed in accordance with mitigation as defined in Public Resources Code Section 2693(c) to ensure that issues of potential liquefaction are addressed.		1. Pre-construction 2. Department of Building and Safety 3. Department of Building and Safety
	GEO-4: To address potential soil settlement, all new building construction shall be supported on deep foundations. Design values for drilled piles shall be consistent with the recommendations of the approved Geotechnical Report.		1. Pre-construction 2. Department of Building and Safety 3. Department of Building and Safety
Sedimentation and Erosion. The Proposed Project has the potential to result in the erosion of soil during the construction activities. However, the potential for erosion is low due to the relatively level topography of the project site and the relatively low volume of mass grading required to implement the development. Substantial erosion during construction is not anticipated and potential impacts due to soil erosion would be less than significant.	**GEO-5:** To address potential stability concerns due to buried structures, such as footings, septic systems, backfilled excavations, and utility lines. Any buried structures should be properly removed and the resulting excavations backfilled with engineered fill. Any other buried structures encountered during construction should be removed and backfilled in accordance with the recommendations of the Soils Engineer. The site should be inspected for possible buried fill material, using heavy excavating equipment. If loose fill material is encountered, excavations should extend to native ground. The exposed native subgrade should be scarified to a minimum of 6 inches, moisture-conditioned as		1. Pre-construction, Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	necessary, and recompacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557. Limits of recompaction should extend 5 feet beyond structural elements. Prior to fill placement, a qualified geotechnical engineer shall inspect the bottom of the excavation to verify no additional excavation will be required. Any buried structures or loosely backfilled excavations encountered during construction should be properly removed and the resulting excavations backfilled with engineered fill. Excavations, depressions, or soft and pliant areas extending below planned finished subgrade levels should be cleaned to firm, undisturbed soil and backfilled with engineered fill. In general, any septic tanks, debris pits, cesspools, or similar structures should be entirely removed. Concrete footings should be removed to an equivalent depth of at least 3 feet below proposed footing elevations or as recommended by the Soils Engineer. Any other buried structures should be removed in accordance with the recommendations of the Soils Engineer. The resulting excavations should be backfilled with engineered fill. **GEO-6:** Any fill material encountered within proposed pavement areas shall be removed and/or recompacted. The		1. Pre-construction, Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	fill material should be moisture-conditioned to near optimum moisture and compacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557. At a minimum it is recommended that the upper 12 inches of subgrade soil be moisture-conditioned to at or above optimum moisture and recompacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557.		
	GEO-7: To minimize the potential soil movement, the upper 24 inches of soil within the building slab and exterior flatwork areas shall be replaced with "non-expansive" soils (with El<20).		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety
	GEO-8: To minimize seismic-induced settlements, foundations shallower than 30 feet shall be designed to tolerate seismic settlements of one-half inch total and one-quarter inch differential over a distance of 50 feet.		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety
	GEO-9: To address cohesionless sandy soil conditions, shoring or sloping back trench sidewalls may be required within these loose cohesionless soils.		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety
	GEO-10: If groundwater is encountered during the course of earthwork at the project site and subgrade soils appear to become		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	saturated, "pump," or not respond to densification techniques, typical remedial measures as prescribed by a qualified geotechnical engineer shall be employed. Groundwater remedial measures include: discing and aerating the soil during dry weather; mixing the soil with dryer materials; removing and replacing the soil with an approved fill material; or mixing the soil with an approved lime or cement product.		
	GEO-11: General site clearing shall include removal of vegetation and existing utilities; structures; including foundations basement walls and floors; existing stockpiled soil; trees and associated root systems; rubble; rubbish; and any loose and/or saturated materials. Site stripping should extend to a minimum depth of 2 to 4 inches, or until all organics in excess of 3 percent by volume are removed. Deeper stripping may be required in localized areas. These materials will not be suitable for reuse as engineered fill. However, stripped topsoil may be stockpiled and reused in landscape or non-structural areas.		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety
	GEO-12: The upper 24 inches of soil within proposed building and exterior flatwork areas shall consist of non-expansive engineered fill. The intent is to support the proposed slab-on-grade and exterior flatwork areas with 24		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	inches of non-expansive fill. The non-expansive fill material should be a well-graded silty sand or sandy silt soil. A clean sand or very sandy soil is not acceptable for this purpose. A sandy soil will allow the surface water to drain into the expansive clayey soils below, which may result in soil swelling. Imported fill should be approved by the Soils Engineer prior to placement. The fill should be placed as specified as engineered fill. The organic-free, on-site, upper soils are predominately silty sand and sandy silt with various amount of clay. Some of these soils may be suitable for reuse as non-expansive engineered fill, provided they are cleansed of excessive organics and debris. The soils with Expansion Index greater than 20 should not be used within the upper 24 inches of the building pad and exterior flatwork areas.		
	GEO-13: Within the proposed pavement areas, the upper 12 inches of subgrade soil shall be moisture-conditioned to near optimum moisture and recompacted to a minimum of 90 percent of maximum density based on ASTM D1557 Test Method.		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety
	GEO-14: The upper soils, during wet winter months, become very moist due to the absorptive characteristics of the soil. Earthwork operations performed		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	during winter months may encounter very moist unstable soils, which may require removal to grade a stable building foundation. Project site winterization consisting of placement of aggregate base and protecting exposed soils during the construction phase should be performed.		
	GEO-15: A qualified geotechnical engineer shall be present during all site clearing and grading operations to test and observe earthwork construction, as acceptance of earthwork construction is dependent upon compaction and stability of the material. The Soils Engineer may reject any material that does not meet compaction and stability requirements.		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety
	GEO-16: The preferred materials specified for engineered fill are suitable for most applications with the exception of exposure to erosion. Project site winterization and protection of exposed soils during the construction phase should be the sole responsibility of the contractor, since he has complete control of the project site at that time. Imported non-expansive fill should consist of a well-graded, slightly cohesive, fine silty sand or sandy silt soil, with relatively impervious characteristics when compacted. This material should be approved by the Soils Engineer prior to use and should typically possess the		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	following characteristics: Fill soils should be placed in lifts approximately 6 inches thick, moisture-conditioned as necessary, and compacted to achieve at least 90 percent of maximum density as determined by ASTM D1577 Test Method. Additional lifts should not be placed if the previous lift did not meet the required dry density or if soil conditions are not stable.		
	GEO-17: All excavations shall comply with the current OSHA requirements. All cuts greater than 3 feet in depth should be sloped or shored. Temporary excavations should be sloped at 1:1 (horizontal to vertical) or flatter, up to a maximum depth of 10 feet. Heavy construction equipment, building materials, excavated soil, and vehicular traffic should not be allowed within five feet of the top (edge) of the excavation. Where sloped excavations are not feasible due to site constraints, the excavations may require shoring. The design of the temporary shoring should take into account lateral pressures exerted by the adjacent soil, and, where anticipated, surcharge loads due to adjacent buildings and any construction equipment or traffic expected to operate alongside the excavation.		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	GEO-18: To maintain the desired support for existing or new foundations, new utility trenches shall be located such that the base of the trench excavation is located above an imaginary plane having an inclination of 1.0 horizontal to 1.0 vertical, extending downward from the bottom edge of the adjacent footing. Utility trenches shall be excavated according to accepted engineering practices following OSHA standards by a contractor experienced in such work. The responsibility for the safety of open trenches should be borne by the contractor. Traffic and vibration adjacent to trench walls should be kept to a minimum; cyclic wetting and drying of excavation side slopes should be avoided. Depending upon the location and depth of some utility trenches, groundwater flow into open excavations could be experienced, especially during or shortly following periods of precipitation.		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety
	GEO-19: With the exception of specific requirements of the local utility companies or building department, pipe bedding and shading should consist of clean medium-grained sand. The sand should be placed in a damp state and should be compacted by mechanical means prior to the placement of backfill soils.		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	Above the pipe zone, underground utility trenches may be backfilled with either free-draining sand, on-site soil or approved imported soil. The trench backfill should be compacted to at least 90 percent relative compaction.		
	GEO-20: Concrete slab-on-grade floors should be underlain by a water vapor retarder. The water vapor retarder should be installed in accordance with ASTM Specification E 1643-98. In addition, utility trenches within the structure shall be compacted to minimize the transmission of moisture through the utility trench backfill.		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety
	GEO-21: Positive drainage shall be established away from the structure and shall be maintained throughout the life of the structure. Ponding of water shall not be allowed adjacent to the structure. Over-irrigation within landscaped areas adjacent to the structure shall not be performed.		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety
HAZARDOUS MATERIALS AND MAN-MADE HAZARDS			
Hazardous Substances. The Proposed Project would not change substantially land uses at the site, the types of hazardous materials used or stored at the site, or the quantity of these materials. The Proposed Project does not include any known or unique specific uses that would pose a	**HAZ-1:** The Proposed Project shall comply with SCAQMD Rule 1403 regulating the removal of ACMs from on-site buildings. **HAZ-2:** The Proposed Project shall comply with Construction Safety Orders 1532.1(pertaining to lead) from	Compliance with SCAQMD Rule 1403 requirements would reduce impacts related to the removal of ACMs from on-site buildings to the extent required by existing regulations. Required compliance and the on-going asbestos and lead abatement program for the site would assure a less than	1. Construction 2. Department of Building and Safety 3. Department of Building and Safety 1. Pre-construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
potential hazardous materials impact due to the reasonably foreseeable upset involving the release of hazardous materials. The Proposed Project is not expected to exceed maximum regulatory requirements for hazardous materials and is not expected to release hazardous materials within the project area or into nearby soil and groundwater supplies. The Proposed Project would result in a less than significant hazardous materials impact due to the routine transport, use, and disposal of hazardous waste. The project site is not included on a list of hazardous materials sites or in close proximately to any known hazardous materials sites which could result in a release of hazardous materials into the project area. **PCBs, Asbestos and Lead.** Demolition of portions of the shopping center that interface with the building structures dating from the original 1962 construction may expose materials containing polychlorinated biphenyls (PCBs), asbestos and/or lead. However, these impacts can be mitigated to a less than significant level by incorporation of proper handling and disposal procedures. Exposure to lead-based paint, if encountered during demolition or	Title 8 of the California Code of Regulations as well as other applicable federal, state and local rules and regulations. **HAZ-3:** Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the portion of the building to be demolished. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as other applicable federal, state and local rules and regulations. **HAZ-4:** Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified lead-paint abatement consultant that no lead-based paint is present in the portion of the building to be demolished. If lead-based paint is found to be present, it will need to be abated in compliance with Construction Safety Orders 1532.1(pertaining to lead) from Title 8 of the California Code of Regulations as well as other applicable federal, state and local rules and regulations. **HAZ-5:** Prior to issuance of the Certificate of Occupancy the applicant	significant ACM impact. With implementation of the recommended mitigation measures, the Proposed Project would not result in a significant adverse impact related to hazardous materials or man-made hazards.	1. Pre-construction 2. Department of Building and Safety 3. Department of Building and Safety 1. Pre-construction 2. Department of Building and Safety 3. Department of Building and Safety 1. Pre-construction 2. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
renovation tied to implementation of the Proposed Project could pose a health hazard to workers and employees at the shopping center. Potential impacts due to lead-based paint can be mitigated to a less than significant level by incorporation of proper handling and disposal procedures.	shall provide a letter from the Fire Department stating that the LAFD has permitted the facility's use, storage and creation of hazardous wastes.		3. Department of Building and Safety
	HAZ-6: All 55-gallon drums on site should be stored in secondary containment to prevent any accidental spills or leaks.		1. Construction, Occupancy 2. Department of Building and Safety 3. Department of Building and Safety
Storage Tanks. Any 55-gallon drums containing fuels or chemicals, such as those used for hydraulic and generator equipment will be stored within an area providing secondary containment to prevent any accidental spills or leaks resulting in negative impacts to the environment.	**HAZ-7:** Hazardous materials generated, as a result of routine maintenance of equipment shall be disposed of in accordance with legal disposal procedures.		1. Construction, Occupancy 2. Department of Building and Safety 3. Department of Building and Safety
Emergency Response and Evacuation. The Proposed Project will be constructed on private property and will not block or interfere with any major highways. The Proposed Project will not impair implementation of or physically interfere with an adopted emergency response plan and will result in a less than significant impact.			
WATER RESOURCES – HYDROLOGY/WATER QUALITY			
Surface Water – Hydrology. Due to the existing impervious nature of the project site and the length of time these conditions have existed, the Proposed Project will not substantially	**WR-1:** The Proposed Project will comply with provisions of the City of Los Angeles Development Best Management Practices Handbook, Part A Construction Activities (3rd	Implementation and of BMPs during construction activities at the project site, including covering construction driveways with gravel, establishing a vehicle washing station, utilizing	1. Pre-construction 2. Department of Public Works 3. Department of Public Works

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
alter existing drainage patterns on the project site nor substantially increase the amount of water flowing from the site. The Proposed Project would not substantially alter the existing drainage patterns at the project site or surrounding area. Construction activities would temporarily make the project site more permeable and vulnerable to erosion and sedimentation, which could be conveyed into nearby storm drains during storm events. The Proposed Project would be designed to comply with all applicable construction and operational water quality standards and waste discharge requirements. The Proposed Project, being greater than one acre would be required to obtain a National Pollution Discharge Elimination System (NPDES) General Construction Permit and the Proposed Project developer must submit a Notice of Intent (NOI) to the SWRCB to prepare a Stormwater Pollution Prevention Plan (SWPPP). The Proposed Project would be required to file a stormwater plan with the City of Los Angeles for grading activities during the construction phase. During the construction activities, the Proposed Project would implement a variety of Best Management Practices (BMPs) to minimize erosion and sedimentation, eliminate runoff pollutants, and maintain post-	Edition), adopted by the Los Angeles Board of Public Works on September 29, 2004, and associated ordinances, which have specific minimum BMP requirements for all construction activities and require that construction projects with one acre or greater of disturbed soil prepare a SWPPP and file a NOI to comply with the State NPDES General Construction Permit with the SWRCB. **WR-2:** The Proposed Project will comply with City of Los Angeles Ordinance No. 172,176 and Ordinance No. 173,494, which specify Stormwater and Urban Runoff Pollution Control requiring the application of Best Management Practices (BMPs), and the LAMC, Chapter IX, Division 70, which addresses grading, excavations, and fills. The Proposed Project will meet the applicable requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board (LARWQCB), including the sections related to commercial development and the restaurant industry. [A expanded list of typical LARWQCB stormwater pollution control measures for commercial and restaurant development that would be required for the Proposed Project is provided in Section IV: Environmental Impact	mulch and roughing soil (to slow down runoff), installing temporary detention basins, avoiding activity during storm events, placement of sedimentation traps, creation of temporary diversion dikes/berms, drainage swales, etc., would all serve to protect downstream receiving waters. These BMPs would eliminate or reduce pollutant levels in stormwater/urban runoff during construction. Compliance with SWPPP guidelines, including implementation of BMPs, would ensure that the Proposed Project would not violate water quality standards during construction activity. Construction-related impacts to hydrology and surface water quality would be less than significant.	1. Pre-construction 2. Department of Public Works 3. Department of Public Works

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
construction water quality. With the proper design and implementation of BMPs, water quality impacts during the construction phase would be less than significant. Proposed Project drainage will to travel via sheetflow to the adjacent roadways and into the Los Angeles River to the south of the project site. Based on the existing and proposed impervious conditions, the amount and quality of stormwater will not change substantially. The Proposed Project will comply with Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The Proposed Project will not change the existing stormwater drainage systems in the project area. Due to the impervious nature of the site, the continuation of surface and/or rooftop parking and the location of the project site within an urban, developed area, the Proposed Project will not create substantial additional runoff that will exceed the capacity of stormwater drainage systems in the project area.	Analysis: E.1-Water Resources – Water Quality, of this EIR.] **WR-3:** The Proposed Project will adopt an erosion and sediment control plan for the project site during the construction phase that would employ strategies such as temporary and permanent seeding, mulching, earth dikes, silt fencing, sediment traps and sediment basins. The erosion and sediment control plan would comply with U.S. Environmental Protection Agency (EPA) Document No. EPA 832/R-92-005 (September 1992), Storm Water Management for Construction Activities, Chapter 3 (or the local agency equivalent erosion and sedimentation control standards and codes) and would address soil loss, stormwater runoff, wind erosion, sedimentation, and fugitive dust at a minimum. The erosion and sediment control plan would contribute to minimizing water quality impacts and may indirectly minimize aesthetic effects during the construction phase.		1. Pre-construction 2. Department of Public Works 3. Department of Public Works
Surface Water – Urban Runoff. Due to the urban nature of the project area, surface runoff routinely collects oil, fuel and debris deposited on the ground. Potential water quality issues are associated with stormwater runoff across existing paved areas and streets	**WR-4:** In accordance with the SUSMP requirements, the Proposed Project shall meet (or exceed) all minimum site design and source control BMPs. **WR-5:** The Proposed Project shall incorporate treatment control BMPs that will minimize urban runoff and		1. Pre-Construction 2. Department of Public Works 3. Department of Public Works 1. Pre-construction 2. Department of Public Works 3. Department of Public Works

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
that have accumulated fuel, oil, grease and trash deposits. Impacts may result from the release of contaminants into the stormwater drainage channels during the routine operation of commercial development projects. The Proposed Project must meet the requirements of the SUSMP approved by the Los Angeles Regional Water Quality Control Board (LARWQCB). Adherence to these standards will insure that storm water discharge from the project site will not exceed existing storm water discharge from the site. With incorporation of the SUSMP requirements, the Proposed Project will not create an adverse storm water runoff or discharge impact. The Proposed Project will not violate any water quality standards or waste discharge requirements and will result in a less than significant impact to water quality.	associated impacts to receiving water quality and specifically address the identified pollutants of concern. Acceptable BMP alternatives that may be implemented with the Proposed Project include: (1) vegetated treatment BMPs, (2) onsite storage and reuse, (3) permeable paving, (4) roof top BMPs, and (5) media filters.		
	WR-6: The Proposed Project shall incorporate vegetated treatment BMPs, including swales, filter strips, bioretention and planter boxes and appropriate and approved by the City.		1. Pre-construction 2. Department of Public Works 3. Department of Public Works
Sedimentation and Erosion. There are no undeveloped parcels or open space located on the project site or nearby in the project area. The Proposed Project will result in a less than significant hydrologic impact due to erosion or siltation.	**WR-7:** The Proposed Project shall incorporate permeable (porous) pavement material in pavement areas (such as roadways, driveways, parking areas, and walkways), such that the pavement materials will allow water to drain down to the underlying soil and reduce the volume of wet weather urban runoff. The Proposed Project shall incorporate a mix of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, into the landscape plan and design of surface parking areas as functionally appropriate.		1. Pre-construction 2. Department of Public Works 3. Department of Public Works
	WR-8: The Proposed Project shall employ rooftop BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of small storm events peaks and the		1. Pre-construction 2. Department of Public Works 3. Department of Public Works

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	overall runoff volume via inter-event evaporation and transpiration. Acceptable rooftop BMPs incorporated into the project design include planters and landscaping on the rooftop portion of the new parking structures, and hanging planters along the parking buildings and along the Riverside Drive mall elevation.		
	WR-9: The Proposed Project shall employ media filtration to separate and filter fine particulates and associated pollutants from captured stormwater to the extent feasible and as approved by the City.		1. Pre-construction 2. Department of Public Works 3. Department of Public Works
WATER RESOURCES –WATER SUPPLY			
Water Demand. Total proposed development will result in the use of approximately 160,655 gpd of water, an increase of approximately 59,795 gpd of water use for the Proposed Project. The increase in water demand from the Proposed Project of approximately 0.18 acre-feet daily would result in an increased water demand of approximately 65.7 AFY (assuming a worst case scenario of operation 365 days annually). Implementation of the Proposed Project would not cause the Community Plan area to exceed the projected growth in population, housing, or employment for the year	No mitigation measures are required. Compliance with Title 20 (Public Utilities and Energy) and Title 24 (Building Standards Code) of the California Code of Regulations is already a required standard condition under applicable regulations and will ensure that the Proposed Project incorporates standard water conservation practices.	The Proposed Project will not result in significant impacts to water supply or water delivery infrastructure. No mitigation measures are required as impacts related to water supply are already less than significant.	

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
of Project occupancy or buildout. Therefore, since the projected water supply is based on the growth projections of the City's General Plan which are used in the LA-UWMP, and the Proposed Project is consistent with the General Plan (and Community Plan) designation, the Proposed Project will fit within the water demand projections. **Water Supply – Water Delivery.** The shopping center relies on existing LADWP water delivery facilities. The Proposed Project will use the existing water delivery infrastructure in the area and no new water delivery facilities would be required as a result of the Proposed Project. No significant impacts to the environment would result.			
LAND USE, PLANNING AND URBAN DECAY			
Consistency with the Van Nuys-North Sherman Oaks Community Plan. Continued use of the project site for shopping center uses (including retail, restaurant and related parking) would be consistent with the Community Commercial land use designation, as would be the requested underlying zone change to (T)(Q)C2-1L, which is a compatible zone under the Community Commercial designation. The Proposed Project is consistent with the adopted land use	**LU-1:** The Proposed Project must obtain the appropriate approvals, including zone change, variances and conditional use permits, prior to commencing project development. Attainment of such approvals shall in turn ensure that the Proposed Project is in full compliance with local codes, procedures and regulations. **LU-2:** The Proposed Project shall comply with the draft RIO and/or adopted RIO in effect at the time of	With implementation of the standard conditions and project design features, the Proposed Project would not result in significant land use compatibility or land use plan consistency impacts on a project-level or cumulative basis; it would not result in significant unavoidable impacts.	1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety 1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
and density designation for the subject project and would not result in impacts relevant to land use consistency with the adopted Community Plan. The Proposed Project does not propose any change to adopted Plans or policies, nor reclassification of applicable designations. **Consistency with the Los Angeles River Revitalization Master Plan (LARRMP) and River Improvement Overlay (RIO).** The project site lies within the recently designated RIO District and adjacent roadways abutting the east, west and north frontages of the project site are designated as "green streets". The Proposed Project would meet the minimum point threshold requirements established under the RIO for each of three required compliance categories (i.e., watershed, building design, and mobility), as it would exceed 20 qualifying points. Because the Proposed Project would be consistent with the RIO, it would be consistent with the LARRMP because the project either directly contributes toward the furtherance of LARRMP policies (i.e., through physical site improvements) or indirectly supports those policies by not creating obstacles for their realization. The Proposed Project will	project approval. **LU-3:** In accordance with the SUSMP requirements, the Proposed Project shall meet (or exceed) all minimum site design and source control BMPs. **LU-4:** The Proposed Project shall adopt an erosion and sediment control plan for the project site during the construction phase that would employ strategies such as temporary and permanent seeding, mulching, earth dikes, silt fencing, sediment traps and sediment basins. The erosion and sediment control plan shall comply with U.S. Environmental Protection Agency (EPA) Document No. EPA 832/R-92-005 (September 1992), Storm Water Management for Construction Activities, Chapter 3 (or the local agency equivalent erosion and sedimentation control standards and codes) and shall address soil loss, stormwater runoff, wind erosion, sedimentation, and fugitive dust at a minimum. The erosion and sediment control plan shall contribute to minimizing water quality impacts and may indirectly minimize aesthetic effects during the construction phase. **LU-5:** Consistent with California laws, the Proposed Project shall prohibit smoking in the shopping center buildings, public areas, or		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety 1. Pre-construction, Construction 2. Department of City Planning 3. Department of Building and Safety 1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
result in a less than significant impact to land use consistency as the Proposed Project will not create any conflicts with policies and programs of the LARRMP and RIO.	exterior areas within 25 feet from entries, outdoor air intakes and operable windows, unless such areas are specifically designated and properly ventilated as a dedicated "smoking area".		
Compliance with the Los Angeles Municipal Code. *Zoning.* The Proposed Project includes a request for a zone change from the existing mix of (T)(Q)C2-1L, (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L. This request would not necessarily provide for a change in the nature of the land uses on-site, but rather would consolidate and make consistent the zoning across the entire shopping center property. Because the Proposed Project is consistent with the permitted uses of the requested C2 zone, complies with the adopted development standards, and would be appropriately conditioned through a CUP for Major Development Project, the Proposed Project would have a less than significant impact relative to zoning compliance.	**LU-6:** The Proposed Project shall include the provision of a new community room to be made available to the surrounding Sherman Oaks community and to offset a potential increase demand on recreational facilities for community meeting space needs.		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety
	LU-7: The Proposed Project shall provide new landscaping treatment along the Hazeltine Avenue, Riverside Drive and Woodman Avenue frontages that would enhance the visual interest along these road way corridors and the shopping center perimeter through the addition of a sophisticated landscape treatment that includes color, depth, volume and variety.		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety
Conditional Use Permit – Major Development Project (MDP). A Conditional Use Permit (CUP) for a "Major Development Project" is requested. The Proposed Project, conditioned in accordance with the intent of the MDP CUP, would result in a less than significant impact related	**LU-8:** The Proposed Project shall provide funds for the implementation of a Neighborhood Protection Program (NPP) that focuses on the prevention of "cut through" traffic in the residential neighborhoods north of the project site (across Riverside Drive). The NPP would seek to maintain the quality of the residential area through		1. Occupancy 2. Neighborhood Protection Program 3. Neighborhood Protection Program

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
to land use consistency and compatibility.	traffic control and traffic calming measures.		
Conditional Use Permit – Commercial Corner (Hours of Operation). To operate as proposed, the Proposed Project also requests through the CUP approval to allow the development to operate from 5:30 a.m. to 12:00 a.m. (midnight), rather than the current permitted hours of 7:00 a.m. to 11:00 p.m. Although the requested operational hours would expand the length of time that the mall could be actively used during a single day, the extended hours are not anticipated to result in a significant change to the operational activity currently experienced at the shopping center. The expanded hours are primarily requested to accommodate the restaurant uses, which will be located on the south side of the mall. Retail stores, which are the primary use and attractant of patrons to the shopping center, would continue to operate under the existing store hours, except during special temporary extended holiday hours (which would be consistent with the overall operational hours of the shopping center). *Conditional Use Permit – Consumption of Alcoholic Beverages.* A CUB, is required for the on-site sale and consumption of a full line of alcoholic beverages and is in	**LU-9:** The Proposed Project shall provide an improved pedestrian crossing at the proposed Riverside Drive/Matilija Avenue intersection, a landscape-enhanced pedestrian corridor along Riverside Drive, and more efficient and safer site driveway entrances that will serve to strengthen community linkages to surrounding uses and support non-motorized vehicle travel options. **LU-10:** The Proposed Project Landscape Plan shall incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance. **LU-11**: The Proposed Project shall incorporate building access points that would improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving public safety (through natural access control, natural surveillance and territorial reinforcement features) and pedestrian activity (through improved convenience and accessibility). **LU-12:** The Proposed Project shall		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety 1. Pre-Construction 2. Department of City Planning 3. Department of Building and Safety 1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety 1. Pre-construction, Construction,

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
conjunction only with new sit-down restaurants proposed . A substantial concentration of facilities that sell alcoholic beverages does not exist in the immediate North Sherman Oaks community. The sale and service of alcoholic beverages is age-restricted and would not pose an opportunity for underage students. The proposed sale and consumption (restricted to on-site) of alcoholic beverages in association with restaurant uses at the shopping center would not detrimentally affect nearby residential or school uses, and impacts would be less than significant.	incorporate treatment control BMPs that will minimize urban runoff and associated impacts to receiving water quality and specifically address the identified pollutants of concern. Many BMP alternatives can be easily integrated into planned landscaping, right-of-ways, and planned infrastructure. BMP alternatives that would be implemented with the Proposed Project include: (1) vegetated treatment BMPs, (2) onsite storage and reuse, (3) permeable paving, (4) roof top BMPs, and 5) media filters.		Occupancy 2. Department of City Planning 3. Department of Building and Safety
Variances (for Commercial Corner standards). Although the Proposed Project would be in substantial compliance with the permitted uses and development standards of the C2 zone, several minor deviations (some of which are addressed through the CUP process) are requested to facilitate a more efficient project design. Approval and implementation of the requested variances related to building height, landscaped areas, parking, operational hours and building façade treatments would be less than significant. *Other Approvals.* The potential impacts associated with a future haul route and other building approvals were determined to be less than significant.	**LU-13:** The Proposed Project shall incorporate a number of vegetated treatment BMPs, including swales, filter strips, bioretention and planter boxes. When properly designed and maintained, vegetated BMPs are among the most effective, cost efficient treatment approaches for dry and wet-weather runoff. Treatment occurs through sedimentation, filtration, adsorption to organic matter, and vegetative uptake. Additionally, vegetated treatment systems would reduce runoff volumes through soil soaking, infiltration, and evapotranspiration. On-site implementation of these systems would be integrated into surface conveyances and on-site landscaping in innovative ways that provide dual-functional site amenities.		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
Other Local Programs. The Proposed Project will not result in the creation or removal of parkland or active recreational facilities. The Proposed Project includes provision of a new and enhanced community room which would increase the stock of available facilities for the immediate community and reduce potential impacts to the community due to demand on recreational facilities for community meeting space needs. **Consistency with the SCAG Regional Comprehensive Plan (RCP).** The Proposed Project is consistent with the RCP because the project directly contributes toward the furtherance of those policies (i.e., as through the provision of jobs) and indirectly supports those policies by not creating obstacles for their realization (i.e., opportunity for greater efficiency of transit infrastructure). The Proposed Project will result in a less than significant impact to land use consistency as it will not create conflicts with policies and programs of SCAG's regional plans, including the RCP. **Consistency with Other Regional Programs.** Other regional plans that address land use in the project area include the Los Angeles County Congestion Management Plan (CMP)	**LU-14:** The Proposed Project shall incorporate permeable (porous) pavement material in pavement areas (such as roadways, driveways, parking areas, and walkways). The permeable (porous) pavement materials would allow water to drain down to the underlying soil and reduce the volume of wet weather urban runoff. The Proposed Project would incorporate a mix of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, into the landscape plan and design of surface parking areas as functionally appropriate.		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety
	LU-15: The Proposed Project shall employ rooftop BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of small storm events peaks and the overall runoff volume via inter-event evaporation and transpiration. Rooftop BMPs incorporated into the project design include planters and landscaping on the rooftop portion of the new parking structures, and hanging planters along the parking building tiers and along the Riverside Drive mall elevation.		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety
	LU-16: The Proposed Project shall employ media filtration to separate and filter fine particulates and associated pollutants from captured		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
administered by the Los Angeles County Metropolitan Transportation Authority (MTA) and the Air Quality Management Plan (AQMP) administered by the South Coast Air Quality Management District (SCAQMD). Because the Proposed Project is consistent with the RCP and growth forecasts, the Proposed Project is consistent with these other regional programs. Both the AQMP and the CMP include additional policy statements that are directed toward achieving physical reductions in air pollutant emissions and traffic congestion, and those aspects are considered separately under the technical analysis related to air quality and traffic.	stormwater.		
	LU-17: The Proposed Project shall provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities.		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety
Land Use Compatibility. *Type and Intensity of Use.* The Proposed Project involves an addition of commercial retail/restaurant uses that are consistent with those that already occur at the project site. At buildout, the floor area ratio of the shopping center would be approximately 1.13:1, and would be substantially less than the permitted 1.5 FAR.	**LU-18:** The Proposed Project shall designate an area for recyclable collection and storage that is appropriately sized and located in a convenient area to serve mall tenants. As appropriate, the Fashion Square Mall Association shall implement the use of cardboard balers, aluminum can crushers, recycling chutes and other waste management technologies to further enhance and manage a recycling program at the shopping center.		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety
Development of the Proposed Project at the existing Fashion Square shopping center would not physically disrupt, divide or isolate existing land uses in the project area or encroach	**LU-19:** The Proposed Project shall install carbon monoxide and airflow measurement equipment that would transfer the information to the HVAC system and/or Building Automation System to trigger corrective action, if		1. Pre-construction 2. Department of City Planning 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
upon residential uses, nor physically alter the overall character of the area. Several of the PDFs serve to bring about a more cohesive development within the project site that affords improved access and linkages with the surrounding community and integrates visually with future green streets and a pedestrian-friendly environment. Adjacent residential land uses would not be altered or physically disrupted due to the development of the Proposed Project. *Hours of Operation.* The operational characteristics of the Proposed Project will be similar to those operational characteristics currently observed with existing commercial retail and restaurant operations. A CUP is requested to deviate from the standard allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit certain uses from 5:30 a.m. to 12 midnight, consistent with the request for hours of operation overall for the shipping center. *Consumption of Alcoholic Beverages.* The sale and consumption (restricted to on-site) of alcoholic beverages in association with restaurant uses at the shopping center would not detrimentally affect nearby residential or school uses, and impacts would be less than significant.	applicable, and/or use the measurement equipment to trigger alarms that inform building operators or occupants of a possible deficiency in outdoor air delivery. Installation of such a system in areas where carbon monoxide concentrations may escalate (such as in the vicinity of loading docks or valet parking drop-offs) would improve both indoor and localized "hotspot" air quality.		

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
Construction Activities. Construction of the Proposed Project would result in temporary disturbances associated with noise, localized air quality, aesthetics and traffic, which as a result may adversely impact surrounding land uses. Because of the precautions that would be taken to coordinate construction activities, potential land use compatibility impacts during the construction phase would be less than significant. **Urban Decay.** While the Proposed Project may add some new competitive retail and restaurant facilities to the regional market area, there would be no reasonable likelihood that the operation of the Proposed Project would result in significant adverse economic competition within the regional market area to the degree that this competition would lead to urban decay.			
NOISE			
Construction (Short-Term) Noise. Construction of the Proposed Project would result in temporary increases in ambient noise levels in the project area on an intermittent basis including to nearby residents. The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. Construction activity could potentially increase	**N-1:** The City of Los Angeles Noise Ordinance has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Regarding construction, the LAMC indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. the following day,	**Construction.** Mitigation Measure N-3 would reduce construction noise levels by 3 dBA, and Mitigation Measure N-6 would reduce construction noise levels by approximately 10 dBA. The noise disturbance coordinator (Mitigation Measure N-11) would ensure that noise complaints would be resolved. The other Mitigation Measures (N-4,	1. Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
ambient noise levels at multi-family residences on Riverside Drive by 15.3 dBA without mitigation measure. Construction activity could also potentially increase the ambient noise level at Notre Dame High School by 3.4 dBA without mitigation measure. Construction noise levels would exceed the 5-dBA incremental increase significance threshold and, as such, would result in a significant construction impact without implementation of mitigation measures. Sensitive receptors located north, east, and west of the project site would also experience increases in ambient noise levels due to construction activity. However, these increases would be less than those presented for the multi-family residences along Riverside Drive due to distance and building attenuation (e.g., the multi-family residences along Riverside Drive would act as a noise barrier to the residential buildings behind them). **Operational (Long-Term) Noise.** The predominant operational noise source for the Proposed Project is vehicular traffic. During the weekday, the greatest project-related noise increase would be 0.4 dBA CNEL and would occur along Riverside Drive between Hazeltine and Woodman Avenues. Weekday roadway noise	since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence. No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on any Sunday. The LAMC also specifies the maximum noise level of powered equipment or powered hand tools. Any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment. **N-2:** The Proposed Project will include certain features to reduce exposure of sensitive receptors to operational noise. For example, mechanical equipment would be enclosed or located on roofs, and	N-5, and N-10) would assist in attenuating construction noise levels. Should pile driving be necessary, Mitigation Measures N-8 and N-9 would reduce pile driving noise by at least 9 dBA. The resulting incremental increase in ambient noise levels due to pile driving at the nearest sensitive receptor would be 4.6 dBA. Construction noise level increases with mitigation at the multi-family residences on Riverside Drive would be less than 5 dBA. As such, construction noise would result in a less than significant impact with mitigation incorporated. **Operational.** The project-related operational noise would result in a less than significant impact and no mitigation is necessary. **Vibration.** The project-related operational ground-borne vibration would result in a less than significant impact.	1. Pre-construction, Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
levels attributed to the Proposed Project would increase by less than the 3 dBA CNEL significance threshold at all analyzed segments. During the weekend, the greatest project-related noise increase would be 0.5 dBA CNEL and would also occur along Riverside Drive between Hazeltine and Woodman Avenues. Weekend roadway noise levels attributed to the Proposed Project would increase by less than 3 dBA CNEL at all analyzed segments. The Proposed Project would result in a less than significant mobile noise impact.	mechanical equipment noise would not increase ambient noise levels by more than 5 dBA at off-site locations. In addition, the new loading docks would be located behind mall structures and away from sensitive receptors. As a result, activity associated with the new loading docks would not increase ambient noise levels by 5 dBA or more at the nearest sensitive receptors (e.g. residences on Riverside Drive).		
Roof-Top and Mechanical Equipment. Potential stationary noise sources related to the long-term operations of the Proposed Project includes mechanical equipment (e.g., parking structure air vents and heating, ventilation, and air conditioning (HVAC) equipment.) Mechanical equipment would be designed so as to be located within an enclosure or confined to the rooftop of the proposed structure. Operation of mechanical equipment would not be anticipated to increase ambient noise levels by 5 dBA or more. Stationary noise would result in a less than significant impact with mitigation construction screen.	**N-3:** All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.		1. Pre-construction, Construction 2. Department of Building and Safety 3. Department of Building and Safety
	N-4: Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).		1. Pre-construction, Construction 2. Department of Building and Safety 3. Department of Building and Safety
	N-5: Equipment staging areas shall be located on the southern portion of the project site, as far as possible from multi-family residences on Riverside Drive.		1. Pre-construction, Construction 2. Department of Building and Safety 3. Department of Building and Safety
Parking Facilities. The Proposed Project would include a six-level	**N-6:** During phase 2 parking structure construction and phase 3 demolition and excavation of the tunnel area, temporary sound barriers (not to exceed a maximum height of ten feet) capable of achieving sound attenuation of at least 10 dBA (e.g., sound attenuation blanket) shall be		1. Pre-construction, Construction 2. Department of Building and Safety 3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
parking structure located south of the existing Macy's parking lot. This parking structure would be located approximately 300 feet south of the nearest sensitive receptor (i.e. residences on Riverside Drive). Noise sources associated with the parking structure include vehicle movement, slamming doors, and car alarms. The monitored noise levels along the portion of Riverside Drive in front of the residential land uses are 66.2 and 68.3 dBA Leq. Adding parking-related noise (i.e., 63 dBA Leq) to the existing noise level along Riverside Drive would increase the existing noise levels by less than 0.1 dBA. This is less than the 5-dBA significance threshold and, as such, parking activity noise would not significantly impact sensitive receptors north of the project site. Under the Proposed Project access scheme, vehicles would enter/exit the new parking structure at a new signalized driveway with direct access to the structure. Based on distance attenuation and the existing ambient noise level at the nearest sensitive receptor, the resulting noise level would be 68.1 dBA Leq, an increase of 1.9 dBA. This level is less than the 5-dBA significance threshold, which would result in a less than significant impact.	constructed, such that the line-of-sight is blocked from active construction areas to residential land uses on Riverside Drive. **N-7:** Construction workers shall be required to park at designated locations and shall be prohibited from parking on nearby residential streets. **N-8:** Pile drivers shall be shrouded with acoustically absorptive shields capable of reducing noise by at least 9 dBA at all times during pile driving operations. **N-9:** Pile driving activity shall be scheduled for times that have the least impact on adjacent sensitive receptors. **N-10:** Consistent with previous Conditions of Approval, all residential units located within 2,000 feet of the construction site shall be sent a notice regarding the construction schedule of the Proposed Project. A sign, legible at a minimum distance of 50 feet, shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints. **N-11:** A "noise disturbance coordinator" shall be established. The		1. Construction 2. Department of Building and Safety 3. Department of Building and Safety 1. Pre-construction, Construction 2. Department of Building and Safety 3. Department of Building and Safety 1. Pre-construction, Construction 2. Department of Building and Safety 3. Department of Building and Safety 1. Pre-construction, Construction 2. Department of Building and Safety 3. Department of Building and Safety 1. Pre-construction, Construction 2. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
Loading Docks and Truck Access Areas. Two existing loading docks are located along Riverside Drive. These loading docks would continue to operate between the same hours and under their existing parameters (approximately two large trucks operating simultaneously on a daily basis). Operational noise levels would not change substantially along the Riverside Drive frontage. The Proposed Project would result in a less than significant operational noise impact due to loading dock operations. **Vibration.** Use of heavy equipment (e.g., a sonic pile driver) generates vibration levels of 0.170 inches per second PPV at a distance of 25 feet. The nearest structure to the pile driving activity would be approximately 50 feet east of the project site and could experience vibration levels of 0.06 inches per second PPV. Vibrations levels at the adjacent sensitive receptors would not exceed the potential building damage thresholds of 0.5 per second PPV. Construction-related vibration associated with the Proposed Project would result in a less than significant impact. Operation of the Proposed Project would not include significant stationary sources of ground-borne vibration, attributable to heavy	disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, posted at the construction site shall list the telephone number for the disturbance coordinator.		3. Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration would result in a less than significant impact.			
PUBLIC SERVICES: FIRE SERVICES			
Fire Flow. Based on a review of the Proposed Project land uses, the LAFD has indicated that a fire flow of 9,000 gallons per minute (gpm) from any 4 to 6 hydrants on the same block flowing simultaneously is required. A minimum residual water pressure of 20 pounds per square inch (psi) must remain in the system while the required fire flow is being delivered. Due to the adequacy of existing fire flow, and that the Proposed Project would not alter fire flow requirements at the project site due to a change in use, upgrades to the fire flow system are not anticipated. The Proposed Project will result in a less than significant impact to fire flow capacity and fire protection services.	**PSF-1:** The Proposed Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, which is an element of the General Plan of the City of Los Angeles (CPC 19708).	The implementation of the identified standard conditions of approval and project design features (incorporated into the Mitigation Program) reduce all potential Proposed Project and cumulative impact to less than significant levels.	1. Pre-construction 2. Department of Building and Safety 3. LAFD, Department of Public Works-Bureau of Engineering, Department of Building and Safety
Fire Protection Facilities and Service. The project site is currently developed and is considered to be adequately served by LAFD services.	**PSF-2:** In accordance with the City of Los Angeles building permit review process, definitive plans and specifications shall be submitted to the Fire Department and any requirements for necessary permits shall be satisfied prior to commencement and/or occupation of any portion of the Proposed Project. Typical site plan and building permit requirements would include, but not be limited to, the following: • All first story portions of any habitable building shall be within 300 feet of an approved fire hydrant.		1. Pre-construction, Construction 2. Department of Building and Safety 3. LAFD, Department of Public Works-Bureau of Engineering, Department of Building and Safety

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
The Proposed Project would install an automatic fire sprinkler system and two electric/emergency driven fire pumps with a combined capacity of 1,250 gallons per minute. Proposed Project impacts to vehicular traffic would also be less than significant after mitigation. Thus, the Proposed Project would not significantly impact response times. Existing fire protection services are considered to be adequate at the project site, and with the incorporation of the PDFs, the Proposed Project will not necessitate new additional fire station facilities or personnel. Therefore, the Proposed Project will result in a less than significant impact to fire protection facilities and services. **On-Site Fire Safety Design and Operations.** The current site design includes a proposed fire/emergency vehicle lane along the southern property boundary, extending from Woodman Avenue to Hazeltine Avenue via Fashion Square Lane. Preliminary discussions with the LAFD indicate acceptable circulation for emergency vehicles and fire protection with this design. The Proposed Project would not result in a significant impact on fire department access to the proposed site or adjacent properties.	• A building smoke alarm system designed to detect any smoke in the building's air- handling systems shall be installed. The system shall cause an alarm to be announced at the central fire control station. • A fire alarm system shall be installed which uses a dependable method of sounding a fire alarm throughout the building. • All decorative landscaping surrounding project structures shall use fire-resistant plants and materials. • Brush in the area adjacent to proposed development shall be cleared or thinned periodically by the applicant under supervision of the LAFD. • New fire hydrants and/or top upgrades to existing fire hydrants shall be installed in accordance with the Los Angeles Fire Code. • Adequate public and private fire hydrants will be required. The number and location of these hydrants will be determined by the Fire Department after review of the Plot Plan. • Access for Fire Department apparatus and personnel to and into all structures shall be required. • At least two different ingress/egress roads for each area, that will accommodate major fire apparatus and provide for major evacuation during emergency		

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
Consistency with Applicable Plans and Polices. The Proposed Project is consistent with the fire protection services related goals, objectives and policies because the project either directly contributes toward the furtherance of those policies (i.e., as through physical site improvements) or indirectly supports those policies by not creating obstacles for their realization (i.e., such as remaining consistent with land use goals). The Proposed Project will result in a less than significant impact to fire protection services in the project area since it will not create conflicts with policies and programs supporting the provision for adequate and comprehensive fire and life safety services.	situations shall be required. • Fire lanes, where required, and dead-ending streets should terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane should be greater than 700 feet in length or secondary access shall be required. • Construction of public or private roadways in the proposed development shall not exceed 15 percent in grade, unless otherwise approved. • No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane, unless otherwise approved. • Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. • Additional vehicular access may be required by the Fire Department where buildings exceed 35 feet in height. • Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the Fire Department. • The Project shall utilize standard cut-corners on all turns, if		

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	applicable. • Fire Department access shall remain clear and unobstructed during demolition. • If applicable, fire lanes and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required. • If applicable, where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface on the roadway. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet. • Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.		
	PSF-3: Fashion Square Lane will be		1. Pre-construction

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	reconfigured and improved to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) for its entire length along the south edge of the shopping center from Hazeltine Avenue to Riverside Drive. This fire lane shall be unobstructed except for the connection from the existing west parking structure to the new mall. However, this limited area shall have a minimum vertical clearance of 17 feet.		2. Department of Building and Safety 3. LAFD, Department of Public Works-Bureau of Engineering, Department of Building and Safety
	PSF-4: New Proposed Project buildings, including parking structures, shall be fully sprinklered.		1. Pre-construction, Construction 2. Department of Building and Safety 3. LAFD, Department of Public Works-Bureau of Engineering, Department of Building and Safety
PUBLIC SERVICES: POLICE SERVICES			
Police Protection Facilities and Service. The Proposed Project may generate the need for an additional 0.9 officers. However, current response times in the Van Nuys area are consistent with City-wide averages, thus additional staffing for this division is currently deemed unwarranted by the LAPD. Incorporation of on-site safety design and operational features, such as on-site private security officers, security cameras, security lighting, and design features which will reduce the demand for police protection at the site, would offset this service need. The Proposed	**PSP-1:** All businesses within the development desiring to sell or allow consumption of alcoholic beverages will require licensing through Alcohol and Beverage Control and approval by the LAPD.	Implementation of the identified standard conditions of approval, project design features and recommended mitigation measures reduce all potential Proposed Project and cumulative impacts to less than significant levels.	1. Pre-construction 2. LAPD 3. LAPD
	PSP-2: The Proposed Project Landscape Plan will incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance.		1. Pre-construction, Occupancy 2. LAPD 3. LAPD
	PSP-3: The Proposed Project shall		1. Occupancy

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
Project will result in a less than significant impact to police protection.	be maintained as a closed mall campus with controlled access points and operational hours.		2. LAPD 3. LAPD
Crime Rates and Potential Demand for Service. Retail land uses similar to the Proposed Project typically result in police response calls for retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons. Because the Proposed Project will increase the use intensity of the site and contribute to additional traffic on local roadways, an increase in the number of reported crimes can be anticipated. The Proposed Project includes numerous on-site design and operational strategies (such as more efficient parking and access configurations, nighttime security lighting, on-site security patrol, etc.) that will enhance public safety and incorporate CPTED strategies, which in turn minimize the risk for criminal activity. The Proposed Project includes a request for a Conditional Use Permit (CUP) to allow the on-site sale and consumption of alcoholic beverages (CUB) in association with up to approximately 40,000 GLSF of new restaurant uses (and up to 28,000 GLSF that would serve alcohol) to be located within, but incidental to, the shopping center use. Approval of the requested CUB would be based on a finding that the Proposed Project	**PSP-4:** The Proposed Project shall result in the addition of more building access points that will improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving opportunities for CPTED principals that employee natural access control, natural surveillance and territorial reinforcement features.		1. Pre-construction 2. LAPD 3. LAPD
	PSP-5: The Proposed Project shall provide organized roving security patrol, video surveillance, and security lighting to ensure the safety and security of patrons, tenants and employees.		1. Pre-construction, Occupancy 2. LAPD 3. LAPD
	PSP-6: The Proposed Project includes reconfiguration of Fashion Square Lane to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) through its entire length of along the south edge of the project site adjacent to proposed structures affording maximum accessibility for emergency service personnel and vehicles.		1. Pre-construction 2. LAPD 3. LAPD
	PSP-7: The Proposed Project shall provide sufficient off-street parking for all building employees and anticipated patrons and visitors,		1. Pre-construction 2. LAPD 3. LAPD

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
would not result in an undue concentration of uses which dispense alcoholic beverages. Because the restaurants would be primarily family-style, incidental to the shopping center, and located indoors, the potential for crimes associated with public drunkenness and disorderly conduct is considered to be less than significant.	thereby minimizing the potential for parking conflicts on off-site locations and providing parking within a controlled environment that can be monitored by on-site patrol and surveillance operations.		
On-Site Safety Design and Operations. The Proposed Project incorporates design and operational measures that will reduce the demand on police facilities and services by addressing crime concerns on the "front end" within the project site. Specifically, the Proposed Project incorporates many Crime Prevention Through Environmental Design (CPTED) strategies that address natural access control, natural surveillance, and territorial reinforcement. The Proposed Project will provide organized roving security patrol, video surveillance, and security lighting that will improve safety and help reduce potential impacts to LAPD services by serving as a first level of enforcement and as a deterrent. It is anticipated that these deterrents will affect the site perimeter and adjacent areas enhancing the overall public safety in the immediate vicinity.	**PSP-8:** Directional and security lighting will be required for safety purposes. Through a new plan, lighting can enhance safety along the Riverside Drive and Hazeltine Avenue frontages and add to the perceived security of the neighborhood in general. Lighting would be incorporated into the streetscape environment at several levels, including the use of bollards, wall reveals, seating areas, and crosswalks. The use of plaza strip lighting will afford additional security lighting but with a park-like feel and without significant light intrusion to the surrounding neighborhood.		1. Pre-construction 2. LAPD 3. LAPD
	PSP-9: Incorporate into the plans the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of		1. Pre-Construction, Occupancy 2. LAPD 3. LAPD
The Proposed Project includes			

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
reconfiguration of Fashion Square Lane to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) through its entire length of along the south edge of the project site adjacent to proposed structures affording maximum accessibility for emergency service personnel and vehicles. In addition, the Proposed Project will provide sufficient off-street parking for all building employees and anticipated patrons and visitors, thereby minimizing the potential for parking conflicts on off-site locations and providing parking within a controlled environment that can be monitored by on-site patrol and surveillance operations. The surrounding residential community is concerned that project patrons may park along adjacent off-site streets, including within residential neighborhoods to the north, for convenience. A key goal of the Proposed Project is to provide a more convenient and efficient access and internal circulation system within the project site, and to provide convenient parking options. It is anticipated that the access, circulation and parking enhancements will provide sufficient incentive for patrons to park on-site at the Fashion Square shopping center. Further, several measures to address pass-through traffic, neighborhood	security guard patrol throughout the project site if needed. Please refer to Design Out Crime Guidelines: Crime Prevention Through Environmental Design published by the Los Angeles Police Department's Crime Prevention Section (located at Parker Center, 150 N. Los Angeles Street, Room 818, Los Angeles, (213) 485-3134. These measures shall be approved by the Police Department prior to the issuance of building permits. **PSP-10:** Elevators, lobbies, and parking areas shall be well illuminated and designed with minimum dead space to eliminate areas of concealment. **PSP-11:** The Project Applicant shall consult with the LAPD Crime Prevention Unit on any additional crime prevention features appropriate to the design of the Proposed Project, and shall incorporate such measures to the extent feasible and practical. **PSP-12:** Upon completion of the Proposed Project, the Fashion Square Mall Association shall provide the Van Nuys Division Commanding Officer with a diagram of each portion of the property, including access routes and additional information that might facilitate police response.		1. Pre-construction, Occupancy 2. LAPD 3. LAPD 1. Pre-construction 2. LAPD 3. LAPD 1. Occupancy 2. LAPD 3. LAPD

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
protection and traffic calming (such as restricted access to Matilija Avenue from Riverside Drive) are proposed to address project traffic. The neighborhood protection plan will provide additional disincentive to park in adjacent neighborhoods to the north of the project site. As a result, vehicle enforcement concerns due to the project are anticipated to be less than significant. **Consistency with Applicable Plans and Polices.** The Proposed Project is consistent with the police services related goals, objectives and policies because the project either directly contributes toward the furtherance of those policies (i.e., as through physical site improvements) or indirectly supports those policies by not creating obstacles for their realization (i.e., such as remaining consistent with land use goals). The Proposed Project will result in a less than significant impact to police services in the project area since it will not create any conflicts with policies and programs supporting the provision for adequate police protection services.			
PUBLIC UTILITIES: SOLID WASTE			
The project is anticipated to generate solid waste during both construction and operational activities at the project site. Construction waste would be	**PU-1:** The Proposed Project shall comply with the Countywide Integrated Waste Management Plan and meet targeted waste stream	With compliance of applicable standard conditions and implementation of the project design features (including attaining LEED	1. Construction 2. Department of Public Works, Integrated Solid Waste Management Office

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
short-term and represents a one-time generation of waste while operation waste will be long-term and ongoing for the life of the shopping center. Both scenarios are discussed below. **Construction Waste.** Construction waste includes waste from both the demolition and construction processes. During construction activities, a considerable portion of both demolition and construction materials while be recycled and used either in on-site construction and/or hauled off-site for recycling, therefore reducing waste materials being transported to landfills serving the project area. Given the amount of remaining landfill capacity and the recycling measures to be used during construction of the project, demolition and construction activities associated with the Proposed Project are anticipated to result in a less than significant solid waste impact. **Operational Waste.** The Proposed Project would result in an increase of solid waste generation during its operation. The shopping center total development is anticipated to result in approximately 4,739 pounds of solid waste per day, an increase of approximately 1,921 pounds per day of solid waste. The Proposed Project would result in a less than significant solid waste impact due to the need for	reduction requirements as provided in the plan. **PU-2:** The Proposed Project shall develop and implement a construction waste management plan (CWMP) that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or commingled. A minimum of 50% of the construction and demolition debris (exclusive of excavated soils and organic debris) shall be recycled and/or salvaged. Excavated/exported soil shall be transferred off-site as clean fill rather than landfilled. Organic landclearing debris (i.e., trees to be removed) shall be processed as greenwaste. The CWMP include measures for the recycling cardboard, metal, brick, acoustical tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation and other similar materials used during the construction phase. The CWMP shall designate a specific area(s) on the construction site for segregated or commingled collection of recyclable materials, and track recycling efforts throughout the construction process. The CWMP shall identify construction haulers and recyclers to handle the designated materials. Consistent with the intent to minimize waste, the CWMP shall also establish a minimum project goal of 10% (post-consumer	certification), which have been incorporated into the Mitigation Program, the Proposed Project would result in a less than significant solid waste impact and would be served by a permitted landfill with sufficient capacity.	3. Department of Public Works, Integrated Solid Waste Management Office 1. Pre-construction, Construction 2. Department of Public Works, Integrated Solid Waste Management Office 3. Department of Public Works, Integrated Solid Waste Management Office

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
additional solid waste collection routes. The Proposed Project will comply with all applicable federal, state, and local laws and regulations related to solid waste generation, collection and disposal. The Proposed Project will result in a less than significant solid waste impact since it will achieve compliance with solid waste regulations or conflicts with applicable solid waste plans and regulations. The Proposed Project would result in a less than significant solid waste impact and would be served by a permitted landfill with sufficient capacity.	and ½ pre-consumer) for recycled content construction materials and identify material suppliers that can achieve this goal. During construction, the developer shall ensure that the specified recycled content materials would be installed. The CWMP shall also establish a project goal (10% minimum) for locally sourced construction materials and would identify materials and material suppliers that can achieve this goal. During construction, the developer shall ensure that the specified local materials would be installed and quantify the total percentage of local materials installed.		
	PU-3: The Proposed Project shall designate an area for recyclable collection and storage that is appropriately sized and located in a convenient area to serve mall tenants. As feasible, the Fashion Square Mall Association shall employ cardboard balers, aluminum can crushers, recycling chutes and other waste management technologies to further enhance and manage a recycling program at the shopping center.		1. Pre-construction 2. Department of Public Works, Integrated Solid Waste Management Office 3. Department of Public Works, Integrated Solid Waste Management Office
	PU-4: The Proposed Project shall be designed, built and operated in a manner consistent with the requirements to achieve LEED certifiable. The Proposed Project will implement a variety of design and		1. Pre-construction, Construction, Occupancy 2. Department of Public Works, Integrated Solid Waste Management Office 3. Department of Public Works,

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	operational features, including waste recycling and stream reduction programs, to achieve LEED certifiable.		Integrated Solid Waste Management Office
TRAFFIC, CIRCULATION AND ACCESS			
Construction Activity. During the construction phase, traffic would be generated by activities including construction equipment, crew vehicles, haul trucks and trucks delivering building materials. The City of Los Angeles will approve specific haul routes for the transport of materials to and from the site during demolition and construction. During the construction phase, local traffic may experience a temporary increase as additional construction-related trips (comprised of commuting construction personnel and haul trucks) would be added to the area in addition to traffic generated by the existing retail uses. Because a construction traffic and interim traffic control plan will be in force, and because the temporary increase and disruption to the local traffic area due to construction activity would be short-term and not permanent, the resulting impact to traffic would be less than significant with implementation of the traffic control plans and City's approval of the haul routes.	Construction **TRF-1:** In accordance with LAMC Section 91.70067, hauling of construction materials shall be restricted to a haul route approved by the City. The City of Los Angeles will approve specific haul routes for the transport of materials to and from the site during demolition and construction. This process includes a public hearing and opportunities for the public to comment on the proposed route. **TRF-2:** Prior to obtaining a demolition and/or grading permit, the Project Applicant shall prepare a Construction Traffic Control Plan (Construction TCP) for review and approval by the LADOT. The Construction TCP shall include the designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction. The Construction TCP will identify a designated off-site parking lot at which construction workers will be	The traffic analysis evaluated potential project-related impacts at 18 intersections and two street segments. Application of the City's threshold criteria to the "With Proposed Project" scenario indicates that six of the 18 study intersections are anticipated to be significantly impacted by the Proposed Project during the weekday conditions. Incremental but not significant impacts are noted at the remaining 12 study intersections, as well as at the two local residential street segments evaluated in the analysis. During the Saturday mid-day peak hour at six study intersections located immediately adjacent to the project site, four of the seven study intersections are anticipated to be significantly impacted by the Proposed Project during the weekend conditions. Incremental but not significant impacts are noted at the remaining three study intersections. For both weekday and weekend conditions, it is recommended that the significant transportation impacts be mitigated through a contribution by the project to the City of Los Angeles' Adaptive Traffic Control System (ATCS)	1. Pre-construction, Construction 2. Department of Building and Safety, Department of Public Works-Bureau of Street Services 3. Department of Building and Safety, Department of Public Works-Bureau of Street Services 1. Pre-construction 2. LADOT 3. LADOT
Long-Term Operation. During the			

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
weekdays, the Proposed Project is expected to generate a net increase of 95 vehicle trips (58 inbound trips and 37 outbound trips) during the A.M. Peak Hour; a net increase of 476 vehicle trips (229 inbound trips and 247 outbound trips) during the P.M. Peak Hour; and a net increase of 4,964 daily trip ends (2,482 inbound trips and 2,482 outbound trips) during a typical weekday. Traffic volumes expected to be generated by the Proposed Project during the Saturday mid-day include a net increase of 632 vehicle trips (329 inbound trips and 303 outbound trips) during the Saturday mid-day peak hour. Over a 24-hour period, the Proposed Project is forecast to generate a net increase of 6,252 daily trip ends during a typical Saturday (3,126 inbound trips and 3,126 outbound trips). The "With Proposed Project" scenario indicates that the Proposed Project is expected to create potentially significant impacts at six of the 18 study intersections during the weekday peak hours and at four of the seven adjacent study intersections during the weekend peak hours. Potentially significant impacts would occur at the following seven study intersections: Int. No. 1: Van Nuys	required to park. Long-Term Operational **MM TRF-3:** The Proposed Project shall comply with Section 12.26 J of the Los Angeles Municipal Code for purposes of implementing a Transportation Demand Management (TDM) plan. The following outlines the minimum measures that the project will undertake in compliance with the Code section. • Employee Transportation Center and Transportation Coordinator. The project shall designate an area within the building to be the Transportation Center. The Employee Transportation Center shall be maintained by the center's Transportation Coordinator, who will be employed by Westfield. The Transportation Coordinator will assist employees in seeking out and arranging for commute alternatives. This includes carpool and vanpool formation, assisting employees with planning trips to work via bus, and locating bike or walking routes to work. The Employee Transportation Center shall provide a bulletin board, display case, or kiosk displaying transportation information where the greatest number of employees are likely to see it. The transportation information displayed should	installation. In addition, at the Woodman Avenue/Riverside Drive intersection, it is recommended that the southbound Woodman Avenue approach to the Riverside Drive intersection be reconfigured to provide one left-turn lane, two through lanes and one optional through/right-turn lane. These recommended mitigation measures are anticipated to reduce the forecast project-related significant impacts to less than significant levels. While not specifically required for traffic mitigation purposes, it is also recommended that, as part of the Proposed Project, two new traffics signal would be installed at the two new driveway intersections of Riverside Drive to enhance traffic safety and reduce wait times. Parking utilization observations conducted at the site during the 2005 and 2006 holiday shopping periods revealed that the demand for parking peaked at a ratio equivalent to 4.03 parking spaces per 1,000 GLSF (observed at 4:00 P.M. on December 26). Parking provided at a reduced shared parking rate of up to 4.5 parking spaces per 1,000 GLSF is expected to be adequate to accommodate peak parking demands during the December holiday season, as well as throughout the year for the Proposed Project.	1. Pre-construction, Construction 2. LADOT 3. LADOT

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
Boulevard/Riverside Drive Int. No. 4: Tyrone Avenue/ Moorpark Street Int. No. 7: Hazeltine Avenue/ Riverside Drive Int. No. 8: Hazeltine Avenue/ Fashion Square Lane Int. No. 12: Woodman Avenue/ Riverside Drive Int. No. 13: Woodman Avenue/ US 101 Westbound Ramps Int. No. 15: Woodman Avenue/ Moorpark Street These potential impacts would be reduced to a less than significant level with the incorporation of the recommended mitigation measures. One key mitigation measure focuses on State funding for the installation of LADOT's Adaptive Traffic Control System (ATCS) at a number of the study intersections. ATCS provides real time control of traffic signals and the funding provided by the project includes additional loop detectors, closed-circuit television, an upgrade in the communications links, and a new generation of traffic control software. The Proposed Project proposed installation of a traffic signal at the two new driveways on Riverside Drive. These traffic signals would facilitate vehicular movements to and	include, but is not limited to, the following: ○ Current routes and schedules for public transit serving the site; ○ Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations; ○ Ridesharing promotion material supplied by commuter-oriented organizations; ○ Regional/local bicycle route and facility information; and ○ A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders. • Preferential Parking Spaces. The project will provide designated parking areas for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit. • Bicycle Parking Spaces. Bicycle parking shall be provided in conformance with Section 12.21 A 16 of the Los Angeles Municipal Code. The project will provide safe		

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
from the project site, particularly in consideration of the revised internal circulation. **Street and Freeway Capacity** *Neighborhood Street Segment Analysis.* The Proposed Project daily trips will incrementally affect traffic volumes on Ranchito Avenue and Matilija Avenue, north of Riverside Drive; however, application of LADOT's threshold criteria for local residential street segment analysis indicates that the Proposed Project is not anticipated to significantly impact the analyzed street segment. *Congestion Management Program Traffic Impact Assessment.* Because the Proposed Project does not contribute more trips that established by the CMP thresholds, and because significant impacts are not triggered at any of the designated CMP intersections, no further review of potential impacts to intersection and highway monitoring locations that are part of the CMP system is required. **Project Access and Neighborhood Intrusion.** The Proposed Project includes an improved Riverside Drive entrance which will provide for better circulation along Riverside Drive and within the shopping center, including direct access to the parking structures. The Proposed Project is designed to	and convenient access from the external circulation system to bicycle parking facilities on-site. • Carpool/Vanpool Loading Area. The project shall provide a safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area. • Pedestrian Access. The project shall provide sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to the center. • Transit Stop Enhancements. In coordination with LADOT and the Department of City Planning, the project will consult with local bus service providers in determining appropriate improvements to transit stops, such as installation of benches, shelters, and schedule information. **TRF-4:** The Project Applicant shall seek LADOT approval to install two new traffic signals at the two new Riverside Drive driveways to facilitate vehicular movements to and from the project site. **TRF-5:** The Project Applicant shall install a pedestrian crossing at the Riverside Drive/Matilija Avenue intersection.		1. Pre-construction 2. LADOT 3. LADOT 1. Construction 2. LADOT 3. LADOT

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
meet the access requirements of the City of Los Angeles Fire and Police Departments. Although adequate access from public streets will be provided with the Proposed Project, surrounding residents have expressed concern that Fashion Square patrons may nonetheless use adjacent residential streets as a "short cut" to access the shopping center. Measures to address pass-through traffic, neighborhood protection and traffic calming (such as restricted access to Matilija Avenue from Riverside Drive) are proposed to address project traffic. Neighborhood intrusion from pass-through traffic is anticipated to be less than significant with the proposed modifications to the Riverside Drive project driveway and the restricted access to Matilija Avenue. Although there is no anticipated significant increase in neighborhood intrusion from the project, the applicant is proposing to fund a Neighborhood Protection Plan. The plan will include funding for the study and implementation of any necessary measures such as speed humps, stop signs, and traffic collars to provide additional disincentive from driving through or parking in adjacent neighborhood north of the center.	**TRF-6:** In addition to the TDM measures described above that satisfy the requirements of Section 12.26 J, the Proposed Project shall voluntarily implement the following demand management services to further reduce vehicle trips and parking demand at the site: • Orange Line Shuttle. The project shall provide a shuttle service connecting the site to a nearby Orange Line station (e.g., Van Nuys Boulevard). This service could be provided by either the provision of a private shuttle or the funding of extended hours for the existing LADOT DASH line. The Orange Line shuttle would complement existing transit services (i.e., the LADOT DASH service) such that the shuttle would operate during hours when other public transit services connecting the site to the Orange Line are not available (e.g., evenings during the work week and certain weekend hours). The shuttle would operate during regular shopping center hours corresponding with periods of peak parking demand at the site (i.e., everyday during the holiday shopping period between November 15 and January 1, and every Saturday/Sunday throughout the year).		1. Pre-construction 2. LADOT 3. LADOT
	TRF-7: The Proposed Project		1. Pre-construction, Occupancy

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
Transit System. The Proposed Project is forecast to generate demand for 5 net new transit trips (3 inbound trips and 2 outbound trips) during the weekday AM peak hour and 23 net new trips (11 inbound trips and 12 outbound trips) in the weekday PM peak hour. Over a 24-hour period, the Proposed Project is forecast to generate a demand for 243 daily transit trips. It is anticipated that the existing transit service will adequately accommodate the project generated transit trips. As a result, the Proposed Project will result in a less than significant impact on existing or future transit services in the project area. **Parking.** The Proposed Project includes a request for shared parking across the entire shopping center site. The Proposed Project proposes to provide parking that is less than the number of parking spaces that would otherwise be required under Section 12.21.A.4 of the LAMC. Even with the requested parking ratio reduction, the Proposed Project would result in a substantial surplus in parking at the site during non-holiday periods (i.e., a minimum surplus of over 1,500 parking spaces during weekdays and over 1,400 parking spaces during weekends), based on the results of a parking demand study. For a weekday condition in December	applicant, in consultation with LADOT, shall fund the development and implementation of a Neighborhood Traffic Management Plan (NTMP) to address potential existing and future regional "cut-through" traffic on residential streets north of the project site, which may encompass the area generally bounded by Magnolia Boulevard to the north, Riverside Drive to the south, Hazeltine venue to the west and Woodman Avenue to the east. The following is a discussion of the sequential steps typically followed by LADOT in implementing the NTMP. • Deposit Funds. Prior to issuance of a Building Permit for the Proposed Project, the project applicant will be required to deposit funds in a separate account maintained by LADOT designated for use in funding the NTMP. The exact amount will be determined by LADOT and will reasonably cover the likely costs of the measures. • Stakeholders Meeting. Following establishment of the NTMP account, a group consisting of representatives from LADOT, the Council Office, and the residential community north of the project site will meet to discuss the goals, opportunities and constraints of the NTMP. As needed, follow-up meetings may be conducted with other City departments (Public Works, Fire		2. LADOT 3. LADOT

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
(worst-case), the analysis indicates a peak demand for approximately 4,595 parking spaces at 1:00 P.M. which can be accommodated by the proposed supply of 5,148 spaces. The analysis also indicates a peak demand for 4,827 parking spaces at 2:00 P.M. for a weekend condition during the holiday season which can be accommodated by the proposed supply of 5,148 spaces. This includes parking of all employees on site. As demonstrated by the shared parking analysis, adequate parking will be provided with the Proposed Project and therefore impacts related to parking demand are less than significant and mitigation is not required. Although sufficient parking will be provided with the Proposed Project, surrounding residents have expressed concern that Fashion Square patrons may nonetheless park along adjacent off-site streets, including within residential neighborhoods to the north, for convenience. It is anticipated that the access, circulation and parking enhancements will provide sufficient incentive for patrons to park on-site at the shopping center. The neighborhood protection plan will provide additional disincentive to park in adjacent neighborhoods to the north of the project site. As a result, parking impacts to surrounding areas are	Department, Police Department, etc.). • Data Collection and Initial Plan Formulation. Based on the input received at the stakeholders meeting, LADOT will commence with conducting appropriate studies (traffic observations, traffic counts, vehicle speed surveys, accident research, commercial parking intrusion, etc.) to assess existing traffic conditions on the residential streets north of the project site. The studies will be based on studies conducted for the EIR as well as other studies deemed necessary by LADOT. Following collection of the data and based on their professional experience, LADOT will prepare for the stakeholders an initial NTMP for implementation prior to completion of the Proposed Project. • Neighborhood Concurrence. As some of the measures that may be recommended within the initial NTMP (e.g., installation of speed humps, implementation of permit parking districts) may, by LADOT policy, require majority or super-majority consent of affected property owners (at least two-thirds), LADOT will work with the stakeholders to survey the appropriate residents to determine if there is support to implement the specific measures.		

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
anticipated to be less than significant. **Pedestrian Environment.** The Proposed Project includes improved Riverside Drive vehicle entrances that will provide for better circulation along Riverside Drive and within the shopping center and thereby also enhancing pedestrian circulation and safety. This improvement includes installation of two new traffic signals and an improved (safer) pedestrian crossing at the new consolidated shopping center driveway entrances. Pedestrian access to the Proposed Project would be available from the parking areas on the south side of the project and at one location along Riverside Drive through Bloomingdale's department store. Pedestrian access will also be facilitated from Riverside Drive by improved pedestrian walkways between parking areas internal to the project site. The Proposed Project impacts are already less than significant, and in fact improved to a beneficial level. **Consistency with Applicable Plans and Polices.** The Proposed Project is consistent with the transportation-related goals, objectives and policies because the project will either directly contribute toward the furtherance of those policies (e.g., as with the	• Implementation and Follow-Up Studies. LADOT will implement the initial NTMP (including those measures authorized by the affected residents) prior to the completion of the Proposed Project. Following a reasonable period of time after opening of the Proposed Project, LADOT will meet with the stakeholders to review traffic experiences since the implementation of the NTMP and opening of the Proposed Project. As needed, additional review and studies may be conducted by LADOT based on the effectiveness of the initial NTMP and/or traffic and parking issues related to the shopping center. • Updated NTMP. Based on the follow-up studies, LADOT will present to the stakeholders their recommendations for an updated NTMP. Following review by the stakeholders, and with consent of the affected residents (if required), the updated NTMP will be implemented. **TRF-8:** To further alleviate potential inconvenience existing in the area which lead to non-project related cut-through traffic the Proposed Project shall install protected/permissive left-turn traffic signal phasing for Hazeltine Avenue at its intersection with Riverside Drive to improve		1. Pre-construction 2. LADOT 3. LADOT

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
funding for implementation of the ATCS system at local intersections, a cost currently covered by the City through State-provided funds) or indirectly supports those policies through not creating obstacles for their realization (e.g., such as enhanced pedestrian and public transit orientation). The Proposed Project will result in a less than significant impact to transportation in the project area since it would not create any conflicts with policies and programs supporting public transit, alternative transportation modes, transportation systems and congestion management, and parking.	current safety and traffic flow at this intersection. **TRF-9:** The Project Applicant will prepare and implement an Interim Traffic Control Plan (TCP) during construction. The Interim TCP shall address interim traffic staging and parking for shopping center patrons that would continue to shop at the shopping center during the construction phase. To maintain the required parking and adequate access during the construction stage, the Proposed Project will include a plan to implement a number of strategies to temporarily address parking on the site and ensure safe and functional access. These strategies are anticipated to include the use of valet parking, stacked parking, shuttles from the eastern most parking lot, and if necessary off-site parking for employees.		1. Construction 2. LADOT 3. LADOT
	TRF-10: Prior to issuance of building permit, the Project Applicant shall contribute prorated funding for the installation of LADOT's Victory ATSAC system at the following seven intersections: (1) Van Nuys Boulevard/Riverside Drive; (2) Tyrone Avenue/Moorpark Street; (3) Hazeltine Avenue/Riverside Drive; (4) Hazeltine Avenue/Fashion Square Lane: (5) Woodman Avenue/Riverside Drive; (6) Woodman Avenue/US 101		1. Pre-construction 2. LADOT 3. LADOT

IMPACT AND MITIGATION MEASURES SUMMARY MATRIX

ADVERSE IMPACT	RECOMMENDED MITIGATION MEASURES	NET UNMITIGATED ADVERSE IMPACTS	1. MONITORING PHASE 2. MONITORING AGENCY 3. ENFORCEMENT AGENCY
	Westbound Ramps; and (7) Woodman Avenue/Moorpark Street.		
	TRF-11: Prior to project occupancy, the LADOT shall redesignate the curb lane on the southbound approach on Woodman Avenue to an optional through/right-turn lane so that the resultant lane configurations at the southbound approach will be one left-turn lane, two through lanes and one optional through/right-turn lane. If required by LADOT, the existing four-foot wide median island on the south leg of the intersection would be replaced by striping and/or lane delineators (e.g., two feet wide or less) so that additional width could be provided to the existing three southbound Woodman Avenue through lanes on the departure side of the intersection. The Project Applicant shall pay all expenses for these improvements.		1. Construction 2. LADOT 3. LADOT

I. SUMMARY

H. ALTERNATIVES

The Los Angeles Department of City Planning and the CEQA Guidelines (Section 15126.6) require that an EIR describe a "no project" alternative, and other reasonable alternatives that may potentially attain most of the basic project objectives and could possibly avoid or substantially lessen any of the significant environmental effects of the project. Based on the analysis of alternatives, an environmentally superior option must be designated. A complete analysis of project alternatives, including an explanation of alternatives considered but not evaluated, is provided in Section V: Alternatives of this DEIR and is summarized below.

The criteria for defining project alternatives was whether an alternative offered the potential to attain most of the basic objectives of the Proposed Project while potentially reducing or eliminating significant impacts compared to the Proposed Project. The selection of alternatives analyzed in the EIR focused on primarily reducing construction impacts (resulting in significant air quality impacts), and secondarily on those project elements for which a significant impact (although reduced to less than significant through mitigation) would occur, specifically those alternatives capable of reducing potential traffic, aesthetics and land use impacts.

Six alternatives, in addition to the Proposed Project, were evaluated, and an Environmentally Superior Alternative was identified. A comparison of the six alternatives relative to the Proposed Project is presented in the Alternatives Comparison Matrix on the following pages. The conclusions for each are summarized below.

Alternative A: No Project Alternative. The No Project Alternative assumes that no changes to the project site or existing structures would occur and the physical and operational conditions of the shopping center would remain as they are today. No expansion of commercial uses, landscaping and building façade enhancements, or improvements to the project site access and circulation would be implemented. This alternative satisfies the requirement in CEQA for a No Project Alternative comparison.

Implementation of the No Project Alternative would not result in new environmental impacts. Overall, the No Project Alternative would result in a reduced level of impact when compared to the Proposed Project. All of the significant and unavoidable impacts (i.e., short-term construction-related air quality) associated with the Proposed Project would be avoided under the No Project Alternative. The potential benefits of the Proposed Project (i.e., enhanced traffic flow and safety, and improved on-site access and pedestrian safety) would not be implemented either.

The No Project Alternative would not satisfy any of the Project objectives. Specifically, the No Project Alternative would not invigorate economic activity at the project site, would not provide circulation and access improvements that promote enhanced vehicular and pedestrian safety, would not enhance on-site aesthetics that could facilitate improved community linkages, and would not expand the range of services available to the community at this location. For these reasons, the No Project Alternative is not considered to be a feasible alternative to the Proposed Project.

Alternative B: Existing Entitlement Alternative. This alternative consists of build out in accordance with the existing entitlements (as approved in 1994) resulting in the construction of an additional 108,000 GLSF of new retail/restaurant commercial space in a two-story structure south of the existing mall and just southeast of the Bloomingdale's department store. This alternative was selected because it complies with the existing zoning and site plan approvals on the site without further discretionary entitlements and it accomplishes some of the project objectives by increasing the commercial intensity at the project site. The Existing Entitlement Alternative is a "reduced project" alternative representing approximately 40% of the square footage proposed (or a 60% reduction) under the Proposed Project.

Implementation of the Existing Entitlement Alternative would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. While some of the impacts under this alternative may have somewhat less impacts relative to the Proposed Project, none of the significant and unmitigatable impacts are totally avoided. The significant and unavoidable impact (i.e., short-term construction-related air quality) associated with the Proposed Project would be reduced but would not be avoided under the Existing Entitlement Alternative.

The Existing Entitlement Alternative would not satisfy a majority of the project objectives. Specifically, the Existing Entitlement Alternative would not invigorate economic activity at the project site to the full extent of the Proposed Project, would not provide circulation and access improvements that promote enhanced vehicular and pedestrian safety, would not enhance on-site improvements that could facilitate improved community linkages, and would not expand to the fullest extent the range of services available to the community at this location. Also, the Existing Entitlement Alternative would not be designed to achieve LEED certifiable to the same extent as the Proposed Project. In summary, the Existing Entitlement Alternative would not attain the majority of the objectives established for the Proposed Project.

Alternative C: Reduced Project 1 (235K) Alternative. This alternative consists of up to 235,000 GLSF of new retail/restaurant commercial space in a two-level structure (with rooftop parking) that would be constructed south of the existing mall between the Bloomingdale's and Macy's department stores. Additional and replacement parking would be accommodated in a new six-level parking structure (one level at grade plus five levels above grade) that would extend easterly from the new commercial segment. This alternative represents an approximate 16% reduction in new commercial square footage compared to the Proposed Project.

Implementation of the Reduced Project 1 Alternative (235K) would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. The size of this alternative was selected because it provided a logical reduction in square footage and still provided a similar internal shopping circulation system as the Proposed Project. While some of the impacts under this alternative may have somewhat less impacts relative to the Proposed Project, none of the impacts are totally avoided. The Proposed Project's significant unavoidable impacts from construction-related activities (i.e., air quality), would also occur under this alternative.

The Reduced Project 1 Alternative would result in slightly reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). However, the Reduced Project 1 Alternative would not satisfy some of the project objectives to the extent possible with the Proposed Project. Specifically, the Reduced Project 1 Alternative would not invigorate economic activity at the project site to the full extent of the Proposed Project and would not expand the range of services available to the community at this location to the fullest extent.

Alternative D: Reduced Project 2 (235K) Alternative. This alternative represents another "reduced project" alternative offering an approximate 16% reduction in proposed commercial square footage than what is proposed with the Proposed Project. This alternative differs from the Reduced Project 1 (235K) Alternative by retaining most of the existing Macy's parking garage and incorporating the full closure of Matilija Avenue. All other aspects (i.e., circulation, access, landscaping, building façade enhancements) would be similar to that included with the Proposed Project and the Reduced Project 1 Alternative, except that unlike the Proposed Project, the tunnel reactivation would not be included. With the Reduced Project 2 Alternative, up to 235,000 GLSF of new retail/restaurant commercial space in a two-level structure (with rooftop parking but no subterranean parking) south of the existing mall between the Bloomingdale's and Macy's department stores would be constructed.

Implementation of the Reduced Project 2 Alternative (235K) would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. The size of this alternative was selected because it provided a logical reduction in square footage and still provided a similar internal shopping circulation system as the Proposed Project. While some of the impacts under this alternative may have somewhat less impacts relative to the Proposed Project, none of the impacts are totally avoided. The Proposed Project's significant unavoidable impacts from construction-related activities, (i.e., air quality) would also occur under this alternative.

The Reduced Project 2 Alternative would result in slightly reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). However, the Reduced Project 2 Alternative would not satisfy some of the project objectives to the extent possible with the Proposed Project. Specifically, the Reduced Project 2 Alternative would not invigorate economic activity at the project site to the full extent of the Proposed Project and would not expand the range of services available to the community at this location to the fullest extent.

Alternative E: Alternate Site Plan 1 (280 K/No Tunnel/No Subterranean Parking) Alternative. This alternative would assume that the project would be approved to allow the same requested development potential as with the Proposed Project at 280,000 GLSF of retail/restaurant commercial space, however, site access, internal circulation, parking configuration would be modified. Relative to the Proposed Project, the Alternate Site Plan 1 Alternative emphasizes a reduced setback of the new parking structure from Riverside Drive as the existing two-level Macy's parking would be demolished and replaced with a consolidated six-level (one level at grade plus five levels above grade) parking structure that would be terraced to step back from the Riverside Drive frontage. No subterranean parking would be

provided with this alternative, and the west Riverside Drive "tunnel" access would not be implemented.

Implementation of the Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative would result in similar environmental impacts for most issue areas compared to the Proposed Project. However, construction phase impacts related to geology/soils and noise may be slightly reduced while impacts to solid waste may be slightly greater due to either the reduced duration of construction and/or construction effort. These slightly increased impact levels do not result in any new or additional significant impacts. During the operation of the project, traffic and air quality impacts would be slightly increased, but not to a significant level due to elimination of the new driveway. Geology/seismic risks may be slightly reduced due to elimination of the subterranean parking.

The Alternate Site Plan 1 Alternative would result in similar impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant), but would also slightly exceed impacts in some areas and reduce others. However, no new significant impacts would occur with this alternative, and significant air quality impacts during construction would occur. The Alternate Site Plan 1 Alternative would not accomplish the same degree of "enhanced traffic flow and safety" as the Proposed Project due primarily to the added congestion at the other project site driveways with the elimination of the "tunnel" access along Riverside Drive. Further, without the additional fifth driveway/access, the internal site circulation would not be as efficient as that which would be accomplished by the Proposed Project.

Alternative F: Alternate Site Plan 2 (280 K/Pedestrian Activation at Riverside Drive) Alternative. Relative to the Proposed Project, the Alternate Site Plan 2 Alternative would present a similar layout and building construction as that described for the Proposed Project (i.e., 280,000 GLSF of retail/restaurant commercial in a two-level retail structure with rooftop and subterranean parking and two new multi-level parking structures, and the tunnel reactivation with new driveway on Riverside Drive) while adding and emphasizing enhanced pedestrian activation along Riverside Drive. However, in order to improve the pedestrian environment and walkability along Riverside Drive, a new pedestrian mall entrance would be created just west of the Macy's department store. The new pedestrian access to the mall would also include construction of a small entrance patio. This alternative was selected because it is useful in comparing land use and aesthetic impacts relative to increased pedestrian activity as well as an indirect reduction in traffic and air quality impacts that may be realized due to increased pedestrian activity.

Implementation of the Alternate Site Plan 2 (Pedestrian) Alternative would result in similar environmental impacts for most issue areas compared to the Proposed Project. During the operation of the project, land use impacts would be slightly reduced, and aesthetics and noise impacts slightly increased due to implementation of the new pedestrian mall entrance. However, no new significant impacts would occur under this alternative.

The Alternate Site Plan 2 Alternative would result in similar impacts for most of the environmental impacts associated with the Proposed Project (including those that would already

be less than significant), but would also slightly exceed impacts in some areas and reduce others. Further, the Alternate Site Plan 2 Alternative would satisfy all of the project objectives to a similar extent as with the Proposed Project. However, the Alternate Site Plan 2 Alternative would provide slightly better attainment of project objectives to enhance pedestrian activity and community linkages through a community friendly design.

Alternative G: Promenade Alternative. This alternative would consist of up to 190,000 GLSF of new retail/restaurant commercial space in a series of single-story structures oriented along an open-air "promenade" to be located along the south side of the existing mall and integrated within the existing parking structures in that area. A net reduction of 32% (e.g. 90,000 GLSF) from the Proposed Project, this alternative considers an alternate site plan that integrates a major pedestrian component that would simultaneously reorient the access to the mall. All three of the existing parking structures would remain, but would be altered to accommodate the new development under this alternative. Two additional new parking structures (a six-level and a three-level) would be constructed in the area located generally south of the existing Macy's parking structure and on the south portion of the existing surface parking lot on the east portion of the development site. The new 190,000 GLSF of commercial retail/restaurant space would be located at the southern portion of the site between the Bloomingdale's and Macy's buildings within a portion of the lower two levels of the Bloomingdale's parking structure, and the entire ground level of the existing three-level south parking structure.

The Promenade Alternative would result in reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). One exception would be a slightly greater parking/traffic impact for the Promenade Alternative for an approximate one-year period during the initial construction phase. However, introduction of the pedestrian promenade, which would parallel the Los Angeles River and connect two designated green street corridors, would better achieve compliance with the intent of the RIO than would the Proposed Project. Overall, the Promenade Alternative would result in a reduced level of impact when compared to the Proposed Project.

The Promenade Alternative would satisfy most of the project objectives, but not to the extent possible with the Proposed Project. Specifically, the Promenade Alternative would invigorate economic activity at the project site, but not to the full extent possible under the Proposed Project as total commercial area would be reduced by approximately 32%. However, the Promenade Alternative would provide circulation and access improvements that promote enhanced vehicular and pedestrian safety. Further, this alternative would enhance on-site improvements that could facilitate improved community linkages and achieve greater compliance with the intent of the RIO. Also, the Promenade Alternative would be designed to achieve LEED certification offering comparable "green" enhancements similar to the Proposed Project. In summary, the Promenade Alternative would generally satisfy the project objectives to a similar extent as with the Proposed Project.

Environmentally Superior Alternative. As required by CEQA, an environmentally superior alternative must be identified. Of the alternatives analyzed in the EIR, the No Project Alternative is considered the overall environmentally superior alternative as it would reduce (or avoid) the vast majority of the significant or potentially significant impacts that are anticipated to

occur under the Proposed Project. However, the No Project Alternative would not meet any of the objectives established for the Proposed Project.

Aside from the No Project, the Existing Entitlement (108K) Alternative would also be considered an Environmentally Superior Alternative since it would reduce more of the project impacts than any other of the remaining alternatives. Impacts that would be reduced include construction related impacts associated with aesthetics, air quality, noise and traffic. Long-term operational impacts would be reduced in those same areas, in addition to hydrology/water quality, land use, water supply and solid waste. However, project objectives pertaining to higher utilization and variety of commercial uses, improved site access, enhanced pedestrian safety, community integrated design, and reduced traffic conflicts would not be fulfilled under this alternative.

ALTERNATIVES SUMMARY MATRIX

DEVELOPMENT ATTRIBUTE OR PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
A. SUMMARY AND COMPARATIVE DESCRIPTION OF ALTERNATIVES								
New Commercial Area Proposed (GLSF)	280,000	0	108,000	235,000	235,000	280,000	280,000	190,000
Total Cumulative Commercial Area Proposed (GLSF)	1,147,000	867,000	975,000	1,102,000	1,102,000	1,147,000	1,147,000	1,057,000
Proposed Building Envelop for New Construction	Two levels of retail building over one level of subterranean parking and one level of rooftop parking, located south of existing main mall.	No change to existing.	Two levels of retail building (without integrated parking), located as extension at south end of existing mall just easterly of Bloomingdale's.	Two levels of retail building (without integrated parking), located as extension at south end of existing mall with footprint slightly less than Proposed Project.	Two levels of retail building (without integrated parking), located as extension at south end of existing mall with footprint slightly less than Proposed Project (same as Alt C).	Same as Proposed Project, including roof top parking over new retail, but without subterranean level parking.	Same as Proposed Project but with new public/ pedestrian mall entrance at Riverside Drive (just west of Macy's), along with additional landscape/ plaza improvements to enhance pedestrian activation at new entry.	One level of retail oriented along new internal roadway (promenade street) along south edge of existing mall, incorporated as addition to existing mall on north side of promenade and integrated into ground level of southerly parking structures (two existing and one new) along south side of promenade.
Proposed Parking Ratio (per 1,000 GLSF)	4.25	4.5	4.5	4.25	4.25	4.25	4.25	4.25 (at build out) 4.1 (temporarily during construction phase)
Proposed Parking Configuration	Demo of three-level parking structure south of main mall.	No change to existing.	Remove portion and add two levels (for a total of five) to existing three-	Demo two level Macy's structure and construct new six-level (one	Retain two level Macy's structure (with alterations) and construct new	To facilitate required parking in the absence of the subterranean	Same as Proposed Project.	Existing three parking structures (including the two-level Macy's,

ALTERNATIVES SUMMARY MATRIX

DEVELOPMENT ATTRIBUTE OR PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
	Construction of two new multi-level parking structures, including a new "main" six-level (one level at grade plus five levels above grade) structure south of the existing Macy's parking structure, and a new "east" four-level (one level at grade plus three levels above grade) structure adjacent to Woodman Avenue. Additional structured parking incorporated into retail building, to include one level subterranean and one level of roof-top parking. Remainder surface parking lot east of Fashion Square Lane. Existing two-level Macy's and five-level Bloomingdale's parking structures to remain with modifications to accommodate circulation.		level (one level at grade plus two levels above grade) southern parking structure; construct new four-level (one level at grade plus three levels above grade) parking structure extension to the east; no alterations to Macy's parking structure.	level at grade plus five levels above grade) structure with footprint similar to that compared to the Proposed Project and slightly increased footprint compared to Alt D, however no subterranean parking would be developed.	six-level (one level at grade plus five levels above grade); new six-level structure to have reduced footprint to the east as compared to the Proposed Project; slightly reduced footprint compared to Alt C, however no subterranean parking would be developed	level, the existing two-level Macy's parking structure would be demolished and replaced with a new consolidated six-level "main" parking structured designed to "step back" from the Riverside Drive frontage in a terraced fashion. Rooftop parking would tie into rooftop level of retail building. The "east" parking structure along Woodman Avenue would be built, however no subterranean parking would be developed.		five-level Bloomingdale's and four-level south parking structures) to remain with modifications. Macy's structure to be modified to accommodate access/ circulation similar to Proposed Project. Bloomingdale's and adjacent "south" structure to be accommodate one level of ground-floor retail along promenade and redirect/ reorient traffic circulation. Construction of one new multi-level parking structure, including a new "main" six-level (one level at grade plus five levels above grade) structure south of the existing Macy's parking structure and stepping down to three levels (grade plus two levels) at

ALTERNATIVES SUMMARY MATRIX

DEVELOPMENT ATTRIBUTE OR PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
								its east extension toward Woodman Avenue. Remainder surface parking lot east of Fashion Square Lane.
Proposed Access/Project Driveways	Riverside Drive: Consolidate 2 existing driveways and create one new consolidated "east" driveway with signalized intersection at Matilija Avenue and one new "west" driveway with signal at activated tunnel entrance. Hazeltine Avenue: Restripe south driveway to include one additional ingress lane and eliminate parking along driveway Fashion Square Lane. Woodman Avenue: Restricted to right-turn ingress only. Matilija Avenue: Restricted access to/from Matilija Avenue	No change to existing access/circulation condition.	No change to existing access/circulation condition.	Only four (rather than five) project driveways to be provided: same as Proposed Project, but without additional new "west" Riverside Drive project access (or tunnel conversion) east of Bloomingdale's. Fashion Square Lane alignment and improvements similar to Proposed Project. Off-site roadway improvements to Riverside Drive, Matilija Avenue and Woodman Avenue would be the similar to Proposed Project (except without tunnel).	Same as Alternative C with the exception of the configuration of Matilija Avenue across from Riverside Drive, for which access to/from Riverside would be fully closed off.	Only four (rather than five) project driveways to be provided: same as Proposed Project, but without additional new "west" Riverside Drive project access (or tunnel conversion) east of Bloomingdale's. Fashion Square Lane internal circulation and off-site roadway improvements similar to Proposed Project (except without tunnel).	Same as Proposed Project for vehicular driveway accesses. New pedestrian access to mall just west of Macy's department store, in addition to other mall, access and circulation improvements similar to Proposed Project.	Vehicular driveway access similar to Proposed Project, but without tunnel access on Riverside Drive and with alternate internal loop road (Fashion Square Lane) configuration. Hazeltine Avenue: South driveway reconfigured to incorporate ramps to second level parking, with no access to ground level parking from this driveway. Modify north driveway to function as secondary access leading to promenade and restricted ground-level parking in Bloomingdale's parking structure.

ALTERNATIVES SUMMARY MATRIX

DEVELOPMENT ATTRIBUTE OR PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
	from Riverside Drive (right-turn movement only and median barrier). Fashion Square Lane: Improve internal circulation with realignment and widening of Fashion Square Lane to establish loop road along southern edge and directly connecting to both Riverside and Woodman access drives.							Fashion Square Lane: Alternate internal loop circulation established along south portion of site and contained within parking structure (level two), and would be continually functional as primary internal access. Second, ground-level east-west segment of Fashion Square Lane to function as promenade. Promenade to serve as open-air pedestrian mall during peak mall hours and would be closed to vehicle traffic during those times. Off-site roadway improvements to Riverside Drive, Matilija Avenue and Woodman Avenue would be the similar to Proposed Project (except without tunnel).

ALTERNATIVES SUMMARY MATRIX

DEVELOPMENT ATTRIBUTE OR PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
B SUMMARY OF ALTERNATIVE IMPACTS AND COMPARISON TO PROPOSED PROJECT								
Key: No Impact = No measurable impact for that alternative. Less than significant = A less than significant impact for that alternative. Significant = A significant unavoidable impact for that alternative. N/A = Not applicable to this alternative. ¤ = Net Alternative impact is generally equivalent to that identified for the Proposed Project ▲ = Net Alternative impact is considered to be greater than that identified for the Proposed Project ▬ = Net Alternative impact is considered to be less than that identified for the Proposed Project								
AESTHETICS AND VISUAL RESOURCES								
Construction (Short-Term)	Less than significant	No impact ▬	Less than significant ▬	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Operation (Long-Term)	Less than significant	Less than significant ▬	Less than significant ▬	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ▲	Less than significant ▬
Cumulative	Less than significant	Less than significant ▬	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
AIR QUALITY								
Construction (Short-Term)	Significant	No impact ▬	Significant ▬	Significant ▬	Significant ▬	Significant ▬	Significant ¤	Significant ▬
Operation (Long-Term)	Less than significant	Less than significant ▬	Less than significant ▬	Less than significant ▬	Less than significant ▬	Less than significant ▬	Less than significant ¤	Less than significant ▬
Cumulative	Less than significant	Less than significant ▬	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
GEOLOGY AND SOILS								
Construction (Short-Term)	Less than significant	No impact ▬	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ▬	Less than significant ¤	Less than significant ¤
Operation (Long-Term)	Less than significant	Less than significant ▬	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ▬	Less than significant ¤	Less than significant ¤

ALTERNATIVES SUMMARY MATRIX

DEVELOPMENT ATTRIBUTE OR PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
HAZARDOUS MATERIALS AND MAN-MADE HAZARDS								
Construction (Short-Term)	Less than significant	No impact —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
WATER RESOURCES – WATER QUALITY								
Construction (Short-Term)	Less than significant	No impact —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
WATER RESOURCES – WATER SUPPLY								
Construction (Short-Term)	Less than significant	No impact —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant —	Less than significant —	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant —
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
LAND USE, PLANNING AND URBAN DECAY								

ALTERNATIVES SUMMARY MATRIX

DEVELOPMENT ATTRIBUTE OR PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
Construction (Short-Term)	Less than significant	No impact —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant —
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
NOISE								
Construction (Short-Term)	Less than significant	No impact —	Less than significant —	Less than significant —	Less than significant —	Less than significant —	Less than significant ¤	Less than significant —
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ▲	Less than significant ¤
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
PUBLIC SERVICES – FIRE PROTECTION								
Construction (Short-Term)	Less than significant	No impact —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
PUBLIC SERVICES - POLICE								
Construction (Short-Term)	Less than significant	No impact —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤

ALTERNATIVES SUMMARY MATRIX

DEVELOPMENT ATTRIBUTE OR PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
PUBLIC UTILITIES – SOLID WASTE								
Construction (Short-Term)	Less than significant	Less than significant —	Less than significant —	Less than significant —	Less than significant —	Less than significant —	Less than significant ¤	Less than significant —
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant —	Less than significant —	Less than significant —	Less than significant	Less than significant ¤	Less than significant —
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
TRAFFIC, CIRCULATION AND ACCESS								
Construction (Short-Term)	Less than significant	No impact —	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ▲
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant —	Less than significant —	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
GROWTH INDUCING								
Construction (Short-Term)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤

ALTERNATIVES SUMMARY MATRIX

DEVELOPMENT ATTRIBUTE OR PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
OTHER IMPACTS								
Construction (Short-Term)	Less than significant	No impact —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Operation (Long-Term)	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤
Cumulative	Less than significant	Less than significant —	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤	Less than significant ¤

II. PROJECT DESCRIPTION

A. PROJECT LOCATION

The project site is located within the existing Fashion Square shopping center located at 14006 Riverside Drive in the Sherman Oaks community of the City of Los Angeles (see *Figure 1: Regional Location*). The project site is approximately 13 miles northwest of downtown Los Angeles. The project area is characterized as urbanized and largely built out with a mix of commercial and residential uses. The project site, which is roughly rectangular in shape and totaling approximately 28.8 acres in size, is bordered by Riverside Drive to the north, Hazeltine Avenue to the west, the Ventura Freeway (US 101) to the south, and Woodman Avenue to the east (see *Figure 2: Local Vicinity*). An approximately 3.0-acre parcel located at the southwest corner of the Riverside Drive/Woodman Avenue intersection (i.e., at the northeast corner of the shopping center) within the same block as the project site, and which is currently developed with retail uses, is adjacent to but "not a part" (NAP) of the project site. However, the NAP parcel does share a common driveway with Fashion Square (see discussion of Project Characteristics later in this section).

The project site lies within the Van Nuys-North Sherman Oaks Community Plan (Community Plan) area and has a General Plan designation of Community Commercial over the entire site (see *Figure 3: Community Plan Designation*). Current zoning on the subject site includes (T)(Q)C2-1L, (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L (see *Figure 4: Zoning Map*).

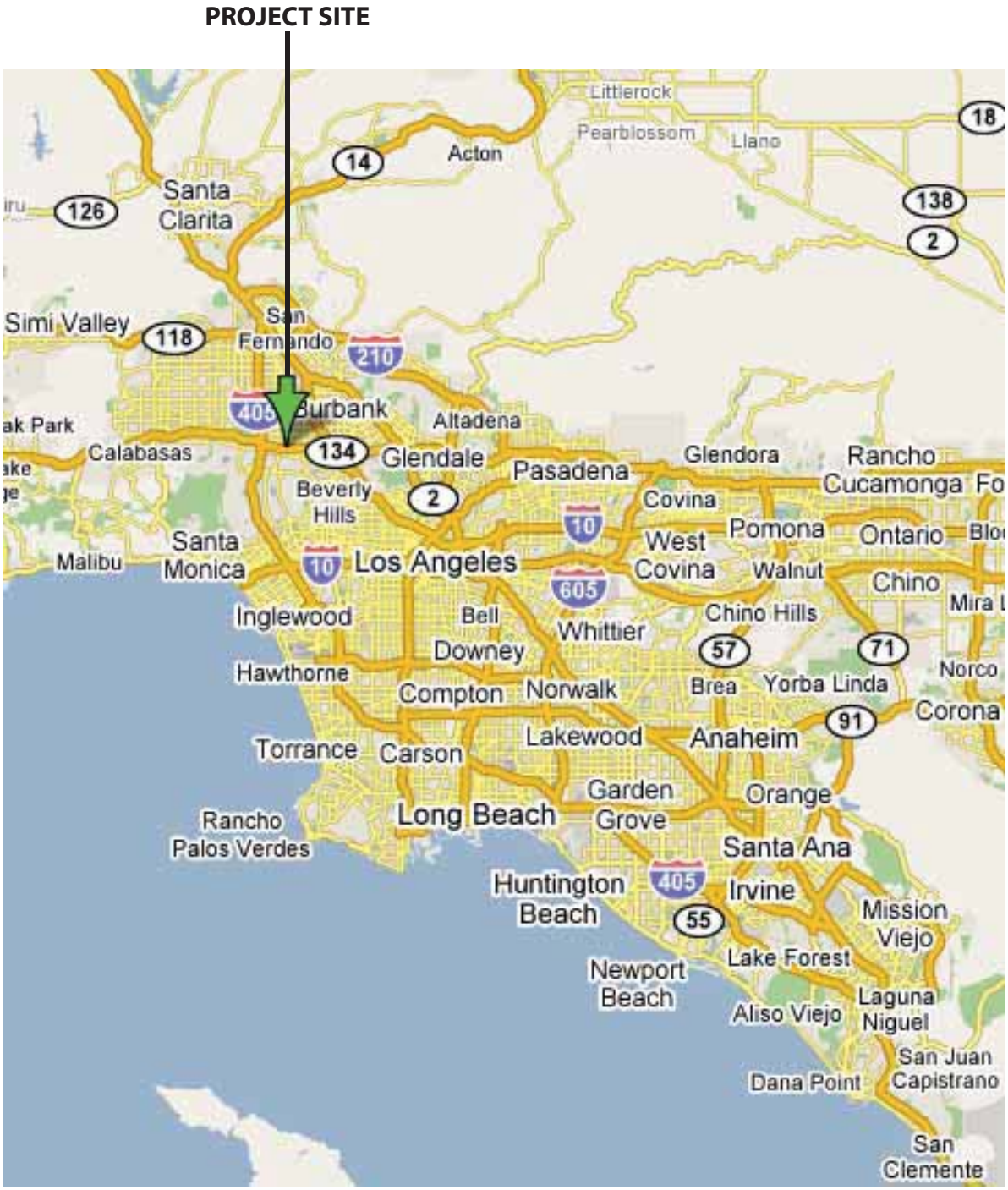


FIGURE 1
REGIONAL LOCATION

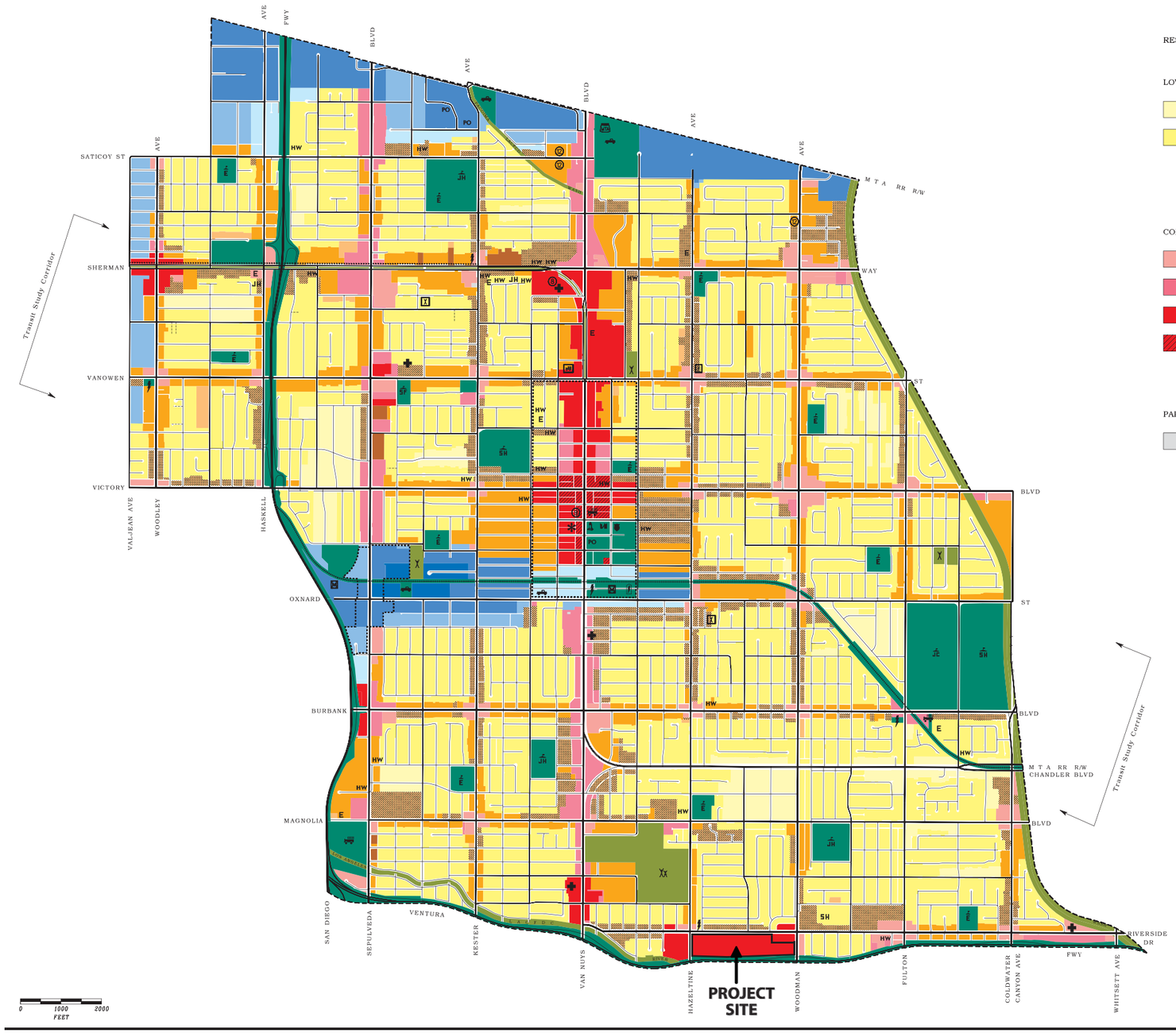
NORTH

MAP SOURCE: MAPS.GOOGLE.COM

FIGURE 2
LOCAL VICINITY

MAP SOURCE: THOMAS BROS. GUIDE

NORTH



LAND USE

RESIDENTIAL [1]

LOW DENSITY	CORRESPONDING ZONES [11]
VERY LOW	RE20,RA,RE15, RE11
LOW	RE9,RS,R1,RU, RD6,RD5

MULTIPLE FAMILY	CORRESPONDING ZONES [11]
LOW MEDIUM I	R2,RD6 [5],RD3,RD4 RZ3,RZ4,RU,RW1
LOW MEDIUM II	RD1.5,RD2,RW2, RZ2.2
MEDIUM	R3
HIGH MEDIUM	R4

COMMERCIAL

NEIGHBORHOOD COMMERCIAL [2]	C1,C1.5,C2,C4, RAS3,RAS4
GENERAL COMMERCIAL [2]	C1.5,C2,C4, RAS3,RAS4
COMMUNITY COMMERCIAL [3]	CR,C2,C4, RAS3,RAS4
REGIONAL COMMERCIAL	CR,C1.5,C2,C4,R3 R4,R5,RAS3,RAS4

INDUSTRIAL

COMMERCIAL MANUFACTURING	CM
LIMITED INDUSTRIAL	CM,MR1,M1
LIGHT INDUSTRIAL	MR2,M2
HEAVY INDUSTRIAL	M3

OPEN SPACE, PUBLIC FACILITIES

OPEN SPACE	OS,A1
PUBLIC FACILITIES [13]	PF

PARKING

PARKING	P,PB

CIRCULATION

- Freeway [7]
- Divided Major Highway II
- Divided Scenic Major Highway II
- Major Highway II
- Secondary Highway
- Collector Street [7]
- Local Street
- MTA RR R/W

SPECIAL BOUNDARY

- Commercial Core Special Study Area

ADMINISTRATIVE BOUNDARY

- Community Boundary

NOTES:

- Proposed [6]

SERVICE SYSTEMS [6]

SCHOOL SITES

- Elementary School
- Private Elem School
- Junior High School
- Private Junior H S
- Senior High School
- Private Senior H S
- Community College
- Special Facility

RECREATIONAL SITES

- Neighborhood Park
- Community Park

OTHER FACILITIES

- Police
- Fire Station
- Community Library
- Health Center
- Post Office
- Maintenance Yard
- House Of Worship
- MTA Station
- MTA Metrolink Station
- Branch Administrative Center
- Power Receiving Station
- Power Distribution Station
- Cultural/Historical Site

FIGURE 3
COMMUNITY PLAN DESIGNATION

MAP SOURCE: CITY OF LOS ANGELES, PLANNING DEPARTMENT

NORTH

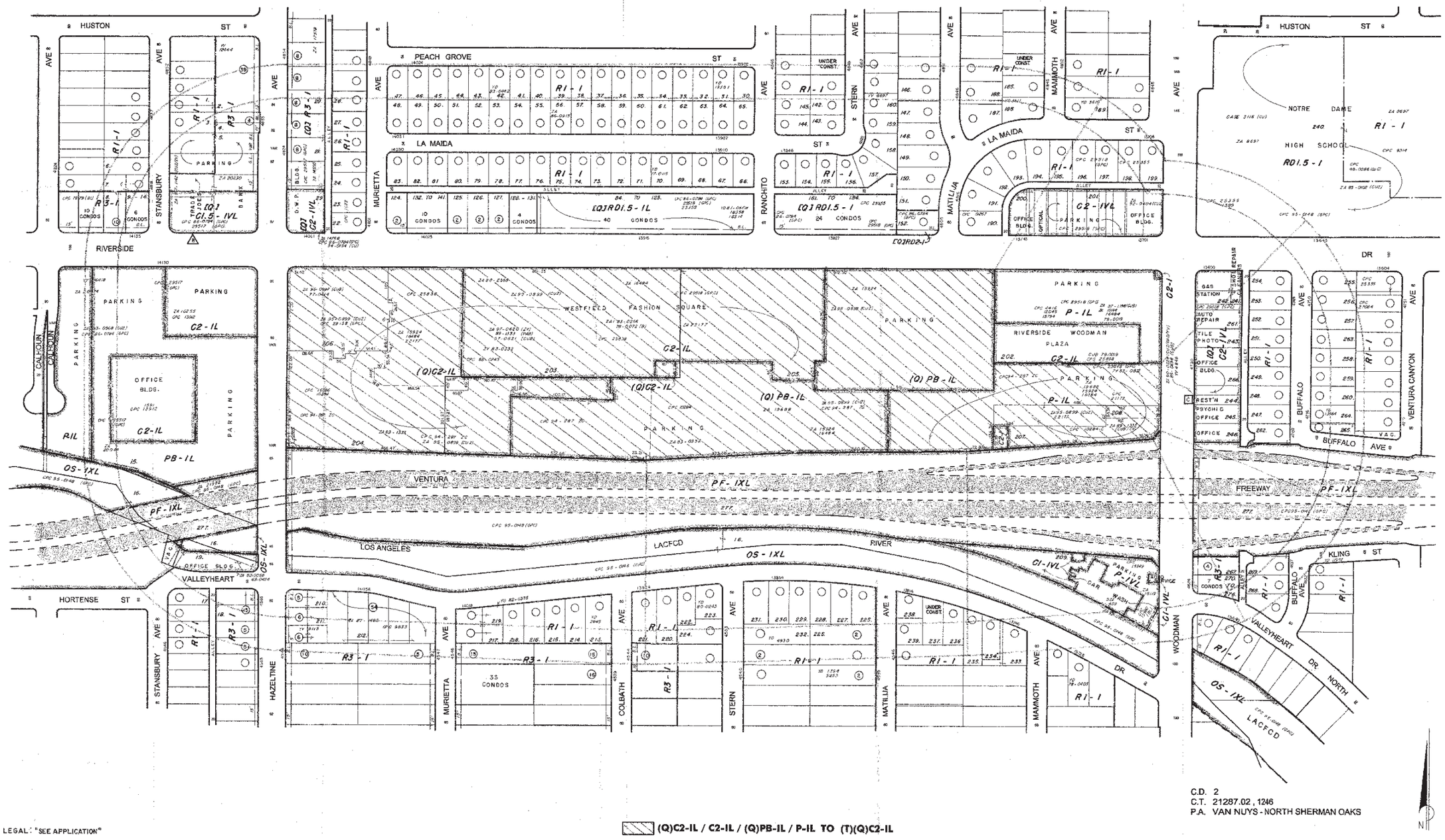


FIGURE 4
ZONING MAP

MAP SOURCE: PLANNING ASSOCIATES, INC.

II. PROJECT DESCRIPTION

B. ADJACENT LAND USES

The project site is located within an established urban setting that includes a mix of retail, office and low to medium density residential uses. The Community Plan (page I-2) characterizes this portion of the North Sherman Oaks community as "predominantly characterized by pockets of single family residential areas surrounded by multi-family and commercial uses." Further, the Plan notes that the major commercial center in North Sherman Oaks is the Sherman Oaks Fashion Square.

More specifically, adjacent land uses include a mix of retail, office and residential (see *Figure 5: Aerial Overview and Surrounding Uses*). Adjacent land uses are summarized as follows:

North (immediate north, across Riverside Drive) - Land uses to the north, across Riverside Drive, include multi- and single-family residential properties, offices and a high-rise (Downey Savings) bank building.

Northeast (at intersection of Riverside Drive at Woodman Avenue) – Land uses include retail uses on the 3.0-acre NAP parcel, also known as the Riverside Woodman Shopping Center (including Linens N' Things, Ross For Less, KB Toys, and Bank of America). The Notre Dame High School is located on the northeast corner of the intersection of Riverside Drive and Woodman Avenue. The High School periodically shares parking on the shopping center's surface parking lot along Woodman Avenue; the details of the shared parking arrangements are described in Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access. Other retail and office uses are located at this intersection.

East (immediate east, across Woodman Avenue) - Land uses include commercial and office along Woodman Avenue.

South (adjacent to property site boundary) - The project site is bordered by the Ventura (US 101) Freeway along its entire southern edge. Mixed intensity residential uses are located further south, on the opposite site of the freeway. The Los Angeles River, running parallel to the project site, is also located just south of the freeway

West (immediate west, across Hazeltine Avenue) - Land uses include offices, including the Sunkist building.

Northwest (at intersection of Riverside Drive and Hazeltine Avenue) – Land uses include a mix of retail and office, and the City of Los Angeles Department of Water and Power office.

FIGURE 5
AERIAL OVERVIEW AND SURROUNDING USES

MAP SOURCE: WESTFIELD

II. PROJECT DESCRIPTION

C. PROJECT BACKGROUND

The project site is part of the existing Westfield Fashion Square shopping center (hereafter "shopping center") located along Riverside Drive between Woodman Avenue and Hazeltine Avenue. Commonly known as Fashion Square, the shopping center has been part of the Sherman Oaks community since the early 1960s.

The entire shopping center comprises approximately 28.8 acres of a roughly rectangular-shaped parcel and is currently developed with mall buildings and parking (combined surface and structured). The shopping center features Macy's and Bloomingdale's department stores at the east and west ends of the center, respectively, as well as a collection of smaller retail stores and a food court.

The shopping center was originally constructed during the 1960s in a series of freestanding one-, two- and three-story stores. In 1987, under case CPC 86-743 ZC the shopping center was approved for 855,000 gross leasable square feet (GLSF)[1] of retail uses. Under the 1987 mall expansion, only 826,000 GLSF was constructed. In 1995 under case ZA-95-0899-CUZ, the shopping center was approved for an additional 120,000 GLSF of development, for a total entitlement of 975,000 GLSF across the entire project site. In 1996 an adjustment to this entitlement permitted the Bloomingdale's department store to be expanded by utilizing approximately 41,000 square feet of gross leasable area from the 1995 entitlement, resulting in a current remaining unused entitlement of approximately 108,000 GLSF over the defined project site. To date, a total of approximately 867,000 GLSF has been constructed at the shopping center. Buildout of the total existing "as built" development corresponds to approximately 988,120 square feet of building floor area (net floor area) and approximately 1,061,276 square feet (gross floor area) of building area. The total permitted existing entitlement of 975,000 GLSF would correspond to an overall gross building area of approximately 1,220,572 square feet (gross). *Table 1: Summary of Gross Leasable Building Area at the Project Site*, summarizes the history of approvals and buildout of GLSF at the project site. *Table 2: Overview of Existing and Proposed Building Area at the Project Site,* compares the leasable, net and gross floor areas for the existing mall, the approved entitlement, and Proposed Project.

The shopping center has historically maintained a contractual arrangement with several area schools to provide for overflow parking of school events. Currently, during schools days (7 a.m. to 4 p.m.), Fashion Square makes available 100 parking spaces in the east surface parking lot for Buckley High School and 60 parking spaces for Notre Dame High School at the same location. These parking spaces are on a month-to-month agreement and are not made available to students on the weekends or during the highest peak holiday periods.

[1] Gross leasable square feet (area) is generally defined as the total area (square feet) that is used for rental space in a building and is a term commonly used when discussing commercial properties. Gross leasable area differs from net or gross floor areas, which are generally tied to the total building area (square feet) associated with the physical structure. "Gross" floor area usually accounts for the entire building measured from it outside walls. "Net" floor area is that area in square feet confined within the exterior walls of a building but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas. (Added by Ordinance No. 163,617, effective 06/21/1988.)

TABLE 1
SUMMARY OF GROSS LEASABLE BUILDING AREA AT THE PROJECT SITE

	ENTITLEMENT SUMMARY		BUILDOUT SUMMARY		
	INCREMENTAL APPROVAL AREA (GLSF)	CUMULATIVE TOTAL APPROVAL AREA (GLSF)	INCREMENTAL BUILT AREA (GLSF)	CUMULATIVE TOTAL BUILT AREA (GLSF)	TOTAL ENTITLED REMAINING AREA (GLSF)
1987 Entitlement	855,000	855,000	826,000	826,000	29,000
ZA-95-0899-CUZ (approved 1995)	120,000	975,000	41,000	867,000	108,000
Current Project Request (Pending)	172,000	1,147,000	280,000	1,147,000	0

GLSF = gross leasable square feet. Gross leasable square feet (area) is generally defined as the total area (square feet) that is used for rental space in a building and is a term commonly used when discussing commercial properties.

TABLE 2
OVERVIEW OF EXISTING AND PROPOSED BUILDING AREA AT THE PROJECT SITE

	APPROVED (SF)	EXISTING BUILT (SF)	PROPOSED BUILDOUT (SF)
Gross Leasable Area[a]	975,000	867,000	1,147,000
Net Floor Area[a]	1,136,473	988,120	1,414,676
Gross Floor Area[a]	1,220,572	1,061,275	1,544,015

SF = square feet

[a] Gross leasable square feet (area) is generally defined as the total area (square feet) that is used for rental space in a building and is a term commonly used when discussing commercial properties. Gross leasable area differs from net or gross floor areas, which are generally tied to the total building area (square feet) associated with the physical structure. "Gross" floor area usually accounts for the entire building measured from it outside walls. "Net" floor area is that area in square feet confined within the exterior walls of a building but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas. (Added by Ordinance No. 163,61, effective 06/21/1988.)

II. PROJECT DESCRIPTION

D. STATEMENT OF PROJECT OBJECTIVES

In accordance with Section 15124(b) of the State California Environmental Quality Act (CEQA) Guidelines, the EIR shall include "a statement of objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further clarifies that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the Proposed Project is to update, modernize and revitalize the Fashion Square shopping center to ensure its long-term viability. The underlying purpose is exemplified in the project objectives provided below. Several of the project objectives embrace many of the relevant goals, objectives and policies set forth in the Community Plan. The objectives of the project are stated as follows:

- To establish and enhance the long-term sustainability of the shopping center through a higher utilization of the commercial center site and modernization of facilities.

- To improve site access and circulation through an updated site circulation plan that reflects modern development practices.

- To enhance on-site pedestrian safety through improved internal vehicle circulation configuration.

- To develop a project consistent with the City' Urban Form Guidelines with special emphasis on creating and encouraging a greater pedestrian environment, especially along Riverside Drive and Hazeltine Avenue.

- To enhance traffic flow and safety concerns along adjacent roadways through improved site access.

- To incorporate a community-friendly design that integrates visually with adjacent uses yet simultaneously affords appropriate neighborhood protection from traffic activity.

- To provide a greater range of stores to enhance the neighborhood shopping opportunities for the Sherman Oaks area.

- To provide greater variety and improved quality of restaurants in the shopping center.

- To conform to the goals, objectives and policies of the Van Nuys-North Sherman Oaks Community Plan.

- To develop a commercial project that is able to be LEED certifiable and enhance sustainability.

II. PROJECT DESCRIPTION

E. REQUESTED ACTIONS AND ENTITLEMENTS

Under previous entitlements, approximately 975,000 GLSF is permitted at the existing shopping center. A total of approximately 867,000 GLSF has been constructed to date. The Proposed Project entails construction of the remaining 108,000 GLSF of development previously permitted and the development of an additional 172,000 GLSF, for a total of approximately 280,000 GLSF of new retail and restaurant uses. The Proposed Project includes:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L: A Zone Change pursuant to Los Angeles Municipal Code (LAMC) Section 12.32, is required to implement the project. The requested zone change is from the existing mix of (T)(Q)C2-1L, (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L. This request will consolidate and make consistent the zoning across the entire shopping center property and eliminate the patchwork zoning currently governing the site. The requested zone change is consistent with the existing Commercial designation of the site in the Community Plan.

- Site Plan Review for the modification of two existing parking structures, reconfiguration of site driveways and internal circulation, construction of 280,000 GLSF retail space within a new two-level structure with subterranean parking, and construction of two new parking structures, one six-level (one-level at grade plus five-levels above grade) and one four-level (one-level at grade plus three-levels above grade): Pursuant to LAMC Section 16.05, a Site Plan Review is required for any development project which creates, or results in, an increase of 50,000 square feet or more of non-residential floor area. The Proposed Project is subject to Site Plan Review to ensure that the development is properly sited in relation to surrounding properties, traffic, circulation, sewers, other infrastructure and the environmental setting, and to control or mitigate any and all environmental impacts identified through the project's environmental review process.

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 280,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP): While the proposed retail project is consistent with the requested zone change and existing general plan designation, a Conditional Use Permit for a Major Development Project is requested for construction of a retail project greater than the 100,000 square foot threshold of non-residential development established by the Code. The Proposed Project includes the addition of 280,000 GLSF (or 482,740 gross square feet) of commercial square footage for which this CUP is necessary to ensure that the development is compatible with the surrounding neighborhoods.

- Conditional Use Permit for Commercial Corner[2] development and deviation from select development standard requirements: The Commercial Corner designation relates to the site proximity and relationship to the corner intersections of Riverside Drive and Woodman Avenue and Riverside Drive and Hazeltine Avenue. While the Commercial Corner designation arguably does not apply to the site since the legal parcel on which the project is located does not extend to the separate parcels at Riverside Drive and Woodman Avenue or Riverside Drive and Hazeltine Avenue, the Proposed Project application conservatively assumes the applicability of the Commercial Corner designation due to: (1) the functional integration of the project center with the Bloomingdale's store located on the parcel at the corner of Riverside Drive and Hazeltine Avenue; (2) the commercial zoning designation; and (3) the relationship of the site to residential properties located north of the site, across Riverside Drive. Pursuant to LAMC Section 12.24.W27, for Commercial Corner developments not in conformance with the requirements established in LAMC Sections 12.22.A23(a)(2), 12.22.A23(a)(4)(i), 12.22.A23(a)(10)(i), and 12.22.A23(b)(3), a CUP is required to implement the Proposed Project. The CUP will address the Commercial Corner and deviation from: (1) the 45-foot height limit to provide a building and parking structure with maximum height of 75 feet[3], which is no taller than the existing Macy's building, (2) allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight, (3) a requirement to provide a five foot landscaped area immediately adjacent to all street frontages; (4) the requirement to provide a minimum of fifty percent coverage with transparent windows along the first floor retail, and instead provide no glass along the Riverside Drive frontage; and (5) the restriction on tandem parking by providing tandem parking spaces.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations: Based on the Commercial Corner designation, the project request includes a Zone Variance to deviate from the 45-foot height limit of the Commercial Corner regulations. Under the Proposed Project, no substantial change or alteration will be made to the existing Bloomingdale's department store.

[2] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Proposed Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site, the unified nature of the center, and for a worst case analysis of potential impacts for this DEIR, it will be assumed that the Proposed Project is subject to the Commercial Corner restrictions.

[3] Per Section 12.03 of the Los Angeles Municipal Code (LAMC) the height of a building is measured from the highest point on the roof or parapet of the structure to the lowest natural or manmade point within 5 feet of the exterior of the structure. Currently, the highest point at the mall is on the parapet wall of the Macy's building this point is at an elevation of 722 feet above sea level. The lowest point within five feet of the building is a point out side of the Bloomingdale's building. This point is approximately 646 feet above sea level so currently the maximum height of the shopping center per the LAMC is 76 feet. This building was constructed prior to the 1-VL height limit being imposed on the property. As a result this building has nonconforming rights. It should be noted, that the lowest grade adjacent to the Macy's building is at approximately 650 feet above sea level so the Macy's building has an effective height of 72 feet .The highest pint on the proposed addition is the parapet wall on the top level of the grade plus five parking structure. This point will be approximately 715 feet above sea level. So this new structure will be approximately 7 feet lower than the highest point on the Macy's building. However, because the site slopes south of Macy's so the construction of the new parking structure will change location of the lowest point within five feet of the outside of the building. The new lowest point will be located at the south eat corner of the new parking structure. The lowest elevation in this area is approximately 640 feet above sea level so it will change the Code defined height of the existing Macy's building to 82 feet tall and the proposed Parking structure will be defined as 75 feet in height.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB): Pursuant to LAMC Section 12.24.W1, a specific Conditional Use Permit, referred to as a CUB, is required for the on-site sale and consumption of a full line of alcoholic beverages. The requested CUB for on-site sale and consumption of alcohol is in conjunction with new sit-down restaurants at the existing shopping center and will be incidental to the main use of the site.

- Request for Shared Parking Review: Shared Parking, pursuant to LAMC Section 12.24.X20, is requested to accommodate a range of varied commercial uses. Prior development approvals at the shopping center (under ZA-95-0899-CUZ and CPC-94-0287-ZC) established a parking requirement for the entire site at 4.5 parking spaces per 1,000 square feet of GLSF which is applicable, but not limited to, retail, restaurant, and office uses. However, the project includes a request for Shared Parking to provide parking at a ratio of up to 4.5 parking spaces per 1,000 GLSF, providing approximately 5,148 parking spaces across the entire site.

- Haul Route approval from the Building and Safety Commission for construction phase operations: The applicant also requests a haul route for the necessary removal of soil and waste from demolition and construction.

- Zone Variance to reduce on-site parking below code requirements during construction.

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Proposed Project.

II. PROJECT DESCRIPTION

F. PROJECT CHARACTERISTICS

1. PROPOSED LAND USES

The Proposed Project includes construction of approximately 280,000 GLSF of retail and restaurant uses as well as an associated parking structure as an expansion to the existing Fashion Square shopping center. The Proposed Project would entail the construction of approximately 108,000 GLSF of available unbuilt entitled uses (per a previous approval in 1995) and the development of an additional 172,000 GLSF (new entitlement under the current request), to account for the proposed total of approximately 280,000 GLSF of retail and restaurant uses under the Proposed Project. The actual building area proposed will be larger than the total gross leasable area. Accounting for mechanical/electrical equipment rooms, emergency access, tenant storage space, corridors, and other City requirements, 280,000 GLSF is equivalent to approximately 426,556 net square feet or approximately 482,740 gross square feet. (see *Table 2: Overview of Existing and Proposed Building Area at the Project Site*, in Section II: Project Description: C-Project Background.[4]

Total new uses are anticipated to include 240,000 GLSF (i.e., 355,227 gross SF) of new "in-line" retail space and 40,000 GLSF (i.e., 71,329 gross SF) of new restaurant space, in addition to approximately 1,235 new parking spaces.

2. SITE PLAN

The proposed retail expansion building and main seven-level parking structure will be constructed primarily on the southerly portion of the project site in the underdeveloped area between the existing shopping center (located immediately adjacent to the Riverside Drive frontage) and the Ventura (US 101) Freeway at the south. This area is currently occupied by a portion of the Bloomingdale's parking structure and surface parking. A second four-level parking structure will be constructed on the eastern portion of the project site (adjacent to Woodman Avenue) on an area currently developed with surface parking. The Proposed Project design would extend the parking structure to the south. Proposed development will be consistent with the type, height, and massing of existing development on the site. *Figure 6: Proposed Site Plan – Fashion Square Level 1*, *Figure 7: Proposed Site Plan – Fashion Square Subterranean Level, Figure 8: Proposed Site Plan – Fashion Square Level 2*, *Figure 9: Proposed Site Plan – Fashion Square Roof Level*, and *Figure 10: Proposed Site Plan – Fashion Square Cross Section*, shows the Proposed Project relative to the existing structures. In summary, the Proposed Project consists of the following elements:

[4] It should be noted that GLSF is used throughout this EIR to define the overall project entitlement and as a basis for certain analysis (i.e., traffic) as appropriate. Net and gross square feet values, another way to define the size of the Proposed Project, are used for throughout the EIR as appropriate as the basis for certain analysis that rely on this level of information. For purposes of this EIR, and in accordance with the definitions provided in Section II: Project Description: C-Project Background of this EIR, the values of 280,000 GLSF, 426,556 net square feet, and 482,740 gross square feet, are the equivalent representation of the Proposed Project.

FIGURE 6
PROPOSED SITE PLAN – FASHION SQUARE LEVEL 1

MAP SOURCE: WESTFIELD

FIGURE 7
PROPOSED SITE PLAN – FASHION SQUARE SUBTERRANEAN LEVEL

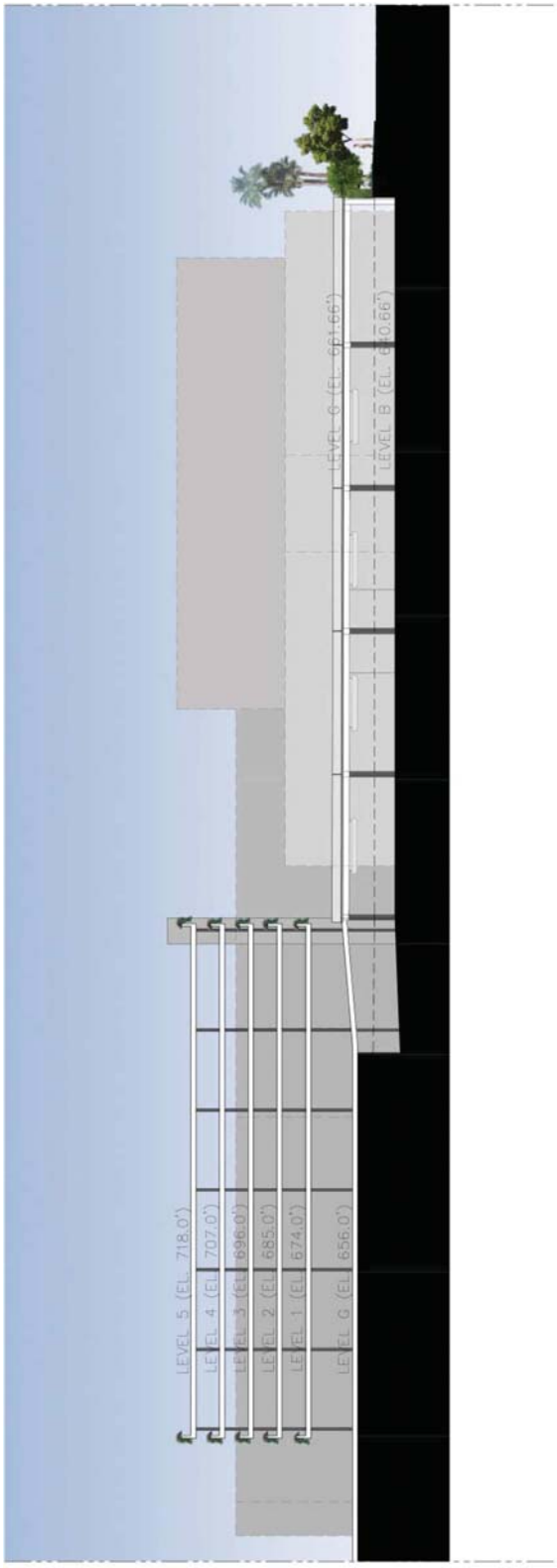
MAP SOURCE: WESTFIELD

FIGURE 8
PROPOSED SITE PLAN – FASHION SQUARE LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE 9
PROPOSED SITE PLAN – FASHION SQUARE ROOF LEVEL

MAP SOURCE: WESTFIELD



NORTH

FIGURE 10
PROPOSED SITE PLAN – FASHION SQUARE CROSS SECTION

MAP SOURCE: WESTFIELD

- Demolition of the three-level parking structure southerly of the mid-section of the existing mall;

- Modification of the existing Hazeltine Avenue (Bloomingdale's) parking structure in the southwest quadrant of the project site to create unobstructed two traffic lanes at the driveway entrance to facilitate internal access;

- Re-opening and re-activation of vehicular driveway and tunnel easterly of Bloomingdale's department store leading from Riverside Drive to rear parking structures;

- Demolition of paved surface parking area in the southern and eastern portions of the project site;

- Closure of two existing driveways along Riverside Drive and creation of two new driveways, including a new consolidated driveway directly across from Matilija Avenue and re-activation of an old driveway just east of Bloomingdale's department store;

- Reconfiguration of one of two existing driveways along Hazeltine Avenue;

- Construction of a new dedicated internal access road between the reconfigured Hazeltine driveway (Bloomingdale's end) and the new Riverside driveway (Macy's end);

- Reconfiguration of existing Woodman Avenue driveway to permit ingress (right-turn only) access only;

- Construction of a traffic control median (i.e. "pork chop") at Matilija Avenue and Riverside Drive to permit right-turn only ingress/egress access to Matilija Avenue;

- Construct a new 280,000 GLSF two-level retail building, above one level of subterranean parking, expansion to the southern edge of the existing shopping center structure between Bloomingdale's and Macy's, and including one level of roof-top parking;

- Construction of a new six-level (one-level at grade plus five-levels above grade) parking structure south of the existing Macy's building and its related parking structure. This six-level main parking structure will be set back behind the existing Macy's parking structure and approximately 300 feet offset from the frontage of Riverside Drive. The top of the structure would be and maximum height of 75 feet and would extend no higher than the top of the existing Macy's building;

- Construction of a new four-level (one-level at grade plus three-levels above grade) parking structure at the eastern portion of the project site currently covered with surface parking, adjacent to Woodman Avenue and southerly of the NAP parcel.

- Reconfiguration and restriping of remaining parking areas to facilitate efficient access/circulation and maximize available parking space;

- Implementation of new landscaping along Riverside Drive and Hazeltine Avenue frontages along Woodman Avenue street frontage, internal to the project site within the parking areas and along driveways, and integrated into the design of new architecturally enhanced building facades;

- Installation of four bus shelter units at existing route stops located at Riverside Drive/Hazeltine Avenue and Riverside Drive/Ranchito Avenue;

- Installation of new directional and tenant signage, and new security, ambient and accent lighting; and

- Reopening of the driveway off of Riverside Drive between Mammoth Avenue and Ranchito Avenue (the tunnel) to provide access to a subterranean parking level under the new mall.

a. Project Layout/Circulation/Access

Vehicular access to the existing shopping center is provided via five driveways: two driveways on Hazeltine Avenue, two driveways on Riverside Drive, and one driveway on Woodman Avenue. Also, five service/loading access ways are also located on Riverside Drive, east of Hazeltine Avenue. These service driveways do not provide access to patron entrances or parking areas. The existing northerly Hazeltine Avenue project driveway and the Woodman Avenue project driveway currently accommodate right-turn ingress and egress movements only. The existing southerly Hazeltine Avenue driveway currently accommodates left- and right-turn ingress and egress movements. The two existing driveways on Riverside Drive currently accommodate left-turn ingress and right-turn ingress and egress movements. All of the driveways provide direct access to the existing surface level and structured parking areas for the existing shopping center. Currently a number of traffic conflict points exist on site. These include limited queuing between the public streets and pedestrian crossing, limited left-turn exiting from the site, and limited queuing between the public street and parking spaces. *Figure 11: Existing Site Circulation and Access: Riverside Drive* and *Figure 12: Existing Site Circulation and Access: Hazeltine Avenue*, identifies the location of these existing conflict areas.

Under the Proposed Project, access to the site and the internal vehicle circulation pattern within the site would be modified to create a more efficient design that is intended to enhance safety and minimize traffic concerns along adjacent roadways and within surrounding neighborhoods. The primary existing access driveway along Riverside Drive at Fashion Square Lane would be relocated and replaced by one new signalized driveway to be located directly across from Matilija Avenue. A new signalized driveway will be established along Riverside Drive at the re-activated "tunnel" access located easterly of the Bloomingdale's department store. Both of these driveways will function as a main shopping center accesses. A secondary existing access

FIGURE 11
EXISTING SITE CIRCULATION AND ACCESS: RIVERSIDE DRIVE

MAP SOURCE: WESTFIELD

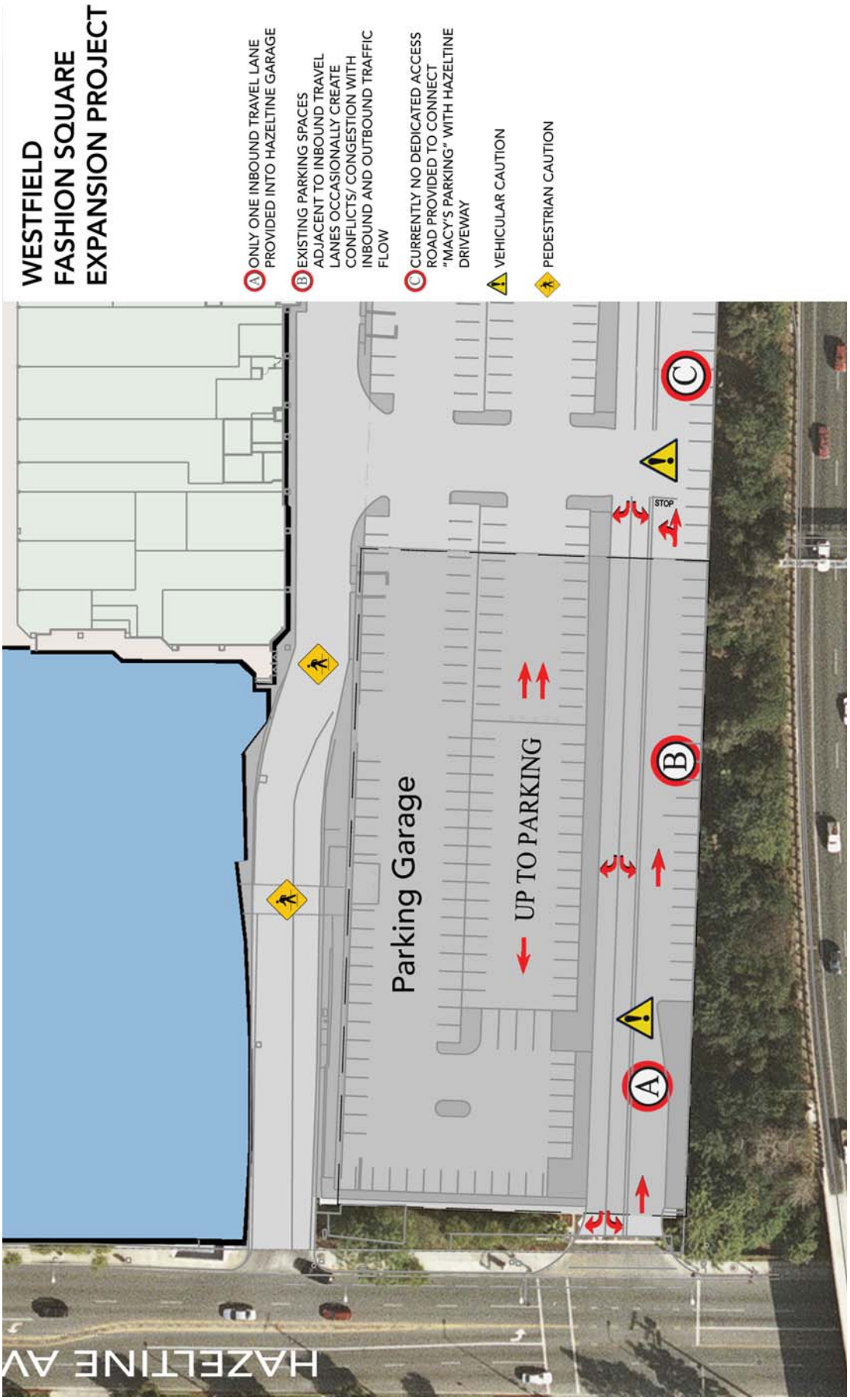


FIGURE 12
EXISTING SITE CIRCULATION AND ACCESS: HAZELTINE AVENUE

MAP SOURCE: WESTFIELD

driveway along the western edge of the existing Macy's parking structure will be closed to Riverside Drive and reconfigured for internal circulation only. Access at the existing Woodman Avenue driveway would be modified to a restricted right-turn, entry-only driveway. The existing access locations on Hazeltine Avenue will not be changed, but through on-site modifications, the function of these driveways will be improved. The revised accesses of the Proposed Project are shown on *Figure 13: Site Access and Driveways – Proposed Internal Circulation*, *Figure 14: Site Access and Driveways – Proposed Hazeltine Avenue Access* and *Figure 15: Site Access and Driveways – Proposed Riverside Drive Access*, and are more specifically described as follows:

Westerly Access – Hazeltine Avenue Driveways

Hazeltine Avenue North Project Driveway: The Hazeltine Avenue north project driveway is located on the east side of Hazeltine Avenue, south of Riverside Drive and immediately south of the Bloomingdale's department store. Under the Proposed Project, the Hazeltine Avenue north project driveway will continue to provide access to the existing parking structure located south of the shopping center but will function as a secondary access. The Hazeltine Avenue north project driveway will continue to accommodate right-turn ingress and egress movements only through the existing travel lanes.

Hazeltine Avenue South Project Driveway: The Hazeltine Avenue south project driveway is located on the east side of Hazeltine Avenue at Fashion Square Lane (along the southerly site boundary). The intersection of Hazeltine Avenue and Fashion Square Lane is currently controlled by traffic signals and consists of one ingress lane and two egress lanes (one dedicated left-turn and one dedicated right-turn). The Hazeltine Avenue south project driveway will continue to provide access to the existing parking structure located south of the shopping center, as well as provide access to the proposed parking structure to be located south of the existing Macy's department store via a new dedicated internal roadway. Although no roadway configuration changes along Hazeltine Avenue are proposed, the driveway configuration with the project site boundary (i.e., Fashion Square Lane) will be modified to accommodate two inbound lanes and two outbound lanes. Under the proposed site plan, existing parking spaces along the ingress lane would be removed so that the new entrance configuration can accommodate two ingress lanes, thereby creating an improved unimpeded and more efficient traffic flow into the project site via Fashion Square Lane. This reconfiguration will allow for this entrance to better function as a primary site entrance because of the additional internal lane, the elimination of conflicts between parked cars and cars entering this site, and its connection to an internal road that will extend to the east-end in a less circuitous fashion than what currently exits. The Hazeltine Avenue south project driveway will continue to accommodate left-turn and right-turn ingress and egress movements.

Northerly Access – Riverside Drive Driveways

With the Proposed Project, the two existing Fashion Square driveways on Riverside Drive will be closed and two new driveways be provided on Riverside Drive. A new westerly driveway will be provided approximately 540 feet east of Hazeltine Avenue. A new

FIGURE 13
SITE ACCESS AND DRIVEWAYS – PROPOSED INTERNAL CIRCULATION

FIGURE 14
SITE ACCESS AND DRIVEWAYS – PROPOSED HAZELTINE AVENUE ACCESS

MAP SOURCE: WESTFIELD

FIGURE 15
SITE ACCESS AND DRIVEWAYS – PROPOSED RIVERSIDE DRIVE ACCESS

MAP SOURCE: WESTFIELD

easterly project driveway will be provided approximately 100 feet west of the existing westerly driveway to align with Matilija Avenue to the north, and this driveway will form the south leg of the existing Matilija Avenue/Riverside Drive intersection.

Riverside Drive and New Westerly Fashion Square Driveway: The new westerly driveway access is proposed to be approximately 40 feet in width and accommodate one inbound lane and two outbound lanes. At the Riverside Drive intersection, the driveway exit would provide one left-turn lane and one right-turn lane. The new westerly driveway access currently serves as an existing service driveway and historically served as a customer driveway. The new westerly driveway would provide access to a new subterranean parking level to be constructed at the south side of the shopping center.

Riverside Drive and New Easterly Fashion Square Driveway: The new easterly driveway access is proposed to be approximately 60 feet in width and accommodate two inbound lanes and three outbound lanes. The new easterly driveway would be constructed opposite Matilija Avenue so as to provide a traditional four-leg intersection on Riverside Drive. At the Riverside Drive intersection, the driveway exit would provide one left-turn lane and two right-turn lanes (i.e., no through movements would be permitted onto Matilija Avenue north of Riverside Drive). The new easterly driveway would provide access to the existing two-level Macy's parking garage, as well as to the new six-level parking structure proposed south of Macy's.

Through access to Matilija Avenue controlled by the installation of a traffic barrier on the north side of Riverside Drive. A rendering of this barrier is provided on *Figure 16: Matilija Avenue Traffic Barrier*. This barrier will limit traffic flow at this intersection to a right-turn in/out movement (relative to Riverside Drive) only.

This new Riverside Drive project driveway would also serve as a replacement westerly access to the adjacent 3.0-acre NAP parcel (i.e., Riverside Woodman Plaza). Currently, the Riverside Woodman Shopping Plaza property has a westerly access directly off Riverside Drive, which leads to a subterranean parking area. The Riverside Woodman Plaza's driveway would be consolidated and combined with the new Riverside Drive/Fashion Square Lane driveway and would intersect the new internal driveway west of the Riverside Woodman Plaza. The existing Riverside Woodman Plaza's Riverside Drive driveways would remain open, but turn movements would be restricted to right-turn in/out only. This proposed driveway reconfiguration reflects input from the Riverside Woodman Plaza property owner and tenants, and would be fully coordinated in cooperation with such.

To accommodate the Proposed Project's Riverside Drive driveway improvements, two new traffic signals would be installed and the travel approaches along Riverside Drive would be improved. Specific physical roadway improvements along Riverside Drive needed to implement the Proposed Project include:

- Widen the south side of Riverside Drive beginning at a point approximately 290 feet west of the Matilija Avenue centerline by 10 feet. The widening would also

FIGURE 16
MATILIJA AVENUE TRAFFIC BARRIER

SOURCE: WESTFIELD

require a concurrent dedication of up to 10 feet (thus resulting in a 50-foot wide half roadway and a 60-foot wide half right-of-way). This dedication would occur only on Fashion Square property.

- Widen the south side of Riverside Drive beginning at a point approximately 600 feet east of the Matilija Avenue centerline by 3 feet. The widening would also require a concurrent dedication of 2 feet along the shopping center frontage (no dedication required by the adjacent Riverside Woodman Plaza). Thus, the resulting cross-section would be a 40-foot wide half roadway and a 52-foot wide half right-of-way (remaining a 50-foot half right-of-way adjacent to the Riverside Woodman Plaza). This dedication would occur only on Fashion Square property.
- Restripe the eastbound Riverside Drive approach to the intersection with the new easterly Fashion Square Lane driveway to provide two through lanes and one right-turn lane, plus retention of the existing eastbound bike lane. No left-turns to Matilija Avenue north of Riverside Drive would be permitted.
- Restripe the westbound Riverside Drive approach to the intersection with the new easterly Fashion Square Lane driveway to provide two left-turn lanes, one through lane, and one optional through/right-turn lane, plus retention of the existing westbound bike lane.
- Restripe the eastbound Riverside Drive approach to the intersection with the new westerly (tunnel) driveway to provide two through lanes and one right-turn lane.
- Restripe the westbound Riverside Drive approach to the intersection with the new westerly (tunnel) driveway to provide one left-turn lane, and two through lanes, plus retention of the existing westbound bike lane.

East End – Woodman Avenue Driveways

Woodman Avenue Project Driveway: The Woodman Avenue project driveway is located on the east side of the project site, south of Riverside Drive and immediately south of the adjacent 3.0-acre NAP Riverside Woodman shopping center. The Woodman Avenue project driveway will provide access to the new four-level parking structure and remaining surface parking area located on the easterly portion of project site. This access will also tie into the main Fashion Square Lane internal circulation driveway. The Woodman Avenue project driveway will continue to accommodate right-turn ingress, however, egress movements would be prohibited through the use of signage and directional arrows.

These circulation modifications will improve access to the site by increasing the number of inbound lanes from the public streets; increasing the left-turn queuing capacity on Riverside Drive by 25%; allowing for safe legal left turns from the Riverside Drive driveway; and reducing pedestrian and parked car conflicts with inbound cars.

b. Project Elevations/Building Materials

New construction for the proposed retail building and six-level "main" parking structure will be located primarily to the south of the existing mall structure and would be consistent with the type, height, and massing of existing development on the site and not to exceed 722 feet above sea level (the current maximum elevation of the Macy's building). A second four-level "east" parking structure, up to a maximum height of 35 feet, will be constructed on the eastern portion of the project site (adjacent to Woodman Avenue) on an area currently developed with surface parking. *Figure 17: Proposed Building Elevations*, shows the general bulk, mass and architecture of the proposed structures relative to the existing buildings. In addition to the demolition and construction associated with the new retail and parking areas, the Riverside and Hazeltine façades of the existing shopping center buildings will be updated through building colors, material accents and landscaping that will visually tie the entire project together and enhance the pedestrian experience through improved integration with the shopping center with surrounding land uses.

The Riverside Drive building surfaces would be refreshed with a new graphic design treatment that would consist of small visual mosaics of color and pattern intended to visually minimize the massing of the long linear wall along the frontage. It is intended that a combination of landscaping (see discussion below), hardscaping and building finish elements would create a vibrant urban atmosphere that offers more pedestrian-friendly linear banding and gives a fresh, updated look to the shopping center. The structural frontage along Riverside Drive (i.e., Bloomingdale's and Macy's department stores, shopping center, loading docks) will not be substantially altered except as necessary to accommodate access to the tunnel reactivation.

The main structural component of the Proposed Project involves the construction of approximately 482,740 total (gross) SF of building area that would house up to 280,000 GLSF of additional retail/restaurant uses in two levels over one level of subterranean parking and would also include rooftop parking. This structure would be constructed as an addition to the back (south side) of the existing shopping center and would extend easterly to create a new mall tie-in to the south edge of the existing Macy's department store. The retail structure would connect to the remaining portion of the existing west parking structure (south of Bloomingdale's department store) and would also interface with the new east parking structure (adjacent to and east and southeast of the Macy's department store). The retail building interface with both parking structures is designed so that direct vehicular access would be maintained between each of these structures through the roof-top parking level and along the reconfigured Fashion Square Lane alignment.

In addition to the retail building expansion (with parking), two additional new parking structures would be constructed on the easterly portion of the project site. A new six-level (one-level at grade plus five-levels above grade) would connect to the eastern edge of the new retail construction and would replace existing surface parking immediately south of the existing two-story parking **st**ructure that currently feeds the Macy's department store. A second four-level parking structure, up to a maximum height of 35 feet, will be constructed on the eastern portion of the project site (adjacent to Woodman Avenue) on an area currently developed with surface parking.

EXISTING

PROPOSED

FIGURE 17
PROPOSED BUILDING ELEVATIONS

MAP SOURCE: PLANNING ASSOCIATES, INC.

NORTH

The parking structure will have semi-open levels broken up with horizontal hanging planters which will visually reduce the building massing. The parking structure will be landscaped with terraced greenery cascading from each level.

The parking structure would be dressed with horizontal landscape planters along the Riverside Drive frontage of the upper levels and would have openings separating the parking levels.

The Proposed Project development (including both the retail expansion and the parking structure) will not exceed 75 feet in height, and would be no taller than the adjacent existing Macy's building on site. Nonetheless, a CUP is requested to address the relationship of the easterly edge of the structures to a 45-foot height limit exception at the commercial corner of Riverside Drive and Woodman Avenue. If it is deemed appropriate, the CUP will permit a height deviation to provide a building and parking structure with maximum height no greater than the existing Macy's building and elimination of the requirement to provide a minimum of fifty percent transparent windows along the first floor retail, as no glass along the Riverside Drive frontage is proposed. However, as noted above, this frontage will be architecturally enhanced with a new mosaic color treatment and vibrant landscaping detail.

c. Best Management Practices, Green Strategies, and LEED

The Proposed Project site plan will include project design features (PDFs) specifically designed to reduce urban runoff and associated pollutants. These PDFs include source controls, low impact development concepts, and treatment control best management practices (BMPs) that will be selected and sized in accordance with applicable regulations. At this stage of conceptual design, site-specific BMPs for the Proposed Project have not been finalized, but will be coordinated through the City site plan review, grading permit and building permit processes. Ultimately, site-specific constraints, such as paved surface area needed to meet parking requirements and traffic control and American Disability Act (ADA) requirements and surface and underground utility clearance requirements for the project upgrades, will dictate the final details of the PDFs and BMPs that will be incorporated into the final project design. A more detailed description of the proposed PDFs assumed for the Proposed Project, including those that related specifically to Best Management Practices and "Green Strategies", is provided in Section II: Project Description: G-Proposed Project Design Features and Standard Conditions Assumed In Impact Analysis, of this EIR.

The Proposed Project will be designed to reduce exposure of sensitive receptors to excessive levels of air quality. The Proposed Project is designed and will be built and operated in a manner consistent with the requirements to achieve Leadership in Energy and Environmental Design (LEED) certification from the United States Green Building Council.[5] LEED is a green building rating system that was designed to guide and distinguish high-performance commercial projects. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. The Proposed Project will implement a variety of design and operational features to achieve LEED certification. As a

[5] U.S. Green Building Council (USGBC). 2007. *Leadership in Energy and Environmental Design.* 19 May 2008 <http://www.usgbc.org/LEED>.

result, the Proposed Project would be proactive in reducing GHG emissions. Examples of specific design features are listed in the Air Quality section.

3. PARKING

Prior development approvals at the shopping center (under ZA-95-0899-CUZ and CPC-94-0287-ZC) established a parking requirement for the entire site at 4.5 parking spaces per 1,000 square feet of GLSF for all retail, restaurant, and office uses. The shopping center has surveyed parking demand on peak shopping days (i.e., weekends during both holiday and non-holiday seasons) for the 2005 and 2006 calendar years. These site-specific surveys show a demand of 4.03 parking spaces per 1,000 square feet GLA. The Proposed Project includes a request for Shared Parking that would establish a revised parking ratio requirement of up to 4.5 parking spaces per 1,000 GLSF. Under the Proposed Project proposal to construct an additional 280,000 GLSF of commercial uses, a minimum of 5,148 parking spaces would be provided across the entire site, representing an minimum increase of approximately 1,235 spaces above the approximate 3,914 parking spaces currently provided on-site.

In addition to increasing the total number of parking spaces, the Proposed Project would reconfigure the location and access to parking to create a more efficient arrangement of parking relative to the shopping center uses. As described above and again summarized below, parking for the Proposed Project will be provided through a combination of both existing and new parking structures constructed as part of the development, and remainder surface parking lots. The Proposed Project will include the following physical improvements to parking facilities:

- The existing southern, three-level parking structure located immediately south of, and serving, the existing shopping center will be demolished and replaced with the retail expansion building, which will include one level of subterranean parking and one level of rooftop parking. This new component will also extend to replace a surface parking lot area immediately east of the demolished parking structure.

- A new six-level (also referred to as the "main") parking structure will be constructed adjacent and easterly to the new retail building and immediately south of the existing two-level Macy's parking structure. The new six-level parking structure, which will be integrated into the new retail component through the subterranean and roof-top levels, will replace an existing surface parking lot.

- A new four-level (also referred to as the "employee" or "east") parking structure, anticipated to accommodate up to approximately 700 parking spaces, will replace existing surface parking along the eastern portion of the project site.

- Other miscellaneous physical improvements to the parking areas include: (1) minor modifications to two existing parking structures (i.e., the Macy's and Bloomingdale's parking structures) to facilitate improved internal access and linkages to new construction; (2) removal of surface parking near the southwest corner of the project site to facilitate traffic flow and safety improvements; and (3) reconfiguration of the remainder surface parking lot areas to integrate with revised circulation plan.

The removal, temporary displacement and establishment of new parking facilities and spaces will be coordinated throughout the Proposed Project construction activities (see Section II: Project Description: F-Project Characteristics, 7-Construction, Grading and Phasing, below) to ensure that adequate on-site parking is available to serve all functional shopping center uses (including patrons and employees) and temporary construction workers.

In addition, during schools days (7 a.m. to 4 p.m.), the shopping center currently makes available 100 parking spaces in the east surface parking lot for Buckley High School and 60 parking spaces for Notre Dame High School at the same location, for overflow parking needs at the schools. These parking spaces are on a month-to-month agreement and are not made available to students on the weekends or during peak holiday periods. This arrangement would continue on an as-needed basis as determined by the individual schools and would be accommodated through adequate surplus parking available during non-peak operational periods. It is anticipated that this arrangement to provide parking to these schools would be suspended during phase 1 and 2 of project construction but could be reinstated at the end of phase 2.

In addition to a finding that Shared Parking at a ratio of up to 4.5 parking spaces per 1,000 GLSF is appropriate, a CUP is requested to deviate from the restriction on tandem parking in association with the Commercial Corner designation (see discussion under entitlements above). The tandem parking spaces would be provided in association with a valet drop-off and pick-up system for convenience of patrons.

4. PROJECT LANDSCAPING/LIGHTING/SIGNAGE

Existing vegetation on the site is limited to landscaping associated with the existing development and trees that buffer the site from the adjacent Ventura Freeway on the south. The project will require the removal of 45 mature trees, 7 of which are in poor health, located adjacent to the Freeway that were installed after construction of the existing shopping center. Upon completion of project construction, any mature trees removed during construction will be replaced on a 1:1 basis with comparable mature trees, per the LAMC and in accordance with the approved Landscape Plan. Landscaping proposed with the Proposed Project is generally illustrated in *Figure 18: Conceptual Landscape Plan -1* and in *Figure 19: Conceptual Landscape Plan -2*.

The landscape plan for the Proposed Project would focus primarily on the enhancing the Riverside Drive and Hazeltine Avenue frontages at the project site, and the addition of new and replacement landscaping within and adjacent to the newly constructed areas, including driveways and the east surface parking lot. The proposed Conceptual Landscape Plan can be described as consisting of three landscape elements: (1) perimeter landscaping; (2) internal landscaping; and (3) architectural accent landscaping. Perimeter landscaping includes landscaping within the required (per LAMC) landscape setbacks along the street frontages and site edges. Perimeter landscaping would include street trees and infill ornamental greenery. The internal landscaping elements include ornamental plantings along driveways, walkways and parking areas within the project site. Internal landscaping includes canopy shade trees throughout the surface parking lots, accent plantings to help define driveways and entrances, and plantings to screen service

FIGURE 18
CONCEPTUAL LANDSCAPE PLAN -1

MAP SOURCE: WESTFIELD

FIGURE 19
CONCEPTUAL LANDSCAPE PLAN -2

MAP SOURCE: WESTFIELD

areas and mechanical equipment. Architectural accent landscaping includes planters, espaliers and similar treatments, as well as accent planters and trees at the roof-top parking levels, that are incorporated into the design of the building facades.

The Conceptual Landscape Plan would introduce a more lush, cohesive and robust greenscape treatment along the Riverside Drive and Hazeltine Avenue street frontages than what currently exists (see *Figure 18: Conceptual Landscape Plan -1* and *Figure 19: Conceptual Landscape Plan -2*). New project landscaping along Riverside Drive would provide an opportunity to visually activate this frontage and minimize building massing. A combination of landscape, hardscape, and building finish elements would create a vibrant urban atmosphere intended to provide a more pedestrian-friendly linear banding and provide a fresh, updated look to the shopping center.

The landscape plan would incorporate specimen accent plantings, including distinctive palms, large canopy trees, evergreens, seasonal color trees and bold median plantings. Approximately seven existing trees in poor health would be removed and replaced. Up to 38 additional trees that would be removed to accommodate new construction would be replaced and are integrated into the landscape plan. The 45 mature trees (which are not protected through any provisions of the LAMC) to be removed during construction would be replaced through the incorporation of trees in the Landscape Plan of comparable maturity. The perimeter landscaping along the street frontages includes a combination of required street trees (e.g., fern pine) intermixed with additional canopy shade (e.g., strawberry tree, jacaranda, or crape myrtle) and iconic accent (e.g., king palm or date palm) trees. Understory plantings, consisting of shrubs, groundcovers and grasses, will be integrated along these edges to relate to the pedestrian experience. Finally, a combination of bamboo screening and espalier evergreen foliage and flowering vines will be incorporated at the building edges to serve as a vegetated backdrop and breakup the building facades. Intermittent wall planters along the sidewalks and parapet planters incorporated into the exterior of the mall and parking structures will offer accents of color and draping foliage.

The Conceptual Landscape Plan proposes a more simplistic landscape treatment internally, with internal landscaping consisting of regularly spaced canopy shade trees within surface parking areas (as on the east side of the project site), and a combination canopy, ornamental accent, and icon specimen trees to define the key parking and driveway edges. To some extent, the internal landscaping elements serve a role in defining vehicular movement and pedestrian access areas. Internal landscaping will also include rooftop and/or open atrium plantings associated with the parking structures and mall expansion building. Such landscaping will consist primarily of shrubs and accent plants in planter containers.

As discussed above, architectural accent landscape plantings will be integrated along building elevations visible from local public streets (i.e., primarily along the north, east and west facing elevations). Architectural accent landscaping will include generous plantings of bamboo in a linear row abutting the building facades to break up the massing of the building faces. Bamboo screening is proposed primarily along the existing mall structures, such as the Riverside Drive faces of the Macy's and Bloomingdale's department store buildings and as a vertical screen of the parking structure along Hazeltine Avenue. Other building façade areas, specifically the mid-section of the existing mall along Riverside Drive, which is sandwiched between the two

department store anchors, will be landscaped with wall-climbing vines trained with a combination of greenscreen, vine cabling and espalier devices. Architectural accent landscaping also includes a series of horizontal planters along parking structure levels and along the Riverside Drive section of the existing mall. Each north-facing parking level of the east-end parking structure by the Macy's department store will be faced with parapet planters to be planted with draping foliage that will serve to soften the visual image of the new parking facilities.

Although enhanced landscaping is proposed along each edge of the project site, due to the assumption that the Commercial Corner designation is applicable, a CUP is requested to deviate from the requirement to provide a five foot landscaped area immediately adjacent to all street frontages. A reduced landscaped setback, to allow a varied width ranging between zero to five feet, is necessary in some locations to accommodate widening of Riverside Drive, which in turn leaves insufficient area to accommodate both pedestrian sidewalks and the required landscaping within the space remaining between the existing buildings. It is intended that extensive incorporation of espalier vines, parapet planters and other plantings which maximize usage of the vertical wall area will generally offset a reduction in landscape depth along street frontages.

The landscape concept also incorporates various hardscape features, including the integration of street furnishings along the Riverside Drive frontage. Street furnishings, including treated wood benches and cast-in-place concrete seating with integral lighting and water features, would add to the visual interest and appeal of this frontage.

Directional and security lighting will be required for safety purposes. Through a new plan, lighting can enhance safety along the Riverside Drive and Hazeltine Avenue frontages and add to the security of the neighborhood in general. Lighting would be incorporated into the streetscape environment at several levels, including the use of bollards, wall reveals, seating areas, and crosswalks. The use of plaza strip lighting will afford additional security lighting but with a park-like feel and without significant light intrusion to the surrounding neighborhood. All lighting sources installed under the Proposed Project will be designed such that as much light as possible is contained on site and does not spill onto nearby properties. As consistent with safety concerns, the Proposed Project will incorporate low-level lighting that is directed downward and shielded to prevent spillover of light toward sensitive uses.

The proposed lighting sources are consistent with existing lighting sources at the shopping center and include project identification and way-finding signs; security lighting for the existing building, building entrances, parking structures and surface parking; and vehicular lighting. New entryway and building signage will be consistent with LAMC requirements and/or an approved signage plan.

5. PROJECT UTILITIES AND SERVICE ACCESS

The project site is currently served by City of Los Angeles infrastructure including sanitary sewer, water, and roadway. No expansion of infrastructure in the community is proposed with the Proposed Project.

6. OPERATIONAL CHARACTERISTICS

The operational characteristics of the Proposed Project will be similar to those operational characteristics currently observed with existing commercial retail and restaurant operations. Employees, customers, deliveries and services accessing the project site will be consistent with typical mall operational hours. A CUP is requested to deviate from the standard allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight to better accommodate the operation of the shopping center and new restaurants uses. Typical operating hours of the restaurants, which include both lunch and dinner service, would extend from approximately 10:00 a.m. to 11:00 p.m. Monday through Saturday, and 11:00 a.m. to 9:00 p.m. Sunday. However, on special occasions or holidays, the restaurant uses may be open from 5:30 a.m. to 12 midnight, consistent with the request for hours of operation overall for the shopping center. The retail uses in the center will continue to operate in accordance with the existing hours of operation (7:00 a.m. to 11:00 p.m.), except for the occasional temporary expanded hours (consistent with the overall operational hours of the shopping center) of operation for holidays and special events.

The Proposed Project will include several ancillary facilities within the shopping center. For example, the shopping center will continue to provide a room open to use/reservation by the community. The new community room, to be located in the new southern retail expansion building, will replace the existing community room located on the east end surface parking lot. The Proposed Project will also provide new showers, lockers, and bike storage facilities for employees. The project will provide at least 2 showers per gender and lockers for each gender. Further, the Proposed Project is estimated to generate approximately 2,590 employees at the site daily, an increase of approximately788[6] employees over existing uses.

7. GRADING, CONSTRUCTION AND PHASING

Construction is planned for completion in the year 2012, while full occupation of the development may not stabilize until the year 2013. The Proposed Project would be completed as a single-event project staged through four phases over an approximate 36 to 48-month period see discussion below). Construction activities will generally occur between the hours of 7:00 a.m. and 9:00 p.m. during weekdays and 8:00 a.m. and 6:00 p.m. on Saturdays.

The Proposed Project will be implemented in four key phases, as follows:

> *Phase One* – This phase includes demolition of portion of easterly surface parking lot and establishment of construction staging area on the un-demolished portion of this lot, and construction of the easterly, four-level parking structure adjacent to Woodman Avenue. Construction of Phase One is anticipated to be initiated in early 2009 and extend for an approximate six-month timeframe.
>
> *Phase Two* – This phase will be implemented as a series of functional sub-phases timed to assist with the transition of work areas. Construction of new main, six-level parking

[6] HR&A Advisors, Inc. 2008 (March 3). Letter "Re: Direct Employment Estimate for the Fashion Square Expansion Project" to D. Steinert (Planning Associates, Inc.). [See Appendix J of this Draft EIR]

structure south of existing two-level Macy's parking structure will take place during this phase. New main parking structure will incorporate temporary construction-stage modifications to the design in order to temporarily accommodate construction equipment access, emergency vehicle access, and safe pedestrian circulation. For example, a portion of the second level will be excluded in order to provide adequate height clearance for construction equipment. Also, an enclosed dedicated pedestrian walkway through the construction zone will be installed to ensure safety and enhance convenience for shopping center users parked at in the east parking structure. To coincide with the completion of the main parking structure, access from Riverside Drive will be modified. These modifications include alterations to the Macy's parking structure, the creation of the new Matilija Avenue entrance and signal, including traffic diverter on the north side of Riverside Drive and closure of the western Riverside Drive driveway. Construction of Phase Two is anticipated to be initiated in approximately January 2010 and completed prior to the year-end 2010 holiday shopping season.

Phase Three – This phase will involve demolition of the existing three-level south parking structure south of the existing main section of the shopping center and construction of the new two-level retail building, including one level of subterranean parking and one level of roof-top parking. During this phase, the new westerly Riverside Drive driveway will be installed in coordination with the re-activation of the tunnel (located easterly of the Bloomingdale's department store) leading to the new subterranean parking level. The relocation and establishment of new loading docks will be coordinated through this phase. The implementation of the Landscaping Plan and building façade improvements along the Riverside Drive and Hazeltine Avenue frontages will also be implemented. Toward the completion of this phase, coordination and implementation of any necessary off-site roadway improvements, along Hazeltine Avenue, Riverside Drive and Woodman Avenue, to address initial traffic demands will be implemented. This phase would be initiated in early 2011 and could take up to twenty months for completion. Anticipated completion would be by Fall 2012.

Phase Four – This phase will include the removal of temporary and interim construction staging elements and finishing of the main parking structure. The Fashion Square Lane internal road system will be finalized and fully operational. Anticipated completion would be by Fall 2012.

Each project construction phase is anticipated to include three primary construction steps during the construction process: demolition of any necessary existing structures, grading and preparation of the site, and construction of the Proposed Project structures. Construction activities would be coordinated to balance space limitations on site, phasing of construction to retain operation of the existing shopping center and appropriate parking during construction, and general construction phasing techniques. The limits of each of these construction phases is shown on *Figure 20: Construction Phasing*.

To maintain the required parking during the construction stage, the Proposed Project will implement a number of strategies to temporarily increase parking on the project site. These

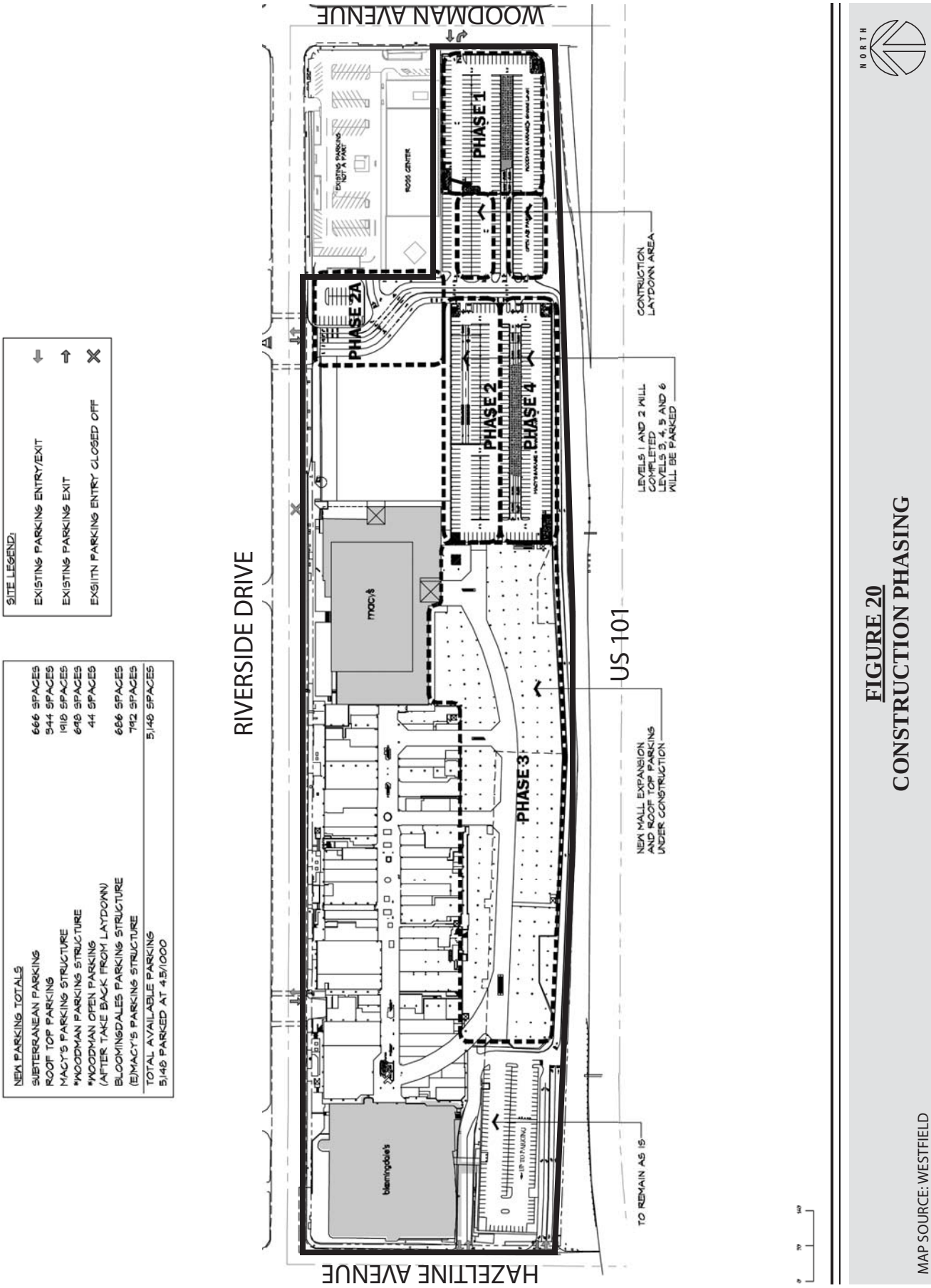


FIGURE 20
CONSTRUCTION PHASING

strategies are anticipated to include strategic phasing of construction stages, the use of valet parking, stacked parking, shuttles and a dedicated pedestrian walkway from the new eastern parking structure, and if necessary, contingency off-site parking during construction at the adjacent Sunkist site on Hazeltine Avenue. During construction, workers will be required to park in designated areas to prevent impacts to the nearby residential areas. Construction activities will be staged and coordinated to: (1) ensure that at no time during the construction activities, will available parking fall below 2,800 parking spaces (the identified non-holiday demand level for the center), (2) construction of parking facilities will be constructed first, (3) parking facilities construction will be timed so that their construction will not occur during peak holiday seasons, and (4) construction will be sequenced such that a parking ratio of 4.5 parking spaces per 1,000 GLSF will be provided during peak holiday seasons. Retention of the 4.5 parking spaces per 1,000 GLSF during peak holidays and 2,800 spaces during the remainder of the year will ensure that the availability of parking spaces coincides with the level of on-going shopping center uses.

Demolition of the existing southerly, three-story parking structure that feeds the shopping center and construction of the proposed retail/restaurant expansion buildings will generate construction waste. During construction activities the applicant will recycle a minimum of fifty percent of both demolition and construction materials in order to reduce waste materials being transported to landfills serving the project area. In an effort to minimize the amount of construction waste being taken to landfills, the applicant will require primary construction contractors to provide separate receptacles for materials that can be recycled such as wood scraps, metal scraps, and cardboard. Individual contractors will be required to emphasize diversion planning to ensure that the maximum amount of recyclable materials are separated and placed in the appropriate bins. Some of these materials may be temporarily stockpiled at the project site until they are either incorporated into the new construction and/or removed for off-site recycling.

Construction debris from demolition of existing parking areas, and earth from excavation will require that dirt and materials be removed from the site. An approved haul route during construction activity from the project site will be required. Trucks entering the jobsite will take the following route, entering the site at the Woodman Avenue entrance on the south side of the property:

- Exit 101 Freeway at Van Nuys Boulevard going north;
- Take right onto Riverside Drive, heading east;
- Take right onto Woodman Avenue, heading south;
- Take right onto property at Woodman Avenue entrance.

The route will be modified slightly during the period in which the Riverside Drive entry is closed to the public by allowing the trucks to enter at the Riverside Drive Entry in lieu of the Woodman Avenue Entry.

Trucks exiting the jobsite will take the following route:

- Exit Woodman Avenue entrance on the south side of property;
- Right onto Woodman Avenue, heading south;
- Right onto 101 Freeway, heading west.

Grading of the site is expected to entail minor cuts and fills from the existing grades to establish the building pads and to provide surface drainage of the site. No soils are expected to be imported to the project site, however, an estimated 147,016 cubic yards of earth materials from site excavation will be required. During grading operations, the Proposed Project would utilize sonic pile driving equipment to construct some of the proposed structures (i.e., the six-level parking structure). The use of pile drivers will minimize the need for extensive excavation work.

Construction activities generating noise are prohibited between the hours of 9 p.m. and 7 a.m. The City of Los Angeles Noise Control Ordinance (No. 144,331), which applies to construction activities being undertaken within 500 feet of a residential zone, prohibits noise that is "loud, unnecessary, and unusual, and substantially exceeds the noise customarily and necessarily attendant to the reasonable and efficient performance of work." Construction activities will be scheduled in compliance with City regulations.

To further reduce potential construction noise impacts, a temporary construction barrier up to ten feet in height may be erected along portions of the northern property line (Riverside Drive).

II. PROJECT DESCRIPTION

G. PROPOSED PROJECT DESIGN FEATURES AND STANDARD CONDITIONS ASSUMED IN IMPACT ASSESSMENT

CEQA Guidelines, Section 15126.4(A), "The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed…which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project." This EIR clarifies these "conditions" into Project Design Features (PDFs) and Standard Conditions of Approval (SCAs) and has utilized this information to support reasonable assumptions about the Proposed Project. PDFs and SCAs, as used herein, are defined more specifically as follows:

Project Design Features - PDFs are specific design and/or operational characteristics proposed by the project applicant that are assumed as a part of the Proposed Project, and which could reasonably be assumed to contribute toward the prevention and/or reduction of potential environmental effects. Because PDFs are incorporated into the project, they do not constitute mitigation measures. However, without their implementation, significant impacts could result. As such, PDFs that would specifically or cumulative ensure that impacts are reduced to less than significant levels are also incorporated into the Mitigation Program to ensure that they are implemented as a part of the Proposed Project.

Standard Conditions of Approval - SCAs are existing requirements and extant standard conditions that are based on local, state, or federal regulations or laws that are frequently required independently of CEQA review and serve to offset or prevent specific impacts. Typical standard conditions and requirements include compliance with the provisions of the Uniform Building Code, South Coast Air Quality Management District Rules, local agency fees, etc. The City may impose additional conditions during the approval process, as appropriate. Because SCAs are neither project specific nor a result of development of the project site, they are generally not considered as either a PDF or Mitigation Measure. However, since these regulations are required by law, they will be incorporated as part of the Mitigation Monitoring and Reporting Program to ensure compliance and to confirm their implementation as part of the Proposed Project.

The analysis in this DEIR assumes that, unless otherwise stated, the Proposed Project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards (e.g., *Los Angeles Municipal Code* and Bureau of Engineering *Standard Plans*), as well as with all applicable statewide regulations. It is also assumed that construction will follow the uniform practices established by the Southern California Chapter of the American Public Works Association (e.g., *Standard Specifications for Public Works Construction* and the *Work Area Traffic Control Handbook*) as specifically adapted by the City of Los Angeles (e.g., The City of Los Angeles Department of Public Works *Additions and Amendments to the Standard Specifications For Public Works Construction* (AKA "The Brown Book," formerly Standard Plan S-610)).

Applicable PDFs and SCAs that were considered in the analysis of potential environmental impacts are discussed in each issue section of the DEIR. However, a complete compilation of the PDFs and SCAs is also provided below.

1. PROJECT DESIGN FEATURES (PDFs)

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

Aesthetics and Visual Resources PDFs

- A minimum of one 24-inch box tree (minimum diameter of two inches and a height of eight feet at the time of planting) shall be planted for every four new surface parking spaces.

- The Final Expansion Project Landscape Plan, which will be reviewed and approved by the City of Los Angeles, shall incorporate clinging vines and bamboo screening, which provide a variety of textures and colors, along exterior walls visible along the Riverside Drive and Hazeltine Avenue frontages.

- The Final Expansion Project Landscape Plan shall include the installation of healthy mature trees for all replacement trees and new landscaping along Riverside Drive.

- New project landscaping along Riverside Drive would provide an opportunity to visually activate this frontage and minimize building massing. A combination of landscape, hardscape, and building finish elements would create a vibrant urban atmosphere that offers more pedestrian-friendly linear banding and gives a fresh, updated look to the shopping center. The landscape plan would incorporate specimen accent plantings, including distinctive palms, large canopy trees, evergreens, seasonal color trees and bold median plantings. The landscape concept also incorporates various hardscape features, including the integration of street furnishings along the Riverside Drive frontage. Street furnishings, including treated wood benches and cast-in-place concrete seating with integral lighting and water features, would add to the visual interest and appeal of this frontage.

- Directional and security lighting will be required for safety purposes. Through a new plan, lighting can enhance safety along the Riverside Drive and Hazeltine Avenue frontages and add to the perceived security of the neighborhood in general. Lighting would be incorporated into the streetscape environment at several levels, including the use of bollards, wall reveals, seating areas, and crosswalks. The use of plaza strip lighting will afford additional security lighting but with a park-like feel and without significant light intrusion to the surrounding neighborhood.

- The Riverside Drive building surfaces would be refreshed with a new graphic design treatment that would consist of small visual mosaics of color and pattern that

effectively serve to visually minimize the massing of the long linear wall along the frontage. It is intended that a combination of landscaping, hardscaping and building finish elements would create a vibrant urban atmosphere that offers more pedestrian-friendly linear banding and gives a fresh, updated look to the shopping center.

Air Quality PDFs

- The Proposed Project will be designed to reduce exposure of sensitive receptors to excessive levels of air quality. The Proposed Project is designed and will be built and operated in a manner consistent with the requirements to achieve Leadership in Energy and Environmental Design (LEED) certification from the United States Green Building Council.[7] LEED is a green building rating system that was designed to guide and distinguish high-performance commercial projects. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. The Proposed Project will implement a variety of design and operational features to achieve LEED certification. As a result, the Proposed Project would be proactive in reducing GHG emissions. Examples of design features to be implemented for the Proposed Project in order to achieve LEED certification include, but are not limited to, the following or their equivalent:

    - A construction activity pollution prevention program.
    - Encouraging the use of mass transit.
    - Providing transportation amenities, such as alternative fueling stations, carpool/vanpool programs, bicycle racks, and showering/changing facilities.
    - Implementing a stormwater management plan that reduces impervious cover, promotes infiltration, and captures and treats the stormwater runoff from 90 percent of the average annual rainfall using acceptable best management practices.
    - Adopting site lighting criteria to maintain safe light levels while avoiding off-site lighting and night sky pollution, minimizing site lighting where possible, and reducing light pollution.
    - Providing tenants with a description of the sustainable design and construction features incorporated in the core and shell project.
    - Using high-efficiency irrigation technology or reducing potable water consumption for irrigation by 50 percent by using a combination of plant species factor, irrigation efficiency, use of captured rainwater, use of recycled wastewater, and use of water treated and conveyed by public agency specifically for non-potable uses.

[7] U.S. Green Building Council (USGBC). 2007. *Leadership in Energy and Environmental Design.* 19 May 2008 <http://www.usgbc.org/LEED>.

- Employing strategies that, in aggregate, use 20 percent less water than the water use baseline calculated for the building (not including irrigation) after meeting the Energy Policy Act of 1992 fixture performance requirements.
- Designing the building envelope and building system to maximize energy performance.
- Selecting refrigerants that reduce ozone depletion while minimizing direct contributions to global warming.
- Implementing a construction waste management plan that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or comingled. The waste management plan would include recycling and/or salvaging at least 50 percent of non-hazardous construction and demolition debris.
- Using materials with recycled content such that the sum of post-consumer recycled content plus one-half of the pre-consumer content constitutes at least ten percent of the total value of the materials in the project.
- Using a minimum of ten percent of the total materials value on building materials or products extracted, harvested, or recovered and manufactured within 500 miles of the project site.
- Adopting an indoor air quality management plan to protect the HVAC system during construction, control pollutant sources, and interrupt contamination pathways.
- Specifying low-volatile organic compounds paints and coatings in construction documents.
- Designing the building with the capability for occupant controls for airflow, temperature and ventilation. Strategies will include underfloor HVAC systems with individual diffusers, displacement ventilation systems with control devices, and ventilation walls and mullions.

- The Proposed Project would install carbon monoxide and airflow measurement equipment that would transfer the information to the HVAC system and/or Building Automation System to trigger corrective action, if applicable, and/or use the measurement equipment to trigger alarms that inform building operators or occupants of a possible deficiency in outdoor air delivery. Installation of such a system in areas where carbon monoxide concentrations may escalate (such as in the vicinity of loading docks or valet parking drop-offs) would improve both indoor and localized "hotspot" air quality.

- The Proposed Project would provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities.

- The Proposed Project would provide a shuttle service connecting the site to a nearby Orange Line station (e.g., Van Nuys Boulevard). This service could be provided by either the provision of a private shuttle or the funding of extended hours for the existing Los Angeles Department of Transportation (LADOT) DASH line. The Orange Line shuttle would complement existing transit services (i.e., the LADOT DASH service) such that the shuttle would operate during hours when other public transit services connecting the site to the Orange Line are not available (e.g., during weekdays evenings and general weekend hours). The shuttle would operate during regular shopping center hours corresponding with periods of peak parking demand at the site and peak holiday season demand (i.e., everyday during the holiday shopping period between November 15 and January 1, and every Saturday/Sunday throughout the year).

Geology and Soils PDFs

- The Proposed Project would incorporate permeable (porous) pavement materials in specific locations that would allow water to drain down to the underlying soil and reduce the volume of wet weather urban runoff. This could include a combination of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, which would be incorporated into the landscape plan and design of surface parking areas, as functionally appropriate.

Hazardous Materials and Man-Made Hazards PDFs

Many of the PDFs identified in Section IV: Environmental Impact Analysis: E-Water Resources, will also serve to reduce or eliminate potential environmental concerns related to hazardous materials and man-made hazards.

Water Resources (Hydrology, Water Quality and Water Supply) PDFs

- The Proposed Project would incorporate a range of "green strategy" project design features for water quality and hydrologic impacts that would include site design, source control, and treatment control BMPs that would be incorporated into the project.

- In accordance with the SUSMP requirements, the Proposed Project would meet (or exceed) all minimum site design and source control BMPs.

- The Proposed Project would incorporate treatment control BMPs that will minimize urban runoff and associated impacts to receiving water quality and specifically address the identified pollutants of concern. Many BMP alternatives can be integrated into planned landscaping, right-of-ways, and planned infrastructure. BMP alternatives that would be implemented with the Proposed Project include: (1) vegetated treatment BMPs, (2) onsite storage and reuse, (3) permeable paving, (4) roof top BMPs, and (5) media filters.

- The Proposed Project would incorporate a number of vegetated treatment BMPs, including swales, filter strips, bioretention and planter boxes. When properly designed and maintained, vegetated BMPs are among the most effective, cost efficient treatment approaches for dry and wet-weather runoff. Treatment occurs through sedimentation, filtration, adsorption to organic matter, and vegetative uptake. Additionally, vegetated treatment systems would reduce runoff volumes through soil soaking, infiltration, and evapotranspiration. On-site implementation of these systems would be integrated into surface conveyances and on-site landscaping in innovative ways that provide dual-functional site amenities.

- The Proposed Project would incorporate permeable (porous) pavement material in pavement areas (such as roadways, driveways, parking areas, and walkways). The permeable (porous) pavement materials would allow water to drain down to the underlying soil and reduce the volume of wet weather urban runoff. The Proposed Project would incorporate a mix of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, into the landscape plan and design of surface parking areas as functionally appropriate.

- The Proposed Project would employ rooftop BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of small storm events peaks and the overall runoff volume via inter-event evaporation and transpiration. Rooftop BMPs incorporated into the project design include planters and landscaping on the rooftop portion of the new parking structures, and hanging planters along the parking building tiers and along the Riverside Drive mall elevation.

- The Proposed Project would employ media filtration to separate and filter fine particulates and associated pollutants from captured stormwater to the extent feasible.

- The Proposed Project will incorporate a series of measures that will reduce water consumption and resulting waste water. These include implementation of "smart irrigation" systems that are customized to accommodate specific plant area and control water based on information from weather forecasts. Compliance with the City Xeroscape requirements to reduce water demand. The project will also include water conservation through installation of efficient plumbing fixtures including low flow and dual flush toilets, waterless urinals, and on touch faucets with short "on" cycles and efficiency aerators.

Land Use, Planning and Urban Decay PDFs

- The project design seeks to promote a "high end" atmosphere, both through the type of tenants that will be located within the development and through the attention to architectural detail and landscape enhancements that promulgate a positive community ambience.

- The Proposed Project would incorporate architecture and landscape design features that will be sensitive and non-intrusive to the surrounding residential community.

- The Proposed Project design incorporates features targeted to effectuate an appropriate transition between large-scale commercial development and the nearby single-family residential neighborhoods.

- The Proposed Project design incorporates a substantial setback and building stepback (of the east parking structure) that ensures the project interfaces with residential uses would be compatible in scale by complying with required height limitations and incorporating building setbacks.

- The Proposed Project incorporates architectural building façade treatment and landscaping that would break up and minimize the scale of both new and existing commercial structures fronting Riverside Drive.

- The Proposed Project building development would enhance and bolster the existing land use buffer between the Ventura (US 101) Freeway and residential areas to the north. The shopping center development functions as a physical barrier from the freeway; new construction would further reinforce this buffer as the new east parking structure (south of Macy's department store) would interrupt the line-of-sight of the freeway from the residential neighborhood, thereby reducing visual and noise effects from traffic along the freeway.

- The Proposed Project would promote community and neighborhood revitalization by reinforcing the economic vitality of the project area, which in turn contributes toward the overall longevity of the residential neighborhoods.

- The Proposed Project, through the provision of a broader range of commercial retail and restaurant uses, would expand the availability of complementary commercial services, thereby maintaining the relationship of a commercial center within convenient proximity to community residents and reinforcing the community core concept.

- The Proposed Project would establish new commercial in-fill development within a long established commercial anchor of the Sherman Oaks community, thereby resulting in a more efficient utilization of the limited land resources within the community and avoiding the potential displacement of other land uses.

- The Proposed Project would provide architectural, landscape, signage and access improvements that would facilitate and distinguish the identity of the shopping center, while reflecting a modernized and distinctive character for the local community.

- The Proposed Project would support pedestrian activity through implementation of site access and circulation improvements that minimize pedestrian conflicts through consolidated driveways and facilitating pedestrian accessibility through and increased

number and improved design of mall entrances. Pedestrian friendliness would be enhanced through an extensive landscape treatment along the Riverside Drive and Hazeltine Avenue frontages that would create a pleasant street experience for pedestrians, encourage improved natural surveillance for a safer environment, and upgrade adjacent transit stops with attractive and comfortable street furniture.

- The Proposed Project and ongoing operation of the shopping center would provide benefits equivalent to a Business Improvement District (BID) at the project site because the current mall association provides continued security, site monitoring for safety and general state of conditions, litter removal and maintenance of the physical facilities in a manner that mirrors, if not exceeds, the level of benefit that would be provided through an independent BID.

- The Proposed Project would be maintained as a closed mall campus with controlled access points and operational hours.

- The Proposed Project would provide sufficient off-street parking for all building employees and anticipated patrons and visitors, thereby minimizing the potential for parking conflicts on off-site locations.

- The Proposed Project would incorporate a range of "green strategy" project design features for water quality and hydrologic impacts that would include site design, source control, and treatment control BMPs that would be incorporated into the project.

- The Proposed Project would be located within close proximity (less than ½ mile) from other key community services, thereby adding to efficient development densities and community connectivity within the North Sherman Oaks community. Further, the Proposed Project development and other proximate services would be conveniently accessible by local residents through an improved pedestrian access plan (i.e., cross walk at Matilija Avenue/Riverside Drive, and aesthetic treatment along Riverside Drive frontage), and accessible by more distant residents and employees through enhanced public transit options/amenities (i.e., upgraded bus stops, and coordinated bus schedules through MTA). Efficient development densities, accomplished through the consolidation and intensity of community services in the project area, contributes toward improved energy efficiency, vehicle trip reduction, vehicle miles traveled reduction, air pollutants reduction, and consistency with local and regional planning programs.

- The Proposed Project would be located within approximately 2 miles from the Metro Orange Line (Express Busway) Valley College and Woodman Stations and adjacent to stops for the MTA Routes 96 (Downtown LA to Sherman Oaks) and 158 (Chatsworth to Sherman Oaks), and LADOT Dash Route for Van Nuys/Studio City, thereby making the project site a reasonable distance to access a range of alternative transportation options for public transportation access.

- The Proposed Project would develop and implement a construction waste management plan (CWMP) that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or commingled. A minimum of 50% of the construction and demolition debris (exclusive of excavated soils and organic debris) would be recycled and/or salvaged. Excavated/exported soil would be transferred off-site as clean fill rather than landfilled. Organic landclearing debris (i.e., trees to be removed) would be processed as greenwaste. The CWMP would consider recycling cardboard, metal, brick, acoustical tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation and other similar materials used during the construction phase. The CWMP would designate a specific area(s) on the construction site for segregated or commingled collection of recyclable materials, and track recycling efforts throughout the construction process. Further, the CWMP would identify construction haulers and recyclers to handle the designated materials. Consistent with the intent to minimize waste, the CWMP would also establish a minimum project goal of 10% (post-consumer and ½ pre-consumer) for recycled content construction materials and identify material suppliers that can achieve this goal. During construction, the developer would ensure that the specified recycled content materials would be installed. The CWMP would also establish a project goal (10% minimum) for locally sourced construction materials and would identify materials and material suppliers that can achieve this goal. During construction, the developer would ensure that the specified local materials would be installed and quantify the total percentage of local materials installed.

- The Proposed Project includes the provision of a new community room which would be made available to the surrounding Sherman Oaks community and offset a potential increase demand on recreational facilities for community meeting space needs.

- The Proposed Project would provide new landscaping treatment along the Hazeltine Avenue, Riverside Drive and Woodman Avenue frontages that would enhance the visual interest along these road way corridors and the shopping center perimeter through the addition of a sophisticated landscape treatment that includes color, depth, volume and variety.

- The Proposed Project would provide funds for the implementation of a Neighborhood Protection Program (NPP) that focuses on the prevention of "cut through" traffic in the residential neighborhoods north of the project site (across Riverside Drive). The NPP would seek to maintain the quality of the residential area through traffic control and traffic calming measures.

- The Proposed Project would provide an improved pedestrian crossing at the proposed Riverside Drive/Matilija Avenue intersection, a landscape-enhanced pedestrian corridor along Riverside Drive, and more efficient and safer site driveway entrances that strengthen community linkages to surrounding uses and support non-motorized vehicle travel options.

- The Proposed Project Landscape Plan will incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance.

- The Proposed Project would result in the addition of more building access points that would improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving public safety (through natural access control, natural surveillance and territorial reinforcement features) and pedestrian activity (through improved convenience and accessibility).

- The Proposed Project would incorporate treatment control BMPs that will minimize urban runoff and associated impacts to receiving water quality and specifically address the identified pollutants of concern. Many BMP alternatives can be easily integrated into planned landscaping, right-of-ways, and planned infrastructure. BMP alternatives that would be implemented with the Proposed Project include: (1) vegetated treatment BMPs, (2) onsite storage and reuse, (3) permeable paving, (4) roof top BMPs, and (5) media filters.

- The Proposed Project would incorporate a number of vegetated treatment BMPs, including swales, filter strips, bioretention and planter boxes. When properly designed and maintained, vegetated BMPs are among the most effective, cost efficient treatment approaches for dry and wet-weather runoff. Treatment occurs through sedimentation, filtration, adsorption to organic matter, and vegetative uptake. Additionally, vegetated treatment systems would reduce runoff volumes through soil soaking, infiltration, and evapotranspiration. On-site implementation of these systems would be integrated into surface conveyances and on-site landscaping in innovative ways that provide dual-functional site amenities.

- The Proposed Project would incorporate permeable (porous) pavement material in pavement areas (such as roadways, driveways, parking areas, and walkways). The permeable (porous) pavement materials would allow water to drain down to the underlying soil and reduce the volume of wet weather urban runoff. The Proposed Project would incorporate a mix of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, into the landscape plan and design of surface parking areas as functionally appropriate.

- The Proposed Project would employ rooftop BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of small storm events peaks and the overall runoff volume via inter-event evaporation and transpiration. Rooftop BMPs incorporated into the project design include planters and landscaping on the rooftop portion of the new parking structures, and hanging planters along the parking building tiers and along the Riverside Drive mall elevation.

- The Proposed Project would employ media filtration to separate and filter fine particulates and associated pollutants from captured stormwater.

- The Proposed Project would provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities.

- The Proposed Project would designate an area for recyclable collection and storage that is appropriately sized and located in a convenient area to serve mall tenants. The Fashion Square Mall Association would consider employing cardboard balers, aluminum can crushers, recycling chutes and other waste management technologies to further enhance and manage a recycling program at the shopping center.

- The Proposed Project would install carbon monoxide and airflow measurement equipment that would transfer the information to the HVAC system and/or Building Automation System to trigger corrective action, if applicable, and/or use the measurement equipment to trigger alarms that inform building operators or occupants of a possible deficiency in outdoor air delivery. Installation of such a system in areas where carbon monoxide concentrations may escalate (such as in the vicinity of loading docks or valet parking drop-offs) would improve both indoor and localized "hotspot" air quality.

Noise PDFs

- The project will include certain features to reduce exposure of sensitive receptors to operational noise. For example, mechanical equipment would be enclosed or located on roofs, and mechanical equipment noise would not be audible off-site. In addition, the new loading dock would be located behind mall structures and away from sensitive receptors. As a result, activity associated with the new loading docks would not increase ambient noise levels by 5 dBA or more at the nearest sensitive receptors (e.g. residences on Riverside Drive).

Public Services (Fire and Police) PDFs

- The Proposed Project Landscape Plan will incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance.

- The Proposed Project shall be maintained as a closed mall campus with controlled access points and operational hours.

- The Proposed Project shall result in the addition of more building access points that will improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving opportunities for CPTED principals that employee natural access control, natural surveillance and territorial reinforcement features.

- The Proposed Project shall provide organized roving security patrol, video surveillance, and security lighting to ensure the safety and security of patrons, tenants and employees.

- The Proposed Project includes reconfiguration of Fashion Square Lane to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) through its entire length of along the south edge of the project site adjacent to proposed structures affording maximum accessibility for emergency service personnel and vehicles.

- The Proposed Project shall provide sufficient off-street parking for all building employees and anticipated patrons and visitors, thereby minimizing the potential for parking conflicts on off-site locations and providing parking within a controlled environment that can be monitored by on-site patrol and surveillance operations.

- Directional and security lighting will be required for safety purposes. Through a new plan, lighting can enhance safety along the Riverside Drive and Hazeltine Avenue frontages and add to the perceived security of the neighborhood in general. Lighting would be incorporated into the streetscape environment at several levels, including the use of bollards, wall reveals, seating areas, and crosswalks. The use of plaza strip lighting will afford additional security lighting but with a park-like feel and without significant light intrusion to the surrounding neighborhood.

- Fashion Square Lane will be reconfigured and improved to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) for its entire length along the south edge of the shopping center from Hazeltine Avenue to Riverside Drive. This fire lane shall be unobstructed except for the connection from the existing west parking structure to the new mall. However, this limited area shall have a minimum vertical clearance of 17 feet.

- New Proposed Project buildings, including parking structures, shall be fully sprinklered.

Public Utilities (Solid Waste) PDFs

- The Proposed Project would develop and implement a construction waste management plan (CWMP) that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or commingled. A minimum of 50% of the construction and demolition debris (exclusive of excavated soils and organic debris) would be recycled and/or salvaged. Excavated/exported soil would be transferred off-site as clean fill rather than landfilled. Organic landclearing debris

(i.e., trees to be removed) would be processed as greenwaste. The CWMP would consider recycling cardboard, metal, brick, acoustical tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation and other similar materials used during the construction phase. The CWMP would designate a specific area(s) on the construction site for segregated or commingled collection of recyclable materials, and track recycling efforts throughout the construction process. Further, the CWMP would identify construction haulers and recyclers to handle the designated materials. Consistent with the intent to minimize waste, the CWMP would also establish a minimum project goal of 10% (post-consumer and ½ pre-consumer) for recycled content construction materials and identify material suppliers that can achieve this goal. During construction, the developer would ensure that the specified recycled content materials would be installed. The CWMP would also establish a project goal (10% minimum) for locally sourced construction materials and would identify materials and material suppliers that can achieve this goal. During construction, the developer would ensure that the specified local materials would be installed and quantify the total percentage of local materials installed.

- The Proposed Project would designate an area for recyclable collection and storage that is appropriately sized and located in a convenient area to serve mall tenants. The Fashion Square Mall Association would consider employing cardboard balers, aluminum can crushers, recycling chutes and other waste management technologies to further enhance and manage a recycling program at the shopping center.

- The Proposed Project will implement a recycling program, which include recycling of more the 90% of corrugated cardboard waste, which is the single largest component of the shopping centers waste. The Proposed Project will also implement a program to separates water from organic waste in the food preparation process through "pulper" equipment. This reduces fuel cost in transporting the waste.

- The application of LEED certifiable measures (see above) would incrementally result in further reduction of solid waste and the long-term impact to local landfills. The Proposed Project will implement a variety of design and operational features, including waste recycling and stream reduction programs, to achieve LEED certification.

Traffic, Circulation and Access PDFs

- While not required to mitigate a significant traffic impact, the Project Applicant will seek LADOT approval to install a traffic signal at the new Riverside Drive/ Fashion Square Lane access at Matilija Avenue to facilitate vehicular movements to and from the project site.

- Pedestrian crossings at Riverside Drive/Matilija Avenue

- In addition to the TDM measures described above that satisfy the requirements of Section 12.26 J, the Proposed Project will voluntarily implement the following

demand management services related to the Orange Line Shuttle to further reduce vehicle trips and parking demand at the site. The Proposed Project will provide a shuttle service connecting the site to a nearby Orange Line station (e.g., Van Nuys Boulevard). This service could be provided by either the provision of a private shuttle or the funding of extended hours for the existing LADOT DASH line. The Orange Line shuttle would complement existing transit services (i.e., the LADOT DASH service) such that the shuttle would operate during hours when other public transit services connecting the site to the Orange Line are not available (e.g., evenings during the work week and certain weekend hours). The shuttle would operate during regular shopping center hours corresponding with periods of peak parking demand at the site (i.e., everyday during the holiday shopping period between November 15 and January 1, and every Saturday/Sunday throughout the year).

- Although not required to mitigate adverse project impacts, the project applicant, in consultation with LADOT, has volunteered to fund the development and implementation of a Neighborhood Traffic Management Plan (NTMP) to address potential existing and future regional "cut-through" traffic on residential streets north of the project site, which may encompass the area generally bounded by Magnolia Boulevard to the north, Riverside Drive to the south, Hazeltine venue to the west and Woodman Avenue to the east. The following is a discussion of the sequential steps typically followed by LADOT in implementing the NTMP.

  - Deposit Funds. Prior to issuance of a Building Permit for the Proposed Project, the project applicant will be required to deposit funds in a separate account maintained by LADOT designated for use in funding the NTMP. The exact amount will be determined by LADOT and will reasonably cover the likely costs of the measures.

  - Stakeholders Meeting. Following establishment of the NTMP account, a group consisting of representatives from LADOT, the Council Office, and the residential community north of the project site will meet to discuss the goals, opportunities and constraints of the NTMP. As needed, follow-up meetings may be conducted with other City departments (Public Works, Fire Department, Police Department, etc.).

  - Data Collection and Initial Plan Formulation. Based on the input received at the stakeholders meeting, LADOT will commence with conducting appropriate studies (traffic observations, traffic counts, vehicle speed surveys, accident research, commercial parking intrusion, etc.) to assess existing traffic conditions on the residential streets north of the project site. The studies will be based on studies conducted for the EIR as well as other studies deemed necessary by LADOT. Following collection of the data and based on their professional experience, LADOT will prepare for the stakeholders an initial NTMP for implementation prior to completion of the Proposed Project.

- Neighborhood Concurrence. As some of the measures that may be recommended within the initial NTMP (e.g., installation of speed humps, implementation of permit parking districts) may, by LADOT policy, require majority or super-majority consent of affected property owners (at least two-thirds), LADOT will work with the stakeholders to survey the appropriate residents to determine if there is support to implement the specific measures.

- Implementation and Follow-Up Studies. LADOT will implement the initial NTMP (including those measures authorized by the affected residents) prior to the completion of the Proposed Project. Following a reasonable period of time after opening of the Proposed Project, LADOT will meet with the stakeholders to review traffic experiences since the implementation of the NTMP and opening of the Proposed Project. As needed, additional review and studies may be conducted by LADOT based on the effectiveness of the initial NTMP and/or traffic and parking issues related to the shopping center.

- Updated NTMP. Based on the follow-up studies, LADOT will present to the stakeholders their recommendations for an updated NTMP. Following review by the stakeholders, and with consent of the affected residents (if required), the updated NTMP will be implemented.

- To further alleviate potential inconvenience existing in the area which lead to non-project related cut-through traffic the Proposed Project has volunteered to design and install protected/permissive left-turn traffic signal phasing for Hazeltine Avenue at its intersection with Riverside Drive to improve current safety and traffic flow at this intersection (i.e., all approaches to the intersection). The southbound left-turn phasing on Hazeltine Avenue is currently under construction by LADOT. The Project Applicant will volunteer to implement the installation of the protected/permissive left-turn phasing at the remaining approaches to the intersection (i.e., northbound approach on Hazeltine Avenue and eastbound and westbound approaches on Riverside Drive).

- Design and install upgraded traffic delineators along Hazeltine Avenue between Riverside Drive and Fashion Square Lane using "quik-kurb" or similar installation approved by LADOT.

2. STANDARD CONDITIONS OF APPROVAL (SCAs)

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

Aesthetics and Visual Resources SCAs

- As required by LAMC Section 12.40, the site will be required to prepare a Landscape Plan which will address replacement of removed trees.

- The owners shall maintain the subject property clean and free of debris and rubbish and to promptly remove any graffiti from the walls, pursuant to LAMC Sections 91.8101-F, 91.8904-1, and 91.1707-E.

Air Quality SCAs

- The Proposed Project will comply with applicable CARB regulations and standards. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.

- The Proposed Project will comply with applicable SCAQMD regulations and standards. The SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the district. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

Geology and Soils SCAs

- Design and construction of the project shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety.

- All grading and earthwork shall be performed in accordance with the Grading Ordinances of the City of Los Angeles and the applicable portions of the General Earthwork Specifications in an approved Geotechnical Report.

- Areas of known or potential liquefaction are required to provide mitigation as defined in Public Resources Code Section 2693(c).

Hazardous Materials and Man-Made Hazards SCAs

- The Proposed Project shall comply with SCAQMD Rule 1403 regulating the removal of ACMs from on-site buildings.

- The Proposed Project shall comply with Construction Safety Orders 1532.1(pertaining to lead) from Title 8 of the California Code of Regulations as well as other applicable federal, state and local rules and regulations.

In addition, standard conditions and regulatory requirements described in Section IV: Environmental Impact Analysis: E-Water Resources, would also address regulations that affect the use/storage of hazardous materials.

Water Resources (Hydrology, Water Quality and Water Supply) SCAs

- The City of Los Angeles Development Best Management Practices Handbook, Part A Construction Activities (3rd Edition), adopted by the Los Angeles Board of Public Works on September 29, 2004, and associated ordinances have specific minimum BMP requirements for all construction activities and require that construction projects with one acre or greater of disturbed soil prepare a SWPPP and file a NOI to comply with the State NPDES General Construction Permit with the SWRCB.

- City of Los Angeles Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control which requires the application of Best Management Practices (BMPs). Los Angeles Municipal Code, Chapter IX, Division 70 addresses grading, excavations, and fills. The Proposed Project will meet the applicable requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board (LARWQCB), including the sections related to commercial development and the restaurant industry. The following is LARWQCB's list of stormwater pollution control measures for commercial and restaurant development is required:

  For Commercial development (Lot size 100,000 square feet)

  - Project applicants are required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24 hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

  - Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rates for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.

  - Concentrate or cluster development on portions of a site while leaving the remaining land in a natural undisturbed condition.

  - Limit clearing and grading of native vegetation at the project site to the minimum needed to build lots, allow access, and provide fire protection.

  - Maximize trees and other vegetation at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.

- Reduce impervious surface area by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e. turf block; and granular materials, i.e. crushed aggregates, cobbles.

- Promote natural vegetation by using parking lot islands and other landscaped areas.

- Preserve riparian areas and wetlands.

- Cover loading dock areas or design drainage to minimize run-on and run-off of stormwater.

- Direct connections to storm drains from depressed loading docks (truck wells) are prohibited.

- Repair/maintenance bays must be indoors or designed in such a way that doesn't allow stormwater run-on or contact with storm water run-off.

- Vehicle/equipment wash areas must be self-contained and/or covered, equipped with a clarifier, or other pretreatment facility, and properly connected to the sanitary sewer.

- Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.

- The following activities are to be conducted under proper cover with drain routed to the sanitary sewer:
    - Storage of industrial wastes
    - Handling or storage of hazardous wastes
    - Metal fabrication or pre-cast concrete fabrication
    - Welding, cutting or assembly
    - Painting, coating or finishing

- Reduce impervious surface area by using permeable pavement materials where appropriate including pervious concrete, unit pavers, and granular materials.

- Store above ground liquid storage tanks (drums and dumpsters) in areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, dikes, liners, vaults, and double-wall tanks. Where used oil or dangerous waste is stored, a dead-end sump should be installed in the drain.

- Toxic wastes must be discarded at a licensed regulated disposal site. Store trash dumpsters either under cover and with drains routed to the sanitary sewer or use non-leaking and water-tight dumpsters with lids. Use drip pans or absorbent materials whenever grease containers are emptied. Wash containers in an area with properly connected sanitary sewer.

- Reduce and recycle wastes, including paper, glass, aluminum, oil and grease.

- Reduce the use of hazardous materials and waste by using detergent-based or water-based cleaning systems, and avoid chlorinated compounds, petroleum distillates, phenols, and formaldehyde.

- Convey runoff safely from the tops of slopes and stabilize disturbed slopes.

- Utilize natural drainage systems to the maximum extent practicable.

- Control or reduce or eliminate flow to natural drainage systems to the maximum extent practicable.

- Stabilize permanent channel crossings.

- Protect slopes and channels and reduce run-off velocities by complying with Chapter IX, Division 70 of the Los Angeles Municipal Code and utilizing vegetation (grass, shrubs, vines, ground covers, and trees) to provide long-term stabilization of soil.

- Cleaning of vehicles and equipment to be performed within designated covered or bermed wash area paved with Portland concrete, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connect sanitary sewer with a CPI type oil/water separator. The separator unit must be designed to handle the quantity of flows, removed for cleaning on a regular basis (at least twice a year) to remove any solids, and the oil absorbent pads must be replaced regularly, once in fall just before the wet season, and in accordance with manufacturer specifications.

- All storm drain inlets and catch basins within the project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO THE OCEAN") and/or graphical icons to discourage illegal dumping.

- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks within the project area.

- Legibility of stencils and signs must be maintained.

- Materials with the potential to contaminate stormwater must be:
  - Placed in an enclosure such as, but not limited to, a cabinet, shed or similar stormwater conveyance system; or
  - Protected by secondary containment structures such as berms, dikes or curbs.

- The storage area must be paved and sufficiently impervious to contain leaks and spills.

- The storage area must have a roof or awning to minimize collection of stormwater within the secondary containment area.

- The owner(s) of the property will prepare and execute a covenant and agreement (Planning Department General Form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturers instructions.

- Cut and fill slopes in designated hillside areas shall be planted and irrigated to prevent erosion, reduce run-off velocities and to provide long-term stabilization of soil. Plant materials include grass, shrubs, vines, ground covers and trees.

- Incorporate appropriate erosion control and drainage devices such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by LAMC Section 91.7013. Protect outlets of culverts, conduits or channels from erosion by discharge velocities by installing rock outlet protection. Rock outlet protection is a physical device composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe. Install sediment traps below the pipe outlet. Inspect, repair, and maintain the outlet protection after each significant rain.

- Trash container areas must have drainage from adjoining roofs and pavement diverted around the area(s).

- Trash container areas must be screened or walled to prevent off-site transport of trash.

- Reduce impervious land coverage of parking lot areas.

- Infiltrate runoff before it reaches the storm drain system.

- Runoff must be treated prior to release into the storm drain. Three types of treatments are available: (1) dynamic flow separator; (2) filtration; or (3) infiltration. Dynamic flow separators uses hydrodynamic force to remove debris, and oil and grease, and are located underground. Filtration involves catch basins with filter inserts. Filter inserts must be inspected every six months and after major storms, cleaned at least twice a year. Infiltration methods are typically constructed on-site and are determined by various factors such as soil types and groundwater table.

- Prescriptive methods detailing BMPs specific to this project category are available. Applicants are encouraged to incorporate the prescriptive methods into

the design plans. These prescriptive methods can be obtained at the Public Counter or downloaded from the City's website at: http://www.lastormwater.org.

For Food Service Industry (Restaurants, Bakeries, Food Processors)

- Project applicants are required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24 hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

- Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rates for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.

- Concentrate or cluster development on portions of a site while leaving the remaining land in a natural undisturbed condition.

- Limit clearing and grading of native vegetation at the project site to the minimum needed to build lots, allow access, and provide fire protection.

- Maximize trees and other vegetation at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.

- Promote natural vegetation by using parking lot islands and other landscaped areas.

- Preserve riparian areas and wetlands.

- Incorporate appropriate erosion control and drainage devices such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by LAMC Section 91.7013. Protect outlets of culverts, conduits or channels from erosion by discharge velocities by installing rock outlet protection. Rock outlet protection is a physical device composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe. Install sediment traps below the pipe outlet. Inspect, repair, and maintain the outlet protection after each significant rain.

- Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.

- Cleaning of oily vents and equipment to be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type

oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.

- Store trash dumpsters either under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids. Wash containers in an area with properly connected sanitary sewer.

- Reduce and recycle wastes, including paper, glass, aluminum, oil and grease.

- Store liquid storage tanks (drums and dumpsters) in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Use drip pans or absorbent materials whenever grease containers are emptied.

- All storm drain inlets and catch basins within the project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO THE OCEAN") and/or graphical icons to discourage illegal dumping.

- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks within the project area.

- Legibility of stencils and signs must be maintained.

- Materials with the potential to contaminate stormwater must be:
  - Placed in an enclosure such as, but not limited to, a cabinet, shed or similar stormwater conveyance system; or
  - Protected by secondary containment structures such as berms, dikes or curbs.

- The storage area must be paved and sufficiently impervious to contain leaks and spills.

- The storage area must have a roof or awning to minimize collection of stormwater within the secondary containment area.

- The owner(s) of the property will prepare and execute a covenant and agreement (Planning Department General Form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturers instructions.

- Prescriptive methods detailing BMPs specific to this project category are available. Applicants are encouraged to incorporate the prescriptive methods into

the design plans. These prescriptive methods can be obtained at the Public Counter or downloaded from the City's website at: www.lastormwater.org.

- The Proposed Project would adopt an erosion and sediment control plan for the project site during the construction phase that would employ strategies such as temporary and permanent seeding, mulching, earth dikes, silt fencing, sediment traps and sediment basins. The erosion and sediment control plan would comply with U.S. Environmental Protection Agency (EPA) Document No. EPA 832/R-92-005 (September 1992), Storm Water Management for Construction Activities, Chapter 3 (or the local agency equivalent erosion and sedimentation control standards and codes) and would address soil loss, stormwater runoff, wind erosion, sedimentation, and fugitive dust at a minimum. The erosion and sediment control plan would contribute to minimizing water quality impacts and may indirectly minimize aesthetic effects during the construction phase.

Title 20 and Title 24 of the California Code of Regulations establish various conservation standards, including standard that relate to water conservation and the protection of water resources. The Proposed Project will be consistent with State requirements for water conservation standards.

Land Use, Planning and Urban Decay SCAs

- The Proposed Project must obtain the appropriate approvals, including zone change, variances and conditional use permits, prior to commencing project development. Attainment of such approvals shall in turn ensure that the Proposed Project is in full compliance with local codes, procedures and regulations.

- The Proposed Project shall comply with the draft RIO and/or adopted RIO in effect at the time of project approval.

- In accordance with the SUSMP requirements, the Proposed Project shall meet (or exceed) all minimum site design and source control BMPs.

- The Proposed Project shall adopt an erosion and sediment control plan for the project site during the construction phase that would employ strategies such as temporary and permanent seeding, mulching, earth dikes, silt fencing, sediment traps and sediment basins. The erosion and sediment control plan shall comply with U.S. Environmental Protection Agency (EPA) Document No. EPA 832/R-92-005 (September 1992), Storm Water Management for Construction Activities, Chapter 3 (or the local agency equivalent erosion and sedimentation control standards and codes) and shall address soil loss, stormwater runoff, wind erosion, sedimentation, and fugitive dust at a minimum. The erosion and sediment control plan shall contribute to minimizing water quality impacts and may indirectly minimize aesthetic effects during the construction phase.

- Consistent with California laws, the Proposed Project shall prohibit smoking in the shopping center buildings, public areas, or exterior areas within 25 feet from entries, outdoor air intakes and operable windows, unless such areas are specifically designated and properly ventilated as a dedicated "smoking area".

Noise SCAs

- The City of Los Angeles Noise Ordinance has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Regarding construction, the LAMC indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. the following day, since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence.[8] No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on any Sunday.

- The LAMC also specifies the maximum noise level of powered equipment or powered hand tools.[9] Any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

Public Services (Fire and Police) SCAs

- All businesses within the development desiring to sell or allow consumption of alcoholic beverages will require licensing through Alcohol and Beverage Control and approval by the LAPD.

Compliance with the LAMC will be required. Many of the LAMC requirements serve to reduce fire safety concerns to less than significant levels.

- The Proposed Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, which is an element of the General Plan of the City of Los Angeles (CPC 19708).

[8] Chapter IV, Article 1, Section 41.40, January 29, 1984 and Chapter XI, Article 2, Section 112.04, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.
[9] Chapter XI, Article 2, Section 112.05, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

- In accordance with the City of Los Angeles building permit review process, definitive plans and specifications shall be submitted to the Fire Department and any requirements for necessary permits shall be satisfied prior to commencement and/or occupation of any portion of the Proposed Project. Typical site plan and building permit requirements would include, but not be limited to, the following:

  - All first story portions of any habitable building shall be within 300 feet of an approved fire hydrant.

  - A building smoke alarm system designed to detect any smoke in the building's air-handling systems shall be installed. The system shall cause an alarm to be announced at the central fire control station.

  - A fire alarm system shall be installed which uses a dependable method of sounding a fire alarm throughout the building.

  - All decorative landscaping surrounding project structures shall use fire-resistant plants and materials.

  - Brush in the area adjacent to proposed development shall be cleared or thinned periodically by the applicant under supervision of the LAFD.

  - New fire hydrants and/or top upgrades to existing fire hydrants shall be installed in accordance with the Los Angeles Fire Code.

  - Adequate public and private fire hydrants will be required. The number and location of these hydrants will be determined by the Fire Department after review of the Plot Plan.

  - Access for Fire Department apparatus and personnel to and into all structures shall be required.

  - At least two different ingress/egress roads for each area, which will accommodate major fire apparatus and provide for major evacuation during emergency situations, shall be required.

  - Fire lanes, where required, and dead-ending streets should terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane should be greater than 700 feet in length or secondary access shall be required.

  - Construction of public or private roadways in the proposed development shall not exceed 15 percent in grade, unless otherwise approved.

- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane, unless otherwise approved.

- Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

- Additional vehicular access may be required by the Fire Department where buildings exceed 35 feet in height.

- Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the Fire Department.

- The Project shall utilize standard cut-corners on all turns, if applicable.

- Fire Department access shall remain clear and unobstructed during demolition.

- If applicable, fire lanes and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

- If applicable, where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface on the roadway. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

- Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.

Public Utilities (Solid Waste) SCAs

- The Propose Project would comply with the Countywide Integrated Waste Management Plan and meet targeted waste stream reduction requirements as provided in the plan.

Traffic, Circulation and Access SCAs

- In accordance with LAMC Section 91.70067, hauling of construction materials shall be restricted to a haul route approved by the City. The City of Los Angeles will approve specific haul routes for the transport of materials to and from the site during demolition and construction. This process includes a public hearing and opportunities for the public to comment on the proposed route.

- The Proposed Project will comply with Section 12.26 J of the Los Angeles Municipal Code for purposes of implementing a Transportation Demand Management (TDM) plan. The following outlines the minimum measures that the project will undertake in compliance with the Code section.

  - Employee Transportation Center and Transportation Coordinator. The project shall designate an area within the building to be the Transportation Center. The Employee Transportation Center shall be maintained by the center's Transportation Coordinator, who will be employed by the shopping center. The Transportation Coordinator will assist employees in seeking out and arranging for commute alternatives. This includes carpool and vanpool formation, assisting employees with planning trips to work via bus, and locating bike or walking routes to work. The Employee Transportation Center shall provide a bulletin board, display case, or kiosk displaying transportation information where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

    - Current routes and schedules for public transit serving the site;
    - Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;
    - Ridesharing promotion material supplied by commuter-oriented organizations;
    - Regional/local bicycle route and facility information; and
    - A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

  - Preferential Parking Spaces. The project will provide designated parking areas for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit.

  - Bicycle Parking Spaces. Bicycle parking shall be provided in conformance with Section 12.21 A 16 of the Los Angeles Municipal Code. The project will provide safe and convenient access from the external circulation system to bicycle parking facilities on-site.

  - Carpool/Vanpool Loading Area. The project shall provide a safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area.

- Pedestrian Access. The project shall provide sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to the center.

- Transit Stop Enhancements. In coordination with LADOT and the Department of City Planning, the project will consult with local bus service providers in determining appropriate improvements to transit stops, such as installation of benches, shelters, and schedule information.

III. GENERAL DESCRIPTION OF THE ENVIRONMENTAL SETTING

A. OVERVIEW OF THE ENVIRONMENTAL SETTING

1. GEOGRAPHIC SETTING AND ACCESS

The project site is located within the Sherman Oaks community within the City of Los Angeles, approximately 13 miles northwest of downtown Los Angeles. Regional access to the Fashion Square shopping center is provided by US 101 (Ventura) Freeway. Local access is provided via Hazeltine Avenue, Riverside Drive, and Woodman Avenue.

The Los Angeles River is on the south side of the Ventura (US 101) Freeway, but crosses to the north side of the freeway just west of Hazeltine Avenue. The River is a concrete channelized structure in this area.

The project site is located on a relatively flat parcel that slopes (downgrade) gently from the northeast to the southwest, with an overall elevation relief of 22 feet differential from the east/west elevation.

Currently during schools days (7 a.m. to 4 p.m.), Fashion Square makes available 100 parking spaces for Buckley High School and 60 parking spaces for Notre Dame High School in the east surface parking lot. These parking spaces are on a month-to-month agreement and are not made available to students on the weekends or during the highest peak holiday periods.

2. EXISTING DEVELOPMENT AND SURROUNDING LAND USES

The project area is characterized as urbanized and largely built out with a mix of commercial and residential uses. The project site is currently developed with the existing shopping center consisting of approximately 28.8 acres of retail shops, restaurants and parking uses.

The project site currently contains three multi-level parking structures, surface parking lots, a two-story mall and two three-story anchor stores. Each existing parking structure contains one-level at grade, and a one-level, two-level and three-level above grade parking floors, respectively.

The project site is surrounded by developed properties on all sides. Land uses immediately to the north, across Riverside Drive, include multi- and single-family residential properties. To the west, land uses include an office building west of Hazeltine Avenue, and retail, office, and City of Los Angeles Department of Water and Power uses at the north side of the intersection of Riverside Drive and Hazeltine Avenue. To the south, the site is bordered by the Ventura (US 101) Freeway. To the east, land uses include commercial along Woodman Avenue, south of Riverside Drive as well as the Notre Dame High School on the northeast corner of the intersection of Riverside Drive and Woodman Avenue.

3. PHYSICAL SITE CHARACTERISTICS

The climate in the project region is a characterized as Mediterranean, which is semi-arid and exhibits a wet-dry cycle of dry summers and a winter rainy season. The strength and location of a semi-permanent, subtropical high pressure cell over the Pacific Ocean is the primarily influence on the climate in the project region. Temperatures range from the low 40's during winter nights to the high 90's and low 100's during summer afternoons.

The project site and surrounding area is characterized as an urban, developed commercial and residential area. The project site and all surrounding properties have undergone disturbance previously resulting from development of the existing shopping center, additional commercial uses at the adjacent intersections of Riverside Drive and both Hazeltine Avenue and Woodman Avenue, as well as the surrounding residential uses.

Vegetation on the site is limited to landscaping associated with existing development and a block of trees that currently buffer the site from the adjacent Ventura (US 101) Freeway to the south.

The visual character of the project site and surrounding area is that of a fully developed urban corridor, developed with a mix of retail, commercial, and residential uses. Typical residential development in the area ranges from one to four stories in height. Surrounding office and retail uses are typically between one to four stories in height as well, except for the six-story Sunkist building to the west and the 10-story office/financial building on the north side of Riverside Drive at Woodman Avenue. Existing buildings on the project site range between approximately 49 to 73 feet in height. Because of the relatively low height of most development within the project area, long-range viewsheds are relatively unobstructed; however, the close relative proximity of development within this urban area obstructs these views. Existing light sources come from both development at the project site and surrounding retail and residential uses.

Regional access to the shopping center is provided by US 101 (Ventura) Freeway. Local access is provided via Hazeltine Avenue, Riverside Drive, and Woodman Avenue. Nonetheless, analysis of 18 study intersection in the project area (see Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access of this DEIR) found that 16 of those intersections are presently operating at acceptable levels of service (i.e., level of service D or better) during peak hours. Two intersections in the immediate project area, Van Nuys Boulevard at the US 101 EB Ramps and Woodman Avenue at Riverside Drive, operated below acceptable levels of service (i.e., level of service F) during the peak hours.

The project area, being fully urbanized, is fully serviced for all public utilities and public services. Electricity at the project site is currently provided by the City of Los Angeles, Department of Water and Power (LADWP). LADWP owns the electrical power generation plant and, as such, electrical service within the LADWP service area has not been affected by the recent statewide energy shortage. Natural gas at the project site is currently provided by the Southern California Gas Company (Gas Company). The project site is located within the Hyperion Water Treatment Plant (HWTP) Service Area.

A comprehensive discussion of the setting and impacts for the issues listed below is found in Sections of this DEIR as follows:

Aesthetics and Visual Resources	Section IV-A
Air Quality	Section IV-B
Geology and Soils	Section IV-C
Hazardous Materials and Man-Made Hazards	Section IV-D
Water Resources	Section IV-E
Land Use, Planning and Urban Decay	Section IV-F
Noise	Section IV-G
Public Services	Section IV-H
Public Utilities	Section IV-I
Traffic, Circulation and Access	Section IV-J

4. LAND USE AND PLANNING CONTEXT

The Van Nuys-North Sherman Oaks Community Plan is the guiding community plan for the project site and surrounding area. The intent of the Community Plan is to promote an arrangement of land uses, circulation, and services that will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live in the community. According to the Community Plan, the project site is currently designated as Community Commercial. Continued use of the project site for the shopping center would be consistent with this land use designation, as it provides commercial uses consistent with the permitted corresponding zoning. The Community Commercial designation is within Height District 1L, which permits structures up to six stories and a maximum of 75 feet in height. The project site is not within any specific plan area.

The project site is currently zoned (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L. All of the existing zones tied to the project site are permitted under the existing Community Commercial General Plan designation, which permits a range of commercial and related zones including CR, C1.5, C2, C4, P, and PB. The C2 zone permits a wide range of commercial retail uses to address community needs. P is an automobile parking zone that provides for public/private parking within surface and/or subterranean lot areas. PB is a parking building zone that permits public/private parking within above-grade parking structures, as well as surface and below-grade parking.

III. GENERAL DESCRIPTION OF THE ENVIRONMENTAL SETTING

B. RELATED PROJECTS

Section 15130 of the California Environmental Quality Act (CEQA) requires that Environmental Impact Reports (EIRs) analyze cumulative impacts of a project. The analysis of cumulative impacts need not be as in-depth as what is provided relative to the Proposed Project, but rather is to "be guided by the standards of practicality and reasonableness". CEQA Guidelines Section 15355 further defines cumulative impacts as "two or more individual projects, which when considered together, are considerable or which compound or increase the environmental impacts."

Cumulative impacts are anticipated impacts of the project along with foreseeable growth. The forecast of future conditions is clarified in Section 15130 of the CEQA Guidelines. Specifically, the CEQA Guidelines provides that foreseeable growth may be based on either of the following:

> "(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the [lead] agency, or
>
> (B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency."

The analysis of cumulative impacts may be based on an analysis of the geographical area that is relevant to a particular environmental issue. Hence, the cumulative study area may vary slightly depending on the issue under analysis. For example, a cumulative assessment of visual impacts will generally focus on the more immediate surrounding area, while traffic impacts may consider a broader range of roadways that may be used by the project.

For purposes of the Proposed Project, a list of potential related projects within and approximate 2 mile radius of the project site and which are generally representative of foreseeable growth was developed in coordination with the Los Angeles Department of Transportation (LADOT) and the Planning Department. The related projects research was based on information on file on July 31, 2007 at the City of Los Angeles Departments of Planning and Transportation. The location of the related projects is shown in *Figure 21: Location of Related Projects*. The list of related projects in the project site area is presented in *Table 3: List of Related Projects*. The list of related projects was submitted to LADOT and the Planning Department staff for review and approval.

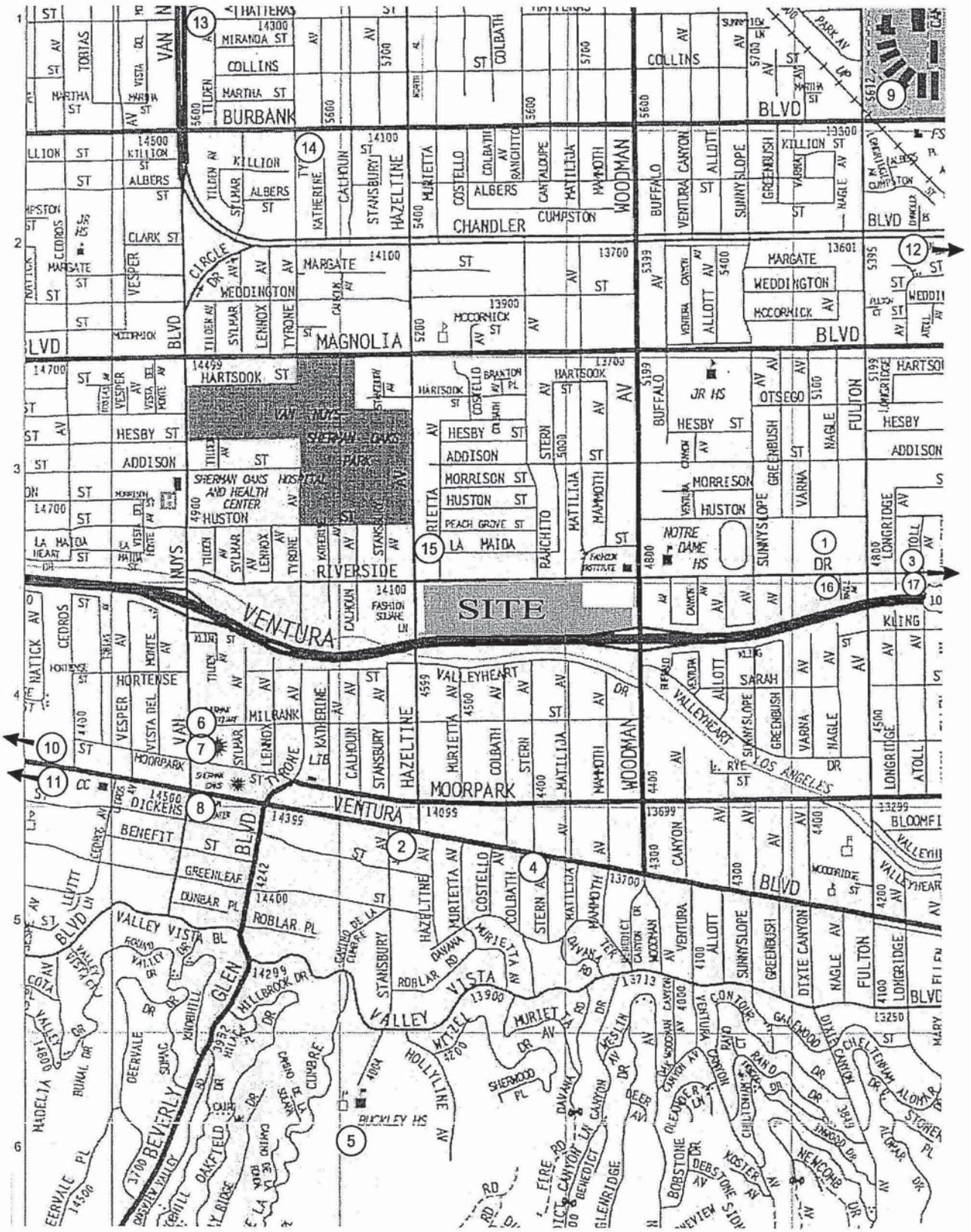


FIGURE 21
LOCATION OF RELATED PROJECTS

NORTH

MAP SOURCE: THOMAS BROS. GUIDE

TABLE 3
LIST OF RELATED PROJECTS [1]

MAP NO.	FILE PROJECT NUMBER	PROJECT NAME LOCATION	LAND USE	SIZE	STATUS	DISTANCE FROM SITE
1	VEN 2004-273	Chase Knolls Apartments 13401 Riverside Dr	Apartments Senior Apartments	102 DU 40 DU	Proposed	.5 Miles
2	VEN 2004-5/ EAF 2002-6453	Camino Real Mixed-Use Development 14121 Ventura Blvd	Condominiums Retail Restaurant Fast Food w/ out Drive-thru	88 DU 6,000 SF 7,000 SF 3,500 SF	Proposed	.6 Miles
3	VEN 2003-2/ EAF 2003-1757	Riverside Drive Office Buildings 12828 Riverside Drive	Office	29,475 SF	Proposed	1.2 Miles
4	VEN 2003-15	Walgreens 13920 Ventura Blvd	Drugstore	11,244 SF	Proposed	.8 Miles
5	VEN 2003-194	Buckley School 3900 Stansbury Ave	School	100 Additional Students (830 Students Total)	Proposed	1.2 Miles
6	VEN 2003-79	Best Buy 4500 Van Nuys Blvd	Retail	60,000 SF	Proposed	.9 Miles
7	VEN 2004-33	Sherman Oaks Square 4454 Van Nuys Blvd	Apartments	98 DU	Proposed	.9 Miles
8	VEN 2003-13	Gas Station Expansion 14478 Ventura Blvd	Gas Station	392 SF	Proposed	1.1 Miles
9	VEN 2003-19	Los Angeles Valley College 5800 Fulton Ave	College	2,300 Students	Proposed	1.9 Miles
10	VEN 2004-86	15222 Ventura Blvd	Condominiums Specialty Retail	52 DU 7,460 SF	Proposed	2.0 Miles
11	VEN 2004-26	Il Villaggio Toscano 4805 Sepulveda Blvd	Apartments Grocery Retail Existing Apartments Existing Residence Existing Office	500 DU 45,000 SF 10,000 SF (24 DU) (11 DU) (52,452 SF)	Proposed	1.8 Miles
12	EAF 2001-3806	5300 Coldwater Canyon Ave	Self Storage Demolish Health Club	60,250 SF (14,624 SF)	Proposed	1.7 Miles
13	EAF 2004-0661	5829 Van Nuys Blvd	New Car Sales	85,038 SF	Proposed	1.8 Miles
14	ENV 2005-5273-MND	14242 West Burbank Blvd	Condominium	26 DU	Proposed	7.8 Miles
15	ENV 2005-6373-MND	4838 North Hazeltine Ave	Condominium	23 DU	Proposed	456 Feet
16	2006-44	Merdinian Evangelical School 13330 Riverside Drive	Private School	300 Students	Proposed	.6 Miles
17	2006-130	Sherman Village 12629 Riverside Drive	Condominium	247 DU	Proposed	2.0 Miles

[1] Source: City of Los Angeles Departments of Planning and Transportation, as of July 31, 2007.

The related projects listed in *Table 3: List of Related Projects* are considered, to the extent that they are appropriate and relevant in the context of incremental impacts of the Proposed Project, in the cumulative impact analysis of each environmental issue evaluated in this EIR.

IV. ENVIRONMENTAL IMPACT ANALYSIS

A. AESTHETICS AND VISUAL RESOURCES

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Visual Character of the Project Area

The visual character of the area is that of a developed urban corridor as shown in *Figure 22: Photo of Surround Area*. The project site is currently surrounded by a mix of retail, commercial, and residential uses. Most development in the area is restricted to three to four stories. However, a ten-story office building (the Downey Savings building) is located at the northwest corner of the Riverside Drive/Woodman Avenue intersection. Surrounding development is typical in visual character of a community area built out between the 1950's through 1970's. When the existing shopping center at the project site was built in the early 1960's, the Fashion Square employed an outdoor mall concept and a modern design for that time. Since its original construction, the shopping center has under gone several renovations for which the design has been influenced by community input. Most notably, when the shopping center was enclosed, community input directed that the mall minimize its access and retail frontages along Riverside Drive and maintain a relatively "low key" façade opposite existing residences north of Riverside Drive.

None of the surrounding roadways have been designated as a scenic highway by the Van Nuys-North Sherman Oaks Community Plan. The closest scenic highways identified by the Community Plan are Sherman Way and Beverly Glen, located approximately four miles northwest one mile to the southwest of the project site, respectively.

No other scenic resources of significance are known to exist within the project area. The project site does not contain any specific trees, rock outcroppings or historic buildings that contribute toward visual character. The Community Plan identifies five historical-cultural monuments within the Plan Area, which included the Tower of Wooden Pallets, the Van Nuys Woman's Club Building, the Valley Municipal Building (Van Nuys City Hall), "The Magnolia" (a.k.a. Hirschberg) residence, and the Baird House. However, these resources are not within the immediate vicinity of the project site.

The City of Los Angeles recently adopted (July 2007) the Los Angeles River Revitalization Master Plan, which targets the revitalization of a 32-mile segment of the Los Angeles River and the land uses that surround it. Although the river corridor has not been designated a scenic resource, the intent of the Master Plan is to facilitate a "greening" of key portals to the river. The Los Angeles River parallels the Ventura Freeway immediately south of the project site and then traverses to the north side of the freeway westerly of Hazeltine Avenue. Because of intervening development and fences, the river is not visible from the project site. The project site's relationship to, and consistency with the Master Plan are discussed in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this DEIR.

FIGURE 22
PHOTO OF SURROUNDING AREA

MAP SOURCE: WESTFIELD

(2) Existing Views in the Project Area

Views of the project site can be described from three general land use source areas: (1) views from the Ventura Freeway; (2) views from surrounding businesses on Hazeltine and Woodman Avenues; and (3) views from local residences along Riverside Drive. *Figure 23: Existing View – Woodman Avenue Frontage*, *Figure 24: Existing View – Riverside Drive and Woodman Avenue Intersection*, *Figure 25: Existing View – Riverside Drive*, *Figure 26: Existing View – Riverside Drive*, *Figure 27: Existing View – Riverside Drive and Hazeltine Avenue Intersection*, and *Figure 28: Existing View – Hazeltine Avenue*, shows views as seen from these adjacent land uses.

Views of the project site from passing motorists along the Ventura Freeway are relatively non-descript. In this area, the freeway is elevated approximately five to twelve feet above the project site elevations as it passes over the Woodman Avenue and Hazeltine Avenue roadways that bound the east as west side of the project site, respectively. The southern edge of the project site, which directly abuts the freeway right-of-way, is lined with trees ranging approximately 30 to 50 feet in height. At typical travel speeds along the freeway, views into the project site are generally screened by the trees; however, intermittent views of the existing parking structures, the upper levels of which are at the same height as the freeway, and signage for the shopping center are visible through the trees.

The majority of the surrounding businesses to the north, east and west of the project site are oriented to face toward the adjacent roadways on which they front. In general, retail businesses along Riverside Drive and Woodman Avenue have views that are defined by their respective frontage parking lots, abutting streetscape and immediate adjacent businesses. Views towards and of the project site from single story retail businesses in the immediate area are not substantial because the project site is generally not visible from within these buildings. However, four taller office buildings are located in the immediate area, which have views directly facing the project site. The Sunkist office building, located on the west side of Hazeltine Avenue faces the western edge of the project site and has views dominated by the existing Bloomingdale's department store and the four level parking structure. The ten-story Downey Savings building and the adjacent two-story, professional office building are located on the north side of Riverside Drive directly across from the Riverside Woodman Shopping Center, which is located on the same block as the shopping center but is not a part of the Fashion Square site. Both of these office structures have partial views that include the easterly parking structure area and the Macy's department store, in addition to the street frontage that extends along this area. Because of its height, occupants in the upper stories of the Downey Savings building also have unobstructed views of the Santa Monica Mountains to the south and an overview perspective of the entire project site. The fourth tall building in the area is the 5 story LB bank building on Woodman Avenue. This building has a direct view of the east surface parking area. Because of its height and location, occupants of this building have unobstructed views of the Santa Monica Mountains to the south.

Views from surrounding residents are mostly restricted to those residences directly north of Riverside Drive. Although there are residential areas south of the site (south of the Ventura

FIGURE 23
EXISTING VIEW – WOODMAN AVENUE FRONTAGE

MAP SOURCE: PLANNING ASSOCIATES, INC.

FIGURE 24
EXISTING VIEW – RIVERSIDE DRIVE AND WOODMAN AVENUE INTERSECTION
MAP SOURCE: PLANNING ASSOCIATES, INC.

FIGURE 25
EXISTING VIEW – RIVERSIDE DRIVE

MAP SOURCE: PLANNING ASSOCIATES, INC.

FIGURE 26
EXISTING VIEW – RIVERSIDE DRIVE

MAP SOURCE: PLANNING ASSOCIATES, INC.

FIGURE 27
EXISTING VIEW – RIVERSIDE DRIVE AND HAZELTINE AVENUE INTERSECTION
MAP SOURCE: PLANNING ASSOCIATES, INC.

FIGURE 28
EXISTING VIEW – HAZELTINE AVENUE

MAP SOURCE: PLANNING ASSOCIATES, INC.

Freeway) and to the east and west of the site on the opposite side of local businesses, views of the project site from these locations are relatively insignificant because they are already obstructed by existing commercial developments, the freeway and landscaping.

Residences to the north that have direct views of the project site include several two story multi-residential uses along the middle segment of Riverside Drive (from approximately Murietta Avenue to Matilija Avenue), and one- and two-story single-family homes along the first block of Matilija Avenue and Ranchito Avenue. Components of the existing shopping center that are visible to residents north of Riverside Drive include the Bloomingdale's and Macy's department stores exterior as anchor buildings, the Riverside Drive frontage of the shopping center exterior, and the two-story Macy's department store parking structure across from Matilija Avenue. The two-story Riverside Woodman Shopping Center is also prominent along this frontage.

Because Ranchito Avenue is oriented at a right-angle perpendicular to Riverside Drive, and homes are set back from the street and there are a number of street trees, views from residences along this street are very limited and generally visible only from the street right-of-way. Views from residences along Matilija Avenue are more relevant because of a curved orientation of this street and the absence of any significant street trees affords a more direct view. Homes closest to the Riverside Drive frontage have very limited view to the mountains toward the south because they are already obscured by existing development. As shown of *Figure 29: Existing View – Existing Residents, North of Riverside Drive*. Residences located more than one-half block to the north have intermittent views of the distant Santa Monica Mountains to the south.

(3) Existing Light, Glare and Nighttime Illumination in the Project Area

The project site is located along a developed commercial corridor. Because of the urban nature of this area, there is a relatively moderate level of general ambient nighttime illumination and light/glare sources from existing commercial retail and office uses, including the existing shopping center, and street and parking lot lighting along local roadways. Individual uses also contribute specifically to lighting. Existing light sources to the north include: (1) retail and commercial uses at the Riverside Drive/Hazeltine Avenue intersection; (2) multi-family residential uses along the north side of Riverside Drive from approximately Murietta Avenue to Matilija Avenue; (3) commercial and retail uses at the intersection of Riverside Drive and Woodman Avenue; (4) retail immediately adjacent to the western portion of the site; and (5) Notre Dame High School located at the northeastern corner of the Riverside Drive/Woodman Avenue intersection. To the west, lighting sources consist of retail and commercial uses at the Riverside Drive/Hazeltine Avenue intersection and offices. To the south, the Ventura Freeway generates vehicular lighting and illumination of freeway signs. To the east, lighting sources include the commercial development located along the east side of Woodman Avenue.

For public safety purposes, night lighting sources at the project site currently include identification and way-finding signs; security lighting for the existing building, building entrances, parking structures and surface parking; and vehicular lighting. Nighttime lighting levels begin approximately 1-2 hours after closing of the shopping center.

FIGURE 29
EXISTING VIEW – EXISTING RESIDENTS, NORTH OF RIVERSIDE DRIVE
MAP SOURCE: PLANNING ASSOCIATES, INC.

(4) Existing Shade and Shadow in the Project Area

Shade and shadow conditions are influenced by an area's solar access potential, and determined by several factors that include those related to climate, geographic location and local site conditions. The project area is characterized by a Mediterranean climate that experiences hot, dry summers and a rainy winter season. The regional climatic conditions, described more specifically in Section IV: Environmental Impact Analysis: B-Air Quality of this DEIR, are predominantly sunny throughout the year. The amount of solar radiation potential, as well as the length and direction of shadows, at a particular site also varies based on the time of the year and/or day. Shadow lengths increase during the "low sun" and hence are at their longest during the winter solstice (i.e., during December). Generally, in the project region (which lies within the northern hemisphere) shadows are cast to the west in the morning and east in the afternoon, passing to the north as they transition from west to east through the course of a day.

Uses sensitive to shade/shadow concerns are those that either rely on the access to solar radiation for passive energy needs and/or have useable spaces that best function with some minimum level of solar access (i.e., such as school playgrounds, residential uses, or solar panel/photovoltaic cell sites).

The project site is located on a relatively flat parcel, which slopes down from northeast to southwest, and is located with the valley area northerly of the Santa Monica Mountains and the Hollywood Hills. The surrounding area is void of major topographical transitions. Existing buildings on the project site are generally under 65 feet in height, with some elements being slightly taller but not exceeding 75 feet. Shadows from these existing structures do shadow the residential properties fronting on the north side of Riverside Drive during winter mornings and afternoons.

b. Regulatory and Policy Setting

(1) Van Nuys-North Sherman Oaks Community Plan

As noted above, the Community Plan does not identify any significant visual and/or scenic resources within or immediately adjacent to the project site. However, the Community Plan does provide generalized urban design policies and standards to ensure that projects, public spaces and rights-of-way incorporate specific elements of good design. The intent of the urban design guidelines in the Community Plan is to promote a stable and pleasant environment. In commercial corridors, the emphasis is on the provision and maintenance of the visual continuity of streetscapes and the creation of an environment that encourages pedestrian and economic activity. The Community Plan also acknowledges that a community's identity can be enhanced by individual projects through improvements to the streetscape and landscaping in public spaces and rights-of-way.

The Urban Design policies in the Community Plan generally seek to:

- Orient commercial structures toward the main commercial street where a parcel is located and avoid pedestrian/vehicular conflicts.

- Provide for massing, proportion and scale of all new buildings and remodels that is at a pedestrian scale.

- Provide articulated architecture (and/or landscaping) that offers variation and visual interest, and enhances the streetscape by providing continuity and avoiding opportunities for graffiti.

- Utilize building materials to provide relief to untreated portions of exterior building facades and avoid large sterile expanses of building walls that are in harmony with the surrounding neighborhood.

- Design parking structures to be integrated with the design of the buildings they serve.

- Provide landscaping within surface parking areas.

- Provide appropriate exterior lighting to enhance pedestrian access and safety, while avoiding spillover on adjacent residential uses.

(2) Los Angeles Municipal Code

The project site is not subject to any special design districts. However, the project site and adjacent properties are within Height District 1L, which permits structures up to six stories and 75 feet in height. See also Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay of this DEIR, for a more detailed description of the applicable existing and proposed zoning requirements, including those addressing height.

2. THRESHOLDS OF SIGNIFICANCE

The following factors are set forth in the LA CEQA Thresholds Guide for consideration, on a case-by-case basis, of the significance of potential environmental impacts:

a. Visual Quality and Character

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished;

- The amount of natural open space to be graded or developed;

- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc;

- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;

- The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements;

- The degree to which the project would contribute to the area's aesthetic value; and

- Applicable guidelines and regulations.

b. Views

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);

- Whether the project affects views from a designated scenic highway, corridor, or parkway;

- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and

- The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

c. Shade/Shadow

- A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).

d. Light/Glare and Nighttime Illumination

- The change in ambient illumination levels as a result of project sources; and

- The extent to which project lighting would spill off the project site and effect adjacent light sensitive areas.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project includes construction of approximately 280,000 GLSF of retail and restaurant uses, as well as two multi-level parking structures and surface parking area. The proposed retail expansion building and main six-level parking structure will be constructed primarily in the space between the existing shopping center (located immediately adjacent to the Riverside Drive frontage) and the Ventura (US 101) Freeway that is currently occupied by a portion of the existing mall parking structure and surface parking. A second four-level parking structure will be constructed on the eastern portion of the project site, adjacent to Woodman Avenue. New construction will not exceed 75 feet in height (with the highest component being the main parking structure), nor will the new construction exceed the height of the existing Macy's building, which has a maximum height of 722 feet above sea level. New construction will be consistent with height limits of the C2-1L zoning on the project site.

Figure 17: Proposed Building Elevations, in Section II: Project Description, shows the general bulk, mass and architecture of the proposed structures relative to the existing buildings. This elevation shows that in addition to views of the new parking structures visible to the south and east of the Macy's department store, the Riverside and Hazeltine façades of the existing shopping center buildings will be updated through building colors, material accents and landscaping that will visually tie the entire project together and enhance the pedestrian-scale environment. Specifically, the Riverside Drive building surfaces would be refreshed with a new graphic design treatment that would consist of small visual mosaics of color and pattern intended to visually minimize the massing of the long linear wall along the frontage. It is intended that a combination of landscaping, hardscaping and building finish elements would create a vibrant urban atmosphere that offers more pedestrian-friendly linear banding and gives a fresh, updated look to the shopping center. The structural frontage along Riverside Drive (i.e., Bloomingdale's and Macy's department stores, shopping center, loading docks) will not be substantially altered except as necessary to accommodate access to the tunnel reactivation.

The new main six-level parking structure will be constructed south of the existing Macy's department store and associated parking structure, and will be set back from the Riverside Drive frontage approximately 300 feet.

Existing vegetation on the site is limited to landscaping associated with the existing development and trees that buffer the site from the adjacent Ventura Freeway on the south. Project construction would require removal of 45 mature trees, 7 of which are in poor health. Upon completion of project construction, any trees removed during construction will be replaced on a 1:1 basis, per the LAMC. Landscaping proposed with the Proposed Project is generally illustrated in *Figure 187: Conceptual Landscape Plan -1* and in *Figure 19: Conceptual Landscape Plan -2*, as provided in Section II: Project Description, of this DEIR.

The proposed landscape plan for the Proposed Project would focus primarily on the enhancing the Riverside Drive and Hazeltine Avenue frontages at the project site, and the addition of new and replacement landscaping within and adjacent to the newly constructed areas, including

driveways and the east surface parking lot. The proposed Conceptual Landscape Plan can be described as consisting of three landscape elements: (1) perimeter landscaping; (2) internal landscaping; and (3) architectural accent landscaping. Each landscape element will contain both vertical and horizontal components. The horizontal components provide visual continuity and the vertical elements will provide articulation to break up the mass and bulk of the structure. Perimeter landscaping includes landscaping within the required (per LAMC) landscape setbacks along the street frontages and site edges. Perimeter landscaping would include street trees and infill ornamental greenery. The internal landscaping elements include ornamental plantings along driveways, walkways and parking areas within the project site. Internal landscaping includes canopy shade trees throughout the surface parking lots, accent plantings to help define driveways and entrances, and plantings to screen service areas and mechanical equipment. Architectural accent landscaping includes planters, espaliers and similar treatments that are incorporated into the design of the building facades and highlight access points and screen back of house elements.

The Proposed Project would comply with the City of Los Angeles Sign Ordinance. The proposed development will not exceed the height of the existing Macy's building on site and will not exceed the 75-foot height limit allowed by the zoning on site.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- A minimum of one 24-inch box tree (minimum diameter of two inches and a height of eight feet at the time of planting) shall be planted for every four new surface parking spaces.

- The Final Expansion Project Landscape Plan, which will be reviewed and approved by the City of Los Angeles, shall incorporate clinging vines and bamboo screening, which provide a variety of textures and colors, along exterior walls visible along the Riverside Drive and Hazeltine Avenue frontages.

- The Final Expansion Project Landscape Plan shall include the installation of healthy mature trees for all replacement trees and new landscaping along Riverside Drive.

- New project landscaping along Riverside Drive would provide an opportunity to visually activate this frontage and minimize building massing. A combination of landscape, hardscape, and building finish elements would create a vibrant urban atmosphere that offers more pedestrian-friendly linear banding and gives a fresh, updated look to the shopping center. The landscape plan would incorporate specimen accent plantings, including distinctive palms, large canopy trees, evergreens, seasonal color trees and bold median plantings. The landscape concept also incorporates various hardscape features, including the integration of street furnishings along the Riverside Drive frontage. Street furnishings, including treated wood benches and cast-in-place concrete seating with integral lighting and water features, would add to the visual interest and appeal of this frontage.

- Directional and security lighting will be required for safety purposes. Through a new plan, lighting can enhance safety along the Riverside Drive and Hazeltine Avenue frontages and add to the perceived security of the neighborhood in general. Lighting would be incorporated into the streetscape environment at several levels, including the use of bollards, wall reveals, seating areas, and crosswalks. The use of plaza strip lighting will afford additional security lighting but with a park-like feel and without significant light intrusion to the surrounding neighborhood. As consistent with safety concerns, the Proposed Project will incorporate low-level lighting that is directed downward and shielded to prevent spillover of light toward sensitive uses.

- The Riverside Drive building surfaces would be refreshed with a new graphic design treatment that would consist of small visual mosaics of color and pattern that effectively serve to visually minimize the massing of the long linear wall along the frontage. It is intended that a combination of landscaping (see discussion below), hardscaping and building finish elements would create a vibrant urban atmosphere that offers more pedestrian-friendly linear banding and gives a fresh, updated look to the shopping center.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- As required by LAMC Section 12.40, the site will be required to prepare a Landscape Plan which will address replacement of removed trees.

- The owners shall maintain the subject property clean and free of debris and rubbish and to promptly remove any graffiti from the walls, pursuant to LAMC Sections 91.8101-F, 91.8904-1, and 91.1707-E.

b. Project Impacts

An Initial Study (IS) was prepared for the Proposed Project. Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the Notice of Preparation (NOP) and IS process to have a potential significant environmental effect. Issues related to Aesthetics and Visual Resources that were determined to be less than significant, and require no further discussion, include: shade and shadow. An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant.

(1) Visual Quality and Character

The visual character of the area is that of a fully developed, commercial corridor. The proposed retail and restaurant expansion would be considered consistent with the commercial nature of the existing uses along Hazeltine Avenue, Woodman Avenue, and within the existing shopping center.

Under the Proposed Project, two new parking structures will be constructed on the southerly and easterly portions of the project site, which are currently developed primarily with surface parking. *Figure 30: Riverside Drive Rendering at Matilija Avenue*. The proposed main six-level parking structure will be accessed from Riverside Drive, and because of the new access and height up to six levels, this parking structure will be visible from the properties immediately north of the Matilija Avenue/Riverside Drive intersection. The new parking structure will extend above the current Macy's parking structure by four levels (or approximately 58 feet); however, this structure would not be taller than the existing Macy's building with a maximum height of 75 feet. The design of both parking structures would be consistent with the design of other parking structures associated with existing commercial uses along this segment of Riverside Drive. The parking structures will also be consistent with existing heights and massing of structures east and west of the project site. Each north-facing parking level of the east-end parking structure by the Macy's department store will be faced with parapet planters to be planted with draping foliage that will serve to soften the visual image of the new parking facilities. The parking structure proposed under the project will extend toward the Riverside Drive frontage and replace a substantial portion of the existing surface parking. Due to the location of the proposed retail expansion to the west of the proposed parking structure, it is anticipated that the retail building will not be visible from the north into the site. Design of the parking structure includes a setback from Riverside Drive of approximately 300 feet, a height consistent with existing structures at the shopping center and the Riverside Woodman Shopping Center as well as the fact that the Proposed Project will not result in the conversion of natural lands or open space; and will not substantially change the existing commercial nature of the site and project area. The Proposed Project will result in a less than significant impact to visual character from the east.

The Proposed Project development would be consistent with the type and height of existing development on the site and would not substantially change the existing commercial nature of the site and project area. Development of the new mall structure would generally not be visible from views along Riverside Drive as existing buildings and the new parking structure would obscure the view. The proposed development will be consistent with the type and height of existing development on the site; will not result in the conversion of natural lands or open space; and will not substantially change the existing commercial nature of the site and project area. The Proposed Project will result in a less than significant impact to the visual character of the area from the north.

Under the project, the Hazeltine Avenue frontage of the existing shopping center will not be altered substantially. Buildings that front Hazeltine Avenue would not be structurally altered. They would only have façade and landscape treatment updates as described herein. As a result, the project will result in a less than significant impact to visual character from the west.

The proposed retail building and parking structure will be located to the south of the existing shopping center and extend to the Ventura (US 101) Freeway. The proposed development will be consistent with the type and height of existing development on the site; will not result in the conversion of natural lands or open space; and will not substantially change the existing commercial nature of the site and project area. The Proposed Project will result in a less than significant impact to visual character from the south.

FIGURE 30
RIVERSIDE DRIVE RENDERING AT MATILIJA AVENUE

MAP SOURCE: PLANNING ASSOCIATES, INC.

The parking structure proposed under the project will extend toward the Woodman Avenue frontage and replace a substantial portion of the existing surface parking. Due to the location of the proposed retail expansion to the west of the proposed parking structure, it is anticipated that the retail building will not be visible from the east into the site. Design of the parking structure includes a setback from Woodman Avenue of approximately 300 feet, a height consistent with existing structures at the shopping center, and uses consistent with the existing and proposed retail and restaurant uses. The proposed development will be consistent with the type and height of existing development on the site; will not result in the conversion of natural lands or open space; and will not substantially change the existing commercial nature of the site and project area. The Proposed Project will result in a less than significant impact to visual character from the east.

In addition to the structural modifications and expansion, the project calls for updating of the landscaping and lighting at the center. The Conceptual Landscape Plan would introduce a more lush, cohesive and robust greenscape treatment along the Riverside Drive, Woodman Avenue and Hazeltine Avenue street frontages than what currently exists (see *Figure 18: Conceptual Landscape Plan -1* and *Figure 19: Conceptual Landscape Plan -2* in Section II: Project Description, of this DEIR). Seven existing trees in poor health would be removed and replaced. Up to 38 additional trees that would be removed to accommodate new construction would be replaced with similar mature trees consistent with species permitted in the approved Landscape Plan. The perimeter landscaping along the street frontages includes a combination of required street trees (e.g., fern pine) intermixed with additional canopy shade (e.g., strawberry tree, jacaranda, or crape myrtle) and iconic accent (e.g., king palm or date palm) trees. Understory plantings, consisting of shrubs, groundcovers and grasses, will be integrated along these edges to relate to the pedestrian experience. Finally, a combination of bamboo screening and espalier evergreen foliage and flowering vines will be incorporated as architectural accent landscaping at the building edges to serve as a vegetated backdrop and breakup the building facades. Intermittent wall planters along the sidewalks and parapet planters incorporated into the exterior of the mall and parking structures will offers accents of color and draping foliage to soften the massing of the new parking facilities.

The Conceptual Landscape Plan proposes a more simplistic landscape treatment internally, with internal landscaping consisting of regularly spaced canopy shade trees within surface parking areas (as on the east side of the project site), and a combination canopy, ornamental accent, and icon specimen trees to define the key parking and driveway edges. To some extent, the internal landscaping elements serve a role in defining vehicular movement and pedestrian access areas. Internal landscaping will also include rooftop and/or open atrium plantings associated with the parking structures and mall expansion building. Such landscaping will consist primarily of shrubs and accent plants in planter containers.

Although enhanced landscaping is proposed along each edge of the project site, the Commercial Corner regulations of the city code requires the provision of a five foot landscape strip along all public streets of a Commercial Corner site. A CUP is requested to deviate from the requirement to provide a five foot landscaped area immediately adjacent to all street frontages. A reduced landscaped setback, ranging in width from zero to five feet, is necessary in some locations to accommodate widening of Riverside Drive, which in turn leaves insufficient area to

accommodate both pedestrian sidewalks and the required landscaping within in the space remaining between the existing buildings. It is intended that extensive incorporation of espalier vines, parapet planters and other plantings which maximize usage of the vertical wall area will generally offset a reduction in landscape depth along street frontages.

During construction activities for the Proposed Project, the visual character of the project site will reflect short-term changes as some of the construction activities will be visible from adjacent land uses. As the majority of the demolition and construction will be located south of the existing shopping center, much of the construction activities will be screened by existing structures on-site. With the exception of the installation of landscaping along the street frontages and the construction of the new Matilija Avenue driveway/signalized intersection at Riverside Drive, much of the construction would be setback from the roadways and adjacent properties. The most visually accessible area for construction activities would be in association with the new easterly parking structure (southeast of the Macy's department store) with regards to residents in the Matilija Avenue vicinity. However, construction security fencing, noise barriers, and staging areas may be located closer to the project site edges and therefore more visible during the short-term construction phase.

During construction, equipment and materials would be stored on-site, and temporary facilities (such as construction trailers, staging sites and portable toilets) would be stored on-site but screened by temporary construction fencing. Because the shopping center will continue to be open to the public during the construction phase, it is anticipated that efforts will be made to continue to present an attractive community presence throughout the duration of the construction activities, and that to enhance safety concerns, construction areas will be clearly partitioned and visually segregated from public areas.

Although construction-related structures and activities would create a notable change to the visual character, these changes would extend only for the duration of the construction activities (approximately 36 to 48 months). Following the completion of construction, the shopping center would resume a visual character similar to what is currently experienced at the project site, but improved and enhanced through an updated façade treatment and embellished landscaping. Since the project will not significantly impact visual elements that substantially contribute to the visual character or image of the area or displace natural open space or contrast or detract from existing features, image or aesthetic values, it will not have a significant impact on the visual quality or character of the area.

(2) Views

This discussion examines whether the Proposed Project would create a potential impact to views in the project area. According to the City of Los Angeles CEQA Threshold Guidelines, determination of a significant impact to views should consider the nature and quality of recognized views; whether the project affects views from a designated scenic highway; and the extent of the obstruction of such views. More specifically, a protected view would include a public view from a designated scenic highway, corridor, or parkway; public art; natural landforms; and/or panoramic views from a public roadway, bike path, trail, or other view corridor. Design characteristics to consider in minimizing impacts to views include building

height, massing, landscaping, and grading. Views considered to be protected are those valued public views such as scenic highways and long stretches of public roadways and trails, which generally do not include private views. Views into and from commercially designated properties are not considered to be protected and hence views out of the shopping center are not analyzed.

As discussed above, that portion of the Proposed Project that has the potential to affect views is limited to the view as observed from residences along Matilija Avenue or Riverside Drive and the offices in the taller commercial buildings on Woodman Avenue, Riverside Drive and Hazeltine Avenue.

The Proposed Project proposes a six-level parking structure to be constructed on the southern portion of the project site and a four-level parking structure on the easterly portion of the project site (adjacent to Woodman Avenue), both over areas that are currently developed as surface parking. The new six-level parking structure will be visible from the north, looking into the project site from Riverside Drive, between the existing Macy's department store and the existing Riverside Woodman Shopping Center (located at the southwesterly corner of the Riverside Drive/Woodman Avenue intersection and not part of the project). The six-level parking structure would be located south of the existing two-level Macy's parking structure and set back by approximately 300 feet from Riverside Drive. The parking structure will have semi-open levels broken up with horizontal hanging planters which will visually reduce the building massing. The parking structure will be landscaped with terraced greenery cascading from each level. While views from the north at the eastern end of the project site will be altered, the proposed development would not exceed the height of the existing Macy's building on site and would not exceed the 75-foot height limit allowed by the zoning on site.

As shown in *Figure 30: Riverside Drive Rendering at Matilija Avenue*, near-range views will be replaced with a more intense structural development, entrance way/intersection and greenery. Long-range views toward the distant Santa Monica Mountains, which are currently partially obstructed to most residents in this area by the existing shopping center, the elevated Ventura Freeway and intervening tree canopies, would be fully obstructed from residences situated closest to Riverside Drive that may currently have a partially unobstructed view. Because of the physical distance of these mountains in this long-range view, and the fact that more proximate urban development is the dominant character of the view, the long-range view toward the south is not considered to be visually protected and the change of this viewshed by a few residents would be less than significant.

Based on the type and design of the proposed development, the lack of identified significant views or scenic vistas by the Community Plan in the project area, the lack of protected or recognized views in the project area, and the location of the proposed development within the envelope of the existing site development, the Proposed Project would not result in a less than significant aesthetic impact due to a substantial adverse effect on views into and out of the project site.

(3) Light, Glare and Nighttime Illumination

The City of Los Angeles CEQA Significance Thresholds indicates that determination of a significant nighttime illumination impact shall be made with consideration of the following factors: the substantial negative change in ambient illumination levels as a result of project sources and the extent to which light would spill off the site and affect adjacent light sensitive areas. Light sensitive receptors are typically limited to residential areas, while a wide range of uses (including travelers along roadways) may be affected by nuisance glare. The nearest sensitive receptors to the project site are the residential neighborhoods located both north of the project site and south of the project site (south of the Ventura Freeway).

Because of the location of new Proposed Project structures south of existing shopping center buildings, the Riverside Drive frontage of the project site and associate lighting sources would not be substantially altered. The building frontage along this area does not incorporate reflective materials that may create nuisance glare. Proposed landscaping along Riverside Drive and Hazeltine Avenue would include the use of climbing, wall-hugging vines and vertical bamboo screens which would cover much of the existing walls along these frontages. New accent lighting may be introduced along these frontages in association with the Landscape Plan; however, such accent lighting is typically low voltage and directed upward and toward focused landscape elements. Further, neither the existing mall structure nor the proposed new Proposed Project mall structures incorporate windows along these perimeters that would emit lighting from interior uses. The majority of residential uses along Riverside Drive would experience no measurable change in nighttime illumination, lighting or glare due to the Proposed Project. However, in the vicinity of the proposed consolidated project driveway at Riverside Drive and Matilija Avenue, new light and glare sources would be introduced and could impact a limited number of residents (see discussion below).

With construction of the east multi-level parking structure (south of the existing Macy's parking structure) and the new consolidated driveway across from Matilija Avenue, directional and security lighting will be required for safety purposes. The parking structure design will be similar to that of the existing adjacent structure, with open levels that are surrounded by approximate four-foot high concrete walls. Although the lower levels of the new easterly parking structure will be obstructed from view to residents north of Riverside by the existing Macy's parking structure, the upper four levels would be visible and nighttime lighting from those open levels could be visible as ambient illumination but would not create spillover lighting directed at residences. Given the four-foot walls and the angle of observation, vehicle headlights within the new parking structure would be shielded and would not shine toward those residential areas. In addition, because all lighting sources installed under the Proposed Project would be designed such that as much light as possible is contained on site and does not spill onto nearby properties, impacts from nighttime lighting associated with the parking structure would be less than significant.

A similar situation to that described above for residential properties to the north and effects of the parking structure lighting would be observed at those residential buildings on the south the Ventura Freeway. The freeway itself obscures most of the Proposed Project development (and related light sources) from residential development to the south, however the upper one or two

levels of the parking structures may be visible from the upper stories of multi-level residential buildings in that area. As noted, direct lighting from headlights would be blocked by the parking structure walls. Further, the physical distance of these southerly oriented residences would minimize the potential influence of the ambient illumination from security/safety lighting associated with the upper levels of the parking structures.

The proposed lighting sources are consistent with existing lighting sources at the existing shopping center, which already includes project identification and way-finding signs, security lighting for the existing building, building entrances, parking structures and surface parking, and vehicular lighting. These lighting sources are consistent with the commercial nature of the community at large and will not substantially increase ambient illumination levels.

One remaining concern is the potential for nighttime lighting and glare from vehicles exiting the new Riverside Drive project driveway (across from Matilija Avenue) during the night time hours. Because the Fashion Square Lane driveway will be relocated further to the west, it will be situated such that vehicle headlights from exiting vehicles would be directed toward residences on Matilija Avenue. Major roadways in the project site vicinity, including Riverside Drive (a Major Highway) and the Ventura Freeway (a regional freeway), are a major source of vehicle lights in the area, but vehicles traveling along these roads are not directed specifically onto this residential street as they drive past. The main operational hours of the mall would close at 9:00 p.m., with some retail/restaurant uses remaining open until 12:00 midnight only on intermittent occasions, hence the majority of exiting vehicle traffic would be completed before 10:00 p.m. The homes along Matilija Avenue near the intersection with Riverside Drive are oriented so that the front of the homes are perpendicular to the street and setback a minimum of 20-feet from the street, therefore windows are not in the direct line of sight of headlights that would shine through the driveway intersection. Two residences located at each corner of Matilija Avenue also have side yards that face Riverside Drive and would be the primary residences of concern likely to be affected by headlights of vehicles exiting the project site. Headlight beams (from vehicles making left turns) toward the residence on the west corner would be obstructed by an existing hedge on that property which affords an adequate screen. The residence on the east corner has landscaping and fencing that would obscure headlight beams from vehicles making right turns. Because of the relative orientation of the residential structures to the driveway, the existing vehicle activity within the vicinity, and the limited hours of operation at the shopping center, nuisance light from project-related vehicle headlights is not anticipated to be noticeable and less than significant.

(4) Consistency with Applicable Plans and Policies

Consistency with applicable plans and policies, including land use and design policies which indirectly address aesthetics, views and urban design, is discussed in detail in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this EIR.

(5) Cumulative Impacts

Visual Character. Impacts to aesthetics are generally site specific and localized. As discussed above, the Proposed Project is anticipated to result in a less than significant aesthetic impact to

the visual character along all project frontages. With the exception of a proposed 23-unit condominium project to be located on Hazeltine Avenue north of Riverside Drive (ENV 2005-6373-MND), none of the related projects are located along the local roadways within the immediate project area. However, the new condominium project in the project site vicinity would be constructed consistent with the Community Plan standards and is a use consistent with the surrounding area. As a result, the Proposed Project would not contribute to a potential cumulative impact to visual character in the project vicinity. A separate, site-specific environmental analysis will be prepared for related projects to determine and, if necessary, mitigate related project-specific potential impacts to visual character. Cumulative visual character impacts of related projects are considered to be less than significant.

Alteration of Views. Although aesthetic impacts are generally site specific to the local setting, impacts that may affect panoramic viewsheds or recognized visual resources can have an effect on a broader area. As discussed above, the Proposed Project is anticipated to result in a less than significant impact to views from residential properties to the north. Related projects in the immediate project area north of the Ventura Freeway, would generally be limited to between two and four stories in height. From a cumulative perspective, these related projects (north of the freeway) would significantly alter viewsheds or the local skyline. Several related projects proposed for locations along the Ventura Boulevard corridor would be larger-scale and may be visible from local viewsheds. However, these projects are not anticipated to have a significant cumulative impact to views within the communities adjacent to the Proposed Project. The Proposed Project would not contribute to a potential cumulative impact to views or viewsheds in the project vicinity. A separate, site-specific environmental analysis will be prepared for related projects to determine and, if necessary, mitigate related project-specific potential impacts to aesthetics. Cumulative impacts related to viewsheds affected by related projects are considered to be less than significant.

Lighting. Buildout of related projects in the project site area will contribute to the overall levels of nighttime illumination and glare in the Van Nuys and Sherman Oaks communities. Glare and direct lighting are site-specific concerns that would be addressed through the separate, site-specific environmental analysis prepared for each related project and, if necessary, mitigate appropriately. Such mitigation would contribute to the reduction of nighttime illumination as well. Because the Proposed Project would not contribute significantly toward increased nighttime lighting levels in the immediate area, its cumulative contribution to lighting is considered to be less than significant.

4. MITIGATION PROGRAM

Although the Proposed Project, with implementation of incorporated project design features and adherence to required standard conditions, would not result in a significant impact to the aesthetics and/or visual resources of the project area, incorporation of the following measures would ensure that any potential impacts are appropriately minimized:

MM AES-1: As required by LAMC Section 12.40, the site will be required to prepare a Landscape Plan which will address replacement of removed trees.

MM AES-2: The owners shall maintain the subject property clean and free of debris and rubbish and to promptly remove any graffiti from the walls, pursuant to LAMC Sections 91.8101-F, 91.8904-1, and 91.1707-E.

MM AES-3: A minimum of one 24-inch box tree (minimum diameter of two inches and a height of eight feet at the time of planting) shall be planted for every four new surface parking spaces.

MM AES-4: The Final Expansion Project Landscape Plan, which will be reviewed and approved by the City of Los Angeles, shall incorporate clinging vines and bamboo screening, which provide a variety of textures and colors, along exterior walls visible along the Riverside Drive and Hazeltine Avenue frontages.

MM AES-5: The Final Expansion Project Landscape Plan shall include the installation of healthy mature trees for all replacement trees and new landscaping along Riverside Drive.

MM AES-6: New project landscaping along Riverside Drive would provide an opportunity to visually activate this frontage and minimize building massing. A combination of landscape, hardscape, and building finish elements would create a vibrant urban atmosphere that offers more pedestrian-friendly linear banding and gives a fresh, updated look to the shopping center. The landscape plan would incorporate specimen accent plantings, including distinctive palms, large canopy trees, evergreens, seasonal color trees and bold median plantings. The landscape concept also incorporates various hardscape features, including the integration of street furnishings along the Riverside Drive frontage. Street furnishings, including treated wood benches and cast-in-place concrete seating with integral lighting and water features, would add to the visual interest and appeal of this frontage.

MM AES-7: Directional and security lighting will be required for safety purposes. Through a new plan, lighting can enhance safety along the Riverside Drive and Hazeltine Avenue frontages and add to the perceived security of the neighborhood in general. Lighting would be incorporated into the streetscape environment at several levels, including the use of bollards, wall reveals, seating areas, and crosswalks. The use of plaza strip lighting will afford additional security lighting but with a park-like feel and without significant light intrusion to the surrounding neighborhood. As consistent with safety concerns, the Proposed Project will incorporate low-level lighting that is directed downward and shielded to prevent spillover of light toward sensitive uses.

MM AES-8: The Riverside Drive building surfaces would be refreshed with a new graphic design treatment that would consist of small visual mosaics of color and pattern that effectively serve to visually minimize the massing of the long

linear wall along the frontage. It is intended that a combination of landscaping, hardscaping and building finish elements would create a vibrant urban atmosphere that offers more pedestrian-friendly linear banding and gives a fresh, updated look to the shopping center.

MM AES-9: All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the Planning Department.

MM AES-10: The trees shall be dispersed within the parking area so as to shade the surface parking area and shall be protected by a minimum 6-inch high curb and landscaping.

MM AES-11: Outdoor lighting shall be designed and installed with shielding, so that the light sources for the Proposed Project are shielded from spillover to adjacent residential properties.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

With implementation of the standard conditions and project design features identified above, the Proposed Project would not result in significant impacts to the general visual character and views. Impacts associated with lighting and glare impacts would be reduced to less than significant levels. Construction impacts would be short-term and would not be significant. Implementation of recommended mitigation measures identified above, although not required to reduce significant impacts, would further minimize the effects of the project and reinforce the effectiveness of the standard conditions and project design features already required/incorporated into the Proposed Project. Due to the distance between the project site and the nearest related project, approximately 1,000 feet; the fact that there is no property with a direct line of site of both the project site and any related project site; and finally that none of the related projects have unique lighting requirements, there is no potential for a significant cumulative light impact.

IV. ENVIRONMENTAL IMPACT ANALYSIS

B. AIR QUALITY

The following analysis of air quality impacts is based primarily upon the *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, prepared by Terry A. Hayes Associates LLC and dated February 26, 2008. Air quality calculation sheets are provided in Appendix D-1: Air Quality of this DEIR. Additionally, analysis of global climate change is based on the Technical Memorandum: Greenhouse Gas Emissions for the Westfield Fashion Square Expansion Project, prepared by Terry A. Hayes Associates, LLC and dated November 12, 2007 (see Appendix D2-Global Warming Technical Memorandum).

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Air Quality Terms and Characteristics

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards or criteria for outdoor concentrations to protect public health. The federal and state standards have been set at levels above which concentrations may be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter ten microns or less in diameter (PM_{10}), and lead (Pb). These pollutants are discussed below.

Carbon Monoxide. CO is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas such as the project location, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient CO concentrations generally follow the spacial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.[1] The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions.

Ozone. O_3 is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG), which includes volatile organic compounds (VOC), and nitrogen oxides (NO_X) react in

[1] Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.

the presence of ultraviolet sunlight. O_3 is not a primary pollutant; it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_X, the components of , are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

Nitrogen Dioxide. NO_2, like O_3, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_X and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10}. High concentrations of NO_2 can cause breathing difficulties and result in a brownish red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (two and three years old) has also been observed at concentrations below 0.3 parts per million (ppm).

Sulfur Dioxide. SO_2 is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO_2 are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 can also yellow plant leaves and erode iron and steel.

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter also forms when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ result from fuel combustion (e.g. motor vehicles, power generation, and industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC. Inhalable particulate matter, or PM_{10}, is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning, industrial sources, windblown dust from open lands; and atmospheric chemical and photochemical reactions.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage

directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

Lead. Pb in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline, the manufacturers of batteries, paint, ink, ceramics, and ammunition and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emission sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Toxic Air Contaminants. An air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health is identified as a toxic air contaminant (TAC). TACs are identified by State and federal agencies based on a review of available scientific evidence. In the State of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act, Assembly Bill 1807, Tanner. This two-step process of risk identification and risk management was designed to protect residents from the health effects of toxic substances in the air.

The South Coast Air Quality Management District (SCAQMD) has a long and successful history of reducing air toxics and criteria emissions in the South Coast Air Basin. SCAQMD has an extensive control program, including traditional and innovative rules and policies. These policies can be viewed in the SCAQMD's Air Toxics Control Plan for the Next Ten Years (March 2000).

(2) Regional Air Quality

(a) Climate

The project site is located within the Los Angeles County portion of the South Coast Air Basin (Basin). The Basin is a subregion of the SCAQMD and covers an area of 6,745 square miles. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The Basin is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego

County line to the south (*Figure 31: South Coast Air Basin*). Ambient pollution concentrations recorded in Los Angeles County are among the highest in the four counties comprising the Basin.

The Basin is in an area of high air pollution potential due to its climate and topography. The general region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. This Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions. Temperature typically decreases with height. However, under inversion conditions, temperature increases as altitude increases, thereby preventing air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to CO and NO_2 emissions. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.). In the morning, CO levels are relatively high due to cold temperatures and the large number of cars traveling. High CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the Basin are associated with heavy traffic. NO_2 levels are also generally higher during fall and winter days.

(b) Attainment Status

As required by the federal Clean Air Act (CAA), National Ambient Air Quality Standards (NAAQS) have been established for seven major air pollutants: CO, NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and Pb. The CAA requires United States Environmental Protection Agency (USEPA) to designate areas as either attainment or nonattainment for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in *Table 4: State and National Ambient Air Quality Standards*. The USEPA has classified the Basin as maintenance for CO and nonattainment for O_3, $PM_{2.5}$, and PM_{10}.

The California Clean Air Act (CCAA) requires California Air Resources Board (CARB) to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as non-attainment for a pollutant if air quality data shows that a State standard for the pollutant was

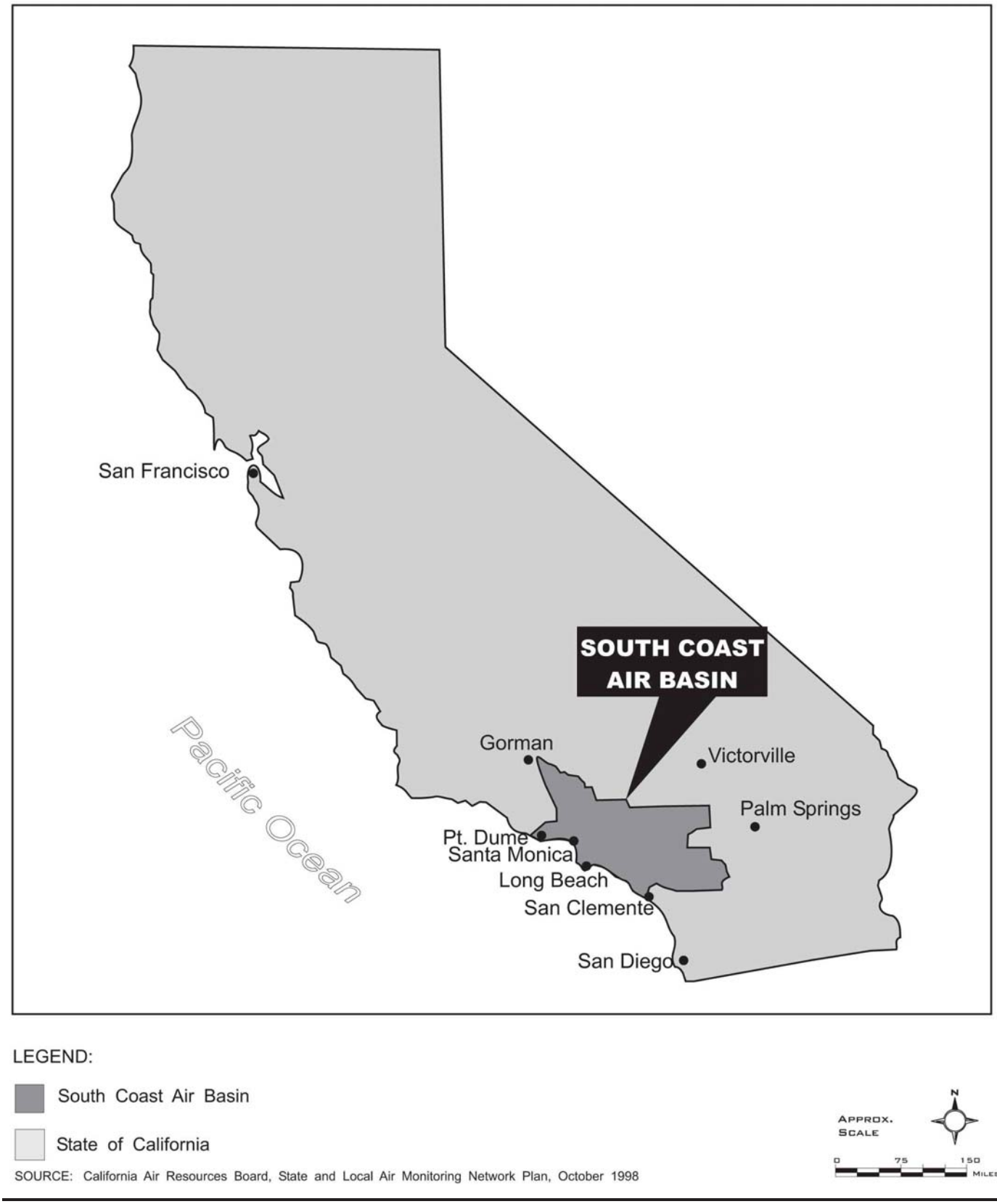


FIGURE 31
SOUTH COAST AIR BASIN

violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment. The State standards are also summarized in *Table 4: State and National Ambient Air Quality Standards*. Under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, $PM_{2.5}$, and PM_{10}.[2]

TABLE 4
STATE AND NATIONAL AMBIENT AIR QUALITY STANDARDS [1]

POLLUTANT	AVERAGING PERIOD	CALIFORNIA		FEDERAL	
		STANDARDS	ATTAINMENT STATUS	STANDARDS	ATTAINMENT STATUS
Ozone (O_3)	1-hour	0.09 ppm (180 μg/m^3)	Nonattainment	--	--
	8-hour	0.070 ppm (137 μg/m^3)	n/a	0.08 ppm (157 μg/m^3)	Nonattainment
Respirable Particulate Matter (PM_{10})	24-hour	50 μg/m^3	Nonattainment	150 μg/m^3	*Nonattainment*
	Annual Arithmetic Mean	20 μg/m^3	Nonattainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 μg/m^3	Nonattainment
	Annual Arithmetic Mean	12 μg/m^3	Nonattainment	15 μg/m^3	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (56μg/m^3)	Attainment	0.053 ppm (100 μg/m^3)	Attainment
	1-hour	0.18 ppm (338 μg/m^3)	Attainment	--	--
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	--	--	0.030 ppm (80 μg/m^3)	Attainment
	24-hour	0.04 ppm (105 μg/m^3)	Attainment	0.14 ppm (365 μg/m^3)	Attainment
	3-hour	--	--	--	--
	1-hour	0.25 ppm (655 μg/m^3)	Attainment	--	--
Lead (Pb)	30-day average	1.5 μg/m^3	Attainment	--	--
	Calendar Quarter	--	--	1.5 μg/m^3	Attainment

[1] Source: CARB, Ambient Air Quality Standards, February 21, 2008.

[2] California Air Resources Board (CARB). 2007. *2006 State Area Designations*. 1 October 2007 <http://www.arb.ca.gov/desig/adm/adm.htm>.

(3) Local Meteorology

The mountains and hills within the Basin contribute to the variation of rainfall, temperature, and winds throughout the region. Within the project site and its vicinity, the average wind speed, as recorded at the Burbank Wind Monitoring Station, is approximately 4.1 miles per hour, with calm winds occurring approximately 13.8 percent of the time. Wind in the vicinity of the project site predominately blows from the West.[3]

The annual average temperature in the project area is 64.1 degrees Fahrenheit (°F). The project area experiences an average winter temperature of approximately 55.2°F and an average summer temperature of approximately 73.1°F. Total precipitation in the project area averages approximately 16.5 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer. Precipitation averages approximately 9.6 inches during the winter, approximately 4.4 inches during the spring, approximately 2.3 inches during the fall, and less than 1 inch during the summer.[4]

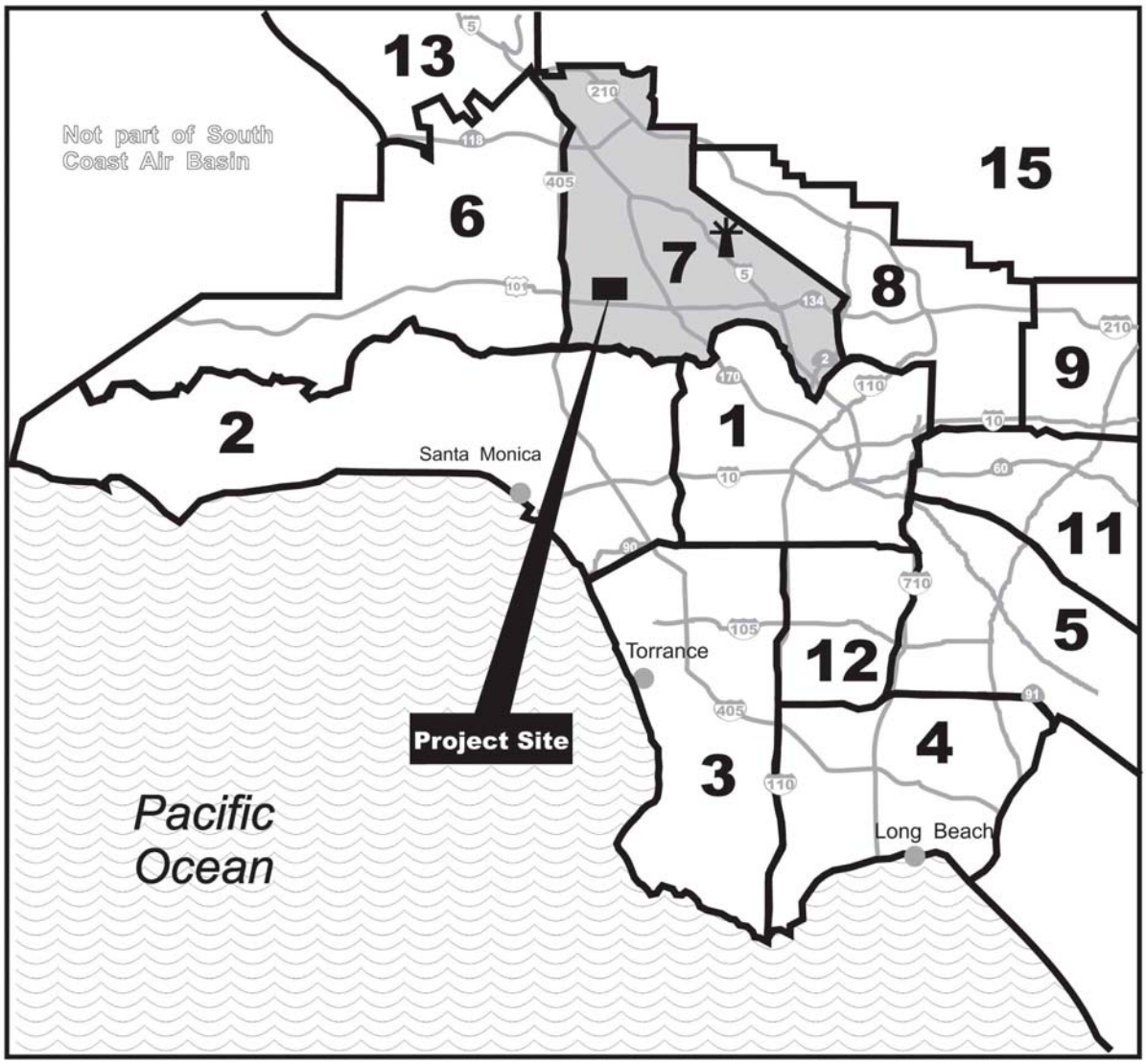
(4) Local Air Quality

The SCAQMD monitors air quality conditions at 38 locations throughout the Basin. The project site is located in SCAQMD's East San Fernando Valley Air Monitoring Subregion, which is served by the Burbank Monitoring Station, located approximately 7.8 miles east of the project site on 228 West Palm Avenue between Victory Boulevard and Lake Street in the City of Burbank (*Figure 32: Air Monitoring Areas*).

Historical data from the Burbank Monitoring Station were used to characterize existing conditions in the vicinity of the project area. Criteria pollutants monitored at the Burbank Monitoring Station include O_3, CO, NO_2, PM_{10}, $PM_{2.5}$, and SO_2.

Table 5: Ambient Air Quality Data in Project Vicinity shows pollutant levels, the State standards, and the number of exceedances recorded at the Burbank Monitoring Station from 2004 to 2006. The CAAQS for the criteria pollutants are also shown in the table. As *Table 5: Ambient Air Quality Data in Project Vicinity* indicates, criteria pollutants CO, NO_2, and SO_2 did not exceed the CAAQS during the 2004 through 2006 period. However, the one-hour State standard for O_3 was exceeded 65 times during this period, and the eight-hour State standard for O_3 was exceeded 72 times. Additionally, the 24-hour State standard for PM_{10} was exceeded seven times in 2004, five times in 2005, and ten times in 2006. The annual State standard for $PM_{2.5}$ was exceeded every year from 2004-2006.

[3] South Coast Air Quality Management District (SCAQMD). 2007. *AQMD Meteorological Data Dispersal Model Application*. September 2007 <http://www.aqmd.gov/smog/metdata/ MeteorologicalData.html>.
[4] Western Regional Climate Center. 2007. *Western Regional Climate Center*. 1 October 2007 <http://www.wrcc.dri.edu/>.



LEGEND: Burbank Monitoring Station

Air Monitoring Areas in Los Angeles County:

1. Central Los Angeles
2. Northwest Coastal
3. Southwest Coastal
4. South Coastal
5. Southeast Los Angeles County
6. West San Fernando Valley
7. East San Fernando Valley
8. West San Gabriel Valley
9. East San Gabriel Valley
10. Pomona/Walnut Valley (not shown)
11. South San Gabriel Valley
12. South Central Los Angeles
13. Santa Clarita Valley
15. San Gabriel Mountains

APPROX. SCALE
0 3.0 6.0 9.0 MILES

SOURCE: South Coast Air Quality Management District Air Monitoring Areas Map, 1999

FIGURE 32
AIR MONITORING AREAS

TABLE 5
AMBIENT AIR QUALITY DATA IN PROJECT VICINITY [1]

POLLUTANT	POLLUTANT CONCENTRATION AND STANDARDS	NUMBER OF DAYS ABOVE STATE STANDARD		
		2004	2005	2006
Ozone	Maximum 1-hr Concentration (ppm)	0.14	0.14	0.17
	Days > 0.09 ppm (State 1-hr standard)	27	13	25
	Maximum 8-hr Concentration (ppm)	0.11	0.11	0.13
	Days > 0.07 ppm (State 8-hr standard)	37	12	23
Carbon Monoxide	Maximum 1-hr concentration (ppm)	5	4	4
	Days > 20 ppm (State1-hr standard)	0	0	0
	Maximum 8-hr concentration (ppm)	3.7	3.4	3.5
	Days > 9.0 ppm (State 8-hr standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hr Concentration (ppm)	0.12	0.09	0.10
	Days > 0.18 ppm (State 1-hr standard)	0	0	0
PM_{10}	Maximum 24-hr concentration ($\mu g/m^3$)	74	92	71
	Estimated Days > 50 $\mu g/m^3$ (State 24-hr standard)	7	5	10
$PM_{2.5}$	Maximum 24-hr concentration ($\mu g/m^3$)	60	63	51
	Exceed Standard (12 $\mu g/m^3$ Annual Arithmetic Mean)?	*Yes*	*Yes*	*Yes*
Sulfur Dioxide	Maximum 24-hr Concentration (ppm)	0.010	0.006	0.004
	Days > 0.04 ppm (State 24-hr standard)	0	0	0

[1] Source : SCAQMD, http://www.aqmd.gov/smog/historicaldata.htm, 2008.

CO concentrations are typically used as an indicator of conformity with CAAQS because CO is the primary component of automobile exhaust (tailpipe emissions), and it does not readily react with other pollutants. In other words, operational air quality impacts associated with a project are generally best reflected through estimated changes in CO concentrations.

For purposes of this assessment, the ambient, or background CO concentration is first established. SCAQMD defines the background level as the highest reading over the past three years. A review of data from the Burbank Monitoring Station for the 2004 to 2006 period indicates that the one- and eight-hour background concentrations are approximately 5 and 3.7 ppm, respectively. Accordingly, the existing one- and eight-hour background concentrations do not exceed the State CO standard of 20 ppm and 9.0 ppm, respectively.

A direct relationship between traffic/circulation congestion and CO impacts exist since exhaust fumes from vehicular traffic are the primary source of CO. CO is a localized gas that dissipates very quickly under normal meteorological conditions. Therefore, CO concentrations decrease substantially as distance from the source (intersection) increases. The highest CO concentrations are typically found in areas directly adjacent to congested roadway intersections.

Existing CO concentrations adjacent to nine study intersections were modeled for the weekday and weekend conditions. The study intersections were selected to be representative of the project area and were based on traffic volume to capacity (V/C) ratio and the traffic level of service (LOS) as indicated in the traffic analysis.[5, 6]

[5] Level of service is used to indicate the quality of traffic flow on roadway segments and at intersections. Level of service ranges from LOS A (free flow, little congestion) to LOS F (forced flow, extreme congestion).

The selected weekday intersections are as follows:

- Hazeltine Avenue/Riverside Drive - PM Peak Hour
- Hazeltine Avenue/Ventura Boulevard - AM Peak Hour
- Hazeltine Avenue/Magnolia Boulevard – PM Peak Hour
- Woodman Avenue/US 101 Westbound Ramps - PM Peak Hour
- Woodman Avenue/Riverside Drive – PM Peak Hour
- Van Nuys Boulevard/Riverside Drive – PM Peak Hour

The selected weekend intersections are as follows:

- Hazeltine Avenue/Riverside Drive
- Woodman Avenue/Riverside Drive
- Woodman Avenue/US 101 Westbound Ramps

At each intersection, traffic-related CO contributions were added to background CO conditions. Traffic CO contributions were estimated using the USEPA CAL3QHC dispersion model, which utilizes traffic volume inputs and CARB EMFAC2007 emissions factors. Consistent with the California Department of Transportation CO protocol, receptors were located 3 meters (approximately 10 feet) from each intersection corner. Existing weekday and weekend conditions at the study intersections are shown in *Table 6: Existing Carbon Monoxide Concentrations – Weekday Conditions* and *Table 7: Existing Carbon Monoxide Concentrations – Weekend Conditions*, respectively. During the weekday, one-hour CO concentrations range from approximately 6 ppm to 7 ppm and eight-hour CO concentrations range from approximately 4.3 ppm to 4.9 ppm. During the weekend, one-hour CO concentrations range from approximately 6 ppm to 7 ppm and eight-hour CO concentrations range from approximately 4.3 ppm to 4.5 ppm. Presently, none of the study intersections exceed the State one- and eight-hour CO standards of 20 ppm and 9.0 ppm, respectively.

TABLE 6
EXISTING CARBON MONOXIDE CONCENTRATIONS – WEEKDAY CONDITIONS [1][2]

INTERSECTION	1-HOUR	8-HOUR
Hazeltine Avenue/Riverside Drive	6	4.4
Hazeltine Avenue/Ventura Boulevard	7	4.7
Hazeltine Avenue/Magnolia Boulevard	7	4.5
Woodman Avenue/US 101 Westbound Ramps	6	4.3
Woodman Avenue/Riverside Drive	7	4.6
Van Nuys Boulevard/Riverside Drive	7	4.9
State Standard	**20**	**9.0**

[1] Source: Terry A Hayes Associates LLC, *Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008.
[2] All concentrations include one- and eight-hour ambient concentrations of 5 ppm and 3.7 ppm, respectively.

[6] Linscott, Law & Greenspan, Engineers. 2008 (August 5). *Traffic Impact, Parking, and Site Access Study for the Westfield Fashion Square Expansion Project*. Pasadena, CA: Author. [See Appendix I of this Draft EIR]

TABLE 7
EXISTING CARBON MONOXIDE CONCENTRATIONS – WEEKEND CONDITIONS [1][2]

INTERSECTION	1-HOUR	8-HOUR
Hazeltine Avenue/Riverside Drive	6	4.3
Hazeltine Avenue/Ventura Boulevard	7	4.5
Woodman Avenue/US 101 Westbound Ramps	6	4.3
State Standard	**20**	**9.0**

[1] Source: Terry A Hayes Associates LLC, *Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008.
[2] All concentrations include one- and eight-hour ambient concentrations of 5 ppm and 3.7 ppm, respectively.

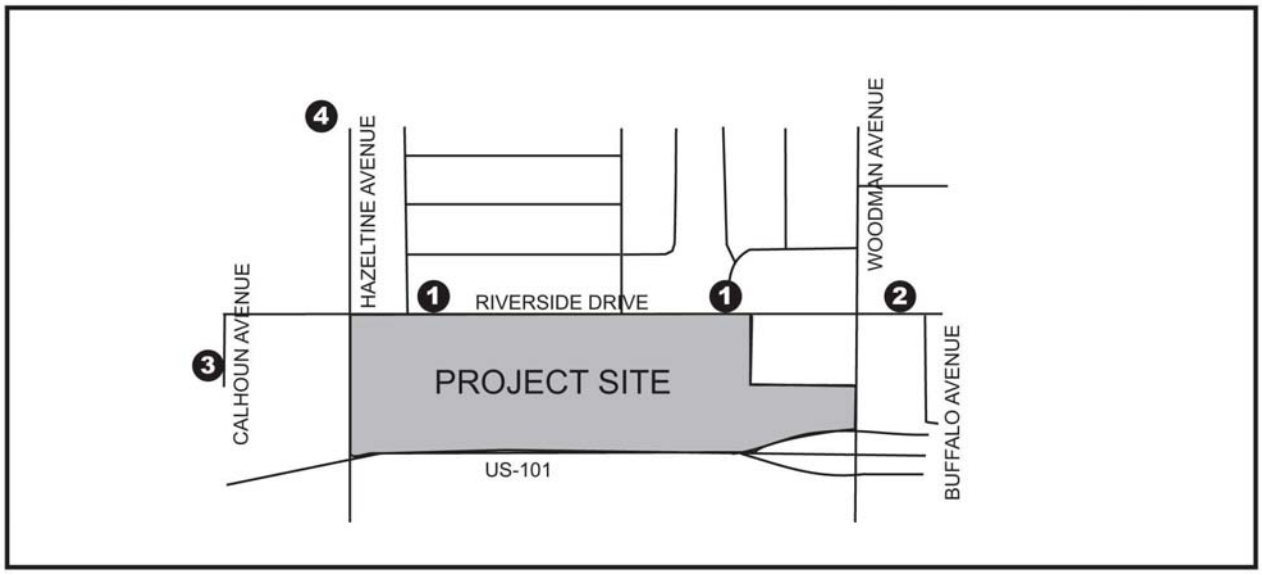
(5) Sensitive Receptors

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

As shown in *Figure 33: Air Quality Receptors*, sensitive receptors within one-quarter mile (1,320 feet) of the project site include the following:

- Multi-family residences located approximately 120 feet north of the project site;
- Single-family residences located approximately 250 feet east of the project site, across Woodman Avenue;
- Notre Dame High School located approximately 575 feet northeast of the project site;
- Single-family residences located approximately 700 feet west of the project site; and
- Van Nuys Sherman Oaks Park located approximately 800 feet northwest of the project site.

The above sensitive receptors represent the nearest residential, recreational, and school land uses with the potential to be impacted by the Proposed Project. Additional single-family and multi-family residences are located in the surrounding community within one-quarter mile of the project site.



LEGEND:

(#) Air Quality Monitoring Locations

1. Multi-Family Residence on Riverside Drive
2. Notre Dame High School
3. Single-Family Residence on Calhoun Avenue
4. Van Nuys Sherman Oaks Park

FIGURE 33
AIR QUALITY RECEPTORS

SOURCE: TAHA, 2007

NORTH

b. Regulatory and Policy Setting

(1) Authority for Current Air Quality Planning

The CAA governs air quality in the United States. In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the CCAA. At the federal level, CAA is administered by the USEPA. In California, the CCAA is administered by the CARB at the State level and by the air quality management districts and air pollution control districts at the regional and local levels.

United States Environmental Protection Agency. USEPA is responsible for enforcing the federal CAA. USEPA is also responsible for establishing the NAAQS. NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in States other than California. Automobiles sold in California must meet stricter emission standards established by CARB.

California Air Resources Board. CARB, which became part of the California Environmental Protection Agency (CalEPA) in 1991, is responsible for meeting the State requirements of the federal CAA, administering the CCAA, and establishing the CAAQS. The CCAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles. CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective on March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.

South Coast Air Quality Management District. SCAQMD monitors air quality within the project area. SCAQMD has jurisdiction over an area of approximately 10,743 square miles, consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The 1977 Lewis Air Quality Management Act created SCAQMD to coordinate air quality planning efforts throughout Southern California. This Act merged four county air pollution control agencies into one regional district to better address the issue of improving air quality in Southern California. Under the Act, renamed the Lewis-Presley Air Quality Management Act in 1988, SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. Specifically, SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the district. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source

permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how the area would meet the State air quality standards by its attainment dates. The AQMP is the region's plan for improving air quality in the region. It addresses CAA and CCAA requirements and demonstrates attainment with State and federal ambient air quality standards. The AQMP is prepared by SCAQMD and the Southern California Association of Governments (SCAG). The AQMP provides policies and control measures that reduce emissions to attain both State and federal ambient air quality standards by their applicable deadlines. Environmental review of individual projects within the Basin must analyze whether the Proposed Project's daily construction and operational emissions would exceed thresholds established by the SCAQMD. The environmental review must also analyze whether individual projects would not increase the number or severity of existing air quality violations.

The 2007 AQMP was adopted by the SCAQMD on June 1, 2007. The 2007 AQMP proposes attainment demonstration of the federal $PM_{2.5}$ standards through a more focused control of SO_X, directly-emitted $PM_{2.5}$, and NO_X supplemented with VOC by 2015. The eight-hour ozone control strategy builds upon the $PM_{2.5}$ strategy, augmented with additional NO_X and VOC reductions to meet the standard by 2024. The 2007 AQMP also addresses several federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. The 2007 AQMP is consistent with and builds upon the approaches taken in the 2003 AQMP.

(2) Global Climate Change

Global climate change refers to variances in Earth's meteorological conditions, which are measured by wind patterns, storms, precipitation, and temperature. There is general scientific agreement that the Earth's average surface temperature has increased by 0.3 to 0.6 degrees Celsius over the past century.[7] The reasons behind the increase in temperature are not well understood and are the subject of intense research activity. Many scientific studies have been completed to determine the extent that greenhouse gas (GHG) emissions from human sources (e.g., fossil fuel combustion) affect the Earth's climate. The interrelationships between atmospheric composition, chemistry, and climate change are very complex. For example, historical records indicate a natural variability in surface temperature.[8] Historical records also indicate that atmospheric concentrations of a number of GHG have increased significantly since the beginning of the industrial revolution.[9] As such, significant attention is being given to anthropogenic (human) GHG emissions.

Many chemical compounds found in the Earth's atmosphere act as GHGs. These gases allow sunlight to enter the atmosphere freely. When sunlight strikes the Earth's surface, some of it is reflected back towards space as infrared radiation (heat). GHGs absorb this infrared radiation

[7] Finlayson-Pitts, Barbara J., and James N. Pitts, Jr. (1999). *Chemistry of the Upper and Lower Atmosphere*. Burlington, MA: Academic Press. 16 June 2008 <http://www.cplbookshop.com/contents/C394.htm>.
[8] *Ibid*.
[9] *Ibid*.

and trap the heat in the atmosphere. Over time, the amount of energy sent from the sun to the Earth's surface should be approximately equal to the amount of energy radiated from Earth back into space, leaving the temperature of the Earth's surface roughly constant. Some GHG are emitted naturally (water vapor, carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O)), while others are exclusively human-made (e.g., gases used for aerosols). According to the California Energy Commission (CEC), emissions from fossil fuel consumption represent approximately 81 percent of GHG emissions and transportation creates 41 percent of GHG emissions in California.[10]

The State of California has traditionally been a pioneer in efforts to reduce air pollution, dating back to 1963 when the California New Motor Vehicle Pollution Control Board adopted the nation's first motor vehicle emission standards. Likewise, California has a long history of actions undertaken in response to the threat posed by climate change. Assembly Bill (AB) 1493, signed by California's governor in July 2002, requires passenger vehicles and light duty trucks to achieve maximum feasible reduction of GHG emissions by model year 2009.[11] AB 1493 was enacted based on recognition that passenger cars are significant contributors to the State's GHG emissions.

Following the passage of the bill, the CARB was tasked to determine the reduction targets based on CARB's analysis of available and near-term technology and cost. After evaluating the options, the CARB established limits that will result in approximately a 22-percent reduction in GHG emissions from new vehicles by 2012, and approximately a 30-percent reduction by 2016.[12] The Federal Clean Air Act reserves the control of emissions from motor vehicles to the federal government, with the exception of California due to its early activity and special conditions (i.e., high density of motor vehicles, topography conducive to pollution formation in heavily populated basins—e.g., Los Angeles and the San Joaquin Valley), and any states that opt for the California regulations. For California to implement a modification such as that represented in AB 1493, it must request a waiver pursuant to Section 209 of the Federal Clean Air Act. The USEPA has not ruled on California's request for a waiver, thereby possibly delaying CARB's proposed implementation schedule.

On September 27, 2006, AB 32, the California Global Warming Solutions Act of 2006, was enacted by the State of California.[13] In that statute, the Legislature stated that "Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." AB 32 seeks to, among other things, cap California's GHG emissions at 1990 levels by 2020. Relevant gases defined by AB 32 as GHG pollutants include CO_2, CH_4, and N_2O.[14] While acknowledging that national and international actions will be necessary to fully address the issue of global warming, AB 32 lays out a program to inventory and reduce GHG emissions in California. This bill represents the first enforceable Statewide

[10] California Energy Commission. 2006 (December). *Inventory of Greenhouse Gas Emissions and Sinks: 1990 to 2004*. 6 June 2008 <http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF>.
[11] California State Legislature. 2002. Assembly Bill 1493 (AB 1493), Pavley. 6 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=ab_1493&sess=0102&house=B&author=pavley>.
[12] Green Car Congress. 2007. *EPA Concludes Public Hearings on California Waiver for New Vehicle CO2 Regulations*. 19 May 2008 <http://www.greencarcongress.com/ 2007/05/epa_concludes_p.html>.
[13] California State Legislature. 2006. Assembly Bill 32 (AB 32), Global Warming Solutions Act of 2006. Nunez. 6 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=ab_32&sess=PREV&house=B&author=nunez>.
[14] AB 32 also defines hydrofluorocarbons, perfluorocarbons and sulfur hexaflouride as GHG pollutants but these gases would not be emitted by the proposed Fashion Square expansion project.

program in the United States to cap all GHG emissions from major industries and include penalties for non-compliance.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions in order to reduce those emissions. On June 1 2007, the CARB adopted three discrete early action measures to reduce GHG emissions. These measures involve complying with a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance and increasing methane capture from landfills.[15] On October 25, 2007, the CARB tripled the set of previously approved early action measures. The newly approved measures include Smartway truck efficiency (i.e., reducing aerodynamic drag), port electrification, reducing perfluorocarbons from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexaflouride emissions from the non-electricity sector. AB 32 also required CARB to define the 1990 baseline emissions for California and adopt that baseline as the 2020 statewide emissions cap. CARB has determined that the total statewide aggregated greenhouse gas 1990 emissions level and 2020 emissions limit is 427 million metric tons of carbon dioxide equivalent.

CARB is mandated by AB 32 to meet additional deadlines. CARB has been tasked to establish a "scoping" plan by January 1, 2009 for achieving reductions in GHG emissions, and regulations by January 1, 2011 for reducing GHG emissions to achieve the emissions cap by 2020,[16] which rules would take effect no later than 2012.[17] In designing emission reduction measures, CARB must aim to minimize costs, maximize benefits, improve and modernize California's energy infrastructure, maintain electric system reliability, maximize additional environmental and economic benefits for California, and complement the State's ongoing efforts to improve air quality. AB 32 also directs CARB to "recommend a *de minimis* threshold of greenhouse gas emissions below which emissions reduction requirements will not apply" by January 1, 2009. HSC §38561(e). CARB has suggested a 25,000 metric ton emissions level as a possible *de minimis* threshold.

California Senate Bill (SB) 97, passed in August 2007, is designed to work in conjunction with the California Environmental Quality Act (CEQA) and AB 32.[18] CEQA requires the State Office of Planning and Research (OPR) to prepare and develop guidelines for the implementation of CEQA by public agencies. SB 97 requires OPR by July 1, 2009 to prepare, develop, and transmit to the State Resources Agency its proposed guidelines for the feasible mitigation of GHG emissions, as required by CEQA, including, but not limited to, effects associated with transportation or energy consumption. The Resources Agency is required to certify and adopt the guidelines by January 1, 2010, and OPR is required to periodically update the guidelines to incorporate new information or criteria established by the CARB pursuant to AB 32. SB 97 would apply to any proposed or draft environmental impact report, negative declaration, mitigated negative declaration, or other document prepared under CEQA that has not been certified or adopted by the CEQA lead agency as of the effective date of the new

[15] California Air Resources Board (CARB). 2007. *Proposed Early Actions to Mitigate Climate Change in California*. 6 June 2008 <http://www.climatechange.ca.gov/climate_action_team/reports/2007-04-20_CAT_REPORT.PDF>.
[16] California State Legislature. 2006. Assembly Bill 32 (AB 32), Global Warming Solutions Act of 2006. Nunez. 6 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=ab_32&sess=PREV&house=B&author=nunez>.
[17] *Ibid.*
[18] California State Legislature. 2007. Senate Bill 97 (SB 97). Dutton. 6 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=sb_97&sess=CUR&house=B&author=dutton>.

guidelines. In addition, SB 97 exempts transportation projects funded under the Highway Safety, Traffic Reduction, Air Quality and Port Security Bond Act of 2006, or projects funded under the Disaster Preparedness and Flood Prevention Bond Act of 2006.

At this time, the USEPA does not regulate GHG emissions. However, in the case of *Massachusetts v. USEPA*, the United States Supreme Court issued a ruling (April 2007) that reviewed a USEPA decision not to regulate GHG emissions from cars and trucks under the Clean Air Act. The lawsuit focused on Section 202 of the Clean Air Act. The case resolved the following legal issues: (1) the Clean Air Act grants the USEPA authority to regulate GHG emissions, and (2) USEPA did not properly exercise its lawful discretion in deciding not to promulgate regulations concerning GHG emissions.

Adopted by the CEC on November 5, 2003, Title 24 is the 2005 Building Energy Efficiency Standards for Residential and Nonresidential Buildings. Title 24 is considered one of the most stringent set of regulations for energy conservation in new buildings in the country. Mandatory measures in Title 24 requirements include, but are not limited to, minimum ceiling, wall, and raised floor insulation, minimum Heating, Ventilating and Air Conditioning (HVAC), and minimum water heating equipment efficiencies. The 2005 Standards (for residential and nonresidential buildings) are expected to reduce electricity use by 478 gigawatt-hours per year (GWh/y) and reduce the growth in natural gas use by 8.8 million therms per year.[19] The savings attributable to new nonresidential buildings are 163.2 GWh/y of electricity savings and 0.5 million therms of natural gas.[20] Additional savings result from the application of the Standards on building alterations. In particular, requirements for cool roofs, lighting and air distribution ducts are expected to save about 175 GWh/y of electricity.[21] The State's energy efficiency standards represent an important strategy that can make an important contribution to the reduction of GHG emissions.

In addition to the State regulations, the City of Los Angeles has issued guidance promoting green building to reduce GHG emissions. The goal of the Green LA Action Plan (Green Plan) is to reduce greenhouse gas emissions 35 percent below 1990 levels by 2030.[22] The Green Plan identifies objectives and actions designed to make the City a leader in confronting global climate change. The measures would reduce emissions directly from municipal facilities and operations, and create a framework to address City-wide GHG emissions. The Green Plan lists various focus areas in which to implement GHG reduction strategies. Focus areas listed in the Green Plan include energy, water, transportation, land use, waste, port, airport, and ensuring that changes to the local climate are incorporated into planning and building decisions. The Green Plan discusses City goals for each focus area as follows:

[19] California Energy Commission. 2005. *2005 Building Energy Efficiency Standards Nonresidential Compliance Manual*. 19 May 2008 <http://www.energy.ca.gov/ title24/2005standards/nonresidential_manual.html>.
[20] *Ibid.*
[21] *Ibid.*
[22] Los Angeles, City of. 2007. *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming*. 19 May 2008 <http://www.lacity.org/ead/EADWeb-AQD/GreenLA_CAP_2007.pdf>.

Energy

- Increase the generation of renewable energy;
- Develop sustainable construction guidelines;
- Increase City-wide energy efficiency; and
- Promote energy conservation.

Water

- Decrease per capita water use to reduce electricity demand associated with water pumping and treatment.

Transportation

- Power the City vehicle fleet with alternative fuels; and
- Promote alternative transportation (e.g., mass transit and rideshare).

Other Goals

- Create a more livable City through land use regulations;
- Increase recycling, reducing emissions generated by activity associated with the Port of Los Angeles and regional airports;
- Create more city parks, promoting the environmental economic sector; and
- Adapt planning and building policies to incorporate climate change policy.

2. THRESHOLDS OF SIGNIFICANCE

This air quality analysis is consistent with the methods described in the SCAQMD CEQA *Air Quality Handbook* (1993 edition), as well as the updates to the CEQA Air Quality Handbook, as provided on the SCAQMD website.[23]

Regional and localized construction emissions were analyzed for the Proposed Project. Construction emissions (i.e., demolition, site preparation, and building construction) were calculated using CARB's URBEMIS2007 model.[24] Regional emissions were compared to SCAQMD regional thresholds to determine project impact significance. The localized construction analysis followed guidelines published by the SCAQMD in the *Localized Significance Methodology for CEQA Evaluations* (SCAQMD Localized Significance Threshold (LST) Guidance Document).[25] In January 2005, the SCAQMD supplemented the SCAQMD LST Guidance Document with *Sample Construction Scenarios for Projects Less than Five Acres in Size*.[26]

URBEMIS2007 was also used to calculate operational emissions (i.e., mobile and area). Localized CO emissions were calculated utilizing USEPA's CAL3QHC dispersion model and CARB's EMFAC2007 model. EMFAC2007 is the latest emission inventory model that

[23] South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Diamond Bar: Author. 6 June 2008 <http://www.aqmd.gov/ceqa/oldhdbk.html>.
[24] California Air Resources Board (CARB). 2007. URBEMIS 2007 Emissions Inventory Model, Version 9.2. 6 June 2008 <http://www.urbemis.com/>.
[25] South Coast Air Quality Management District (SCAQMD). 2003 (June). *Final Localized Significance Threshold Methodology*. 19 May 2008 <http://www.aqmd.gov/CEQA/handbook/LST/ LST.html>.
[26] South Coast Air Quality Management District (SCAQMD). 2005 (January). *Sample Construction Scenarios for Projects Less than Five Acres in Size*. 19 May 2008 <http://www.aqmd.gov/ceqa/ handbook/LST/FinalReport.pdf>.

calculates emission inventories and emission rates for motor vehicles operating on roads in California. This model reflects the CARB's current understanding of how vehicles travel and how much they pollute. The EMFAC2007 model can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future. CAL3QHC is a model developed by USEPA to predict CO and other pollutant concentrations from motor vehicles at roadway intersections. The model uses a traffic algorithm for estimating vehicular queue lengths at signalized intersections. The Proposed Project does not contain lead emissions sources. Therefore, emissions and concentrations related to this pollutant are not analyzed in this report.[27]

The following are the significance criteria SCAQMD has established to determine project impacts.

Construction Phase Significance Criteria

The Proposed Project would have a significant impact if:

- Regional and localized construction emissions were to exceed SCAQMD construction emissions thresholds for VOC, NO_X, CO, SOX, $PM_{2.5}$, or PM_{10}, as presented in *Table 8: SCAQMD Daily Construction Emissions Thresholds*;
- The Proposed Project would generate significant TAC emissions; and
- The Proposed Project would create an odor nuisance.

TABLE 8
SCAQMD DAILY CONSTRUCTION EMISSIONS THRESHOLDS [1]

CRITERIA POLLUTANT	REGIONAL EMISSIONS (POUNDS PER DAY)	LOCALIZED EMISSIONS (POUNDS PER DAY) [2]
Volatile Organic Compounds (VOC)	75	--
Nitrogen Oxides (NO_X)	100	176
Carbon Monoxide (CO)	550	553
Sulfur Oxides (SO_X)	150	--
Fine Particulates ($PM_{2.5}$)	55	4
Particulates (PM_{10})	150	6

[1] Source: SCAQMD, 2008
[2] The localized significance thresholds are for a five-acre project site and a 25-meter (82-foot) receptor distance.

[27] Prior to 1978, mobile emissions were the primary source of lead resulting in air concentrations. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. Currently, industrial sources are the primary source of lead resulting in air concentrations. Since the Proposed Project does not contain an industrial component, lead emissions are not analyzed in this report.

Operations Phase Significance Criteria

The Proposed Project would have a significant impact if:

- Daily operational emissions were to exceed SCAQMD operational emissions thresholds for VOC, NO_X, CO, SOX, $PM_{2.5}$, or PM_{10}, as presented in *Table 9: SCAQMD Daily Operational Emissions Thresholds*;

- Project-related traffic causes CO concentrations at study intersections to violate the CAAQS for either the one- or eight-hour period. The CAAQS for the one- and eight-hour periods are 20 ppm and 9.0 ppm, respectively. If CO concentrations currently exceed the CAAQS, then an incremental increase of 1.0 ppm over "no project" conditions for the one-hour period would be considered a significant impact. An incremental increase of 0.45 ppm over the "no project" conditions for the eight-hour period would be considered significant;[28]

- The Proposed Project would generate significant emissions of TACs;

- The Proposed Project would create an odor nuisance; and

- The Proposed Project would not be consistent with the AQMP.

TABLE 9
SCAQMD DAILY OPERATIONAL EMISSIONS THRESHOLDS [1]

CRITERIA POLLUTANT	POUNDS PER DAY
Volatile Organic Compounds (VOC)	55
Nitrogen Oxides (NO_X)	55
Carbon Monoxide (CO)	550
Sulfur Oxides (SO_X)	150
Fine Particulates ($PM_{2.5}$)	55
Particulates (PM_{10})	150
[1] Source: SCAQMD, 2008	

Climate Change Significance Criteria

While Global warming and climate change have received substantial public attention for a number of years, the analytical tools necessary to determine the effect on worldwide global warming from a particular increase in GHG emissions or the resulting effects on climate change in a particular locale are still being developed. Further, the information and data needed to evaluate the impacts that a specific project may have on climate change is still being gathered. Consequently, federal agencies, State agencies and local agencies (such as the SCAQMD), have not developed methodology to determine the significance of project-level impacts on global warming and climate change. Thus, no government agency has established any significance thresholds to assess specific project effects on climate change. For purpose of this EIR, the

[28] Consistent with SCAQMD Regulation XIII definition of a significant impact.

Proposed Project would result in a significant climate change impact if it would impair or prevent attainment of AB 32 or Green LA Action Plan GHG emission reduction goals and strategies.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

Operational Characteristics

The Proposed Project would involve the construction and operation of approximately 280,000 GLSF of retail and restaurant uses, as well as associated parking facilities (including both surface lots and multi-level structures). The proposed retail expansion (two-levels of shopping plus one subterranean parking level) and the main six-level parking structure (one-level at grade plus five-levels above grade) will be constructed primarily in the space between the existing shopping center (located immediately adjacent to the Riverside Drive frontage) and the Ventura (US 101) Freeway that is currently occupied by a portion of the existing mall parking structure and surface parking. A second four-level parking structure (one-level at grade plus three-levels above grade) will be constructed on the eastern portion of the project site (adjacent to Woodman Avenue) on an area currently developed with surface parking.

The Proposed Project includes a request to extend the length of its allowable hours of operation from 7:00 a.m. - 11:00 p.m. and to permit hours between 5:30 a.m. - 12 midnight in order to facilitate mall operations. The new parking structures would be designed with openings between the parking levels. Also, two new loading docks will be constructed along the south side of the new mall buildings. One existing loading dock, currently along Riverside Drive at the proposed tunnel entrance, would be relocated south the mall structure.

Under the Proposed Project, a number of local access and roadway improvements are proposed to improve traffic flow and improve the level of service at adjacent intersections. These measures, anticipated traffic generation from the Proposed Project, and the resultant levels of service on local roadways are detailed in Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access, of this EIR.

Construction Activity

Construction is planned for completion in the year 2012, while full occupation of the development may not stabilize until the year 2013. The Proposed Project would be completed as a single-event project staged through four phases over an approximate 36 to 48-month period. Construction activities will generally occur between the hours of 7:00 a.m. and 9:00 p.m. during weekdays. Construction phasing is described in detail in Section II: Project Description: F-Project Characteristics.

Construction activities would be coordinated and staged to balance space limitations on site, phasing of construction to retain operation of the existing shopping center and appropriate parking during construction, and general construction phasing techniques. Construction debris

from demolition of existing parking areas, and earth from excavation will require that dirt and materials be removed from the site. A haul route from the project site will be required.

As currently designed, several project features were considered in the air quality impact analysis. The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- The Proposed Project would be located near public transportation routes and along a heavily traveled vehicle corridor. The Proposed Project would be located within approximately 2 miles from the Metro Orange Line (Express Busway) Valley College and Woodman Stations and adjacent to stops for the MTA Routes 96 (Downtown LA to Sherman Oaks) and 158 (Chatsworth to Sherman Oaks), and LADOT Dash Route for Van Nuys/Studio City, thereby supporting a range of alternative transportation options for public transportation access.

- The Proposed Project would be located within close proximity (less than ½ mile) from other key community services, thereby adding to efficient development densities and community connectivity within the North Sherman Oaks community. Further, the Proposed Project development and other proximate services would be conveniently accessible by local residents through an improved pedestrian access plan (i.e., cross walk at Matilija Avenue/Riverside Drive, and aesthetic treatment along Riverside Drive frontage), and accessible by more distant residents and employees through enhanced public transit options/amenities (i.e., upgraded bus stops, and coordinated bus schedules through MTA). Efficient development densities, accomplished through the consolidation and intensity of community services in the project area, contributes toward improved energy efficiency, vehicle trip reduction, vehicle miles traveled reduction, air pollutants reduction, and consistency with local and regional planning programs.

- Proposed Project would not create a regional mall but a better serving community/neighborhood mall.

- The Proposed Project will be designed to reduce exposure of sensitive receptors to excessive levels of air quality. The Proposed Project is designed and will be built and operated in a manner consistent with the requirements to achieve Leadership in Energy and Environmental Design (LEED) certification from the United States Green Building Council.[29] LEED is a green building rating system that was designed to guide and distinguish high-performance commercial projects. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. The Proposed Project will implement a variety of design and operational features to achieve LEED certification. As a result, the Proposed Project would be proactive in reducing GHG emissions. Examples of design features to be implemented for the Proposed Project in order to

[29] U.S. Green Building Council (USGBC). 2007. *Leadership in Energy and Environmental Design.* 19 May 2008 <http://www.usgbc.org/LEED>.

achieve LEED certification include, but are not limited to, the following or their equivalent:

- A construction activity pollution prevention program.
- Encouraging the use of mass transit.
- Providing transportation amenities, such as alternative fueling stations, carpool/vanpool programs, bicycle racks, and showering/changing facilities.
- Implementing a stormwater management plan that reduces impervious cover, promotes infiltration, and captures and treats the stormwater runoff from 90 percent of the average annual rainfall using acceptable best management practices.
- Adopting site lighting criteria to maintain safe light levels while avoiding off-site lighting and night sky pollution, minimizing site lighting where possible, and reducing light pollution.
- Providing tenants with a description of the sustainable design and construction features incorporated in the core and shell project.
- Using high-efficiency irrigation technology or reducing potable water consumption for irrigation by 50 percent by using a combination of plant species factor, irrigation efficiency, use of captured rainwater, use of recycled wastewater, and use of water treated and conveyed by public agency specifically for non-potable uses.
- Employing strategies that, in aggregate, use 20 percent less water than the water use baseline calculated for the building (not including irrigation) after meeting the Energy Policy Act of 1992 fixture performance requirements.
- Designing the building envelope and building system to maximize energy performance.
- Selecting refrigerants that reduce ozone depletion while minimizing direct contributions to global warming.
- Implementing a construction waste management plan that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or comingled. The waste management plan would include recycling and/or salvaging at least 50 percent of non-hazardous construction and demolition debris.
- Using materials with recycled content such that the sum of post-consumer recycled content plus one-half of the pre-consumer content constitutes at least ten percent of the total value of the materials in the project.
- Using a minimum of ten percent of the total materials value on building materials or products extracted, harvested, or recovered and manufactured within 500 miles of the project site.
- Adopting an indoor air quality management plan to protect the HVAC system during construction, control pollutant sources, and interrupt contamination pathways.

- Specifying low-volatile organic compounds paints and coatings in construction documents.
- Designing the building with the capability for occupant controls for airflow, temperature and ventilation. Strategies will include underfloor HVAC systems with individual diffusers, displacement ventilation systems with control devices, ventilation walls and mullions.

- The Proposed Project would install carbon monoxide and airflow measurement equipment that would transfer the information to the HVAC system and/or Building Automation System to trigger corrective action, if applicable, and/or use the measurement equipment to trigger alarms that inform building operators or occupants of a possible deficiency in outdoor air delivery. Installation of such a system in areas where carbon monoxide concentrations may escalate (such as in the vicinity of loading docks or valet parking drop-offs) would improve both indoor and localized "hotspot" air quality.

- The Proposed Project would provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities.

- The Proposed Project would provide a shuttle service connecting the site to a nearby Orange Line station (e.g., Van Nuys Boulevard). This service could be provided by either the provision of a private shuttle or the funding of extended hours for the existing Los Angeles Department of Transportation (LADOT) DASH line. The Orange Line shuttle would complement existing transit services (i.e., the LADOT DASH service) such that the shuttle would operate during hours when other public transit services connecting the site to the Orange Line are not available (e.g., during weekdays evenings and general weekend hours). The shuttle would operate during regular shopping center hours corresponding with periods of peak parking demand at the site and peak holiday season demand (i.e., everyday during the holiday shopping period between November 15 and January 1, and every Saturday/Sunday throughout the year).

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- The Proposed Project will comply with applicable CARB regulations and standards. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.

- The Proposed Project will comply with applicable SCAQMD regulations and standards. The SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the district. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

b. Project Impacts

An Initial Study (IS) was prepared for the Proposed Project. Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the Notice of Preparation (NOP) and IS process to have a potential significant environmental effect. Issues related to Air Quality that were determined to be less than significant, and are not addressed below, include: toxic air contaminants (during construction activity) and odors (during both operational and construction phases). An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant of this EIR.

(1) Construction Activity

(a) Regional Impacts

Construction of the Proposed Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Fugitive dust emissions would primarily result from demolition and site preparation (e.g., excavation) activities. NO_X emissions would primarily result from the use of construction equipment. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

It is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas. Compliance with Rule

403 would reduce regional PM_{10} emissions associated with construction activities by approximately 61 percent[30].

The project would be completed in one phase with four stages. The first stage would include the construction of a new four-level parking structure (one-level at grade plus three-levels above grade) at the eastern edge of the project site. The second stage would include the construction of a new six-level parking structure (one-level at grade plus five-levels above grade) south of the existing Macy's parking structure. The third stage would include construction of the shopping retail building and associated one-level of subterranean parking. The fourth stage would consist of the infilling of a portion of the grade and first above grade level of the main parking structure that was used for construction staging.

Each project construction stage is anticipated to include three primary construction phases during the construction process: demolition of any necessary existing pavement or structures, grading and preparation of the site, and erection of structures. Construction activities would be coordinated and staged to balance space limitations on site, phasing of construction to retain operation of the existing shopping center and appropriate parking during construction, and general construction phasing techniques..

The assumed equipment mix for each phase of construction is included in the technical report prepared by Terry A. Hayes Associates LLC.[31] General URBEMIS2007 assumptions utilized to calculate Stage 1 construction emissions include a maximum of 22 haul trips per day during demolition and 2.7 acres of disturbed land per day during grading activity. Stage 2 construction emissions include a maximum of 24 haul trips per day during demolition, 2.3 acres of disturbed land per day during grading activity, and a maximum of 97 haul trips per day during grading activity. Stage 3 construction emissions include a maximum of 25 haul trips per day during demolition, five acres of disturbed land per day during grading activity, and a maximum of 150 haul trips per day during grading activity.

URBEMIS2007 was used to calculate daily construction emissions. *Table 10: Estimated Daily Construction Emissions – Unmitigated*, shows the estimated daily emissions associated with each construction phase. As shown, regional emissions generated by construction activity occurring within the assumptions described above would not exceed the SCAQMD regional significance thresholds for VOC, CO, SO_X, $PM_{2.5}$, or PM_{10}. Because daily construction emissions would exceed the SCAQMD regional thresholds for NO_X, regional NO_X construction emissions would result in a significant impact without incorporation of mitigation

[30] South Coast Air Quality Management District (SCAQMD). 2007 (April). *Overview–Fugitive Dust Mitigation Measures Tables.* 25 August 2008. <http://www.aqmd.gov/ceqa/handbook/mitigation/fugitive/Dust_MM_Overview.pdf>

[31] Terry A. Hayes Associates, LLC. 2008 (February 26). *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*. Culver City, CA: Author. [See Appendix D of this Draft EIR]

TABLE 10
ESTIMATED DAILY CONSTRUCTION EMISSIONS – UNMITIGATED [1]

CONSTRUCTION PHASE	POUNDS PER DAY					
	VOC	NO_X	CO	SO_X	$PM_{2.5}$ [2]	PM_{10} [2]
PHASE 1 – FOUR-LEVEL PARKING STRUCTURE						
Demolition						
On-Site	2	13	6	0	5	21
Off-Site	2	24	11	<1	1	1
Total	**4**	**37**	**17**	**<1**	**6**	**22**
Grading/Excavation						
On-Site	2	13	6	0	7	29
Off-Site	<1	<1	1	0	<1	<1
Total	**2**	**13**	**7**	**0**	**7**	**29**
Construction						
On-Site	4	22	11	0	2	2
Off-Site	1	9	44	<1	<1	<1
Total	**5**	**31**	**55**	**<1**	**2**	**2**
PHASE 2 – MAIN PARKING STRUCTURE						
Demolition						
On-Site	2	13	6	0	5	23
Off-Site	2	26	11	<1	1	1
Total	**4**	**39**	**17**	**<1**	**6**	**24**
Grading/Excavation						
On-Site	3	29	12	0	6	26
Off-Site	6	68	29	<1	3	3
Total	**9**	**97**	**41**	**<1**	**9**	**29**
Construction						
On-Site	3	21	11	0	2	2
Off-Site	2	8	41	<1	<1	<1
Total	**5**	**29**	**52**	**<1**	**2**	**2**
PHASE 3 – RETAIL AND SUBTERRANEAN PARKING						
Demolition						
On-Site	2	12	6	0	6	24
Off-Site	2	26	11	<1	1	1
Total	**4**	**38**	**17**	**<1**	**7**	**25**
Grading/Excavation						
On-Site	3	29	12	0	12	53
Off-Site	9	104	44	<1	4	5
Total	**12**	**133**	**56**	**<1**	**16**	**58**
Building Construction						
On-Site	3	20	11	0	2	2
Off-Site	1	7	38	<1	<1	<1
Total	**4**	**27**	**49**	**<1**	**2**	**2**

TABLE 10 (CONTINUED)
ESTIMATED DAILY CONSTRUCTION EMISSIONS – UNMITIGATED [1]

CONSTRUCTION PHASE	POUNDS PER DAY					
	VOC	NO_X	CO	SO_X	$PM_{2.5}$ [2]	PM_{10} [2]
Architectural Coating						
On-Site	68	<1	<1	<1	<1	<1
Off-Site	<1	<1	1	<1	<1	<1
Total	**68**	**<1**	**1**	**<1**	**<1**	**<1**
Maximum Regional Total	68	133	56	<1	16	58
Regional Significance Threshold	75	100	550	150	55	150
Exceed Threshold?	No	Yes	No	No	No	No
Maximum On-Site Total	68	29	12	0	12	53
Localized Significance Threshold [3]	--	176	553	--	4	6
Exceed Threshold?	--	No	No	--	Yes	Yes

[1] Source: Terry A Hayes Associates LLC, *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008.
[2] URBEMIS2007 emissions for fugitive dust were adjusted to account for a 61 percent control efficiency associated with SCAQMD Rule 403.
[3] Assumed a two-acre project site and a 25-meter (82-foot) receptor distance. This is the smallest distance between source and receptor to be analyzed under the SCAQMD LST methodology.

(b) Localized Impacts

Emissions for the localized construction air quality analysis of $PM_{2.5}$, PM_{10}, CO, and NO_2 were compiled using LST methodology promulgated by the SCAQMD.[32] Localized on-site emissions were calculated using similar methodology to the regional emission calculations. LSTs were developed based upon the size or total area of the emissions source, the ambient air quality in each source receptor area, and the distance to the sensitive receptor. LSTs for CO and NO_2 were derived by using an air quality dispersion model to back-calculate the emissions per day that would cause or contribute to a violation of any ambient air quality standard for a particular source receptor area. Construction PM_{10} LSTs were derived using a dispersion model to back-calculate the emissions necessary to exceed a concentration equivalent to 50 µg/m3 over five hours, which is the SCAQMD Rule 403 control requirement.

Table 10: Estimated Daily Construction Emissions – Unmitigated, shows the estimated localized daily emissions associated with each construction phase. Because daily construction emissions would exceed the SCAQMD localized thresholds for $PM_{2.5}$ and PM_{10}, localized construction emissions would result in a significant impact without incorporation of mitigation measures.

[32] The concentrations of SO_2 are not estimated because construction activities would generate a small amount of SOX emissions. No State standard exists for VOC. As such, concentrations for VOC were not estimated.

(2) Long-Term Operation

(a) Regional Impacts

Long-term project emissions would be generated by area sources, such as natural gas combustion and consumer products (e.g., aerosol sprays) and mobile sources. Motor vehicle trips generated by the Proposed Project would be the predominate source of long-term project emissions. According to the traffic report, the Proposed Project would generate 4,964 net daily[33] vehicle trips during the weekday and 6,252 net daily vehicle trips during the weekend.[34]

Mobile and area source emissions were estimated using URBEMIS2007. A project-specific trip length analysis concluded that the average vehicle miles traveled by a Fashion Square patron is 4.85 per trip.[35] The average trip length was based on a study of existing shopper travel patterns for the shopping center. The objective of the Proposed Project is to capture more shoppers from the existing service area. As such, the Proposed Project would not expand the existing market range, and it was assumed that existing average trip length would not change with implementation of the Proposed Project. The trip length was utilized to determine that the daily weekday vehicle miles traveled would be approximately 24,075 and the daily weekend vehicle miles traveled would be approximately 30,320. The VMT includes a ten percent increase to account for pass-by trips. The default URBEMIS2007 trip length was adjusted to account for the predicted vehicle miles traveled. Weekday and weekend operational emissions are shown in *Table 11: Estimated Daily Operational Emissions - Weekday* and *Table 12: Estimated Daily Operational Emissions - Weekend*, respectively. As shown, regional operational emissions due to the Proposed Project would not exceed SCAQMD significance thresholds and, as such, would result in a less than significant impact.

TABLE 11
ESTIMATED DAILY OPERATIONAL EMISSIONS – WEEKDAY [1]

EMISSION SOURCE	POUNDS PER DAY					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
EXISTING LAND USE						
Area Sources [2]	<1	8	9	<1	<1	<1
EXISTING LAND USE						
Mobile Sources	106	155	1,148	1	211	41
Total Emissions	**106**	**163**	**1,156**	**1**	**211**	**41**
PROPOSED EXPANSION						
Area Sources [2]	<1	11	11	<1	<1	<1
Mobile Sources	128	186	1,377	2	253	49
Total Emissions	**128**	**197**	**1,388**	**2**	**253**	**49**

[33] Bravio, F. 2007 (August 23). E-mail. E-mail communication between F. Bravio (Linscott, Law & Greenspan Engineers) and D. Steinert (Planning Associates, Inc.)
[34] Linscott, Law & Greenspan, Engineers. 2008 (August 5). *Traffic Impact, Parking, and Site Access Study for the Westfield Fashion Square Expansion Project*. Pasadena, CA: Author. [See Appendix I of this Draft EIR]
[35] Linscott, Law & Greenspan, Engineers. 2007. *Westfield Fashion Square Vehicle Miles Traveled Study*. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

TABLE 12
ESTIMATED DAILY OPERATIONAL EMISSIONS – WEEKEND [1]

EMISSION SOURCE	POUNDS PER DAY					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
NET EMISSIONS	**22**	**34**	**232**	**1**	**42**	**8**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
[1] Source: Terry A Hayes Associates LLC, *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008. [2] Area sources include emissions from natural gas combustion and consumer product (e.g., aerosol sprays).						
EXISTING LAND USE						
Area Sources [2]	<1	8	8	<1	<1	<1
Mobile Sources	137	202	1,496	1	275	54
Total Emissions	**137**	**210**	**1,504**	**1**	**275**	**54**
PROPOSED EXPANSION						
Area Sources [2]	<1	11	11	<1	<1	<1
Mobile Sources	164	241	1,784	2	328	64
Total Emissions	**164**	**252**	**1,795**	**2**	**328**	**64**
NET EMISSIONS	**27**	**42**	**291**	**1**	**53**	**10**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
[1] Source: Terry A Hayes Associates LLC, *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008. [2] Area sources include emissions from natural gas combustion and consumer product (e.g., aerosol sprays).						

(b) Localized Impacts

CO concentrations in 2012 are expected to be lower than existing conditions due to stringent State and federal mandates for lowering vehicle emissions. Although traffic volumes would be higher in the future both without and with the implementation of the Proposed Project, CO emissions from mobile sources are expected to be much lower due to technological advances in vehicle emissions systems, as well as from normal turnover in the vehicle fleet. Accordingly, increases in traffic volumes are expected to be offset by increases in cleaner-running cars as a percentage of the entire vehicle fleet on the road.[36] This reduction is accounted for in the EMFAC2007 model and included in the CO analysis.

The State one- and eight-hour CO standards may potentially be exceeded at congested intersections with high traffic volumes. An exceedance of the State CO standards at an intersection is referred to as a CO hotspot. The SCAQMD recommends a CO hotspot evaluation of potential localized CO impacts when V/C ratios are increased by two percent at intersections with a LOS of D or worse. SCAQMD also recommends a CO hotspot evaluation when an intersection decreases in LOS by one level beginning when LOS changes from C to D.

[36] Consistent with CARB's vehicle emissions inventory.

Based on the traffic study, the selected weekday intersections are as follows:

- Hazeltine Avenue/Riverside Drive - PM Peak Hour
- Hazeltine Avenue/Ventura Boulevard - AM Peak Hour
- Hazeltine Avenue/Magnolia Boulevard – PM Peak Hour
- Woodman Avenue/US 101 Westbound Ramps - PM Peak Hour
- Woodman Avenue/Riverside Drive – PM Peak Hour
- Van Nuys Boulevard/Riverside Drive – PM Peak Hour

Based on the traffic study, the selected weekend intersections are as follows:

- Hazeltine Avenue/Riverside Drive
- Woodman Avenue/Riverside Drive
- Woodman Avenue/US 101 Westbound Ramps

The USEPA CAL3QHC micro-scale dispersion model was used to calculate CO concentrations for 2012 "no project" and "project" conditions. CO concentrations at the six study intersections are shown for the AM and PM peak hours in *Table 13: Carbon Monoxide Concentrations – Weekday* and *Table 14: Carbon Monoxide Concentrations – Weekend*, respectively. As indicated, weekday one-hour CO concentrations under "project" conditions would be approximately 5 ppm at worst-case sidewalk receptors. Weekday eight-hour CO concentrations under "project" conditions would range from approximately 3.2 ppm to 3.5 ppm. Weekend one- and eight-hour CO concentrations under "project" conditions would be approximately 5 and 3.2 ppm, respectively, at worst-case sidewalk receptors. The State one- and eight-hour standards of 20 ppm and 9.0 ppm, respectively, would not be exceeded at the analyzed intersections. Thus, a less than significant impact is anticipated.

TABLE 13
CARBON MONOXIDE CONCENTRATIONS – WEEKDAY [1][2]

INTERSECTION	1-HOUR (PARTS PER MILLION)			8-HOUR (PARTS PER MILLION)		
	EXISTING (2007)	NO PROJECT (2012)	PROJECT (2012)	EXISTING (2007)	NO PROJECT (2012)	PROJECT (2012)
Hazeltine Avenue/Riverside Drive	6	5	5	4.4	3.2	3.2
Hazeltine Avenue/Ventura Boulevard	7	5	5	4.7	3.4	3.4
Hazeltine Avenue/Magnolia Boulevard	7	5	5	4.5	3.3	3.3
Woodman Avenue/ US 101 Westbound Ramps	6	5	5	4.3	3.2	3.2
Woodman Avenue/Riverside Drive	7	5	5	4.6	3.2	3.3
Van Nuys Boulevard/Riverside Drive	7	5	5	4.9	3.5	3.5
State Standard	**20**			**9.0**		

[1] Source: Terry A Hayes Associates LLC, *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008.
[2] Existing concentrations include year 2007 one- and eight-hour ambient concentrations of 5 ppm and 3.7 ppm, respectively. No Project and Project concentrations include year 2012 one- and eight-hour ambient concentrations of 4 ppm and 2.6 ppm, respectively.

TABLE 14
CARBON MONOXIDE CONCENTRATIONS – WEEKEND [1][2]

INTERSECTION	1-HOUR (PARTS PER MILLION)			8-HOUR (PARTS PER MILLION)		
	EXISTING (2007)	NO PROJECT (2012)	PROJECT (2012)	EXISTING (2007)	NO PROJECT (2012)	PROJECT (2012)
Hazeltine Avenue/Riverside Drive	6	5	5	4.3	3.2	3.2
Woodman Avenue/Riverside Drive	7	5	5	4.5	3.3	3.2
Woodman Avenue/ US 101 Westbound Ramps	6	5	5	4.3	3.2	3.2
State Standard	**20**			**9.0**		

[1] Source: Terry A Hayes Associates LLC, *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008.
[2] Existing concentrations include year 2007 one- and eight-hour ambient concentrations of 5 ppm and 3.7 ppm, respectively. No Project and Project concentrations include year 2012 one- and eight-hour ambient concentrations of 4 ppm and 2.6 ppm, respectively.

CO is a gas that disperses quickly. Thus, CO concentrations at sensitive receptor locations are expected to be much lower than CO concentrations adjacent to the roadway intersections. Additionally, the intersections were selected based on poor LOS and high traffic volumes. Sensitive receptors that are located away from congested intersections or are located near roadway intersections with better LOS would be exposed to lower CO concentrations. As shown in *Table 13: Carbon Monoxide Concentrations – Weekday* and *Table 14: Carbon Monoxide Concentrations – Weekend*, CO concentrations would not exceed the State one- and eight-hour standards. Thus, no significant increase in CO concentrations at sensitive receptor locations is expected, resulting in a less than significant impact.

Notre Dame High School is located near Riverside Avenue and Woodman Avenue. As shown in *Table 13: Carbon Monoxide Concentrations – Weekday*, one- and eight-hour weekday CO concentrations at Notre Dame High School would be approximately 7 and 4.6 ppm, respectively. Weekday CO concentrations would not exceed the one- and eight-hour CO standards of 20 and 9.0 ppm, respectively.

(c) Toxic Air Contaminant Impacts

The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[37] The primary source of potential TACs associated with Proposed Project operations is diesel particulate from delivery trucks (e.g., truck traffic on local streets and on-site truck idling). Diesel truck activity associated with the existing loading docks would not change as a result of the Proposed Project. The Proposed Project would locate two new loading docks on the southern portion of the project site, facing the US 101. The number of heavy-duty trucks (e.g., delivery trucks) accessing the new loading docks on a daily basis would be minimal, and, consistent with CARB regulations, the trucks that do visit the site would not idle on-site for over five minutes. Based on the limited activity of the TAC sources, the Proposed Project would not warrant the need for a health risk assessment associated with on-site activities, and potential TAC impacts would be less than

[37] South Coast Air Quality Management District (SCAQMD). 2002 (December). *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions.* 6 June 2008 <http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc>.

significant. However, mitigation is recommended to limit the potential idling of heavy-duty trucks due to the close proximity of sensitive receptors.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Proposed Project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). As such, the Proposed Project would not release substantial amounts of TACs, and no significant impact on human health would occur.

(3) Climate Change Gas Emissions

Project-related carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N2O) emissions were calculated for energy use and mobile sources. Each GHG has a different global warming potential, called a CO_2 equivalent value, which describes its global warming potency. CO_2 is the most common GHG and has an equivalent value of one. The CO_2 equivalent values for CH_4 and N_2O are 21 and 310, respectively.[38]

(a) Construction Activity Climate Change Gas Emissions

Construction activity for the Proposed Project would generate GHG emissions from construction equipment, delivery/haul truck trips, and construction worker commute trips. CO_2 emissions were obtained from the URBEMIS2007 emissions inventory model[39]. URBEMIS2007 uses emission factors obtained from the CARB's OFFROAD2007 model to calculate construction equipment emissions[40]. URBEMIS2007 does not estimate CH_4 emissions. CH_4 combustion emissions were obtained using a reactive organic compound to CH_4 ratio of 0.0902, which was obtained directly from the CARB's OFFROAD2007 model.[41] Neither the SCAQMD nor OFFROAD2007 provides construction equipment N_2O emission factors. Other models that have been developed to inventory GHG emissions, such as Clean Air and Climate Protection Software[42], Sustainable Communities Model[43], I-PLAC^{3}S[44], EMFAC2007[45], and Climate Action Registry Reporting On-Line Tool[46], focus on regional energy use and transportation and also do not provide construction equipment N_2O emission factors. As such, N_2O emissions from construction equipment were not estimated by use of those models. However, the N_2O emissions from construction worker commute trips were calculated as a ratio of daily countywide VMT to

[38] Intergovernmental Panel on Climate Change. 1995. *IPCC Second Assessment Report: Climate Change 1995*. 19 May 2008 <http://www.ipcc.ch/ipccreports/assessments-reports.htm>.
[39] California Air Resources Board (CARB). 2007. URBEMIS 2007 Emissions Inventory Model, Version 9.2. 6 June 2008 <http://www.urbemis.com/>.
[40] California Air Resources Board (CARB). 2006 (December 15). OFFROAD2007 Emissions Inventory Model, Version 2.0.1.2. 6 June 2008 <http://www.arb.ca.gov/msei/offroad/offroad.htm>.
[41] *Ibid.*
[42] National Association of Clean Area Agencies (NACAA) [formerly the State and Territorial Air Pollution Program Administrators (STAPPA) and Association of Local Air Pollution Control Officials (ALAPCO)]. 2005. 12 June 2008 <http://www.4cleanair.org/InnovationDetails.asp?innoid=1>.
[43] Constructive Technologies Group. 2007. Sustainable Communities Model. 6 June 2008 <http://www.ctg-net.com/energetics/resources/newsDetails.aspx?id=17>.
[44] U.S. Department of Energy. 2005. Internet Accessed Planning for Community Energy, Economic and Environmental Sustainability (I-PLACE3S). 6 June 2008 <http://www.energy.ca.gov/places/index.html>.
[45] California Air Resources Board (CARB). 2006 (November 1). EMFAC2007 Mobile Source Emissions Inventory Model, Version 2.3. 6 June 2008 <http://www.arb.ca.gov/msei/onroad/latest_version.htm>.
[46] California Climate Action Registry. 2007. *Climate Action Registry Reporting On-Line Tool (CARROT)*. 19 May 2008 <http://www.climateregistry.org/tools/carrot.html>.

daily countywide emissions obtained from EMFAC2007. The ratio was utilized to obtain an NO_X emission rate, which was then adjusted to account for an N_2O to NO_X conversion ratio of 0.048.[47] The N_2O emission rate was then multiplied by the VMT to obtain GHG emissions. It was assumed that an average of 60 worker commuter trips would be made every day for the entire construction period. Based on UREBMIS2007, it was also assumed that one-way trips would be 13.3 miles, resulting in a VMT of 1,053,360 .

Based on this methodology, construction activity would result in CO_2 equivalent levels of approximately 2,415 tons of CO_2 emissions, less than 1 ton of CH_4 carbon dioxide-equivalent emissions, and 24 tons of N_2O carbon dioxide-equivalent emissions.

(b) Long-Term Operations Climate Change Gas Emissions

Long-term operational GHG emissions are generated due to local site-specific activity, such as on-site natural gas combustion and project-related vehicle trips, as well as regionally due to consumption of resources to provide energy, water, and waste management services for the Proposed Project. GHG emissions for the key areas (i.e., electricity generation, provision of water services, natural gas consumption and mobile sources) are discussed below.

Energy Use Associated with Standard Electricity Generation

GHG emissions would result from the combustion of fossil fuels that would provide energy for the Proposed Project. Based on information obtained from the Project Applicant, the shopping center currently consumes approximately 3,396,325 kilowatt-hours (kWh) of electricity per year.[48] This represents approximately 3.92 kWh per square foot per year based on the existing development size of 867,000 GLSF. The Proposed Project would include 280,000 GLSF of new retail development, which when applying similar factors would use approximately additional 1,096,852 kWh per year. As such, the shopping center with the Proposed Project would potentially consume approximately 4,493,177 kWh per year.

Implementation of the LEED program would directly reduce project-related energy use. Development that accomplishes LEED certifiable results in a minimum energy efficiency savings of approximately 10.5 to 14 percent over California Title 24 Energy Design Standards.[49] For a worst-case GHG emissions scenario, this LEED-level reduction was conservatively applied only to the new Proposed Project portion of the shopping center. As a result, the combined existing shopping center (with no LEED assumed) and Proposed Project (assumed LEED compliant) energy use would be reduced to approximately 4,378,008 kWh per year.

Table 15: Annual Greenhouse Gas Emissions shows electricity consumption-related GHG emissions associated with the Proposed Project. Pounds per kWh emission rates for CO_2 of 8.1E-01, CH_4 of 6.7E-06, and N_2O of 3.7E-06 were obtained from the California Climate Action

[47] California Air Resources Board (CARB). 2005 (June). *N2O Emission Factors - Estimates of Nitrous Oxide Emissions from Motor Vehicles and the Effects of Catalyst Composition and Aging* (Table 8.2). 6 June 2008 <http://www.arb.ca.gov/research/apr/past/02-313.pdf>.
[48] Based on average energy use in 2005 and 2006.
[49] U.S. Green Building Council (USGBC). 2007 (November 19). *LEED-NC v2.2, LEED-CS and California Title 24-2005*. 6 June 2008 <http://www.usgbc.org/ShowFile.aspx?DocumentID=2255 >.

Registry.[50] As shown, the shopping center currently generates 1,239 tons per year of CO_2 emissions from energy use and the Proposed Project would generate an additional 440 tons per year. When construction is complete, the Proposed Project would generate 1,639 tons per year of CO_2 emissions. LEED certifiable construction would reduce CO_2 emissions to 1,598 tons per year. The Proposed Project would increase electricity consumption-related emissions of CH_4 by 0.1 tons per year and NO_2 by 0.6 tons per year. LEED certifiable construction would reduce CH_4 and N_2O emissions by 0.01 and 0.06 tons per year, respectively.

TABLE 15
ANNUAL GREENHOUSE GAS EMISSIONS [1]

SCENARIO	CARBON EQUIVALENT (TONS PER YEAR)		
	CO_2	CH_4	N_2O
EXISTING CONDITIONS (SHOPPING CENTER)			
Mobile Emissions	22,410	38	688
Electricity Consumption Emissions	1,239	0.22	1.77
Water Consumption Emissions	72	0.013	0.103
Natural Gas Consumption Emissions	1,548	3.63	0.91
CO_2 Equivalent Emissions	25,629	42	691
Total CO_2 Equivalent Emissions	**26,362**		
280,000-SQUARE-FOOT PROPOSED PROJECT			
Mobile Emissions	4,469	8	136
Electricity Consumption Emissions	400	0.10	0.57
Water Consumption Emissions	23	0.004	0.033
Natural Gas Consumption Emissions	431	1.01	0.25
CO_2 Equivalent Emissions	5,323	9	137
Total CO_2 Equivalent Emissions	**5,469**		
PROJECT BASELINE CONDITIONS (EXISTING + PROPOSED PROJECT)			
Mobile Emissions	26,879	46	824
Electricity Consumption Emissions	1,640	0.29	2.34
Water Consumption Emissions	95	0.017	0.136
Natural Gas Consumption Emissions	1,979	4.64	1.16
CO_2 Equivalent Emissions	30,593	51	828
Total CO_2 Equivalent Emissions	**31,472**		
LEED BASIC CONDITIONS			
Mobile Emissions	26,879	46	824
Electricity Emissions	1,598	0.28	2.28
Water Consumption Emissions	89	0.015	0.126

[50] California Climate Action Registry. 2008 (April). *California Climate Action Registry General Reporting Protocol Version 3.0*. 6 June 2008 <http://www.climateregistry.org/resources/docs/protocols/grp/GRP_V3_April2008_FINAL.pdf>.

TABLE 15 (CONTINUED)
ANNUAL GREENHOUSE GAS EMISSIONS [1]

SCENARIO	CARBON EQUIVALENT (TONS PER YEAR)		
	CO_2	CH_4	N_2O
LEED BASIC CONDITIONS			
Natural Gas Consumption Emissions	1,979	0.221	0.004
CO_2 Equivalent Emissions	30,545	47	826
Total CO_2 Equivalent Emissions	**31,418**		
NET CO_2 EQUIVALENT EMISSIONS WITH LEED	**5,056**		

[1] Source: Terry A Hayes Associates LLC, *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008.

Energy Use Associated with Water Consumption

The provision of potable water to commercial consumers requires large amounts of energy associated with source and conveyance, treatment, distribution, end use, and wastewater treatment.[51] Based on information obtained from the Applicant, the shopping center currently utilizes approximately 5,700 cubic feet of water per day, which is equivalent to 15,563,235 gallons per year (gpy) or approximately 17.95 gpy per square foot (based on the existing development area of 867,000 square feet). The Proposed Project would use an additional approximate 5,026,189 gpy of water. As such, the Proposed Project would potentially consume approximately 20,589,424 gpy of water. The California Energy Commission estimates that water usage has an embodied energy of 12,700 kWh per million gallons. The Proposed Project would require approximately 261,486 kWh per year of electricity to support water consumption needs.

Implementation of the LEED program would directly reduce project-related water consumption. The Project Applicant is committed to reducing interior water usage by 20 percent and exterior water usage by 50 percent.[52] This reduction was conservatively applied only to the Proposed Project portion. The resulting total shopping center water consumption would be 9,800 gpd, or 3,577,000 gallons per year. Energy use associated with water consumption at the project site would be reduced to approximately 242,783 kWh per year.

Table 15: Annual Greenhouse Gas Emissions shows water consumption-related GHG emissions associated with the Proposed Project. As shown, the shopping center currently generates 72 tons per year of CO_2 emissions from water consumption and the Proposed Project would generate an additional 23 tons per year. When construction is complete, the entire shopping center (including the Proposed Project) would generate 95 tons per year of CO_2 emissions. LEED certifiable construction would reduce CO_2 emissions to 89 tons per year. The Proposed Project would increase water consumption-related emissions of CH_4 and NO_2 by less than 0.037 tons per year. LEED certifiable construction would reduce CH_4 and N_2O emissions by 0.002 and 0.01 tons per year, respectively.

[51] Construction-related water usage would be de minimis when compared to overall water usage and was not factored into the analysis.
[52] U.S. Green Building Council (USGBC). 2008. *LEED for New Construction v2.2 Registered Project Checklist*. 19 May 2008 <http://www.usgbc.org/DisplayPage.aspx?CMSPageID= 220#v2.2>.

Natural Gas Emissions

Daily operational activity associated with the Proposed Project would require natural gas consumption. The shopping center currently generates a demand for natural gas of approximately 2,443,998 cubic feet per month (CF/month).[53] The proposed retail and restaurant expansion is anticipated to generate an additional demand for approximately 3,124,094 CF/month, an increase of approximately 680,096 CF/month.[54] These usage rates were converted into million British thermal units per year (kg/mmBTU). Kg/mmBTU emission rates for CO_2 of 52.78, CH_4 of 0.0059, and N_2O of 0.0001 were obtained from the California Climate Action Registry.[55]

Table 15: Annual Greenhouse Gas Emissions shows natural gas consumption-related GHG emissions associated with the Proposed Project. As shown, the shopping center currently generates 1,548 tons per year of CO_2 emissions from natural gas consumption and the Proposed Project portion would generate an additional 431 tons per year. When construction is complete, the shopping center (including the Proposed Project) would generate 1,979 tons per year of CO_2 emissions. The Proposed Project would increase natural gas consumption-related emissions of CH_4 by 1.01 tons per year and NO_2 by 0.25 tons per year. LEED certifiable construction would not substantially reduce natural gas consumption CH_4 and N_2O emissions.

Mobile Source Emissions

GHG emissions from mobile sources are a function of vehicle miles traveled (VMT). Based on a zip code analysis, it was determined that the average trip length for shopping center patrons is 4.85 miles.[56,57] On an annual basis, the existing VMT is 47,730,363 and the 280,000 GLSF Proposed Project would increase VMT by 9,413,113. At project buildout, the shopping (including the Proposed Project) would result in a total VMT of 57,143,476. URBEMIS2007 typically calculates CO_2 emissions based on default VMT values. However, the zip code analysis provided a project-specific VMT and URBEMIS2007 was modified to account for the correct VMT.

URBEMIS2007 does not calculate CH_4 and N_2O emissions. The CH_4 emission rate was calculated as a ratio of daily countywide VMT to daily countywide emissions obtained from CARB's EMFAC2007 Mobile Source Emissions Inventory Model.[58] The same ratio methodology was utilized to obtain an NO_X emission rate, which was then adjusted to account

[53] Table A-9-11-A. South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Diamond Bar: Author. 6 June 2008 <http://www.aqmd.gov/ceqa/oldhdbk.html>. Assumes a natural gas generation rate of 2.9 CF/SF/month for retail and restaurant uses.
[54] *Ibid.*
[55] California Climate Action Registry. 2008 (April). *California Climate Action Registry General Reporting Protocol Version 3.0*. 6 June 2008 <http://www.climateregistry.org/resources/docs/protocols/grp/GRP_V3_April2008_FINAL.pdf>.
[56] Linscott, Law & Greenspan, Engineers. 2007. *Westfield Fashion Square Vehicle Miles Traveled Study*. Pasadena, CA: Author. [See Appendix K of this Draft EIR]
[57] The VMT was based on a study of existing shopper travel patterns for the Westfield Fashion Square. The objective of the Proposed Project is to capture more shoppers from the existing service area. As such, the Proposed Project would not expand the existing market range and it was assumed that existing average trip length would not change with implementation of the Proposed Project.
[58] California Air Resources Board (CARB). 2006 (November 1). EMFAC2007 Mobile Source Emissions Inventory Model, Version 2.3. 6 June 2008 <http://www.arb.ca.gov/msei/onroad/latest_version.htm>.

for an N_2O to NO_X conversion ratio of 0.048.[59] The CH_4 and N_2O emission rates were multiplied by the existing and future VMT to obtain GHG emissions.

Table 15: Annual Greenhouse Gas Emissions shows mobile GHG emissions associated with the Proposed Project. As shown, the shopping center currently generates 22,410 tons per year of CO_2 emissions from mobile sources and the Proposed Project would generate an additional 4,469 tons per year. When construction is complete, the shopping center (including the Proposed Project) would generate 26,879 tons per year of CO_2 emissions. The shopping center currently generates 38 tons per year of CH_4 emissions from mobile sources and the Proposed Project would generate an additional 8 tons per year. At buildout, the Proposed Project would generate 46 tons per year of CH_4 emissions. The shopping center currently generates 688 tons per year of N_2O emissions from mobile sources and the Proposed Project would generate an additional 136 tons per year. When construction is complete, the shopping center (including the Proposed Project) would generate 824 tons per year of N_2O emissions.

Emissions Summary

As previously discussed, *Table 15: Annual Greenhouse Gas Emissions* shows GHG emissions for the shopping center, the 280,000 GLSF Proposed Project, existing conditions plus the Proposed Project, and existing conditions plus the Proposed Project with LEED certification. As shown, LEED certification would reduce CO_2 equivalent emissions by 54 tons per year. Total CO_2 equivalent emissions would be 31,418 tons per year. It should be noted that approximately 88 percent of GHG emissions would result from mobile sources. Net CO_2 equivalent emissions would be 5,056 tons per year. CARB has calculated total CO_2 equivalent emissions for the State of California for a number of years up through 2004.[60] The State emitted 26.56 million metric tons of CO_2 equivalent emissions in 2004. The Proposed Project would represent less than 0.02 percent of Statewide CO_2 equivalent emissions.

(c) Consistency with Climate Change and Gas Emissions Policy

The Proposed Project is an expansion of an existing retail shopping center, which is intended to capture retail sales and demand in the current trade area of the shopping center. Thus, the Proposed Project has the potential to decrease the amount of GHG emissions resulting from automobile trips associated with retail customers who currently travel longer distances to more distant retail businesses. Further, the other sources of regional GHG emissions associated with the Proposed Project (energy, natural gas, and water consumption) would probably occur even if the project is not developed since the demand for the goods and services to be provided at the project site would be provided at another location to satisfy the demands of a growing population. Moreover, the Proposed Project is not the type of project that would generate a disproportionate amount of vehicle miles traveled or consumption of fuel. In fact, the Proposed Project includes programs that support greater use of mass transit. For example, the Proposed Project would provide a shuttle service connecting the site to a nearby Orange Line station (e.g.,

[59] California Air Resources Board (CARB). 2005 (June). *N2O Emission Factors - Estimates of Nitrous Oxide Emissions from Motor Vehicles and the Effects of Catalyst Composition and Aging* (Table 8.2). 6 June 2008 <http://www.arb.ca.gov/research/apr/past/02-313.pdf>.
[60] California Air Resources Board (CARB). 2007 (November 19). Draft California Greenhouse Gas Inventory (millions of metric tonnes of CO2 equivalent) - By IPCC Category. 25 August 2008. < http://www.arb.ca.gov/cc/inventory/data/tables/rpt_Inventory_IPCC_Sum_2007-11-19.pdf>.

Van Nuys Boulevard). This service would complement existing transit services (i.e., the LADOT DASH service) such that the shuttle would operate during hours when other public transit services connecting the site to the Orange Line are not available (e.g., evenings during the work week and certain weekend hours). The shuttle would operate during regular shopping center hours corresponding with periods of peak parking demand at the site (i.e., everyday during the holiday shopping period between November 15 and January 1, and every Saturday/Sunday throughout the year). Consequently, the Proposed Project would result in a negligible increase in regional and national GHG emissions.

However, in light of the increased accumulation of GHGs in the atmosphere that may result in global climate change, a Proposed Project's contribution to that potential cumulative effect on climate change should be discussed. As previously discussed, OPR has been tasked with developing CEQA global warming significance thresholds. OPR has indicated that many significant questions must be answered before a consistent, effective, and workable process for completing global warming analyses can be created for use in CEQA documents.[61] OPR has also indicated that there may not be sufficient amount of information or research available to develop significance thresholds.[62] On a local level, the City of Los Angeles has not adopted a global warming significance threshold or addressed the issue in its CEQA Thresholds Guide. Also, no other agency (e.g., United States Environmental Protection Agency, CARB, or SCAQMD) responsible for managing air quality emissions has promulgated a global warming significance threshold that may be used in reviewing new development projects.

In the absence of project-specific significance thresholds established by any State or local air quality management agency, the analysis of potential impacts should focus on compliance with State and local plans aimed at reducing GHG emissions. The California Climate Action Team was formed in response to AB 32. The goal of the California Climate Action Team is to evaluate the impacts of climate change on California and examine adaptation measures that would best prepare the State to respond to adverse consequences of climate change. As shown in *Table 16: Project Consistency with the California Climate Action Team Report and the Green LA Action Plan*, the Proposed Project would be consistent with the applicable GHG reduction measures recommended by the California Climate Action Team to comply with AB 32.[63] As previously discussed, the City has published a Green LA Action Plan (Green Plan). The Proposed Project would be consistent with the applicable policies and measures discussed in the Green Plan. Green Plan policies relevant to the Proposed Project are also presented in *Table 16: Project Consistency with the California Climate Action Team Report and the Green LA Action Plan*. In addition to complying with the applicable elements of these two plans for reducing GHG emissions, the Proposed Project will also achieve LEED Basic certification. As a result, the Proposed Project's energy efficiency would be at least 10.5 to 14 percent improved from the standard Title 24 requirements. Thus, the Proposed Project would actively reduce on-going operational emissions through compliance with a number of GHG emission reduction strategies and would result in a less than significant impact on climate change.

[61] California Climate Action Team. California Climate Change Portal website. 12 June 2008 <http://climatechange.ca.gov/climate_action_team/index.html>.
[62] *Ibid.*
[63] California Environmental Protection Agency. 2006. *Climate Action Team Report to Governor Schwarzenegger and the Legislature.* 19 May 2008 <http://www.climatechange. ca.gov/climate_action_team/reports/index.html>.

TABLE 16
PROJECT CONSISTENCY WITH THE
CALIFORNIA CLIMATE ACTION TEAM REPORT AND THE GREEN LA ACTION PLAN [1]

CALIFORNIA CLIMATE ACTION TEAM REPORT	
GHG REDUCTION STRATEGY [2][3]	**PROJECT CONSISTENCY**
Diesel Anti-Idling – Limit diesel-fueled commercial motor vehicle idling.	Consistent with State law, the Proposed Project would prohibit diesel-fueled vehicles from idling in excess of five minutes.
Alternative Fuels – Require the use of one to four percent biodiesel displacement in California diesel fuel and increase the ethanol content of diesel fuel.	The Proposed Project would include transportation amenities, such as providing preferred parking to alternative-fueled vehicles, to encourage the use of alternative fuels.
Achieve 50 Percent Statewide Recycling Goal – Reduce GHG emissions associated with material extraction and production as well as methane emissions from landfills.	The Proposed Project would include a construction waste management plan that identifies construction materials to be diverted from disposal. The waste management plan would include recycling and/or salvaging at least 50 percent of non-hazardous construction and demolition debris.
Urban Forestry – Plant trees in urban areas.	Landscaping for the Proposed Project would include the planting of native, drought-resistant trees throughout the project site, including the replacement of mature trees removed during project construction.
Water Use Efficiency – Conserve water so that GHG emissions are reduced from energy consumption required to convey, treat, distribute, and use water and wastewater.	The Proposed Project would use high-efficiency irrigation technology or reduce potable water consumption for irrigation by 50 percent. In addition, the Proposed Project would employ strategies that use 20 percent less water than the water use baseline calculated for the building (not including irrigation) after meeting the Energy Policy Act of 1992 fixture performance requirements.
Building Energy Efficiency Standards in Place – Place priority on and establish specific goals for updating building energy efficiency standards.	The Proposed Project will achieve LEED Basic certification. This would result in minimum energy efficiency savings of approximately 10.5 to 14 percent over California Title 24 Energy Design Standards.
Appliance Energy Efficiency Standards in Place – Place priority on updating State appliance energy efficiency standards.	The Proposed Project will achieve LEED Basic certification. This would result in minimum energy efficiency savings of approximately 10.5 to 14 percent over California Title 24 Energy Design Standards.
Measures to Improve Transportation Energy Efficiency – Provide incentives, tools, and information that advance cleaner transportation and reduce GHG emissions.	The Proposed Project would include transportation amenities, such as providing preferred parking to alternative-fueled vehicles. The Proposed Project will be located near public transportation routes and along a heavily traveled vehicle corridor. This would encourage mass transportation thereby potentially reducing regional VMT.
Green Building Initiative – Encourage private building owners and operators to reduce energy use by 20 percent.	LEED Basic certification would reduce energy use by at least 10.5 to 14 percent. In addition, the Proposed Project would encourage alternative-fueled vehicles, which would also reduce project-related energy use.
Promote Green Building – Create a comprehensive set of green building policies.	The Proposed Project will achieve LEED Basic certification, which would reduce energy use by at least 10.5 to 14 percent. In addition, the Proposed Project would encourage alternative-fueled vehicles, which would also reduce project-related energy use.

TABLE 16 (CONTINUED)
PROJECT CONSISTENCY WITH THE
CALIFORNIA CLIMATE ACTION TEAM REPORT AND THE GREEN LA ACTION PLAN [1]

GREEN LA ACTION PLAN	
GHG REDUCTION STRATEGY [2][3]	**PROJECT CONSISTENCY**
Decrease Per Capita Water Use – Encourage water conservation and recycling.	The Proposed Project would use high-efficiency irrigation technology or reduce potable water consumption for irrigation by 50 percent. In addition, the Proposed Project would employ strategies that use 20 percent less water than the water use baseline calculated for the building (not including irrigation) after meeting the Energy Policy Act of 1992 fixture performance requirements.
Transportation – Promote mass transit.	The Proposed Project will be located near public transportation routes and along a heavily traveled vehicle corridor. This would encourage mass transportation (e.g., providing bus shuttles and encouraging carpooling through an on-site Ride-Share Coordinator), thereby potentially reducing regional VMT.
Shift Waste Disposal to Resource Recovery– Increase City-wide recycling.	The Proposed Project would include a construction waste management plan that identifies construction materials to be diverted from disposal. The waste management plan would include recycling and/or salvaging at least 50 percent of non-hazardous construction and demolition debris. Other waste management strategies are discussed in Section IV: Environmental Impact Analysis: I.1-Solid Waste, of this EIR.

[1] Source: Terry A Hayes Associates LLC, *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008.
[2] California Air Resources Board, *Expanded List of Early Action Measure to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration*, September 2007.
[3] Only GHG reduction strategies applicable to the Proposed Project are presented.

(4) Consistency with Applicable Plans and Policies

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's *CEQA Air Quality Handbook*. The AQMP is establishes goals and policies to reduce long-term emissions in the Basin. Thus, this analysis focuses on long-term operational emissions. There are two key indicators of consistency. These indicators are discussed below.

- **Consistency Criterion No. 1**: *The Proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

  Consistency Criterion No. 1 refers to violations of the CAAQS. CO is the designated pollutant for assessing local area air quality impacts because it is primarily emitted by motor vehicles, and it does not readily react with other pollutants. In addition, as shown in *Table 11: Estimated Daily Operational Emissions - Weekday* and *Table 12: Estimated Daily Operational Emissions - Weekend*, mobile CO emissions would account for the majority of operational emissions. As such, CO was utilized as an indicator for AQMP consistency. Based on methodologies set forth by SCAQMD,

one measure to determine whether the Proposed Project would cause or contribute to a violation of an air quality standard would be based on the estimated CO concentrations at intersections that would be affected by the Proposed Project. The CO hotspot analysis indicates that the Proposed Project would not result in an exceedance of the State one- and eight-hour CO concentration standards. Therefore, the Proposed Project would comply with Consistency Criterion No. 1.

- **Consistency Criterion No. 2**: *The Proposed Project will not exceed the assumptions in the AQMP in 2010 or increments based on the year of project build-out phase.*

  The second consistency criterion requires that the Proposed Project not exceed the assumptions in the AQMP. A project is consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. The 2007 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates, in part, SCAG's 2004 Regional Transportation Plan (RTP) socioeconomic forecast projections of regional population and employment growth. The 2004 RTP is based on growth assumptions through 2030 developed by each of the cities and counties in the SCAG region.

  SCAG locates the project site within the Los Angeles City subregion. The Proposed Project would not include new housing and, as such, would be consistent with the RTP housing and population growth assumptions. The Proposed Project, which would add 788 employees, represents less than one percent of the 121,694 new employees projected in SCAG's RTP between 2007 and 2010 for the Los Angeles City subregion[64]. Such levels of housing, population, and employment growth are consistent with housing forecasts for the subregion as adopted by SCAG. The Proposed Project is consistent with growth assumptions included in the AQMP and, as such, the Proposed Project would comply with Consistency Criterion No. 2.

The Proposed Project complies with Consistency Criteria No. 1 and No. 2. and is consistent with the AQMP.

(5) Cumulative Impacts

The SCAQMD has set forth both a methodological framework and significance thresholds for the assessment of a project's cumulative air quality impacts[65]. SCAQMD's approach is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. This forecast also takes into account SCAG's forecasted future regional growth. As such, the analysis of cumulative impacts focuses on determining whether the Proposed Project is consistent with forecasted future regional growth.

[64] Provided by the Project Applicant.
[65] Table A9-14. South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Diamond Bar: Author. 6 J une 2008 <http://www.aqmd.gov/ceqa/oldhdbk.html>.

Based on SCAQMD's methodology, a project would have a significant cumulative air quality impact if the ratio of daily project-related employment vehicle miles traveled to daily countywide vehicle miles traveled exceeds the ratio of project-related employment to countywide employment[66]. None of the related projects in the Proposed Project area require a General Plan Amendment and as a result, these projections are viewed by SCAG and SCAQMD, as representing new anticipated growth. As shown in *Table 17: Cumulative Air Quality Analysis*, the Proposed Project to countywide VMT ratio is not greater than the Proposed Project to countywide employment ratio.

TABLE 17
CUMULATIVE AIR QUALITY ANALYSIS [1]

DAILY VEHICLE MILES	
Daily Vehicle Miles Traveled For Project Employment [2]	20,961
Daily Vehicle Miles Traveled Countywide [3]	223,514,000
Daily Vehicle Miles Traveled Ratio	**0.00009**
EMPLOYMENT	
Project Employment [4]	788
Countywide Employment [5]	5,022,215
Employment Ratio	**0.00016**
Significance Test **Daily Vehicle Miles Traveled Ratio Greater Than Employment Ratio**	**No**

[1] Source: Terry A Hayes Associates LLC, *Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008..
[2] Data obtained from URBEMIS 2007.
[3] Data obtained from EMFAC2007.
[4] Provided by the project Applicant.
[5] Data obtained from SCAG's Regional Transportation Plan, Socioeconomic Projections, 2004.

A localized CO impact analysis was also completed for cumulative traffic (i.e., related projects and ambient growth through 2012). When calculating future traffic impacts, the traffic consultant took 17 additional projects into consideration. The future traffic results without and with the Proposed Project already account for the cumulative impacts from these other related projects. As shown in *Table 13: Carbon Monoxide Concentrations – Weekday* and *Table 14: Carbon Monoxide Concentrations – Weekend*, the Proposed Project with cumulative traffic would not violate CO standards at local intersections. As such, the Proposed Project would not contribute to cumulative air quality impacts.

4. MITIGATION PROGRAM

MM AQ-1: The Proposed Project will comply with applicable CARB regulations and standards. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.

[66] Table A9-14. South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Diamond Bar: Author. 6 June 2008 <http://www.aqmd.gov/ceqa/oldhdbk.html>.

MM AQ-2: The Proposed Project will comply with applicable SCAQMD regulations and standards. The SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the district. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

MM AQ-3: The Proposed Project will be designed to reduce exposure of sensitive receptors to excessive levels of air quality. The Proposed Project is designed and will be built and operated in a manner consistent with the requirements to achieve Leadership in Energy and Environmental Design (LEED) certification from the United States Green Building Council.[67] LEED is a green building rating system that was designed to guide and distinguish high-performance commercial projects. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. The Proposed Project will implement a variety of design and operational features to achieve LEED certification. As a result, the Proposed Project would be proactive in reducing GHG emissions. Examples of design features to be implemented for the Proposed Project in order to achieve LEED certification include, but are not limited to, the following or their equivalent:

- A construction activity pollution prevention program.
- Encouraging the use of mass transit.
- Providing transportation amenities, such as alternative fueling stations, carpool/vanpool programs, bicycle racks, and showering/changing facilities.
- Implementing a stormwater management plan that reduces impervious cover, promotes infiltration, and captures and treats the stormwater runoff from 90 percent of the average annual rainfall using acceptable best management practices.
- Adopting site lighting criteria to maintain safe light levels while avoiding off-site lighting and night sky pollution, minimizing site lighting where possible, and reducing light pollution.
- Providing tenants with a description of the sustainable design and construction features incorporated in the core and shell project.

[67] U.S. Green Building Council (USGBC). 2007. *Leadership in Energy and Environmental Design.* 19 May 2008 <http://www.usgbc.org/LEED>.

- Using high-efficiency irrigation technology or reducing potable water consumption for irrigation by 50 percent by using a combination of plant species factor, irrigation efficiency, use of captured rainwater, use of recycled wastewater, and use of water treated and conveyed by public agency specifically for non-potable uses.

- Employing strategies that, in aggregate, use 20 percent less water than the water use baseline calculated for the building (not including irrigation) after meeting the Energy Policy Act of 1992 fixture performance requirements.

- Designing the building envelope and building system to maximize energy performance.

- Selecting refrigerants that reduce ozone depletion while minimizing direct contributions to global warming.

- Implementing a construction waste management plan that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or commingled. The waste management plan would include recycling and/or salvaging at least 50 percent of non-hazardous construction and demolition debris.

- Using materials with recycled content such that the sum of post-consumer recycled content plus one-half of the pre-consumer content constitutes at least ten percent of the total value of the materials in the project.

- Using a minimum of ten percent of the total materials value on building materials or products extracted, harvested, or recovered and manufactured within 500 miles of the project site.

- Adopting an indoor air quality management plan to protect the HVAC system during construction, control pollutant sources, and interrupt contamination pathways.

- Specifying low-volatile organic compounds paints and coatings in construction documents.

- Designing the building with the capability for occupant controls for airflow, temperature and ventilation. Strategies will include underfloor HVAC systems with individual diffusers, displacement ventilation systems with control devices, and ventilation walls and mullions.

MM AQ-4: The Proposed Project would install carbon monoxide and airflow measurement equipment that would transfer the information to the HVAC system and/or Building Automation System to trigger corrective action, if applicable, and/or use the measurement equipment to trigger alarms that inform building operators or

occupants of a possible deficiency in outdoor air delivery. Installation of such a system in areas where carbon monoxide concentrations may escalate (such as in the vicinity of loading docks or valet parking drop-offs) would improve both indoor and localized "hotspot" air quality.

MM AQ-5: The Proposed Project would provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities.

MM AQ-6: The Proposed Project would provide a shuttle service connecting the site to a nearby Orange Line station (e.g., Van Nuys Boulevard). This service could be provided by either the provision of a private shuttle or the funding of extended hours for the existing Los Angeles Department of Transportation (LADOT) DASH line. The Orange Line shuttle would complement existing transit services (i.e., the LADOT DASH service) such that the shuttle would operate during hours when other public transit services connecting the site to the Orange Line are not available (e.g., during weekdays evenings and general weekend hours). The shuttle would operate during regular shopping center hours corresponding with periods of peak parking demand at the site and peak holiday season demand (i.e., everyday during the holiday shopping period between November 15 and January 1, and every Saturday/Sunday throughout the year).

MM AQ-7: During construction activity, water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.

MM AQ-8: During construction activity, track-out shall not extend 25 feet or more from any active construction operations, and track-out shall be removed at the conclusion of each workday.

MM AQ-9: During construction activity, a wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site.

MM AQ-10: All haul trucks hauling soil, sand, and other loose materials shall maintain at least six inches of freeboard in accordance with California Vehicle Code Section 23114, and such trucks shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).

MM AQ-11: During construction activity, traffic speeds on unpaved roads shall be limited to 15 miles per hour.

MM AQ-12: During construction activity, operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.

MM AQ-13: Heavy equipment operations shall be suspended during first and second stage smog alerts.

MM AQ-14: On-site stock piles of debris, dirt, or rusty materials shall be covered or watered at least twice per day.

MM AQ-15 Heavy-duty equipment shall be equipped with a diesel oxidation catalyst capable of reducing NO_X emissions by 40 percent.

MM AQ-16 Contractors shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.

MM AQ-17 Contractors shall utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.

MM AQ-18 Heavy-duty construction shall be prohibited from idling in excess of five minutes, both on- and off-site, to be consistent with State law.

MM AQ-19 Construction parking shall be configured to minimize traffic interference.

MM AQ-20 Construction activity that affects traffic flow on the arterial system shall be limited to off-peak hours, as feasible.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

a. Construction

Implementation of Mitigation Measures above would ensure that fugitive dust emissions (i.e. $PM_{2.5}$ and PM_{10}) would be reduced by approximately 61 percent. However, localized $PM_{2.5}$ and PM_{10} emissions would still exceed the SCAQMD significance thresholds. Mitigation Measures would reduce regional NO_X emissions by at least 40 percent. The mitigation measures although difficult to quantify would also reduce NO_X emissions. As demonstrated in *Table 18: Estimated Daily Construction Emissions –Mitigated*, regional construction emissions of VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10} would be less than the SCAQMD significance thresholds. However, regional NO_X emissions, localized $PM_{2.5}$ and PM_{10} concentrations would exceed the SCAQMD significance thresholds. As such, regional NO_X construction emissions would result in a significant impact, even with the implementation of mitigation measures. Localized construction emissions from the Proposed Project would also result in significant impacts even with implementation of all feasible mitigation measures. The Proposed Project would be considered to have a significant unavoidable regional and localized construction air quality impact.

TABLE 18
ESTIMATED DAILY CONSTRUCTION EMISSIONS –MITIGATED [1]

CONSTRUCTION PHASE	POUNDS PER DAY					
	VOC	NO_X	CO	SO_X	$PM_{2.5}$ [2]	PM_{10} [2]
PHASE 1 –FOUR LEVEL PARKING STRUCTURE						
Demolition						
On-Site	2	10	6	0	5	21
Off-Site	2	25	11	<1	1	1
Total	**4**	**35**	**17**	**<1**	**6**	**22**
Grading/Excavation						
On-Site	2	10	6	0	7	29
Off-Site	<1	<1	1	0	<1	<1
Total	**2**	**10**	**7**	**0**	**7**	**29**
Construction						
On-Site	4	17	11	0	2	2
Off-Site	1	9	44	<1	<1	<1
Total	**5**	**26**	**55**	**<1**	**2**	**2**
PHASE 2 – MAIN PARKING STRUCTURE						
Demolition						
On-Site	2	11	6	0	5	23
Off-Site	2	26	11	<1	1	2
Total	**4**	**37**	**17**	**<1**	**6**	**24**
Grading/Excavation						
On-Site	3	22	12	0	6	26
Off-Site	6	68	29	<1	3	3
Total	**9**	**90**	**41**	**<1**	**9**	**29**
Construction						
On-Site	3	16	11	0	2	2
Off-Site	2	8	41	<1	<1	<1
Total	**5**	**24**	**52**	**<1**	**2**	**2**
PHASE 3 – RETAIL AND SUBTERRANEAN PARKING						
Demolition						
On-Site	2	10	6	0	6	24
Off-Site	2	26	11	<1	1	1
Total	**4**	**36**	**17**	**<1**	**7**	**25**
Grading/Excavation						
On-Site	3	24	12	0	12	53
Off-Site	9	104	44	<1	4	5
Total	**12**	**129**	**56**	**<1**	**16**	**58**
Building Construction						
On-Site	3	15	11	0	2	2
Off-Site	1	8	38	<1	<1	<1
Total	**4**	**23**	**49**	**<1**	**2**	**2**

TABLE 18 (CONTINUED)
ESTIMATED DAILY CONSTRUCTION EMISSIONS –MITIGATED [1]

CONSTRUCTION PHASE	POUNDS PER DAY					
	VOC	NO_X	CO	SO_X	$PM_{2.5}$ [2]	PM_{10} [2]
Architectural Coating						
On-Site	68	<1	<1	<1	<1	<1
Off-Site	<1	<1	1	<1	<1	<1
Total	**68**	**<1**	**1**	**<1**	**<1**	**<1**
Maximum Regional Total	68	129	56	<1	16	58
Regional Significance Threshold	75	100	550	150	55	150
Exceed Threshold?	No	Yes	No	No	No	No
Maximum On-Site Total	68	24	12	0	12	53
Localized Significance Threshold [3]	--	176	553	--	4	6
Exceed Threshold?	--	No	No	--	Yes	Yes

[1] Source: Terry A Hayes Associates LLC, *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, February 26, 2008.
[2] URBEMIS2007 emissions for fugitive dust were adjusted to account for a 61 percent control efficiency associated with SCAQMD Rule 403.
[3] Assumed a two-acre project site and a 25-meter (82-foot) receptor distance. This is the smallest distance between source and receptor to be analyzed under the SCAQMD LST methodology.

b. Operational

The project-related operational emissions would result in a less than significant impact without mitigation.

IV. ENVIRONMENTAL IMPACT ANALYSIS

C. GEOLOGY AND SOILS

The following analysis of geology, soils and seismic hazards is based primarily upon the technical report *Geotechnical Engineering Investigation Proposed Fashion Square Expansion*, prepared by Krazan & Associates, Inc. and dated September 27, 2006. This study is provided in Appendix E: Geotechnical and Soils of this DEIR.

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Geologic Conditions

The project site is relatively level with an overall change in grade of 22 feet from west to east (i.e., less than 1% grade). The average elevation of the project site is approximately 640 feet above mean sea level. Immediate adjacent properties are characterized by similar elevations and slopes.

The project site is underlain by Holocene and Pleistocene alluvium deposited in the San Fernando Valley, a structural basin surrounded by mountains on all four sides[1]. The alluvium is estimated to be several hundred feet thick. These deposits are generally fine grained consisting of mixtures of clay, silt, and sand.

(2) Seismic Hazards

Seismicity is a general term relating to the abrupt release of accumulated strain energy in the rock materials of the earth's crust in a given geographical area, generally due to earthquakes. The recurrence of accumulation and subsequent release of strain have resulted in faults and fault systems. The degree of seismic risk is generally determined or estimated by the seismic record in any given region.

The project site is not located within a designated Alquist - Priolo study zone or City of Los Angeles fault rupture study area[2]. However, Southern California is seismically active and will experience future earthquakes that will affect the project site. The earthquakes are predominately generated by periodic slip along the northwesterly trending faults associated with the San Andreas fault system and the east-west trending faults along the northern margin of the Los Angeles Basin. See *Figure 34: Fault Map*, for the location of local and regional faults relative the project site. In addition to these probable earthquake sources, recent earthquakes in the region have occurred on previously unknown faults having no surface expression (1987 Whittier Narrows and the 1994 Northridge earthquakes).

[1] Krazan & Associates, Inc. 2006. *Geotechnical Engineering Investigation Proposed Fashion Square Expansion*. Clovis, CA: Author. [See Appendix E of this Draft EIR]

[2] Figure GS-8 *Alquist-Priolo Special Study Zones and Fault Rupture Study Areas in the City of Los Angeles*. Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan*. Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>. . Available at the City of Los Angeles Department of City Planning.

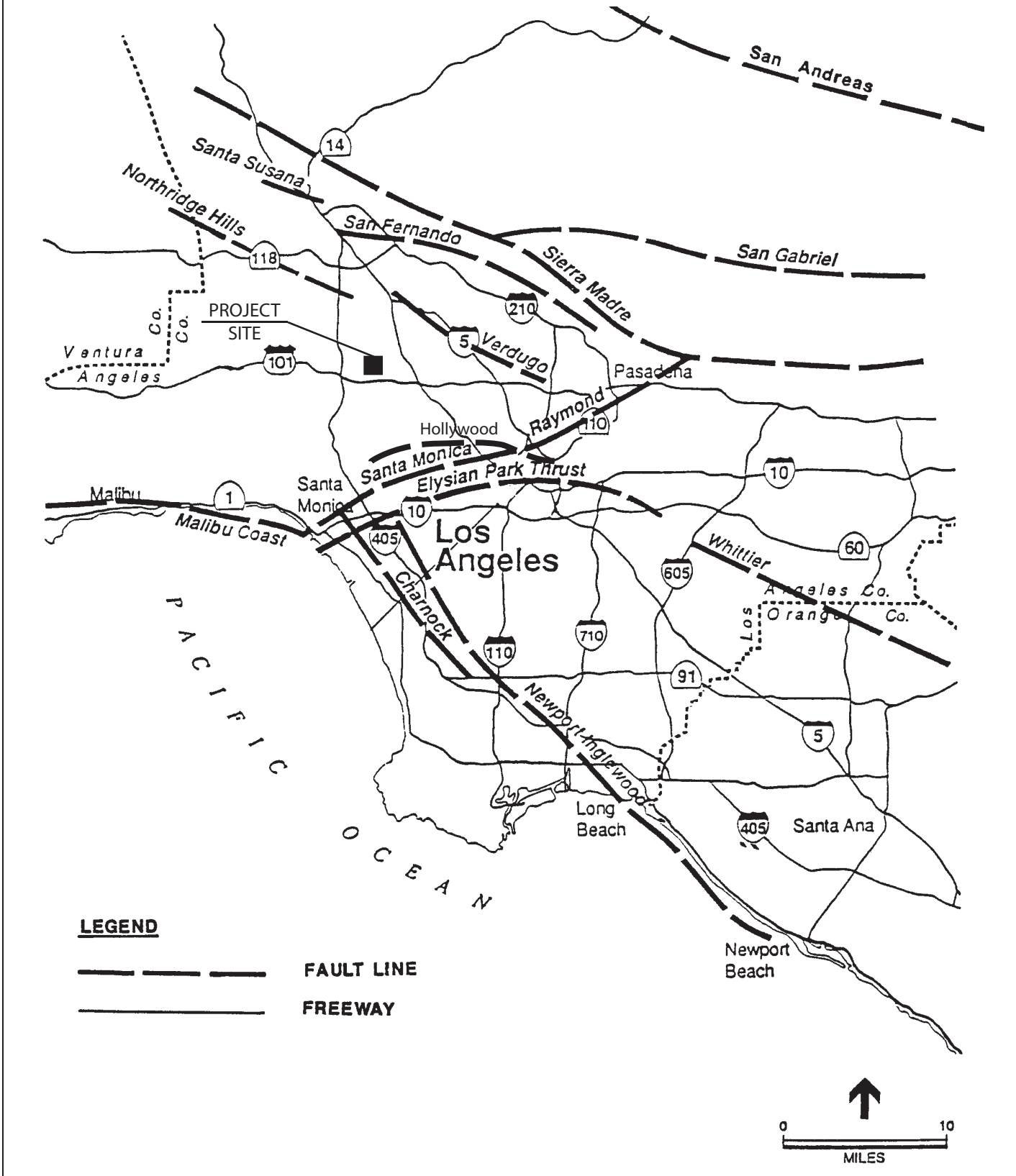


FIGURE 34
FAULT MAP

MAP SOURCE: PLANNING ASSOCIATES, INC.

The seismic hazard most likely to impact the project site is groundshaking due to a large earthquake on one of the major active regional faults. The Hollywood Fault is the nearest active fault to the project site, and is located approximately 4.8 kilometers (3.0 miles) to the south. The Santa Monica, Verdugo and Malibu Coast Fault Zones are located approximately 6.1, 9.8 and 14.3 kilometers (approximately 3.8, 6.1, and 8.9 miles) from the project site, respectively. During the Northridge Earthquake (1994), newer portions of buildings at the existing shopping center suffered little to no structural damage. All older portions of buildings at the existing shopping center that suffered structural damage were retrofitted in compliance with current seismic standards in the Uniform Building Code.

Secondary hazards of earthquakes include rupture, seiche, landslides, liquefaction, and subsidence. Since there are no known faults within or immediately adjacent to the project site area, ground rupture from surface faulting should not be a potential problem. Seiche and landslides are not known hazards in the area either as the project site is not near large bodies of water or steep hillsides that contribute to these concerns. The area in consideration shows no mapped faults on-site according to maps prepared by the California Geological Survey (CGS) (previously know as the California Department of Conservation, Division of Mines and Geology). No evidence of surface faulting was observed on the property during reconnaissance.

According to the Los Angeles City-wide General Plan Framework, the project site is located within an area of potential liquefaction[3]. The CGS map also identifies that the site is located within an area of potential liquefaction. Soil liquefaction is a state of soil particle suspension caused by a complete loss of strength when the effective stress drops to zero. Liquefaction normally occurs under saturated conditions in soils such as sand in which the strength is purely frictional and often triggered by seismic activity. Areas of known or potential liquefaction, where historic occurrences of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements, are required to provide mitigation as defined in Public Resources Code Section 2693(c).

Based on the findings of the geotechnical report (see Appendix E: Geotechnical and Soils), soils underneath the project site are considered loose to medium dense, sandy soils that have a low to moderate potential for liquefaction under seismic conditions[4]. The total liquefaction-induced settlement was calculated to be on the order of one inch with a differential settlement estimated to be one-half inch over a distance of 50 feet.

The Los Angeles City-wide General Plan Framework Final EIR does not designate the project site as being an inundation and tsunami hazard area. The site is not located downslope of any confined bodies of water that would adversely affect the site in the event of earthquake-induced failures or seiches (defined as wave oscillations in an enclosed or semi-enclosed body of water). The site is not located within a coastal zone, where tsunamis (seismically induced sea waves) are a potential hazard.

[3] Figure GS-5 *Areas Susceptible to Liquefaction in the City of Los Angeles*. Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan*. Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>. Available at the City of Los Angeles Department of City Planning.
[4] Krazan & Associates, Inc. 2006. *Geotechnical Engineering Investigation Proposed Fashion Square Expansion*. Clovis, CA: Author. [See Appendix E of this Draft EIR]

(3) Soils and Stability

According to a geotechnical/soils analysis prepared for the project (see Appendix E: Geotechnical and Soils), subsurface conditions encountered at the project site appear typical of those found in the geologic region[5]. Soils within the depth of exploration consist of up to five feet of fill underlain by native alluvium. Below the soils, alternative layers of clayey silt, sandy silt, silty clay, silty sand and sand were encountered. Field and laboratory tests suggest that native soils are moderately strong and slightly compressible. For a more detailed description of the soil conditions encountered, please refer to the boring logs in Appendix A of Appendix E: Geotechnical and Soils to this DEIR.

According to the Los Angeles City-wide General Plan Framework, the project site is not located within an area susceptible to landslides[6]. The CGS map does not identify that the site is located within an area susceptible to earthquake induced landslides[7]. There are no known landslides in the site vicinity and the site is not in the path of any known or potential landslides.

(4) Groundwater

During and immediately following the drilling of six test borings within the project site, the test boring locations were checked for the presence of groundwater. Free groundwater was encountered in three of six total borings at the project site, with groundwater encountered at depths of 34, 43.5 ad 44.5 feet during field explorations. The depth of the water table elevation may fluctuate with time and groundwater can be expected to fluctuate both seasonally and from year to year. Fluctuations in the groundwater level may occur due to variations in precipitation, irrigation practices at the site and in the surrounding areas, climatic conditions, flow in adjacent or nearby canals, pumping from wells and possibly as the result of other factors that were not evident at the time of the geotechnical investigation. Long-term monitoring in observation wells, sealed from the influence of surface water, is often required to more accurately define the potential range of groundwater conditions on a site.

(5) Mineral Resources

The project site does not contain any known mineral resources. Further, the project site is not designated as a Mineral Resource Zone (MRZ) by the State of California and it is not identified in the Conservation Element of the City of Los Angeles General Plan as being of local importance for mineral resources.

[5] Krazan & Associates, Inc. 2006. *Geotechnical Engineering Investigation Proposed Fashion Square Expansion*. Clovis, CA: Author. [See Appendix E of this Draft EIR]
[6] Figure GS-4 *Landslide Inventory and Hillside Areas in the City of Los Angeles*. Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan*. Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>. Available at the City of Los Angeles Department of City Planning.
[7] California Department of Conservation, Division of Mines and Geology [now California Geological Survey]. 1998. *Seismic Hazard Zones Van Nuys Quadrangle Official Map*. 20 May 2008 <http://www.conservation.ca.gov/cgs/shzp/Pages/Index.aspx>.

b. Regulatory and Policy Setting

(1) California Geological Survey

The CGS provides guidance on seismic hazards. Under the CGS's Seismic Hazards Mapping Act (CA Public Resources Code, Chapter 7.8), seismic hazard zones are identified and mapped to assist local governments in planning and developing with the intent to protect the public health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and other seismic hazards caused by earthquakes.

Under the Seismic Hazards Mapping Act, the CGS is tasked with compiling maps that identify seismic hazard zones, and which in turn are provided to all affected cities, counties, and state agencies for review and consideration. Each city and county, in preparing the safety element to its general plan pursuant to subdivision (g) of Section 65302 of the Government Code, and in adopting or revising land use planning and permitting ordinances, shall take into account the information provided in available seismic hazard maps.

(2) City of Los Angeles

Specific grading requirements and geotechnical hazard ameliorating regulations are provided in the Los Angeles Municipal Code (LAMC). For example, Chapter IX, Division 70 of the LAMC includes general construction, grading and site excavation requirements that would apply to the Proposed Project.

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section are used to determine the Proposed Project environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006).

(1) Geologic Hazards

A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

(2) Sedimentation and Erosion

A project would normally have significant sedimentation or erosion impacts if it would:

- Constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or

- Accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

(3) Landform Alteration

A project would normally have a significant impact on landform alteration if one or more distinct and prominent geologic or topographic features would be destroyed, permanently covered or materially and adversely modified. Such features may include, but are not limited to, hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds and wetlands.

(4) Mineral Resources

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 or other known or potential mineral resource area; and

- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project involves demolition of one multi-level parking structures and construction of a new addition, comprised of two multi-level parking structures and retail space, to the south and east of the existing mall buildings. One level of subterranean parking will be provided under the westerly portion of the new construction. The mall addition is planned to be of two to three - story, reinforced concrete construction. Per recommendation of the geotechnical report, proposed structures for the Proposed Project will be supported on deep foundations. Portions of the project site not covered with structures will be paved for surface parking. Landscaping will be provided primarily along the project site and mall buildings perimeters, and within the surface parking lot area, as generally shown in the Conceptual Landscape Plan (see *Figure 18: Conceptual Landscape Plan -1* and *Figure 19: Conceptual Landscape Plan -2*)

Grading of the site is expected to entail minor cuts and fills from the existing grades to establish the building pads and to provide surface drainage of the site. Excavation depths to accommodate the subterranean parking and deep foundations will generally not exceed 18 feet in depth. Total earth movement volumes include and estimated 147,016 cubic yards of cut. No soils are expected to be imported to the project site; however, an estimated 147,016 cubic yards of earth materials from site excavation will be required.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- The Proposed Project would incorporate permeable (porous) pavement materials in specific locations that would allow water to drain down to the underlying soil and

reduce the volume of wet weather urban runoff. This could include a combination of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, which would be incorporated into the landscape plan and design of surface parking areas, as functionally appropriate.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- Design and construction of the project shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety.

- All grading and earthwork shall be performed in accordance with the Grading Ordinances of the City of Los Angeles and the applicable portions of the General Earthwork Specifications in an approved Geotechnical Report.

- Areas of known or potential liquefaction are required to provide mitigation as defined in Public Resources Code Section 2693(c).

b. Project Impacts

An Initial Study (IS) was prepared for the Proposed Project. Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the Notice of Preparation (NOP) and IS process to have a potential significant environmental effect. Issues related to Geology and Soils that were determined to be less than significant, and therefore are not addressed below, include: surface rupture (due to seismic activity); landslides, tsunamis, seiche and mudflows; landform alteration; and mineral resources. An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant.

(1) Seismic and Geologic Hazards

(a) Groundshaking and Liquefaction

Due to the location of the project site within the seismically active Southern California region, the project site has the potential to experience strong ground shaking as a result of earthquakes occurring on regional faults. Although the project site could be subjected to strong ground shaking in the event of an earthquake, this hazard is common in Southern California and the effects of ground shaking can be mitigated to a less than significant level by proper engineering design and construction in conformance with current building codes and engineering practices.

During the Northridge Earthquake in 1994, newer portions of buildings (constructed in 1990's) at the existing shopping center suffered minimal structural damage. All older portions of buildings (constructed in 1960's) at the existing shopping center that suffered structural damage were retrofitted in compliance with current seismic standards in the Uniform Building Code. The Proposed Project includes expansion of the existing shopping center/retail facilities located

at the project site. The potential for exposure to strong seismic ground shaking at the project site would not be greater than normal seismic risk as compared to other areas in Southern California. Buildings constructed under the Proposed Project will be constructed in compliance with current seismic standards in the Uniform Building Code.

(b) Soil and Slope Stability

The project site and soil conditions, with the exception of the existing structures, undocumented fill, seismic-induced settlements and expansive clayey soils, appear to be conducive to the development of the Proposed Project if developed in accordance with standard geotechnical engineering practices that take the underlying soil conditions into account. The project site has been developed with structures and/or pavement since approximately the early 1960s. During this time, there has been no indication of building or structural damage caused by unstable soil with the exception of the Northridge Earthquake. Recommendations pertaining to the removal and recompaction of loose soils, site preparation for deep foundation support, and similar construction activities are identified in the mitigation section below. With implementation of the geotechnical engineering recommendations, it is anticipated that the Proposed Project will not result in, or be affected by, design or construction concerns related to soils and slope stability.

The estimated soil settlements for moderately loaded structures are anticipated to be excessive utilizing a shallow foundation system. In addition, all the current structures are supported on deep foundations. It is recommended that the proposed structures for the Proposed Project be supported on similar deep foundations. Design values for drilled piles (using sonic pile drivers) with various diameters are provided in the Geotechnical Report and approved by the City Department of Building and Safety.

Associated with the existing development are buried structures, such as footings, septic systems, backfilled excavations, and utility lines. These buried structures should be properly removed and the resulting excavations backfilled with engineered fill. Any other buried structures encountered during construction should be removed and backfilled in accordance with the recommendations of the Soils Engineer. The project site should be inspected for possible buried fill material, using heavy excavating equipment. If loose fill material is encountered, excavations should extend to native ground. Limits of recompaction should extend 5 feet beyond structural elements. It is recommended that any fill material encountered within proposed pavement areas be removed and/or recompacted. The shrinkage on recompacted soil and fill placement is estimated at 10 to 15 percent. This value is an estimate and may vary significantly depending on several items including soil conditions, compaction effort, weather, etc.

Based on the soil information obtained from the borings and the test results from the previous investigation, the clayey soils have an expansion potential of moderately high. The estimated swell pressure of the clayey material may cause movement affecting slabs and brittle exterior finishes. To minimize the potential soil movement, it is recommended that the upper 24 inches of soil within the building slab and exterior flatwork areas be replaced with "non-expansive" soils (with El<20).

With the anticipated seismic-induced settlements, the foundation shallower than 30 feet should be designed to tolerate seismic settlements of one inch total and one-half inch differential over a distance of 50 feet. The static settlements are anticipated to be less than one-half inch total and one-quarter inch differential over a distance of 50 feet.

Sandy soil conditions were also encountered at the site. These cohesionless soils have a tendency to cave in trench wall excavations. Shoring or sloping back trench sidewalls may be required within these loose cohesionless soils.

Groundwater was encountered at depths ranging between 34 to 45 feet below the surface at the project site. However, based on the findings of the soils analysis and historical records, it is not anticipated that groundwater will rise within the zone of structural influence or affect the construction of foundations and pavements for the project. However, if earthwork is performed during or soon after periods of precipitation, the subgrade soils may become saturated, "pump," or not respond to densification techniques. Typical remedial measures include: discing and aerating the soil during dry weather; mixing the soil with dryer materials; removing and replacing the soil with an approved fill material; or mixing the soil with an approved lime or cement product.

(2) Sedimentation and Erosion

The project site has been fully developed with structures and pavement since the 1960's, and with the exception of negligible areas of landscaping, is considered to be (for purposes of this evaluation) totally impervious. The site is currently graded, paved, and improved for storm drainage and would continue to function under similar conditions post construction and is anticipated to have a less than significant impact for potential soil erosion and sediementation during the long-term operation of the Proposed Project.

The Proposed Project has the potential to result in the erosion of soil during the construction activities. However, erosion is typically reduced by implementation of appropriate erosion and sedimentation control measures during grading, site preparation, and ultimately the landscaping and operation of the project. Minor amounts of erosion and siltation could occur during site demolition and grading when soil surfaces are disrupted. However, the potential for erosion is low due to the relatively level topography of the project site and the relatively low volume of mass grading required to implement the development.

All grading activities would require grading permits from the City Department of Building and Safety, which include standard requirements and procedures for conducting grading in a controlled manner. In addition, all on-site grading and site preparation activities would be required to comply with sections of the LAMC (Chapter IX, Division 70) that address grading, excavations and fills. The Proposed Project is also required to comply with Best Management Practices (BMPs) identified in Section IV: Environmental Impact Analysis: E-Hydrology and Water Quality of this DEIR. As a result, substantial erosion during construction activities is not anticipated and potential impacts due to soil erosion would be less than significant.

(3) Consistency with Applicable Plans and Policies

Consistency of applicable plans and policies s discussed in detail in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this EIR.

(4) Cumulative Impacts

Aside from regionally significant seismic events, geologic and soil-related issues are considered to be site specific. A Geotechnical Report was prepared for the Proposed Project and it was determined that with incorporation of the proposed mitigation measures, the Proposed Project will result in a less than significant geologic hazards impact would not contribute to a potential cumulative geologic hazards impact. A separate, site-specific environmental analysis will be prepared for each related project to assess and mitigate related project-specific potential impacts to geologic hazards. Related projects would require municipal government (i.e., City) approvals of design, and the implementation of mitigation measures, where needed and will comply with building codes which address seismic engineering and soils stability. Significant cumulative grading and geotechnical impacts resulting from the potentially concurrent construction of the related projects are not anticipated.

4. MITIGATION PROGRAM

MM GEO-1: Design and construction of the project shall conform to the Uniform Building Code seismic standards as approved by the Department of Building and Safety.

MM GEO-2: All grading and earthwork shall be performed in accordance with the Grading Ordinances of the City of Los Angeles and the applicable portions of the General Earthwork Specifications in an approved Geotechnical Report.

MM GEO-3: All earthwork and construction shall be completed in accordance with mitigation as defined in Public Resources Code Section 2693(c) to ensure that issues of potential liquefaction are addressed.

MM GEO-4: To address potential soil settlement, all new building construction shall be supported on deep foundations. Design values for drilled piles shall be consistent with the recommendations of the approved Geotechnical Report.

MM GEO-5: To address potential stability concerns due to buried structures, such as footings, septic systems, backfilled excavations, and utility lines. Any buried structures should be properly removed and the resulting excavations backfilled with engineered fill. Any other buried structures encountered during construction should be removed and backfilled in accordance with the recommendations of the Soils Engineer. The site should be inspected for possible buried fill material, using heavy excavating equipment. If loose fill material is encountered, excavations should extend to native ground. The exposed native subgrade should be scarified to a minimum of 6 inches,

moisture-conditioned as necessary, and recompacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557. Limits of recompaction should extend 5 feet beyond structural elements. Prior to fill placement, a qualified geotechnical engineer shall inspect the bottom of the excavation to verify no additional excavation will be required.

Any buried structures or loosely backfilled excavations encountered during construction should be properly removed and the resulting excavations backfilled with engineered fill. Excavations, depressions, or soft and pliant areas extending below planned finished subgrade levels should be cleaned to firm, undisturbed soil and backfilled with engineered fill. In general, any septic tanks, debris pits, cesspools, or similar structures should be entirely removed. Concrete footings should be removed to an equivalent depth of at least 3 feet below proposed footing elevations or as recommended by the Soils Engineer. Any other buried structures should be removed in accordance with the recommendations of the Soils Engineer. The resulting excavations should be backfilled with engineered fill.

MM GEO-6: Any fill material encountered within proposed pavement areas shall be removed and/or recompacted. The fill material shall be moisture-conditioned to near optimum moisture and compacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557. At a minimum it is recommended that the upper 12 inches of subgrade soil be moisture-conditioned to at or above optimum moisture and recompacted to a minimum of 90 percent of maximum density based on ASTM Test Method D1557.

MM GEO-7: To minimize the potential soil movement, the upper 24 inches of soil within the building slab and exterior flatwork areas shall be replaced with "non-expansive" soils (with El<20).

MM GEO-8: To minimize seismic-induced settlements, foundations shallower than 30 feet shall be designed to tolerate seismic settlements of one-half inch total and one-quarter inch differential over a distance of 50 feet.

MM GEO-9: To address cohesionless sandy soil conditions, shoring or sloping back trench sidewalls shall be required within these loose cohesionless soils.

MM GEO-10: If groundwater is encountered during the course of earthwork at the project site and subgrade soils appear to become saturated, "pump," or not respond to densification techniques, remedial measures as prescribed by a qualified geotechnical engineer shall be employed. Groundwater remedial measures include: discing and aerating the soil during dry weather; mixing the soil with dryer materials; removing and replacing the soil with an approved fill material; or mixing the soil with an approved lime or cement product.

MM GEO-11: General site clearing shall include removal of vegetation and existing utilities; structures; including foundations basement walls and floors; existing stockpiled soil; trees and associated root systems; rubble; rubbish; and any loose and/or saturated materials. Site stripping shall extend to a minimum depth of 2 to 4 inches, or until all organics in excess of 3 percent by volume are removed. Deeper stripping may be required in localized areas. These materials will not be suitable for reuse as engineered fill, however, stripped topsoil may be stockpiled and reused in landscape or non-structural areas.

MM GEO-12: The upper 24 inches of soil within proposed building and exterior flatwork areas shall consist of non-expansive engineered fill. The intent is to support the proposed slab-on-grade and exterior flatwork areas with 24 inches of non-expansive fill. The non-expansive fill material should be a well-graded silty sand or sandy silt soil. A clean sand or very sandy soil is not acceptable for this purpose. A sandy soil will allow the surface water to drain into the expansive clayey soils below, which may result in soil swelling. Imported fill should be approved by the Soils Engineer prior to placement. The fill shall be placed as specified as engineered fill.

The organic-free, on-site, upper soils are predominately silty sand and sandy silt with various amount of clay. Some of these soils may be suitable for reuse as non-expansive engineered fill, provided they are cleansed of excessive organics and debris. The soils with Expansion Index greater than 20 shall not be used within the upper 24 inches of the building pad and exterior flatwork areas.

MM GEO-13: Within the proposed pavement areas, the upper 12 inches of subgrade soil shall be moisture-conditioned to near optimum moisture and recompacted to a minimum of 90 percent of maximum density based on ASTM D1557 Test Method.

MM GEO-14: The upper soils, during wet winter months, may become very moist due to the absorptive characteristics of the soil. Earthwork operations performed during winter months may encounter very moist unstable soils, which may require removal to grade a stable building foundation. Project site winterization consisting of placement of aggregate base and protecting exposed soils during the construction phase shall be performed.

MM GEO-15: A qualified geotechnical engineer shall be present during all site clearing and grading operations to test and observe earthwork construction, as acceptance of earthwork construction is dependent upon compaction and stability of the material. The Soils Engineer shall reject any material that does not meet compaction and stability requirements.

MM GEO-16: The preferred materials specified for engineered fill are suitable for most applications with the exception of exposure to erosion. Project site

winterization and protection of exposed soils during the construction phase shall be the sole responsibility of the contractor, since he has complete control of the project site at that time. Imported non-expansive fill shall consist of a well-graded, slightly cohesive, fine silty sand or sandy silt soil, with relatively impervious characteristics when compacted. This material shall be approved by the Soils Engineer prior to use and shall typically possess the following characteristics:

Fill soils shall be placed in lifts approximately 6 inches thick, moisture-conditioned as necessary, and compacted to achieve at least 90 percent of maximum density as determined by ASTM D1577 Test Method. Additional lifts shall not be placed if the previous lift did not meet the required dry density or if soil conditions are not stable.

MM GEO-17: All excavations shall comply with the current OSHA requirements. All cuts greater than 3 feet in depth should be sloped or shored. Temporary excavations should be sloped at 1:1 (horizontal to vertical) or flatter, up to a maximum depth of 10 feet. Heavy construction equipment, building materials, excavated soil, and vehicular traffic should not be allowed within five feet of the top (edge) of the excavation.

Where sloped excavations are not feasible due to site constraints, excavations shall require shoring. The design of the temporary shoring shall take into account lateral pressures exerted by the adjacent soil, and, where anticipated, surcharge loads due to adjacent buildings and any construction equipment or traffic expected to operate alongside the excavation.

MM GEO-18: To maintain the desired support for existing or new foundations, new utility trenches shall be located such that the base of the trench excavation is located above an imaginary plane having an inclination of 1.0 horizontal to 1.0 vertical, extending downward from the bottom edge of the adjacent footing. Utility trenches shall be excavated according to accepted engineering practices following OSHA standards by a contractor experienced in such work. The responsibility for the safety of open trenches should be borne by the contractor. Traffic and vibration adjacent to trench walls should be kept to a minimum; cyclic wetting and drying of excavation side slopes should be avoided. Depending upon the location and depth of some utility trenches, groundwater flow into open excavations could be experienced, especially during or shortly following periods of precipitation.

MM GEO-19: With the exception of specific requirements of the local utility companies or building department, pipe bedding and shading shall consist of clean medium-grained sand. The sand shall be placed in a damp state and should be compacted by mechanical means prior to the placement of backfill soils. Above the pipe zone, underground utility trenches shall be backfilled with

either free-draining sand, on-site soil or approved imported soil. The trench backfill shall be compacted to at least 90 percent relative compaction.

MM GEO-20: Concrete slab-on-grade floors shall be underlain by a water vapor retarder. The water vapor retarder shall be installed in accordance with ASTM Specification E 1643-98. In addition, utility trenches within the structure shall be compacted to minimize the transmission of moisture through the utility trench backfill.

MM GEO-21: Positive drainage shall be established away from the structure and shall be maintained throughout the life of the structure. Ponding of water shall not be allowed adjacent to the structure. Over-irrigation within landscaped areas adjacent to the structure shall not be performed.

MM GEO-22: Retaining walls shall be constructed according to the recommendations of the approved Geotechnical Report.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

Based on standards of acceptable risk reflected in the City of Los Angeles Building Code, the Uniform Building Code, and performance review procedures of current standard engineering practices, no significant geology impacts would occur as a result of the Proposed Project with implementation of the applicable standard conditions of approval, project design features and recommended mitigation measures.

IV. ENVIRONMENTAL IMPACT ANALYSIS

D. HAZARDOUS MATERIALS AND MAN-MADE HAZARDS

The following analysis of hazardous materials and man-made hazards is based primarily upon the technical report *Phase I Environmental Site Assessment, Westfield Shopping Mall Fashion Square*, prepared by The Reynolds Group, and dated February 2008. This study is provided in Appendix F: Phase I Environmental Site Assessment of this DEIR.

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Historic and Existing Use of Hazardous Substances at the Project Site

The shopping center was originally constructed on the project site in 1962 and renovated in 1990 and 1996. Since 1996, operations and uses of chemicals at the site have not substantially changed. Prior to the construction of the shopping center, the project site was occupied by a school.

Operation of the existing facilities does not include the use or generation of significant quantities of hazardous materials. According to a Phase I Environmental Site Assessment (ESA) prepared for the project site (see Appendix F: Phase I Environmental Site Assessment), several of the shopping center tenants are small quantity generators of hazardous wastes.[1] In addition, other more common chemicals common for janitorial, maintenance, and painting supplies are stored on-site. Several products that are used and stored in small quantities for general maintenance purposes on-site could be hazardous if mishandled or spilled.

A review of facilities at the project site that are currently under review, management, or notification by a regulatory agency for hazardous substances was conducted. The following properties (i.e., tenants) were identified:

- Sephora Stores is a small quantity generator of hazardous wastes. The wastes are stored in a five gallon container and are picked up for recycling or disposal on an as needed basis. No violations found.

- Kits/Ritz Camera has a one-hour photo developing service that generates a small quantity of hazardous waste from the film developing process. Silver is recovered from the waste developing fluids and then those fluids are dumped into the sewer system. The recovered silver is picked up for recycling on an as needed basis. No violations were found. Site reconnaissance through the ESA noted that the film development chemical use area was clean and well maintained at Ritz Camera. No violations were found in the database review.

[1] The Reynolds Group, Inc. 2008. *Phase I Environmental Site Assessment, Westfield Shopping Mall Fashion Square*. Tustin, CA: Author. [See Appendix F of this Draft EIR]

- LensCrafters is a small quantity generator of organic solids hazardous wastes. The wastes are stored in a five gallon container and picked up for disposal on an as needed basis. No violations were found in the database review.

- JP Mechanical is listed as a small quantity generator of waste oil and mixed oil hazardous waste at the subject Property. Reportedly, the wastes were stored in a five gallon container and picked up for recycling or disposal on an as needed basis. City Freehold was also listed on the HAZNET database as a small quantity generator of inorganic solids hazardous wastes. The wastes were stored in a five gallon container and are picked up for recycling or disposal on an as needed basis. Neither of these tenants was observed at the time of the site visit; and neither historic telephone directories nor a tenant report listed either of these businesses at the Property. According to Westfield staff, City Freehold may have been a prior owner or management company for the project site.

- Bloomingdale's is not specifically identified through the agency list review. However, Bloomingdale's is a generator of hazardous wastes from two categories. Bloomingdale's retains a 55 gallon of used grease from the restaurant which is picked up for recycling by Baker Industries on an as needed basis. Also, returned and damaged cosmetics and fragrances are classified as hazardous waste. Those wastes are also stored in a 55 gallon drum and picked up for disposal by Smurfit Co. on an as needed basis. No violations were found in the database review.

- Macy's also generates a small amount of hazardous waste identical to the waste from Bloomingdale's. Their waste is stored in a 55 gallon drum and is picked up by Clean Harbors Co., Inc. on an as needed basis. No violations were found in the database review.

The Cortese List of hazardous materials sites compiled pursuant to Government Code Section 65962.5 does not list the project site as having a hazardous materials problem needing cleanup.[2] No National Priority List (NPL) sites, Corrective Action Report (CORRACTS) sites or State Hazardous Waste Sites (Cal-Sites) were identified within a one mile radius of the subject property; no Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) sites, Resource Conservation and Recovery Information System – Treatment, Storage and Disposal Facility (RCRIS-TSD) sites or Solid Waste Facility/Landfill (State Landfill) sites were identified within a ½ mile radius of the subject property; no Resource Conservation and Recovery Information System – Large Quantity Generator (RCRIS Lg. Quan. Gen.) sites or Underground Storage Tank (UST) sites were identified within a ¼ mile radius of the subject property.

[2] California Department of Toxic Substances Control (DTSC). 2008 (as updated). Hazardous Waste and Substances Site List (Cortese List). 12 June 2008 <http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&city=&zip=&county=Los%20Angeles&federal_superfund=True&state_response=True&voluntary_cleanup=True&school_cleanup=True&permitted=True&corrective_action=True&display_results=Report&pub=True>.

(2) Historic and Existing Use of Hazardous Substances at Surrounding Sites

The immediate vicinity is dominated by commercial and residential uses. North of the project site is a residential neighborhood composed primarily of apartment buildings immediately north and single family dwellings further north. Parcels along Riverside Drive, both west of Hazeltine Avenue and east of Woodman Avenue, are primarily commercial use. Notre Dame High School is at the northeast corner of Woodman Avenue and Riverside Drive and a Downey Savings office is found on the northwest corner of this intersection.

The 76 –Tosco Gasoline Service Station, a Leaking Underground Storage Tank (LUST) site is found just south of Notre Dame High, adjacent to the northeast of the project site. South of the 76 Tosco station, on Woodman Avenue are some small retail shops and an office building. West of the Property, at the southwest corner of the intersection of Riverside Drive and Hazeltine Avenue is a Sunkist office building (LUST site). A Trader Joes store is found at the northwest corner of Riverside and Hazeltine, and a Los Angeles Department of Water & Power facility at the northeast corner of this intersection. Located to the adjacent to the north west of the Property at 14061 Riverside Drive is a former Chevron Service Station which is a closed LUST case.

Three (3) small quantity generator sites are identified within 1/4 mile of the project site. They are identified as:

- Burbank Medical Clinic Inc., 13739 Riverside Drive, located adjacent to the north northeast of the project site, is a small quantity generator with no violations found.

- Former Chevron Station #9-1683, 14061 Riverside Drive located adjacent to the north northwest, former gasoline station site. Site is now closed. The former Chevron station is discussed in more detail below.

- High Tech Auto, located adjacent to the west of the project site at 4774 Woodman Avenue, is a small quantity generator with no violations found.

The Cortese List, which is not currently updated by the State of California, identifies public drinking water wells with detectable levels of contamination, hazardous substance sites selected for remedial action, sites with known toxic material identified through the abandoned site assessment program, sites with USTs having a reportable release and all solid waste disposal facilities from which there is known migration. A review of the Cortese list revealed that there are four (4) Cortese sites within a half mile radius of the project site. All of these sites are also found in the LUST database. The Cortese sites include:

- The 76-Tosco Gasoline Service Station found on Woodman Avenue and Riverside Drive

- The former Chevron station at 14061 Riverside Drive adjacent to the north of the Property

- The Sunkist Growers site, adjacent to the west of the property and

- The Fashion Square Car Wash (LUST Site) located just south of the Ventura Freeway on Woodman Avenue

The former Chevron and Sunkist LUST cases are closed. The 76-Tosco and Fashion Square sites are still undergoing assessment/remediation. See *Appendix F: Phase I Environmental Assessment*, for a more detailed description of these sites found near the project site.

The adjacent property (Sunkist) west of the project site was previously identified in 1996 as a LUST site for leaking gasoline that has affected the aquifer. Remedial action was completed and the case was closed in 1996. Due to the cross-gradient location and the closed nature of the case, the location of this previous LUST site is not known to have affected the project site. Four other LUST were identified within a one-half mile radius of the project site, but due to their distance and cross/down-gradient location from the project site, these sites are not expected to negatively affect the project site.

(3) Electrical Transformers and Hydraulic Equipment

The main building has two floors in the area between Macy's and Bloomingdale's with stairways, escalators and elevators for the use of shopping patrons. The Macy's department store has four floors and Bloomingdale's has three floors. In addition to the elevators for the shopping patrons, there are several freight elevators.

A total of eight hydraulic elevators were observed at the shopping center. The hydraulic elevators are serviced by Kone Elevator (Kone). According to Kone, the elevators are serviced with hydraulic fluid that does not contain polychlorinated biphenyls (PCBs). The hydraulic elevators were observed to be in good condition and no evidence of leaks was observed at the time of the ESA. A fifty five gallon drum of oil was observed in one of the equipment rooms for the freight elevators. No stains or other evidence of leaking were observed around the drum of oil.

Four hydraulic trash compactors are located at the shopping center. A representative of IEM, the company which maintains the trash compactors, indicated that the hydraulic fluid in the compactors does not contain PCB's.

(4) PCBs, Asbestos and Lead

Twelve pad-mounted electrical transformers are located along Riverside Drive and along the parking garage areas south of the shopping center building. The transformers (IS 2627-1-01 & 02 through IS 2627- 6-01 & 02) are the property of the Los Angeles Department of Water & Power (LADWP). LADWP is responsible for any maintenance on their transformers. A request has been sent to the LADWP regarding the possible presence of PCB's in the transformers. However, the transformer stations are labeled "No PCBs in this station". Several additional transformers are located within the shopping mall building. All of those transformers are "dry type" transformers and, as such, are not suspect of containing PCB's.

Fluorescent light ballasts were observed throughout the project site. As the mall was originally constructed in 1962 prior to when PCB use was more common, it is possible that PCB-containing light ballasts may be located on the subject property. However, since the mall was renovated in 1990 and 1996, it is unlikely that PCB-containing fluorescent light ballasts are present on the subject property.

Asbestos Containing Materials (ACM) were identified in only one tenant space (Erik's Shoes) in the shopping center, in a portion of the mall that is part the original 1962 construction. Approximately 450 square feet of friable asbestos ceiling materials were found in the Erik's Shoes shop. This ACM is considered a REC, requiring proper management in-place and notification to the tenants of that shop.

Because the shopping center was constructed in 1962 (prior to current asbestos regulations), it is possible that other ACM may be located on the subject property. However, due to subsequent renovations in 1990 and 1996, it is unlikely that significant quantities of friable ACM are present.

Again, because of the date of construction in 1962 (occurring prior to current lead paint regulations), it is possible that lead-containing paint may be located in the original shopping center structures. However, since the mall has gone through major renovations in 1990 and 1996, it is unlikely that lead-containing paint is present in occupied areas of the mall.

(5) Storage Tanks

Two emergency backup generators were also observed in a walled open air area on the southern portion of the project site, with an associated above ground double-walled diesel tank located on concrete. Minor staining was observed near the diesel tank. No other aboveground storage tanks (ASTs) or visual evidence of existing underground storage tanks (USTs), such as pipes, vents, pumps, or stains were observed. The subject property was not identified in public databases as a UST or a LUST site. One 55-gallon drum of oil was observed to be stored without secondary containment in the area of freight elevators. Provided that these fuels are handled using best management practices, they are not considered an issue of environmental concern at this time. The drums were not stored in an area having secondary containment; however, no signs of spillage or leakage were noted.

(6) On-Site and Off-Site Man-Made Hazards

No public use airport is located within two miles of the project site. The closest public airport is Burbank/Bob Hope Airport, located approximately 9 miles northeast of the project site.

b. Regulatory and Policy Setting

(1) Hazardous Substances

Many agencies regulate the use of hazardous materials. These include the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), the Nuclear Regulatory Commission (NRC), the Department of Transportation (DOT), the National Institutes of Health (NIH), and the Food and Drug Administration (FDA) for the federal government. State agencies, including the Health and Welfare Agency (HWA), under which is the Department of Toxic Substances Control (DTSC), have parallel, and in some cases more stringent, rules governing the use of hazardous materials. The Los Angeles Fire Department is the local regulating body for hazardous materials, due to the passage of AB 2185 and AB 2187, which require full disclosure of the use and storage of hazardous materials that could lead to public exposure to these substances. In addition to the laws governing the use of hazardous substances, federal and state laws also exist to control the generation, transportation, and disposal of hazardous wastes. At the federal level, the principal regulatory agency is the EPA. Within the state, DTSC has primary regulatory responsibility.

(2) Asbestos and Lead

In California, any facility that is known to contain asbestos is required to have a written asbestos management plan. Removal of asbestos containing materials must be conducted in accordance with the requirements of the South Coast Air Quality Management District (SCAQMD) Rule 1403, which sets forth regulations and procedures for the identification, notification, removal and disposals of AMCs.

Similarly, the California Occupational Safety and Health Administration (Cal-OSHA) has established safety levels for exposure to lead contained in dusts and fumes (as from lead-based paints). The California Code of Regulations (Title 8 Section 1532.1) provides for exposure limits, monitoring and protective measures for exposure to lead.

(3) Storage Tanks

The storage of hazardous materials in USTs is regulated by the State Water Resources Control Board (SWRCB). Authority for hazardous materials is delegated to the local level through the Regional Water Quality Control Board (RWQCB) and the City of Los Angeles Fire Department (LAFD). The LAFD administers and enforces Federal and State laws, as well as local ordinances, for USTs.

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section and used to determine the Proposed Project environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006).

The following factors are set forth in the LA CEQA Thresholds Guide for consideration, on a case-by-case basis, of the significance of potential environmental impacts:

Risk of Upset/Emergency Preparedness

- The regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

Human Health Risk

- The regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project would not change substantially land uses at the site, the types of hazardous materials used or stored at the site, or the quantity of these materials. The Proposed Project does not include excavation and disturbance of soil and groundwater at the project site that have any known contamination.

The shopping center is heated and cooled by electric-powered, roof mounted central Heating, Ventilating and Air Conditioning (HVAC) units. Electricity, drinking water and sewage service are provided by the LADWP. Natural gas service is provided by The Gas Company and solid waste disposal is provided through Consolidated. Floor drains located throughout the shopping center drain to the sanitary sewer system. The Proposed Project would continue to be served in a similar manner.

The analysis does not assume any specific Project Design Features as part of the Proposed Project; however, the analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- The Proposed Project shall comply with SCAQMD Rule 1403 regulating the removal of ACMs from on-site buildings.

- The Proposed Project shall comply with Construction Safety Orders 1532.1(pertaining to lead) from Title 8 of the California Code of Regulations as well as other applicable federal, state and local rules and regulations.

In addition, standard conditions and regulatory requirements described in Section IV: Environmental Impact Analysis: E-Water Resources, would also address regulations that affect the use/storage of hazardous materials and man-made hazards.

b. Project Impacts

Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the NOP and IS process to have a potential significant environmental effect. Issues related to Hazardous Materials and Man-Made Hazards that were determined to be less than significant and require no further analysis, include: listing as a known hazardous site, contamination of soils and/or groundwater, contribution to hazardous conditions to an airport/air strip, and wildfire hazards. An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant of this EIR.

(1) Hazardous Substances

Existing shopping center (retail and restaurant) operations do not result in extensive generation or use of hazardous materials. The Proposed Project would not change substantially land uses at the site, the types of hazardous materials used or stored at the site, or the quantity of these materials. The Proposed Project does not include any known, unique specific uses that would pose a potential hazardous materials impact due to the reasonably foreseeable upset involving the release of hazardous materials. The Proposed Project, or the continued use of the shopping center in general, is not expected to exceed maximum regulatory requirements for hazardous materials and is not expected to release hazardous materials within the project area or into nearby soil and groundwater supplies.

Additional chemicals and fuels may be temporarily stored as used on-site throughout the duration of construction activity for the Proposed Project. Plans and programs designed to protect water quality, such as the Standard Urban Stormwater Mitigation Plan (SUSMP) and Stormwater Pollution Prevention Plan (SWPPP) will address appropriate storage, spill containment and contingency programs for hazardous materials retained on-site during the construction phase. These programs are described in more detail in Section IV: Environmental Impact Analysis: E-Water Resources of this DEIR.

During both the construction phase and ongoing operation of the shopping center, the shipment and storage of hazardous materials to and on the site must conform to all applicable laws, regulations, and health and safety standards set forth by federal, state, and local authorities to properly dispose of such materials and their containers.

Any materials would be stored and disposed of in accordance with State and local regulations and industry standards. By complying with the generally applicable administrative procedures required by the Municipal Code and the industry-wide safety procedures for the use and storage of these materials, the Proposed Project will result in a less than significant impact due to hazardous materials.

The closest school to the project site is Notre Dame High School, located approximately 0.15 miles east of the project site at the northeast corner of the Riverside Drive/Woodman Avenue intersection. However, as the Proposed Project would involve the continuation of current retail/restaurant land uses, and would be consistent with land uses in the project vicinity which do not typically emit substantial concentrations of hazardous emissions or waste, potential impacts to the school due to the routine generation, use, storage, or transport of hazardous materials would be less than significant.

(2) PCBs, Asbestos and Lead

Demolition of portions of the shopping center that interface with the building structures dating from the original 1962 construction may expose materials containing PCBs, asbestos and/or lead.

Due to the age and proposed demolition of existing buildings, the potential exists that asbestos containing materials (ACM) may be located and exposed in the structure(s). Exposure to ACM during demolition could be hazardous to the health of demolition workers as well as area residents and employees. However, these impacts can be mitigated to a less than significant level by incorporation of proper handling and disposal procedures. For example, the Proposed Project shall comply with SCAQMD Rule 1403 regulating the removal of ACMs from on-site buildings.

In accordance with the ESA, it is recommended that any ACMs continue to be managed in place by the existing Asbestos Operating and Maintenance Program. Planned renovation and demolition activities that may affect the integrity of any unknown ACMs will be completed in accordance with standard practices to evaluate for such materials. If encountered, then the ACMs should be removed by a licensed asbestos abatement contractor in accordance with all applicable Federal, State and local regulatory guidelines.

Similarly, based on the age of the existing structures, the potential exists for the older portions of the shopping center to contain lead-based paint. Exposure to lead-based paint, if encountered during demolition or renovation tied to implementation of the Proposed Project could pose a health hazard to workers and employees at the shopping center. Potential impacts due to lead-based paint can be mitigated to a less than significant level by incorporation of proper handling and disposal procedures.

(3) Storage Tanks

The Proposed Project is anticipated to provide an area with secondary containment for any 55-gallon drums containing fuels or chemicals, such as those used for hydraulic and generator equipment. This storage area with secondary containment will prevent any accidental spills or leaks from causing any negative impacts to the environment.

(4) Emergency Response and Evacuation

The Proposed Project will be constructed on private property and will not block or interfere with any major highways. During the Building Permit process, access to the project site will be designed to provide access for emergency response vehicles to the satisfaction of the LAFD. The Proposed Project will not impair implementation of or physically interfere with an adopted emergency response plan and will result in a less than significant impact.

(5) Consistency with Applicable Plans and Policies

Consistency with applicable plans and policies, including land use and design policies which indirectly address hazardous materials and water resource protection, is discussed in detail in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay of this EIR.

(6) Cumulative Impacts

A significant hazardous materials impact is typically based on consideration of the project's proposed routine transport, use, and disposal of hazardous materials directly related to project operations and the potential for the Proposed Project to indirectly create a hazardous materials release into the environment

As discussed above, the Proposed Project would result in a less than significant hazardous materials impact due to the routine transport, use, and disposal of hazardous waste. The project site is not included on a list of hazardous materials sites or immediately upstream of environmentally sensitive areas which could result in a release of hazardous materials into the environment, not directly related to the Proposed Project. The Proposed Project includes an expansion of existing retail facilities which are not known to generate substantial amounts of hazardous materials. The Proposed Project is not anticipated to contribute to a cumulative hazardous materials impact due to generation of a substantial amount of waste. Further, the Proposed Project will not significantly interfere with an adopted emergency response plan at the site. None of the related projects are located in the immediate project vicinity along these roadways. The Proposed Project is not anticipated to contribute to a cumulative hazardous materials impact due to interference with an emergency route.

PCBs, ACMs and lead-based paint may be present in buildings targeted for demolition in conjunction with the related project list. Unless ACMs and lead paint are removed prior to demolition, potentially significant cumulative health hazards related to the accidental release of

asbestos and/or lead could occur. However, as with the Proposed Project, all demolition activity associated with the related projects is assumed to be conducted in full compliance with the applicable federal, state and local rules and regulations addressing PCBs, asbestos, and lead; therefore, the potential for an accidental release would be minimal and cumulative impacts would be considered less than significant.

Related projects also have the potential to contain other hazardous substances associated with their operation and maintenance. It is anticipated that they will also comply with all required rules and regulations concerning the use of hazardous substances. Further it should be noted that none of commercial related projects are located near enough to the project site to have a cumulative effect on hazardous material generation or disposal and none of the residential related projects are located along the truck routes to be used by the Proposed Project. There would be no potential cumulative hazardous impacts associated with the Proposed Project and the related projects.

4. MITIGATION PROGRAM

Mitigation Measures identified in Section IV: Environmental Impact Analysis: E-Water Resources, will serve to reduce or eliminate potential environmental concerns related to hazardous materials and man-made hazards. In addition, the following Mitigation Measures are recommended:

MM HAZ-1: The Proposed Project shall comply with SCAQMD Rule 1403 regulating the removal of ACMs from on-site buildings.

MM HAZ-2: The Proposed Project shall comply with Construction Safety Orders 1532.1(pertaining to lead) from Title 8 of the California Code of Regulations as well as other applicable federal, state and local rules and regulations.

MM HAZ-3: Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the portion of the building to be demolished. If ACMs are found to be present, the applicant shall abate such ACMs in compliance with the South Coast Air Quality Management District's Rule 1403 as well as other applicable federal, state and local rules and regulations.

MM HAZ-4: Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified lead-paint abatement consultant that no lead-based paint is present in the portion of the building to be demolished. If lead-based paint is found to be present, it shall be abated in compliance with Construction Safety Orders 1532.1(pertaining to lead) from Title 8 of the California Code of Regulations as well as other applicable federal, state and local rules and regulations.

MM HAZ-5: Prior to issuance of the Certificate of Occupancy the applicant shall provide a letter from the Fire Department stating that the LAFD has permitted the facility's use, storage and creation of hazardous wastes.

MM HAZ-6: All 55-gallon drums on site shall be stored in secondary containment to prevent any accidental spills or leaks.

MM HAZ-7: Hazardous materials generated, as a result of routine maintenance of equipment shall be disposed of in accordance with legal disposal procedures.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

Compliance with SCAQMD Rule 1403 requirements would reduce impacts related to the removal of ACMs from on-site buildings to the extent required by existing regulations. Required compliance and the on-going asbestos and lead abatement program for the site would assure a less than significant ACM impact. With implementation of the recommended mitigation measures, the Proposed Project would not result in a significant adverse impact related to hazardous materials or man-made hazards.

IV. ENVIRONMENTAL IMPACT ANALYSIS

E. WATER RESOURCES

This section of the Draft EIR discusses a range of water resource issues, including hydrology, water quality and water supply. To facilitate the discussion, this section is subdivided into two separate areas of water resources: (1) Hydrology/Water Quality; and (2) Water Supply. In Section E.1: Water Resources: Hydrology/Water Quality, the hydrology analysis and discussion is limited to the Proposed Project's effect on stormwater runoff, as flood hazard and debris production are not relevant. The water quality analysis and discussion focuses on watershed management programs and project compliance with National Pollution Discharge Elimination System (NPDES) and Standard Urban Stormwater Mitigation Plan (SUSMP).

In Section E.2: Water Resources: Water Supply, the discussion is focused on water supply (and demand) and its relationship to regional water quality and watershed management issues. Groundwater is also addressed in this section in the context of its relationship to water supply, urban runoff, and overall water quality. It should be noted that while the Proposed Project is not subject to Senate Bill (SB) 610 (Cal. Water Code Sections 10910-10912) or SB 221 (Cal. Government Code Section 66473.7), which require the preparation by water purveyors of assessments and analyses verifying available water supply, this Draft EIR nonetheless provides an analysis of the Proposed Project's potential impact on the ability of the Los Angeles Department of Water and Power (LADWP) to meet the Project's water demands. The information presented in this section regarding current and projected water supplies is based on information provided in the City of Los Angeles Department of Water and Power 2005 Urban Water Management Plan (LA-UWMP).

E.1. WATER RESOURCES: HYDROLOGY/WATER QUALITY

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Site Hydrology and Stormwater Runoff

(a) Surface Water Flows and Urban Runoff

The project site is located on Riverside Drive within an urbanized area of the San Fernando Valley and has been developed since the early 1960s with the existing Fashion Square shopping center. The surface of the project site is currently fully covered with either structures or pavement. As such, the site is predominantly considered impervious and there are no undeveloped parcels or open space areas located on the project site. Vegetation on the project site is limited to ornamental landscaping associated with existing development. The site is currently graded, developed with structures, and improved for stormwater drainage. The surrounding project area exhibits similar conditions and is typical for an urban environment.

Under existing conditions, runoff at the site sheetflows in two primary directions - eastward to Woodman Avenue and westward to Hazeltine Avenue, which in turn flow into the Los Angeles River.

As determined by the Flood Insurance Rate Maps, the project site is located within Flood Zone C (since reclassified as Zone X-No Shading) which is located outside of both the 100- and 500-year floods. Furthermore, no bodies of water contained by dams or levees are located directly upstream of the project site that could expose people or structures to a significant risk. Therefore, the project site is not subject to a significant impact due to the creation of a significant flood risk to people and/or structures. The Los Angeles City-wide General Plan Framework Final EIR does not designate the project site as being an inundation and tsunami hazard area.

According to the United States Geological Survey (USGS) Map, Van Nuys Quadrangle, no blue line streams are located on the project site. The nearest identified blue line stream is the Los Angeles River, located approximately 300 feet southerly of the site, separated from the site by the Ventura (US 101) Freeway. The Los Angeles River through this area is entirely channelized in concrete.

(b) Surface Water Runoff Quality

Potential Pollutants of Concern

Potential pollutants of concern consist of those pollutants that exhibit one or more of the following characteristics: current loadings or historic deposits of the pollutant are impacting the beneficial uses of a receiving water; elevated levels of the pollutant are found in sediments of a receiving water and/or have the potential to bioaccumulate in organisms therein; or the detectable inputs of the pollutant are at concentrations or loads considered potentially toxic to humans and/or flora and fauna. The potential pollutants of concern for the water quality analysis are those pollutants that are anticipated or potentially could be generated by the Proposed Project at concentrations, based on water quality data collected in Los Angeles County from land uses that are the same as those proposed by the Proposed Project, that exhibit these characteristics. Identification of the pollutants of concern for the Proposed Project considered proposed land uses, current 303(d) listings and Total Maximum Daily Loads (TMDLs) in the Los Angeles River, as well as pollutants that have the potential to cause toxicity or bioaccumulate in the Project's receiving waters.

The following pollutants were chosen as the potential pollutants of concern for purposes of evaluating water based upon the above considerations:

Sediments (TSS and Turbidity). Excessive erosion, transport, and deposition of sediment in surface waters are a significant form of pollution resulting in water quality impairments. Sediment imbalances impair waters' designated uses. Excessive sediment can impair aquatic life by reducing beneficial habitat structure in stream channels affecting benthic infauna, by filling interstitial spaces of spawning gravels, impairing fish food sources, and filling rearing pools. In addition, excessive sediment can cause taste and odor problems in drinking water supplies and block water intake structures or recharge systems.

Nutrients (Phosphorus and Nitrogen (Nitrate-N, Nitrite-N and Ammonia-N). Inorganic forms of nitrogen include nitrate, nitrite and ammonia. Organic forms of nitrogen are associated with vegetative matter such as particulates from sticks and leaves. Total Nitrogen (TN) is a measure of nitrogen present, including inorganic and particulate forms. There are several sources of nutrients in urban areas, mainly fertilizers in runoff from lawns, pet wastes, failing septic systems, and atmospheric deposition from industry and automobile emissions. Nutrient over-enrichment is especially prevalent in agricultural areas where manure and fertilizer inputs to crops significantly contribute to nitrogen and phosphorus levels in streams and other receiving waters. Eutrophication due to excessive nutrient input can lead to changes in algae, benthic, and fish communities; extreme eutrophication can cause hypoxia or anoxia, resulting in fish kills. Surface algal scum, water discoloration, and the release of toxins from sediment can also occur.

Various downstream reaches of the Los Angeles River are identified as impaired by nutrients in general and nitrogen compounds in particular. Evidence of impairment includes low diversity of benthic macroinvertebrates and observations of excessive algae growth. TMDLs have been developed and adopted into the Los Angeles Region Basin Plan[1] for nitrogen compounds, including nitrate/nitrite and ammonia.

Trace Metals (Copper, Lead, and Zinc). The primary sources of trace metals in stormwater are typically commercially available metals used in transportation (e.g., automobiles), buildings, and infrastructure. Metals are also found in fuels, adhesives, paints, and other coatings. Copper, lead, and zinc are the most prevalent metals typically found in urban runoff. Other trace metals, such as cadmium, chromium, and mercury, are typically not detected in urban runoff or are detected at very low levels. Metals are of concern because of the potential for toxic effects on aquatic life and the potential for ground water contamination resulting from surface water infiltration to underlying aquifer systems. High metal concentrations can lead to bioaccumulation in fish and shellfish and affect beneficial uses of receiving waters.

Various downstream reaches of the Los Angeles River are identified as impaired for metals including cadmium, copper, lead, and zinc and TMDLS have been developed and adopted into the Basin Plan.

Pathogens (Bacteria, Viruses, and Protozoa). Elevated pathogens are typically caused by the transport of domestic animal, wildlife, or human fecal wastes from the watershed. Runoff that flows over land such as urban runoff can mobilize pathogens, including bacteria and viruses. Even runoff from natural areas can contain pathogens (e.g., from wildlife). Other sources of pathogens in urban areas include pets, leaky sanitary sewer pipes, and recreational vehicle waste discharges to the storm sewer system. The presence of pathogens in runoff can impair receiving waters and contaminate drinking water sources. Many of the downstream reaches of the Los Angeles River are identified as impaired by high fecal coliform counts. However, coliform TMDLs have not yet been developed.

[1] The *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Waters of Los Angeles and Ventura Counties* (or Basin Plan), adopted in 1994 and subsequently amended, sets pollutant criteria objectives that must be attained or maintained to protect the designated beneficial uses of receiving waters and conform to the state's anti-degradation policy. See the Regulatory and Policy Setting discussion in this section for more information on the role of the Basin Plan.

Petroleum Hydrocarbons (Oil and Grease and PAHs). The sources of oil, grease, and other petroleum hydrocarbons in urban areas include spillage fuels and lubricants, discharge of domestic and industrial wastes, atmospheric deposition, and runoff. Runoff can be contaminated by leachate from road surfaces, wearing of tires, and deposition from automobile exhaust. Also, do-it-yourself auto mechanics may dump used oil and other automobile-related fluids directly into storm drains. Petroleum hydrocarbons, such as polycyclic aromatic hydrocarbons (PAHs), can bioaccumulate in aquatic organisms from contaminated water, sediments, and food and are toxic to aquatic life at low concentrations. Hydrocarbons can persist in sediments for long periods of time and result in adverse impacts on the diversity and abundance of benthic communities. Hydrocarbons can be measured as total petroleum hydrocarbons (TPH), oil and grease, or as individual groups of hydrocarbons, such as PAHs.

Pesticides. Pesticides (including herbicides, insecticides and fungicides) are chemical compounds commonly used to control insects, rodents, plant diseases, and weeds. Excessive application of a pesticide may result in runoff containing toxic levels of its active component. Pesticides may be classified as organochlorine pesticides or organophosphorus pesticides, the former being associated with persistent bioaccumulative pesticides (e.g., DDT and other legacy pesticides) which have been banned. The Los Angeles River estuary is listed as impaired for legacy pesticides. Organophosphorus pesticides include diazinon and chlorpyrifos whose uses also are being restricted by EPA.

Trash and Debris. Trash (such as paper, plastic, polystyrene packing foam, and aluminum materials) and biodegradable organic debris (such as leaves, grass cuttings, and food waste) are general waste products on the landscape that can be entrained in urban runoff. The presence of trash and debris may have a significant impact on the recreational value of a water body and aquatic habitat. Excess organic matter can create a high biochemical oxygen demand in a water body and thereby lower its water quality. Also, in areas where stagnant water exists, the presence of excess organic matter can promote septic conditions resulting in the growth of undesirable organisms and the release of odorous and hazardous compounds such as hydrogen sulfide. Trash TMDLs for the Los Angeles River Watershed are currently being scoped by the Los Angeles Regional Water Quality Control Board (LARWQCB).

(2) Groundwater

Test boring locations conducted at the project site were checked for the presence of groundwater during and immediately following testing drilling operations. Free groundwater was encountered in three of six total borings at the project site, with groundwater encountered at depths of 34, 43.5 ad 44.5 feet during field explorations. The depth of the water table elevation may fluctuate with time and groundwater can be expected to fluctuate both seasonally and from year to year. Fluctuations in the groundwater level may occur due to variations in precipitation, irrigation practices at the site and in the surrounding areas, climatic conditions, flow in adjacent or nearby canals, pumping from wells and possibly as the result of other factors that were not evident at the time of the geotechnical investigation. Long-term monitoring in observation wells, sealed from the influence of surface water, is often required to more accurately define the potential range of groundwater conditions on a site.

b. Regulatory and Policy Setting

(1) Federal Clean Water Act of 1972 (33 USC.§ 1251 et seq.), Sections 401 and 404

Under the federal Clean Water Act (CWA) Section 401, an activity involving discharge to a waterbody must obtain a federal permit and a State Water Quality Certification to ensure that the activity will not violate established water quality standards.[2] Section 404 of the Clean Water Act regulates the discharge of dredge-and-fill material into waters of the United States including wetlands. Dredge and fill activities are typically associated with development projects; water-resource related projects; infrastructure development and wetland conversion to farming; forestry; and urban development. The Environmental Protection Agency (EPA) is the federal regulatory agency responsible for implementing the CWA. However, it is the State Water Resources Control Board (SWRCB) in conjunction with the nine California Regional Water Quality Control Boards who essentially have been delegated the responsibility to administer the water quality certification (401) program. The U.S. Army Corps of Engineers (USACE) is the designated regulatory agency responsible for administering the 404 permit program and for making jurisdictional determinations. While these provisions of the CWA do not pertain to flood hazards per se, areas under the USACE's jurisdiction (through Sections 401 and 404 of the CWA) typically occur within some floodplain areas.

(2) State Porter-Cologne Act (California Water Code § 13000 et seq.)

The Porter-Cologne Act established the State Water Resources Control Board and the nine Regional Water Quality Control Boards. It authorized the State Board to formulate and adopt state water policy, including water quality objectives, principles, and guidelines. The Porter-Cologne Act directs the Regional Boards to adopt, review and revise Basin Plans and provides direction on factors to be considered in the adoption of water quality objectives and implementation measures to protect water quality in the State.

In adopting water quality objectives, the Regional Boards are required to consider the following factors[3]:

- Past, present, and probable future beneficial uses of water;
- Environmental characteristics of the hydrographic unit under consideration, including the quality of the water available thereto;
- Water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area;
- Economic considerations;
- The need for developing housing within the region;
- The need to develop and use recycled water.
- The shopping center project site is located within the Los Angeles Region 4.

[2] U.S. Congress, 95th Congress. 1977 (as amended). *U.S. Code* (Title 33, Chapter 26). Federal Clean Water Act of 1977. 6 June 2008 <http://www.access.gpo.gov/uscode/title33/chapter26_.html >.
[3] Section 13241. California, State of. 2006 (as amended). *California Water Code*. 20 May 2008 <http://www.leginfo.ca.gov/calaw.html>.

(3) NPDES General Construction Permit

The State Water Resources Control Board (SWRCB), Division of Water Quality issues National Pollutant Discharge Elimination System (NPDES) stormwater permits for general construction activities. The Los Angeles Regional Water Quality Control Board (LARWQCB) enforces the NPDES program for the State of California within its jurisdiction (including all of Los Angeles and Ventura Counties) and includes the project area. Dischargers whose projects disturb one or more acres of soil are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit 99-08-DWQ). Coverage under the Construction General Permit is accomplished by completing and filing a Notice of Intent with the SWRCB and by preparing and implementing a Storm Water Pollution Prevention Plan (SWPPP) prior to grading. The primary objective of the SWPPP is to identify, construct, implement, and maintain Best Management Practices[4] (BMPs) to reduce or eliminate pollutants in stormwater discharges from the construction site. The SWPPP must include BMPs that the discharger will use to protect storm water runoff during construction and the placement of those BMPs. Additionally, a SWPPP must include a site map, a visual monitoring program, and a chemical monitoring program for "non-visible" pollutants to be implemented, if there is a failure of a BMP.

(4) Los Angeles Region Basin Plan

The Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, (Basin Plan), adopted by the LARWQCB in 1994, is a resource guide for those who use water and/or discharge wastewater in the Los Angeles Region. Agencies and organizations involved in environmental permitting and resource management activities also use the Basin Plan. The Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy; and (3) describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Basin Plan is reviewed and updated as necessary to reflect changing regulations, watershed conditions and best management practices.

(5) SUSMP Requirements

On March 8, 2000, the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP) requirements were approved by the RWQCB as part of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Program to address stormwater pollution from new construction and redevelopment projects in the County. The SUSMP contains a list of minimum site design, source control and treatment controls best management practices (BMPs) that must be employed to infiltrate or treat

[4] Effective management of wet and dry weather runoff water quality begins with limiting increases in runoff pollutants and flows at the source. Site design and source control best management practices (BMPs) are practices designed to minimize runoff peaks and volumes, as well as the initial introduction of pollutants in stormwater runoff. Treatment control BMPs are designed to remove pollutants once they have been mobilized by rainfall and runoff.

stormwater runoff, control peak flow discharge, and reduce the post-Project discharge of pollutants from stormwater conveyance systems. The SUSMP defines, based upon land use type, the types of practices that must be included and issues that must be addressed as appropriate to the development type and size.

Table 19: SUSMP Requirements, provides a summary of the SUSMP requirements and stormwater BMPs to be implemented on all significant new development and redevelopment projects in Los Angeles County. The Proposed Project fits the criteria of redevelopment projects requiring SUSMP mitigation for potential storm water quality impairments. The Proposed Project's goal at the project site is compliance with NPDES water quality objectives, including SUSMP requirements.

TABLE 19
SUSMP REQUIREMENTS

SUSMP REQUIREMENT	CRITERIA/ DESCRIPTION
1. Peak Flow Controls	• Control post-development peak discharge rates, velocities and duration in Natural Drainage Systems to prevent accelerated downstream erosion and to protect habitat related beneficial uses.[1] • All post-development runoff from a 2-year, 24-hour storm shall not exceed the predevelopment peak flow rate, burned, from a 2-year, 24-hour storm when the predevelopment peak flow rate equals or exceeds five cubic feet per second. Discharge flow rates shall be calculated using the County of Los Angeles Modified Rational Method. • Post-development runoff from the 50-year capital storm shall not exceed the predevelopment peak flow rate, burned and bulked, from the 50-year capital storm. • Control peak flow discharge to provide stream channel and over bank flood protection, based on flow design criteria selected by the local agency.
2. Conserve Natural Areas	• Concentrate or cluster development on portions of a site while leaving the remaining land in a natural undisturbed condition. • Limit clearing and grading of native vegetation at a site to the minimum amount needed to build lots, allow access, and provide fire protection. • Maximize trees and other vegetation at each site, planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants. • Promote natural vegetation by using parking lot islands and other landscaped areas. • Preserve riparian areas and wetlands.
3. Minimize Stormwater Pollutants of Concern	• Minimize, to the maximum extent practicable, the introduction of pollutants of concern that may result in significant impacts generated from site runoff of directly connected impervious areas (DCIA) to the stormwater conveyance system as approved by the building official.
4. Protect Slopes and Channels	Project plans must include BMPs consistent with local codes and ordinances and the SUSMP requirements to decrease the potential of slopes and/or channels from eroding and impacting stormwater runoff: • Convey runoff safely from the tops of slopes and stabilize disturbed slopes • Utilize natural drainage systems to the maximum extent practicable • Control or reduce or eliminate flow to natural drainage systems to the maximum extent practicable • Stabilize permanent channel crossings • Vegetate slopes with native or drought tolerant vegetation • Install energy dissipaters, such as riprap, at the outlets of new storm drains,

SUSMP REQUIREMENT		CRITERIA/ DESCRIPTION
		culverts, conduits, or channels that enter unlined channels in accordance with applicable specifications to minimize erosion with the approval of all agencies with jurisdiction, e.g., the U.S. Army Corps of Engineers and the California Department of Fish and Game.
5.	Provide Storm Drain System Stenciling and Signage	• All storm drain inlets and catch basins within the Project area must be stenciled with prohibitive language and/or graphical icons to discourage illegal dumping. • Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks within the Project area. • Legibility of stencils and signs must be maintained.
6.	Properly Design Outdoor Material Storage Areas	• Where proposed Project plans include outdoor areas for storage of materials that may contribute pollutants to the stormwater conveyance system measures to mitigate impacts must be included.
7.	Properly Design Trash Storage Areas	All trash containers must meet the following structural or treatment control BMP requirements: • Trash container areas must have drainage from adjoining roofs and pavement diverter around the areas. • Trash container areas must be screened or walled to prevent offsite transport of trash.
8.	Provide Proof of Ongoing BMP Maintenance	• Applicant required to provide verification of maintenance provisions through such means as may be appropriate, including, but not limited to legal agreements, covenants, and/or Conditional Use Permits.
9.	Design Standards for Structural or Treatment Control BMPs	• Post-construction Structural or Treatment Control BMPs shall be designed to mitigate (infiltrate or treat) stormwater runoff using either volumetric treatment control BMPs or flow-based treatment control BMPs sized per a project specific criteria developed in consultation between the applicant and Los Angeles City Bureau of Sanitation.
10.B.1.	Properly Design Loading/ Unloading Dock Areas (100,000 sq. ft. Commercial Developments)	• Cover loading dock areas or design drainage to minimize run-on and runoff of stormwater. • Direct connections to storm drains from depressed loading docks (truck wells) are prohibited.
10.B.2.	Properly Design Repair/ Maintenance Bays (100,000 sq. ft. Commercial Developments)	• Repair/maintenance bays must be indoors or designed in such a way that does not allow stormwater run-on or contact with stormwater runoff. • Design a repair/maintenance bay drainage system to capture all wash water, leaks, and spills. Connect drains to a sump for collection and disposal. Direct connection of the repair/ maintenance bays to the storm drain system is prohibited. If required by local jurisdiction, obtain an Industrial Waste Discharge Permit.
10.B.3.	Properly Design Vehicle/Equipment Wash Areas (100,000 sq. ft. Commercial Developments)	• Self-contained and /or covered, equipped with a clarifier, or other pretreatment facility, and properly connected to a sanitary sewer.
10.D.	Properly design fueling area (Retail Gasoline Outlets)	• The fuel dispensing area must be covered with an overhanging roof structure or canopy. The cover's minimum dimensions must be equal to or greater than the area within the grade break. The cover must not drain onto the fuel dispensing area and the downspouts must be routed to prevent drainage across the fueling area. • The fuel dispensing area must be paved with Portland cement concrete (or equivalent smooth impervious surface). The use of asphalt concrete shall be prohibited.

SUSMP REQUIREMENT	CRITERIA/ DESCRIPTION
	• The fuel dispensing areas must have a 2% to 4% slope to prevent ponding, and must be separated from the rest of the site by a grade break that prevents run-on of urban runoff. • At a minimum, the concrete fuel dispensing area must extend 6.5 feet (2.0 meters) from the corner of each fuel dispenser, or the length at which the hose and nozzle assembly may be operated plus 1 foot (0.3 meter), whichever is less.
10.E.1. Properly design fueling area (Automotive Repair Shops)	• See requirement 10.D. above.
10.E.2. Properly design repair/maintenance bay (Automotive Repair Shops)	• See requirement 10.B.2 above.
10.E.3. Properly design vehicle/equipment wash areas (Automotive Repair Shops)	• Self-contained and/or covered, equipped with a clarifier, or other pretreatment facility, and properly connected to a sanitary sewer or to a permitted disposal facility.
10.E.4. Properly design loading/unloading dock areas (Automotive Repair Shops)	• See requirement 10.B.1. above.
10.F.1. Properly Design Parking Area (Parking Lots)	• Reduce impervious land coverage of parking areas. • Infiltrate runoff before it reaches the storm drain system. • Treat runoff before it reaches storm drain system.
10.F.2. Properly Design to Limit Oil Contamination and Perform Maintenance (Parking Lots)	• Treat to remove oil and petroleum hydrocarbons at parking lots that are heavily used. • Ensure adequate operation and maintenance of treatment systems particularly sludge and oil removal.
13. Limitation of Use of Infiltration BMPs	• Infiltration is limited based on design of BMP, pollutant characteristics, land use, soil conditions, and traffic. • Appropriate conditions (groundwater >10 ft from grade) must exist to utilize infiltration to treat and reduce stormwater runoff for the Project.
[1] This requirement is from Part 4, § D.1 of the MS4 Permit.	

(5) LA River Revitalization Master Plan and River Improvement Overlay

In May 2007, the City of Los Angeles recently adopted the Los Angeles River Revitalization Master Plan (LARRMP), which targets the redevelopment and revitalization of a 32-mile segment of the Los Angeles River and the land uses that surround it. The LARRMP establishes the creation of the River Improvement Overlay (RIO) as the implementing mechanism, which in turn establishes requirements for private property and publicly owned facilities to comply with design categories addressing watershed, urban design and mobility alternatives. The project site and surrounding properties are located within the RIO District. Many of the watershed management practices requested in the RIO are consistent with BMPs that would be employed with the Proposed Project. Please refer to Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this DEIR, which identifies applicable watershed management design criteria and project compliance with those criteria.

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section and used to determine the Proposed Project environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006).

Surface Water Hydrology

A proposed project would normally have a significant impact on surface water hydrology if it would:

- Cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources;
- Substantially reduce or increase the amount of surface water in a water body; or
- Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

Surface Water Quality

A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code (CWC) (see definitions below) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

Groundwater Quality

A project would normally result in a significant impact on groundwater quality if it would:

- Affect the rate or change the direction of movement of existing contaminants;
- Expand the area affected by contaminants;
- Result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion); or
- Cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations (CCR), Title 22, Division 4, and Chapter 15 and in the Safe Drinking Water Act.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project would include project design features (PDFs) specifically designed to reduce urban runoff and associated pollutants. These PDFs include source controls, low impact development concepts, and treatment control best management practices (BMPs) that will be selected and sized in accordance with applicable regulations. At this stage of conceptual design, site-specific BMPs for the Proposed Project have not been selected or finalized. Ultimately, site-specific constraints, such as paved surface area needed to meet parking requirements and traffic control and American Disability Act (ADA) requirements, and surface and underground utility clearance requirements for the project upgrades will dictate PDFs that will be evaluated as part of final design.

The Proposed Project will not discharge any "waste" as defined by the statutes governing waste discharge requirements, and will not violate any water quality standards applicable to the project concerning stormwater runoff.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- In compliance with LEED Certification and the River Implementation Overlay District (see Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay), the Proposed Project would incorporate a range of "green strategy" project design features for water quality and hydrologic impacts that would include site design, source control, and treatment control BMPs that would be incorporated into the project.

- In accordance with the SUSMP requirements, the Proposed Project would meet (or exceed) all minimum site design and source control BMPs.

- The Proposed Project would incorporate treatment control BMPs that will minimize urban runoff and associated impacts to receiving water quality and specifically address the identified pollutants of concern. Many BMP alternatives can be integrated into planned landscaping, right-of-ways, and planned infrastructure. BMP alternatives that would be implemented with the Proposed Project include: (1) vegetated treatment BMPs, (2) onsite storage and reuse, (3) permeable paving, (4) roof top BMPs, and (5) media filters.

- The Proposed Project would incorporate a number of vegetated treatment BMPs, including swales, filter strips, bioretention and planter boxes. When properly designed and maintained, vegetated BMPs are among the most effective, cost efficient treatment approaches for dry and wet-weather runoff. Treatment occurs through sedimentation, filtration, adsorption to organic matter, and vegetative uptake. Additionally, vegetated treatment systems would reduce runoff volumes through soil soaking, infiltration, and evapotranspiration. On-site implementation of these systems would be integrated into

surface conveyances and on-site landscaping in innovative ways that provide dual-functional site amenities.

- The Proposed Project would incorporate permeable (porous) pavement material in pavement areas (such as roadways, driveways, parking areas, and walkways). The permeable (porous) pavement materials would allow water to drain down to the underlying soil and reduce the volume of wet weather urban runoff. The Proposed Project would incorporate a mix of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, into the landscape plan and design of surface parking areas as functionally appropriate.

- The Proposed Project would employ rooftop BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of small storm events peaks and the overall runoff volume via inter-event evaporation and transpiration. Rooftop BMPs incorporated into the project design include planters and landscaping on the rooftop portion of the new parking structures, and hanging planters along the parking building tiers and along the Riverside Drive mall elevation.

- The Proposed Project would employ media filtration to separate and filter fine particulates and associated pollutants from captured stormwater to the extent feasible.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- The City of Los Angeles Development Best Management Practices Handbook, Part A Construction Activities (3rd Edition), adopted by the Los Angeles Board of Public Works on September 29, 2004, and associated ordinances have specific minimum BMP requirements for all construction activities and require that construction projects with one acre or greater of disturbed soil prepare a SWPPP and file a Notice of Intent to comply with the State NPDES General Construction Permit with the SWRCB.

- City of Los Angeles Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control which requires the application of Best Management Practices (BMPs). Also, the LAMC, Chapter IX, Division 70 addresses grading, excavations, and fills that would be required. The Proposed Project is required to comply with those provisions as well as meet the applicable requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board (LARWQCB), including the sections related to commercial development and the restaurant industry. A complete list of the LARWQCB required stormwater pollution control measures for commercial and restaurant development is provided with MM WR-2 at the end of this section.

- The Proposed Project would adopt an erosion and sediment control plan for the project site during the construction phase that would employ strategies such as temporary and permanent seeding, mulching, earth dikes, silt fencing, sediment traps and sediment basins. The erosion and sediment control plan would comply with U.S. Environmental

Protection Agency (EPA) Document No. EPA 832/R-92-005 (September 1992), Storm Water Management for Construction Activities, Chapter 3 (or the local agency equivalent erosion and sedimentation control standards and codes) and would address soil loss, stormwater runoff, wind erosion, sedimentation, and fugitive dust at a minimum. The erosion and sediment control plan would contribute to minimizing water quality impacts and may indirectly minimize aesthetic effects during the construction phase.

b. Project Impacts

Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the NOP and IS process to have a potential significant environmental effect. Issues related to Hydrology and Water Quality that were determined to be less than significant, and not addressed further, include: flooding and groundwater. An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant.

(1) Surface Water

(a) Short-Term Construction Activity

During construction of the Proposed Project, existing buildings, pavement and landscaping would be removed to make way for the proposed improvements. As a result, the underlying soils would be temporarily exposed making the project site temporarily more permeable and vulnerable to erosion and sedimentation that could be conveyed into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to short-term drainage and pollutant loading in urban runoff. Other sources of short-term, construction-related water pollution that may be associated with the Proposed Project, include the handling, storage and disposal of construction materials that contain pollutants (i.e., demolition debris) and the maintenance and operation of construction equipment (i.e., due to fuel and grease spills).

Construction at the project site would utilize a number of construction materials that are potential sources of water pollutants, such as adhesives, cleaning agents, paints, heating/cooling fluids, and demolition debris. Construction material spills can be a source of stormwater pollution and/or soil contamination. According to the Los Angeles City Bureau of Engineering, routine safety precautions for handling and storing toxic and hazardous materials, and maintaining construction equipment in proper working condition, may effectively control the use of these items and their potential to contribute pollutants to the urban runoff. These "good housekeeping" measures apply to non-hazardous runoff pollutants (such as sawdust or other solid construction debris) as well.

Because the construction site would be greater than one acre in size, the Proposed Project would be required to obtain an NPDES General Construction Permit. In order to obtain coverage under the NPDES General Construction Permit (see discussion above under Regulatory and Policy

Setting section), the Proposed Project developer must submit a Notice of Intent (NOI) to the SWRCB and prepare a SWPPP. The NPDES General Construction Permit requires that developers:

- eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the U.S.;
- develop and implement a SWPPP, which would specify BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards; and
- perform inspections and maintenance of all BMPs that are implemented at the project site.

BMPs within the SWPPP typically target minimization of erosion during construction, stabilization of the construction areas, sediment control, control of pollutants from construction materials, as well as post-construction stormwater management (i.e., minimization of impervious surfaces, treatment of stormwater runoff, etc.). The SWPPP also must include a discussion of the program for inspection and maintenance of all BMPs.

The City of Los Angeles Development Best Management Practices (BMPs) Handbook, Part A Construction Activities (3rd Edition), adopted by the Los Angeles Board of Public Works on September 29, 2004, and associated ordinances also have specific minimum BMP requirements for all construction activities and require that construction projects with on acre or greater of disturbed soil require the preparation of a SWPPP and filing of a NOI to comply with the State NPDES General Construction Permit with the SWRCB.

The Proposed Project would be designed to comply with all applicable construction and operational water quality standards and waste discharge requirements. Further, the Proposed Project would be required to file a stormwater plan with the City of Los Angeles for grading activities during the construction phase. It is anticipated that the NPDES General Construction Permit would serve as a temporary permit for the construction phase.

During the construction activities, the Proposed Project would implement a variety of BMPs to minimize erosion and sedimentation, eliminate runoff pollutants, and maintain post-construction water quality. Measures specific to erosion and sediment control would include soil stabilization, dust control, sediment control, and roadway cleaning practices. The final selection of BMPs would occur in the field prior to commencement of various construction activities, based in part on the ultimate construction staging plans and the time of year during which construction will occur. Typical BMPs to be utilized during construction activities at the project site include, but would not be limited to, covering construction driveways with gravel, establishing a vehicle washing station, utilizing mulch and roughing soil (to slow down runoff), installing temporary detention basins, avoiding activity during storm events, placement of sedimentation traps, etc. Physical erosion control devices, including temporary diversion dikes/berms, drainage swales, sediment traps, are also effective in protecting downstream receiving waters. These BMPs would eliminate or reduce pollutant levels in stormwater/urban

runoff during construction. Thus, compliance with SWPPP guidelines, including implementation of BMPs, would ensure that the Proposed Project would not violate water quality standards during construction activity and construction-related impacts to hydrology and surface water quality would be less than significant.

(b) Hydrology

The project site is currently fully covered with either structures or pavement and is considered to be impervious. The Proposed Project will be located on an area that is currently developed with structured and surface parking. Due to the existing impervious nature of the project site and the length of time these conditions have existed, the Proposed Project will not substantially alter existing drainage patterns on the project site nor substantially increase the amount of water flowing from the site. Implementation of the Proposed Project would not substantially alter the existing drainage patterns at the project site or surrounding area.

Under the Proposed Project, the project site will continue to be considered impervious and drainage will continue to travel via sheetflow to the adjacent roadways and into the Los Angeles River (located south of the project site). Based on the existing and proposed impervious conditions, the amount and quality of stormwater will not change substantially. The Proposed Project will comply with SUSMP requirements.

The Proposed Project will not change the existing stormwater drainage systems in the project area. Existing capacity of the stormwater system in the project area is adequate to accommodate existing flows. Due to the impervious nature of the site, the continuation of surface and/or rooftop parking and the location of the project site within an urban, developed area, the Proposed Project will not create substantial additional runoff that will exceed the capacity of stormwater drainage systems in the project area.

(c) Urban Runoff Water Quality

The project site is currently graded and improved for stormwater drainage. Due to the urban nature of the project area, surface runoff routinely collects oil, fuel and debris deposited on the ground. The existing shopping center uses are served by large surface parking areas (and include open rooftop parking levels) over which stormwater currently travels, collecting the existing deposits on the ground. Stormwater on the project site and in the project area is currently degraded when runoff mixes with pollutants on surface parking areas and adjacent major roadways. Potential water quality issues are associated with stormwater runoff across existing paved areas and streets that have accumulated fuel, oil, grease and trash deposits.

Adverse impacts may result from the release of contaminants into the stormwater drainage channels during the routine operation of commercial development projects. However, the potential impacts will be mitigated to a level of insignificance by incorporating standard stormwater pollution control measures defined through Ordinance No. 172,176, Ordinance No. 173,494 and LAMC Chapter IX, Division 70. The Proposed Project will meet the applicable requirements of the SUSMP approved by LARWQCB, including the sections related to commercial development and the restaurant industry.

The Proposed Project includes construction of two parking structures over a large portion of the existing surface parking area to serve the entire shopping center. Because the retail building and parking structures will provide rooftop parking, stormwater quality on the project site will not be altered (as the rooftop parking footprint would cover the equivalent area of existing surface parking). In addition, the Proposed Project must meet the requirements of the SUSMP approved by the LARWQCB. Adherence to these standards will insure that storm water discharge from the project site will not exceed existing storm water discharge from the site. With incorporation of the SUSMP requirements, the Proposed Project will not create an adverse storm water runoff or discharge impact. The Proposed Project will not violate any water quality standards or waste discharge requirements and will result in a less than significant impact to water quality.

The Proposed Project will utilize a variety of water quality improvement project design features (PDFs). Preferred over a "one size fits all" approach, the potential use of a few appropriately-placed PDFs will allow the Project meet the tight space constraints of the upgrade and to potentially divide flows for desired reduction in flow and water quality impacts to surrounding systems (both natural and engineered). PDFs for water quality and hydrologic impacts include site design, source control, and treatment control BMPs that will be incorporated into the Proposed Project and are considered a part of the Proposed Project for impact analysis. Effective management of wet and dry weather runoff water quality begins with limiting increases in runoff pollutants and flows at the source. Site design and source control BMPs are practices designed to minimize runoff peaks and volumes, as well as the initial introduction of pollutants in stormwater runoff. Treatment control BMPs are designed to remove pollutants once they have been mobilized by rainfall and runoff.

In accordance with the SUSMP requirements, minimum site design and source control BMPs will be met or exceeded. The Proposed Project will also incorporate, as PDFs, treatment control BMPs that will minimize urban runoff and associated impacts to receiving water quality and specifically address the identified pollutants of concern. Many BMP alternatives can be integrated into planned landscaping, right-of-ways, and infrastructure without requiring large areas of dedicated open space while still meeting the SUSMP sizing requirements.

The following paragraphs describe the types of BMP alternatives that are recommended for implementation at the Proposed Project. While these alternatives are described herein for planning purposes only (i.e., no site-specific designs have been finalized), they provide a listing of the water quality improvement BMPs specifically being evaluated for the Proposed Project. The alternatives have been grouped into (1) vegetated treatment BMPs, (2) onsite storage and reuse, (3) permeable paving, (4) roof top BMPs, and (5) media filters.

Vegetated Treatment BMPs. Vegetated treatment BMPs include swales, filter strips, bioretention and planter boxes. When properly designed and maintained, vegetated BMPs are among the most effective, cost efficient treatment approaches for dry and wet-weather runoff. While the Project is significantly space-constrained, areas such as the northern frontage of the Project adjacent to Riverside Drive will be evaluated for possible siting of such PDFs. Treatment occurs through sedimentation, filtration, adsorption to organic matter, and vegetative uptake. Additionally, vegetated treatment systems can help to reduce runoff volumes through soil soaking, infiltration, and evapotranspiration. A beneficial feature of vegetated treatment systems

is that their design and implementation is highly flexible and adaptable. On-site implementation of these systems can be integrated into surface conveyances and on-site landscaping in innovative ways that provide site amenities, are functionally effective for runoff conveyance and water quality treatment, and in some cases are less costly to construct than traditional storm sewers.

Onsite Storage and Reuse. The goal of onsite storage and reuse is to temporarily detain stormwater and then use it to meet irrigation or other non-potable water demands. With the space and geotechnical constraints of the existing on-site (commercial buildings) and off-site (utility corridors and roadways) structures, large-scale retention is not feasible. Nevertheless, small-scale systems such as small storage tanks strategically located next to and upgradient from landscaped areas will be evaluated for feasibility at the Project.

Permeable Paving. Areas such as roadways, driveways, parking areas, and walkways covered with impermeable (non-porous) pavement are one of the largest contributors to wet weather urban runoff. Permeable or porous pavements are a special type of material that allows water to drain down to the underlying soil, yet are strong enough to structurally support vehicular or pedestrian traffic. Many types of porous pavements and configurations have been developed for a variety of applications. Most of the systems are supported by a stone base that has large pore spaces. This base acts both as pavement support and as a reservoir to store water so that it can be infiltrated, if the soil conditions allow, or detained and slowly released to the storm drain system. In addition, the pavement roughness may be improved (i.e., increased with no significant effect on the driver) thereby providing greater control of runoff hydraulics (i.e., increasing the time required to reach discharge points). Supplemental storage facilities, such as underground vaults (described above) or drainage blankets, can be used in conjunction with these systems. Some of the available permeable pavements that may be further evaluated as PDFs for the Project, subject to geotechnical constraints, are described below. Similar to other PDF alternatives described above, these paving alternatives may be used in specific locations and in conjunction with other PDFs. It should also be noted that these systems are currently being evaluated for the concrete matrix ability to support beneficial bacterial growth that can provide treatment benefits to the water percolating through the pavement.

Media Filters. Media filtration is primarily intended to separate fine particulates and associated pollutants, but depending on the type of media, dissolved constituents, such as metals and nutrients, may be removed via sorption processes. Stormwater is captured and directed either under gravity or pressure through media such as sand, engineered media, compost, zeolite, or combinations of media. These PDFs can be either large installations (not described herein due to Project size constraints), or sized to address a portion of the Project runoff.

Furthermore, the project will not discharge any "waste" as defined by the statutes governing waste discharge requirements, and will not violate any water quality standards applicable to the project concerning stormwater runoff.

Based on the existing and proposed impervious conditions, the amount and quality of stormwater will not change substantially. Due to the impervious nature of the site, the continuation of surface parking (perhaps on the rooftop of the proposed parking structure) and the location of the

project site within an urban, developed area, the Proposed Project will not create substantial additional sources of polluted runoff. The Proposed Project will not otherwise degrade water quality and will result in a less than significant impact to water quality.

(d) Sedimentation and Erosion

There are no undeveloped parcels or open space located on the project site or nearby in the project area. Substantial soil erosion and siltation that could adversely affect water quality will not occur due to the impervious conditions. Due to the existing and proposed impermeable conditions at the project site, the length of time this development has existed on site, and the lack of streams in the project area, the Proposed Project will not substantially alter the existing drainage pattern nor substantially alter the amount of erosion at the project site. Therefore, the Proposed Project will result in a less than significant hydrologic impact due to erosion or siltation.

(2) Consistency with Applicable Plans and Policies

Consistency with applicable plans and policies, including land use and design policies which indirectly address water resource protection, is discussed in detail in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this EIR.

(3) Cumulative Impacts

The project site has considered to be impervious and vegetation is limited to installed landscaping associated with the existing development and parking areas. Stormwater currently sheetflows across the site to existing City of Los Angeles facilities, picking up debris, oils, and grease left behind by vehicles. With implementation of standard regulatory requirements including the use of biological and/or material filters, water quality from the site will be improved from current conditions. The project would not negatively change the quantity or quality of stormwater at the project site and the Proposed Project will result in a less than significant hydrologic impact. Based on this, the Proposed Project is not anticipated to contribute to a cumulative impact to hydrology based on either quantity or quality of stormwater.

No significant cumulative impacts on the stormwater drainage system, hydrology or water quality are anticipated from implementation of this and other projects included under the related project list. The related projects would result in increased runoff to the County storm drain system as a whole. However, none of the related projects are located immediately adjacent to the project site such that they might contribute to a significant hydrologic impact in the project area. Furthermore, a separate, site-specific environmental analysis will be prepared for related projects to assess and mitigate related project-specific potential impacts to hydrology.

4. MITIGATION PROGRAM

MM WR-1: The Proposed Project will comply with provisions of the City of Los Angeles Development Best Management Practices Handbook, Part A Construction Activities (3rd Edition), adopted by the Los Angeles Board of Public Works on September 29, 2004, and associated ordinances, which have specific minimum BMP requirements for all construction activities and require that construction projects with one acre or greater of disturbed soil prepare a SWPPP and file a NOI to comply with the State NPDES General Construction Permit with the SWRCB.

MM WR-2: The Proposed Project will comply with City of Los Angeles Ordinance No. 172,176 and Ordinance No. 173,494, which specify Stormwater and Urban Runoff Pollution Control requiring the application of Best Management Practices (BMPs), and the LAMC, Chapter IX, Division 70, which addresses grading, excavations, and fills. The Proposed Project will meet the applicable requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board (LARWQCB), including the sections related to commercial development and the restaurant industry. The following LARWQCB list of stormwater pollution control measures for commercial and restaurant development is required:

For Commercial development (Lot size 100,000 square feet)

- Project applicants are required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24 hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

- Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rates for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.

- Concentrate or cluster development on portions of a site while leaving the remaining land in a natural undisturbed condition.

- Limit clearing and grading of native vegetation at the project site to the minimum needed to build lots, allow access, and provide fire protection.

- Maximize trees and other vegetation at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.

- Reduce impervious surface area by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e. turf block; and granular materials, i.e. crushed aggregates, cobbles.

- Promote natural vegetation by using parking lot islands and other landscaped areas.

- Preserve riparian areas and wetlands.
- Cover loading dock areas or design drainage to minimize run-on and run-off of stormwater.

- Direct connections to storm drains from depressed loading docks (truck wells) are prohibited.

- Repair/maintenance bays must be indoors or designed in such a way that doesn't allow stormwater run-on or contact with storm water run-off.

- Vehicle/equipment wash areas must be self-contained and/or covered, equipped with a clarifier, or other pretreatment facility, and properly connected to the sanitary sewer.

- Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.

- The following activities are to be conducted under proper cover with drain routed to the sanitary sewer:
  - Storage of industrial wastes
  - Handling or storage of hazardous wastes
  - Metal fabrication or pre-cast concrete fabrication
  - Welding, cutting or assembly
  - Painting, coating or finishing

- Reduce impervious surface area by using permeable pavement materials where appropriate including pervious concrete, unit pavers, and granular materials.

- Store above ground liquid storage tanks (drums and dumpsters) in areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, dikes, liners, vaults, and double-wall tanks. Where used oil or dangerous waste is stored, a dead-end sump should be installed in the drain.

- Toxic wastes must be discarded at a licensed regulated disposal site. Store trash dumpsters either under cover and with drains routed to the sanitary sewer or use non-leaking and water-tight dumpsters with lids. Use drip pans or absorbent materials whenever grease containers are emptied. Wash containers in an area with properly connected sanitary sewer.

- Reduce and recycle wastes, including paper, glass, aluminum, oil and grease.

- Reduce the use of hazardous materials and waste by using detergent-based or water-based cleaning systems, and avoid chlorinated compounds, petroleum distillates, phenols, and formaldehyde.

- Convey runoff safely from the tops of slopes and stabilize disturbed slopes.

- Utilize natural drainage systems to the maximum extent practicable.

- Control or reduce or eliminate flow to natural drainage systems to the maximum extent practicable.

- Stabilize permanent channel crossings.

- Protect slopes and channels and reduce run-off velocities by complying with Chapter IX, Division 70 of the Los Angeles Municipal Code and utilizing vegetation (grass, shrubs, vines, ground covers, and trees) to provide long-term stabilization of soil.

- Cleaning of vehicles and equipment to be performed within designated covered or bermed wash area paved with Portland concrete, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connect sanitary sewer with a CPI type oil/water separator. The separator unit must be designed to handle the quantity of flows, removed for cleaning on a regular basis (at least twice a year) to remove any solids, and the oil absorbent pads must be replaced regularly, once in fall just before the wet season, and in accordance with manufacturer specifications.

- All storm drain inlets and catch basins within the project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO THE OCEAN") and/or graphical icons to discourage illegal dumping.

- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks within the project area.

- Legibility of stencils and signs must be maintained.

- Materials with the potential to contaminate stormwater must be:
  - Placed in an enclosure such as, but not limited to, a cabinet, shed or similar stormwater conveyance system; or
  - Protected by secondary containment structures such as berms, dikes or curbs.

- The storage area must be paved and sufficiently impervious to contain leaks and spills.

- The storage area must have a roof or awning to minimize collection of stormwater within the secondary containment area.

- The owner(s) of the property will prepare and execute a covenant and agreement (Planning Department General Form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturers instructions.

- Cut and fill slopes in designated hillside areas shall be planted and irrigated to prevent erosion, reduce run-off velocities and to provide long-term stabilization of soil. Plant materials include grass, shrubs, vines, ground covers and trees.

- Incorporate appropriate erosion control and drainage devices such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by LAMC Section 91.7013. Protect outlets of culverts, conduits or channels from erosion by discharge velocities by installing rock outlet protection. Rock outlet protection is a physical device composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe. Install sediment traps below the pipe outlet. Inspect, repair, and maintain the outlet protection after each significant rain.

- Trash container areas must have drainage from adjoining roofs and pavement diverted around the area(s).

- Trash container areas must be screened or walled to prevent off-site transport of trash.

- Reduce impervious land coverage of parking lot areas.

- Infiltrate runoff before it reaches the storm drain system.

- Runoff must be treated prior to release into the storm drain. Three types of treatments are available: (1) dynamic flow separator; (2) filtration; or (3) infiltration. Dynamic flow separators uses hydrodynamic force to remove debris, and oil and grease, and are located underground. Filtration involves catch basins with filter inserts. Filter inserts must be inspected every six months and after major storms, cleaned at least twice a year. Infiltration methods are typically constructed on-site and are determined by various factors such as soil types and groundwater table.

- Prescriptive methods detailing BMPs specific to this project category are available. Applicants are encouraged to incorporate the prescriptive methods into the design plans. These prescriptive methods can be obtained at the Public Counter or downloaded from the City's website at: http://www.lastormwater.org.

For Food Service Industry (Restaurants, Bakeries, Food Processors)

- Project applicants are required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24 hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

- Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rates for developments where the increased peak stormwater discharge rate will result in increased potential for downstream erosion.

- Concentrate or cluster development on portions of a site while leaving the remaining land in a natural undisturbed condition.

- Limit clearing and grading of native vegetation at the project site to the minimum needed to build lots, allow access, and provide fire protection.

- Maximize trees and other vegetation at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.

- Promote natural vegetation by using parking lot islands and other landscaped areas.

- Preserve riparian areas and wetlands.

- Incorporate appropriate erosion control and drainage devices such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by LAMC Section 91.7013. Protect outlets of culverts, conduits or channels from erosion by discharge velocities by installing rock outlet protection. Rock outlet protection is a physical device composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe. Install sediment traps below the pipe outlet. Inspect, repair, and maintain the outlet protection after each significant rain.

- Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.

- Cleaning of oily vents and equipment to be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.

- Store trash dumpsters either under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids. Wash containers in an area with properly connected sanitary sewer.

- Reduce and recycle wastes, including paper, glass, aluminum, oil and grease.

- Store liquid storage tanks (drums and dumpsters) in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Use drip pans or absorbent materials whenever grease containers are emptied.

- All storm drain inlets and catch basins within the project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO THE OCEAN") and/or graphical icons to discourage illegal dumping.

- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks within the project area.

- Legibility of stencils and signs must be maintained.

- Materials with the potential to contaminate stormwater must be:
  - Placed in an enclosure such as, but not limited to, a cabinet, shed or similar stormwater conveyance system; or
  - Protected by secondary containment structures such as berms, dikes or curbs.

- The storage area must be paved and sufficiently impervious to contain leaks and spills.

- The storage area must have a roof or awning to minimize collection of stormwater within the secondary containment area.

- The owner(s) of the property will prepare and execute a covenant and agreement (Planning Department General Form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturers instructions.

- Prescriptive methods detailing BMPs specific to this project category are available. Applicants are encouraged to incorporate the prescriptive methods into the design plans. These prescriptive methods can be obtained at the Public Counter or downloaded from the City's website at: www.lastormwater.org.

MM WR-3: The Proposed Project will adopt an erosion and sediment control plan for the project site during the construction phase that would employ strategies such as temporary and permanent seeding, mulching, earth dikes, silt fencing, sediment traps and sediment basins. The erosion and sediment control plan will be reviewed and approved by Department of Building & Safety to insure it complies with U.S. Environmental Protection Agency (EPA) Document No. EPA 832/R-92-005 (September 1992), Storm Water Management for Construction Activities, Chapter 3 (or the local agency equivalent erosion and sedimentation control standards and codes) and would address soil loss, stormwater runoff, wind erosion, sedimentation, and fugitive dust at a minimum. The erosion and sediment control plan would contribute to minimizing water quality impacts and may indirectly minimize aesthetic effects during the construction phase.

MM WR-4: In accordance with the SUSMP requirements, the Proposed Project shall meet (or exceed) all minimum site design and source control BMPs.

MM WR-5: The Proposed Project shall incorporate treatment control BMPs that will minimize urban runoff and associated impacts to receiving water quality and specifically address the identified pollutants of concern. Acceptable BMP alternatives that may be implemented with the Proposed Project include: (1) vegetated treatment BMPs, (2) onsite storage and reuse, (3) permeable paving, (4) roof top BMPs, and (5) media filters.

MM WR-6: The Proposed Project shall incorporate vegetated treatment BMPs, including swales, filter strips, bioretention and planter boxes and appropriate and approved by the City.

MM WR-7: The Proposed Project shall incorporate permeable (porous) pavement material in pavement areas (such as roadways, driveways, parking areas, and walkways), such that the pavement materials will allow water to drain down to the underlying soil and reduce the volume of wet weather urban runoff. The Proposed Project shall incorporate a mix of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, into the landscape plan and design of surface parking areas as functionally appropriate.

MM WR-8: The Proposed Project shall employ rooftop BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of small storm events peaks and the overall runoff volume via inter-event evaporation and transpiration. Acceptable rooftop BMPs incorporated into the project design include planters and landscaping on the rooftop portion of the new parking structures, and hanging planters along the parking buildings and along the Riverside Drive mall elevation.

MM WR-9: The Proposed Project shall employ media filtration to separate and filter fine particulates and associated pollutants from captured stormwater to the extent feasible and as approved by the City.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

Implementation and of BMPs during construction activities at the project site, including covering construction driveways with gravel, establishing a vehicle washing station, utilizing mulch and roughing soil (to slow down runoff), installing temporary detention basins, avoiding activity during storm events, placement of sedimentation traps, creation of temporary diversion dikes/berms, drainage swales, etc., would all serve to protect downstream receiving waters. These BMPs would eliminate or reduce pollutant levels in stormwater/urban runoff during construction. Compliance with SWPPP guidelines, including implementation of BMPs, would ensure that the Proposed Project would not violate water quality standards during construction activity. Construction-related impacts to hydrology and surface water quality would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS

E.2. WATER RESOURCES: WATER SUPPLY

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Water Supply

The Los Angeles Department of Water and Power (LADWP) owns, operates, and maintains all water facilities within the City of Los Angeles and is responsible for ensuring that the delivered water meets all applicable state quality standards. The shopping center is located within the City, and as such, LADWP is responsible for delivering water to the project site. The shopping center's existing water demand is approximately 100,860 gallons per day (gpd) of water, or approximately 113 acre-feet of water per year (AFY).

LADWP supplies water to its customers from four main sources: (1) the Mono Basin and Owens Valley, located on the east side of the Sierra Nevada Mountains delivered via the Los Angeles Aqueduct (LAA); (2) local groundwater basins, including the San Fernando, Sylmar, Eagle Rock, Central Coast, and West Coast basins; (3) purchases of State Water Project (SWP) and Colorado River water from the Metropolitan Water District (MWD); and (4) water recycling.

On average, LADWP receives 20% of its annual water supply from MWD during normal years, and as much as 39% during dry years.[1] In 1993, MWD commenced its Integrated Resources Plan (IRP) process, which is designed to reduce MWD's dependency on imported water during droughts or other shortages. The IRP includes a variety of projects and programs, including: (1) providing financial incentives for local projects and conservation; (2) increased surface storage in Diamond Valley Lake and SWP reservoirs; (3) groundwater storage programs in the Central Valley, Imperial Valley and Coachella Valley; (4) short- and long-term water transfers; and (5) local groundwater storage programs with participating member agencies. As part of its IRP update, MWD is planning for the development of a 500,000 acre-foot supply which will provide sufficient water to its member agencies even during critically dry events from now until at least 2025. MWD, along with LADWP and other member agencies, also established a Water Surplus and Drought Management Plan to ensure MWD's ability to meet its member agencies' future water needs.

In addition to purchases from MWD, the City of Los Angeles intends to enhance its water supplies through continued conservation measures and increased use of recycled water. LADWP is committed to expanding its recycled water program and has several projects that provide recycled water for landscape irrigation and commercial use, including the 6.5-acre Japanese Garden located at the Sepulveda Dam Recreation Area. The City also uses recycled water in Griffith Park to irrigate two golf courses and a seven-mile stretch of open space along the Golden

[1] Page 6-4. Los Angeles Department of Water and Power. 2005. *2005 Urban Water Management Plan*. 19 May 2008 <http://www.ladwp.com/ladwp/cms/ladwp007157.pdf>.

State Freeway. In addition, LADWP is evaluating the potential for using recycled water for recharging groundwater supplies.

Consistent with the Urban Water Management Planning Act (see Regulatory and Policy Setting discussion below), LADWP maintains an Urban Water Management Plan (UWMP) (the LA-UWMP) which includes estimates of past, current, and projected potable and recycled water use, identifies conservation and reclamation measures currently in place, describes alternative conservation measures, and provides an urban water shortage contingency plan.

LADWP also encourages water conservation through multiple measures, including a tiered pricing system, weather sensitive irrigation controllers, low flow toilets and water saving showerheads, as well as a rebate program encouraging residential customers to purchase high efficiency clothes washers. Moreover, there are a number of City ordinances in place mandating water conservation (*e.g.*, requiring the installation of low-flow showerheads and toilets for all properties; requiring water-efficient landscaping for all new construction; prohibiting hose washing of paved surfaces; imposing watering restrictions on turf that exceeds three acres).[2]

As a result of LADWP's multiple supply sources and continued water management planning, the LA-UWMP concluded that LADWP will have adequate water supplies to serve City needs through the year 2030, during normal, single-dry, and multiple-dry years, taking into account projected population growth and various established and expected land uses based on current zoning. The LA-UWMP indicates that LADWP is planning for future population growth in its service area, similar to the manner in which the City's General Plan forecasts population growth in planning for future growth and development throughout the City. Both the General Plan and the LA-UWMP's growth projections are based on population forecasts provided by the Southern California Association of Governments (SCAG).

The amount of water that MWD will be able to supply to Southern California in the near future is uncertain given the recent federal court decision case *Natural Resources Defense Council, et al. vs. Kempthorne, et al.* (*NRDC*). In Spring 2007, various environmental groups sought to halt the operation of water pumps in the Sacramento-San Joaquin River Delta (the Delta) to protect the Delta smelt and other endangered fish species living in the Delta. In May 2007, a federal court invalidated the Biological Opinion issued by the U.S. Fish & Wildlife Service, which had held that the Delta smelt were in "no jeopardy" from operational changes of the State Water Project in the Delta. On May 31, 2007, the California Department of Water Resources (DWR) voluntarily shut down the State Water Project's pumps for 17 days in an effort to protect the Delta smelt. In an August 2007 oral decision, the same federal court agreed to institute interim protective measures that restrict water operations in the Delta, including reducing the amount of water being pumped out of the Delta between the end of December and June. In December 2007, the federal court issued an interim remedial order, requiring the U.S. Fish & Wildlife Service to revise its Biological Opinion by September 15, 2008 and conditioning Delta operations on various requirements. LADWP estimates that MWD may receive 20 to 30 percent less water

[2] Chapter XII (The Water Conservation Plan of the City of Los Angeles). Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

from the State Water Project as a result of this interim remedial order. However, this remedial order sunsets in September 2008, at which time a new Biological Opinion will govern operations of the Delta. At this time, it is not known how the future Biological Opinion will impact MWD's ability to supply water to Southern California. The federal court's written decision will likely not be issued until November 2007 and permanent measures are expected to be implemented in August 2008, therefore, the full extent of NRDC's impact on MWD's ability to supply water to Southern California is still uncertain. LADWP indicates that MWD obtains approximately 1.2 million AF of water from the State Water Project. With this recent oral decision by the federal court, the amount of water MWD receives from the State Water Project is anticipated to be decreased by approximately 15 to 30 percent.

At present, both the California state government and MWD are evaluating Delta operations and options to address Delta smelt impacts and other environmental concerns. The Governor's Delta Vision Process and the Bay-Delta Conservation Plan are both focused on finding and implementing long-term solutions for the Delta. MWD is also actively engaged in improving Delta water operations. In May 2007, MWD's Board adopted a Delta Action Plan as a framework to address water supply risks in the Delta both for the near- and long-term. The near- and mid-term actions outlined in the Delta Action Plan are intended to implement measures to reduce fishery and earth-quake related risks, such as aggressive monitoring, ecosystem restoration, local water supply projects, and emergency preparedness and response plans.

In response to recent developments in the Delta, MWD is also engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies. In the near-term, MWD will continue to rely on the plans and policies outlined in its Regional Urban Water Management Plan (RUWMP) and Integrated Water Resources Plan to address water supply shortages and interruptions (including potential shut downs of State Water Project pumps) to meet water demands. Campaigns for voluntary conservation, curtailment of replenishment water and agricultural water delivery are some of the actions outlined in the RUWMP. If necessary, reduction in municipal and industrial water use and mandatory water allocation could be implemented.

(2) Groundwater

Existing groundwater conditions in the project area are described in Section E.2: Water Resources: Hydrology and Water Quality. Local groundwater encountered in the immediate project site vicinity is not used as a water supply source.

b. Regulatory and Policy Setting

(1) California Urban Water Management Planning Act

The Urban Water Management Planning Act (Water Code § 10610 et. seq.) (the UWMP Act), requires all urban water purveyors of a certain size to prepare Urban Water Management Plans (UWMPs) that evaluate the purveyor's water supplies and demands for a 20-year period (Water Code Section 10620). Among other requirements, the UWMP Act requires purveyors to identify existing water supplies and demands; project future supplies and demands for the next 20 years;

assess such supplies and demands during dry years; describe all water supply projects and programs that may be undertaken by the purveyor, and formulate a water shortage contingency plan (Water Code Section 10631). The UWMP Act requires that UWMPs be updated every five years. UWMPs provide valuable information that can be used in the land use planning process and enable cities to gauge the availability of water supplies to support development projects within their boundaries.

In 1995, the California legislature passed and Governor Wilson signed into law Senate Bill (SB) 901 (Costa) which is codified as Part 2.10 (§ 10910 et seq.) of the California Water Code. This statute provides that environmental impact reports for certain development projects must meet address the availability of water for a project.

Additional legislation was enacted as of January 2002 that placed further requirements upon water purveyors. SB 610 (Costa) amended Part 2.10 of the Water Code regarding water supply availability. These amendments require generally that retail water providers demonstrate that sufficient and reliable sources are available in order for local agencies to evaluate large-scale developments and complete the environmental review process. SB 221 (Kuehl) amended the Subdivision Map Act, requiring that a public water system must provide written verification of sufficient water supply prior to approval of a new subdivision of property of more than 500 dwelling units prior to approval of a tentative or parcel map.[3]

In particular, SB 610 requires cities and counties to request specific information regarding water supplies from the public water systems that would serve any project that is subject to CEQA and is defined as a "project" in Water Code Section 10912, and to include this information in environmental review documents prepared pursuant to CEQA.[4] Projects meeting the following criteria must prepare a Water Supply Assessment:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed hotel or motel, or both, having more than 500 rooms;
- A proposed industrial, manufacturing, or processing plant, or industrial park 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;

[3] The Proposed Project does not include any residential dwelling units, and no approvals of a tentative tract map or parcel map are required. Accordingly, SB 221 does not apply to the Project.
[4] The Proposed Project does not fall within the purview of SB 610 because the Project involves a 280,000 square foot expansion of an existing shopping mall and would not generate an additional 1,000 full-time employees. The proposed expansion Project would need to be 500,000 square feet or more or employ more than 1,000 persons in order to fall within the California Water Code's definition of "project." Cal. Water Code § 10912(a)(2).

- A mixed-use project that includes one or more of the projects specified above; or

- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

(2) City of Los Angeles Urban Water Management Plan

The UWMPA (see discussion above) requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 AFY of water to prepare, and update every 5 years, an UWMP. Complying with that statute, LADWP's UWMP (the LA-UWMP) includes estimates of past, current, and projected potable and recycled water use, identifies conservation and reclamation measures currently in place, describes alternative conservation measures, and provides an urban water shortage contingency plan. LADWP updates its Urban Water Management Plan (LA-UWMP) every five years to account for changing conditions. This LA-UWMP projects water supply and distribution needs based on anticipated growth in population, housing, and employment and identifies water supply strategies to meet this demand. LADWP currently expects to have adequate water supplies for all anticipated development in the City. The LA-UWMP is available at http://www.ladwp.com/ladwp/cms/ladwp007157.pdf, or by contacting the Department of City Planning at Planning@lacity.org.

LADWP also addresses climate change in the LA-UWMP. LADWP is currently conducting studies and monitoring research on the potential impacts of climate change on its water supply. However, LADWP has concluded that, at present, there is still general uncertainty within the scientific community regarding the potential impacts of global warming on the City's water supply. Similarly, the California Department of Water resources has concluded that many uncertainties remain regarding the expected degree of climate change on water supplies.[5] Because of this uncertainty, the City has determined that the potential impact of climate change on water supply is too speculative to conduct a quantitative evaluation of climate change impacts. Therefore, pursuant to CEQA Guideline Section 15145, this EIR does not, and is not required to provide further discussion of impacts related to water supply in the context of climate change.

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section and used to determine the proposed project environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006).

[5] Roos, Maurice. 2005 (December).. *Accounting for Climate Change*, California Water Plan Update 2005, Volume 4. California Department of Water Resources. 2005. 6 June 2008 <http://www.waterplan.water.ca.gov/docs/cwpu2005/vol4/vol4-globalclimate-accountingforclimatechange.pdf >.

Water Supply

The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Groundwater Level

A project would normally have a significant impact on groundwater level if it would:

- Change potable water levels sufficiently to:
  - Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or to respond to emergencies and drought;
  - Reduce yields of adjacent wells or well fields (public or private); or
  - Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction of groundwater recharge capacity.

In addition, the following criteria, taken from the Initial Study checklist in Appendix G of the State CEQA Guidelines, were used to determine the significance of potential impacts related to water services. A project typically would result in a significant impact to water services if it would either:

1. Not have sufficient water supplies available to serve the project from existing entitlements and resources, and would require new and expanded entitlements; or
2. Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project includes expansion of the shopping center with the addition of approximately 280,000 gross leasable square feet (GLSF) of retail and restaurant uses and associated parking facilities. Employment related uses of the Proposed Project will add approximately 788 new employees.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

The Proposed Project will incorporate a series of measures that will reduce water consumption and resulting waste water. These include implementation of "smart irrigation" systems that are customized to accommodate specific plant area and control water based on information from weather forecasts. Compliance with the City Xeroscape requirements to reduce water demand. The project will also include water conservation through installation of efficient plumbing fixtures including low flow and dual flush toilets, waterless urinals, and on touch faucets with short "on" cycles and efficiency aerators.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- Title 20 and Title 24 of the California Code of Regulations establish various conservation standards, including standard that relate to water conservation and the protection of water resources. The Proposed Project will be consistent with State requirements for water conservation standards.

b. Project Impacts

Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the NOP and IS process to have a potential significant environmental effect. Issues related to Water Supply that were determined to be less than significant, and are not addressed further, include: groundwater as a water supply and water treatment facilities. An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant.

(1) Water Supply

(a) Water Demand

A project would have a significant environmental impact if sufficient water supplies were not available to serve the project from existing entitlements and resources, or if new or expanded entitlements were needed.

According to the LA-UWMP, water demand City-wide in 2005 was approximately 661,000 acre-feet per year.[5] The proposed City-wide supply for 2012 is expected to be approximately 683,000 acre feet annually. The Proposed Project will result in approximately 1,544,015 gross square feet including approximately 1,075,223 GLSF of retail, approximately 28,000 GLSF of sit-down restaurants, and approximately 43,777 GLSF the Gourmet Dining Terrace. The existing shopping center's water demand is approximately 100,860 gpd of water.[6] The total Proposed Project will result in the use of approximately 160,655 gpd of water, an increase of approximately 59,795 gpd of water use[7], assuming the same water usage factors for the Proposed Project. In addition, while the Proposed Project also will use water to control fugitive dust during construction, that amount is negligible.

The increase in water demand from the Proposed Project of approximately 0.18 acre-feet daily would result in an increased water demand of approximately 65.7 AFY (assuming a worst case scenario of operation 365 days annually)[8]. Based on LADWP's projected City-wide water demand, the City's total water needs were approximately 661,000 acre-feet in 2005. This demand will increase to 683,000 AFY in 2010 and to 776,000 AFY in 2030. The LA-UWMP concludes that LADWP will be able to meet the increasing demand through 2030 to accommodate anticipated growth.

Further, the projected water demands in the LA-UWMP already take into account existing and projected land uses, including expansion of commercial uses such as the Proposed Project, which would be accommodated by the LADWP through the year 2030, as set forth in the LA-UWMP.[9] The project site currently is designated under the General Plan and Community Plan as "Community Commercial". Implementation of the Proposed Project would not cause the Community Plan area to exceed the projected growth in population, housing, or employment for the year of Project occupancy or buildout.[10] Moreover, the LA-UWMP states that it will have sufficient water supplies to serve approximately 126,000 AFY to commercial uses by 2012 and 140,000 AFY to expanded commercial uses by the year 2030. Since the projected water supply is based on the growth projections of the City's General Plan which are used in the LA-UWMP and the Proposed Project is consistent with the General Plan and Community Plan designation, the Proposed Project will fit within the water demand projections.

---

[5] Los Angeles Department of Water and Power. 2005. *2005 Urban Water Management Plan*. 19 May 2008 <http://www.ladwp.com/ladwp/cms/ladwp007157.pdf>.

[6] Assumes approximately 110% of wastewater generation. Based on the City of Los Angeles Wastewater Program Management, Sewer Facilities Charge Guide and Generation Rates, August 1988. This Guide provides the following generation rates for the Project: 100 gpd per 1,000 square feet of retail/shopping center space, 300 gpd per 1,000 square feet of take-out restaurant space, 50 gpd per seat of fixed seat restaurant space. Assumes approximately a worst-case scenario of 35 square feet per seat.

[7] Assumes approximately 110% of wastewater generation. Based on the City of Los Angeles Wastewater Program Management, Sewer Facilities Charge Guide and Generation Rates, August, 1988. This Guide provides the following generation rates for the Project: 100 gpd per 1,000 square feet of retail/shopping center space, 300 gpd per 1,000 square feet of take-out restaurant space, 50 gpd per seat of fixed seat restaurant space. Assumes approximately a worst-case scenario of 35 square feet per seat. Assumes one half of the total gross leasable square footage for sit-down restaurants to exclude foyers, waiting areas, hallways, and storage areas.

[8] Because construction sequencing does not result in incremental operational expansion of the center and construction water demand will be less than operational water demand, a construction water demand analysis was not performed.

[9] Exhibit 6C. Los Angeles Department of Water and Power. 2005. *2005 Urban Water Management Plan*. 19 May 2008 <http://www.ladwp.com/ladwp/cms/ladwp007157.pdf>.

[10] Section M.1.C. Los Angeles, City of. 2006 (May). *L.A. CEQA Thresholds Guide*. Los Angeles, CA: Author. 6 June 2008 <http://www.lacity.org/ead/EADWeb-AQD/thresholdsguide.htm>.

Finally, the LA-UWMP analyzes water supply during both normal and dry years and concludes LADWP will have sufficient water supplies to serve the water needs of its service area, which would include the project site, during normal and drought conditions. The Proposed Project would not cause an increase in water usage beyond the projections in the LA- UWMP.

Because the LA-UWMP anticipates potential development in the project area and demonstrates that sufficient water supplies are available, the Proposed Project will result in a less than significant impact to water supply. No mitigation measures are required.

Water Supply Assessment - As discussed above, SB 610 requires specific information regarding water supplies for projects meeting the criteria defined in Water Code Section 10912. Projects meeting the criteria must prepare a Water Supply Assessment (WSA) and provide such information as part of the CEQA process. Relevant to the Proposed Project, a WSA would be required if the proposed shopping center would employ more than 1,000 persons or have more than 500,000 square feet of floor space. The Proposed Project would result in the net addition of approximately 280,000 GLSF of commercial floor area and approximately 790 new employees. Because the Proposed Project will not exceed the above criteria, a WSA is not required.

(b) Water Delivery

A project would have a significant environmental impact if the project would require or result in the construction of new water treatment facilities or expansion of existing facilities, or expansion of the existing distribution system.

The existing shopping center relies on existing LADWP water delivery facilities. The Proposed Project will use the existing water delivery infrastructure that adequately serves the project area. Accordingly, no new water delivery facilities would be required as a result of the Proposed Project. No significant impacts to the environment would result, and no mitigation measures are required.

(2) Consistency with Applicable Plans and Policies

Consistency with applicable plans and policies, including land use and design policies which indirectly address water resources and supply, is discussed in detail in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this EIR.

(3) Cumulative Impacts

With respect to potential cumulative impacts to water provision, the identified related projects (Section III: General Description of the Environmental Setting: B-Related Projects) could result in an increase in water demand of approximately 184,000 gpd which, based on a most-conservative estimate of a seven-day-a-week operation, could result in approximately 206 AFY of additional water demand. According to the LA-UWMP, water demand City-wide in 2005 was

approximately 661,000 AFY.[11] The proposed City-wide demand for 2010 is expected to be approximately 683,000 AFY and 776,000 AFY in 2030, and the LA-UWMP concludes that LADWP will have sufficient supply to meet anticipated demand through the year 2030. Moreover, as the anticipated related projects are already planned for in the City's General Plan and the LA-UWMP, these related projects' additional demand of 206 AFY will result in a less than significant impact. Consequently, the Proposed Project will result in a less than significant cumulative impact to water supply and infrastructure, and as such, no mitigation measures are required.

4. MITIGATION PROGRAM

No mitigation measures are required. Compliance with Title 20 (Public Utilities and Energy) and Title 24 (Building Standards Code) of the California Code of Regulations is already a required standard condition under applicable regulations and will ensure that the Proposed Project incorporates standard water conservation practices.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

The Proposed Project will not result in significant impacts to water supply or water delivery infrastructure. No mitigation measures are required as impacts related to water supply are already less than significant.

[11] Los Angeles Department of Water and Power. 2005. *2005 Urban Water Management Plan*. 19 May 2008 <http://www.ladwp.com/ladwp/cms/ladwp007157.pdf>.

IV. ENVIRONMENTAL IMPACT ANALYSIS

F. LAND USE, PLANNING AND URBAN DECAY

The following analysis of land use impacts considers a range of land use issues, including the compatibility of the Proposed Project with surrounding land uses, the nature of the entitlements requested, and consistency with applicable plans and policy documents. The land use analysis is based upon a range of local and regional planning documents and the *Analysis of Potential "Urban Decay" as a Consequence of the Proposed Expansion of the Westfield Fashion Square Shopping Center*, prepared by HR&A Advisors, Inc. and dated March 2008 (see Appendix H: Urban Decay Study of this DEIR. The local and regional plans evaluated in this analysis are available on-line at the noted agency websites. Relevant portions of those plans, including applicable goals, objectives and policies, have been summarized below for the consistency analysis.

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Existing On-Site Land Uses

The 28.8-acre project site, located at 14006 Riverside Drive in Sherman Oaks, is currently developed with the existing Fashion Square shopping center, which is comprised of approximately 867,000 gross leasable square feet (GLSF) of retail shops and restaurants, and parking uses within multi-level parking structures and surface lots. The main mall building is a two-story structure anchored by two three-story department stores (Bloomingdale's and Macy's). Three parking structure buildings, ranging between two- and four-levels above grade, are located to the south and east of the mall structures. Building heights range between 49 to 76 feet (as defined by Building and Safety) at their tallest elevations.

The project site has been developed with the existing shopping center since the early 1960s. Two renovations, including one which added 41,000 GLSF to the original 826,000 GLSF development, were completed in the 1990's.

(2) Local Context and Surrounding Land Uses

The project site is located within the Sherman Oaks community of the City of Los Angeles, approximately 13 miles northwest of downtown Los Angeles and 12 miles northeast of the Pacific Ocean. The project area is characterized as urbanized and largely built out with a mix of commercial and residential uses.

The project site is currently surrounded by developed properties on all sides, as shown in *Figure 35: Existing Surrounding Land Uses*. Land uses in the surrounding area are summarized as follows:

FIGURE 35
EXISTING SURROUNDING LAND USES

MAP SOURCE: WESTFIELD

North (immediate north, across Riverside Drive) - Land uses to the north, across Riverside Drive, include multi- and single-family residential properties, offices and a high-rise (Downey Savings) bank building.

Northeast (at intersection of Riverside Drive at Woodman Avenue) – Land uses include retail uses on the 3.0-acre NAP parcel, also known as the Riverside Woodman Shopping Center (including Linens n' Things, Ross for Less, KB Toys, and Bank of America). The Notre Dame High School is located on the northeast corner of the intersection of Riverside Drive and Woodman Avenue. The High School periodically shares parking on the shopping center's surface parking lot along Woodman Avenue; the details of the shared parking arrangements are described in Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access. Other retail and office uses are located at this intersection.

East (immediate east, across Woodman Avenue) - Land uses include commercial and office along Woodman Avenue.

South (adjacent to property site boundary) - The project site is bordered by the Ventura (Highway 101) Freeway along its entire southern edge. Mixed intensity residential uses are located further south, on the opposite site of the freeway. The Los Angeles River, running parallel to the project site, is also located just south of the freeway

West (immediate west, across Hazeltine Avenue) - Land uses include offices, including the Sunkist building.

Northwest (at intersection of Riverside Drive and Hazeltine Avenue) – Land uses include a mix of retail and office, and the City of Los Angeles Department of Water and Power office.

b. Regulatory and Policy Setting

(1) Local Plans and Regulations

Several local plans and regulatory documents guide development of the project site. The Van Nuys-North Sherman Oaks Community Plan (Community Plan), a component of the City of Los Angeles General Plan (General Plan), is the primary planning document for the project site area. The Community Plan implements city-wide land use policy standards of the General Plan, as well as establishes specific policies to address the unique character of the Van Nuys-North Sherman Oaks community. The LAMC governs land use through building standards and development restrictions determined by the underlying property zoning. Recently (May 2007), the project site also became subject to the Los Angeles River Revitalization Master Plan (LARRMP) and its pending implementation companion document the River Improvement Overlay (RIO)[1], which guides development throughout the Los Angeles River corridor. These plans and regulatory documents are described below.

[1] The River Improvement Overlay (RIO) will be the implementation component of the Los Angeles River Revitalization Master Plan. The RIO is anticipated to be adopted by the Los Angeles City Council in late 2008. The discussion in this EIR references an in-progress draft of the RIO, dated April 2008.

(a) City of Los Angeles General Plan and Van Nuys-North Sherman Oaks Community Plan

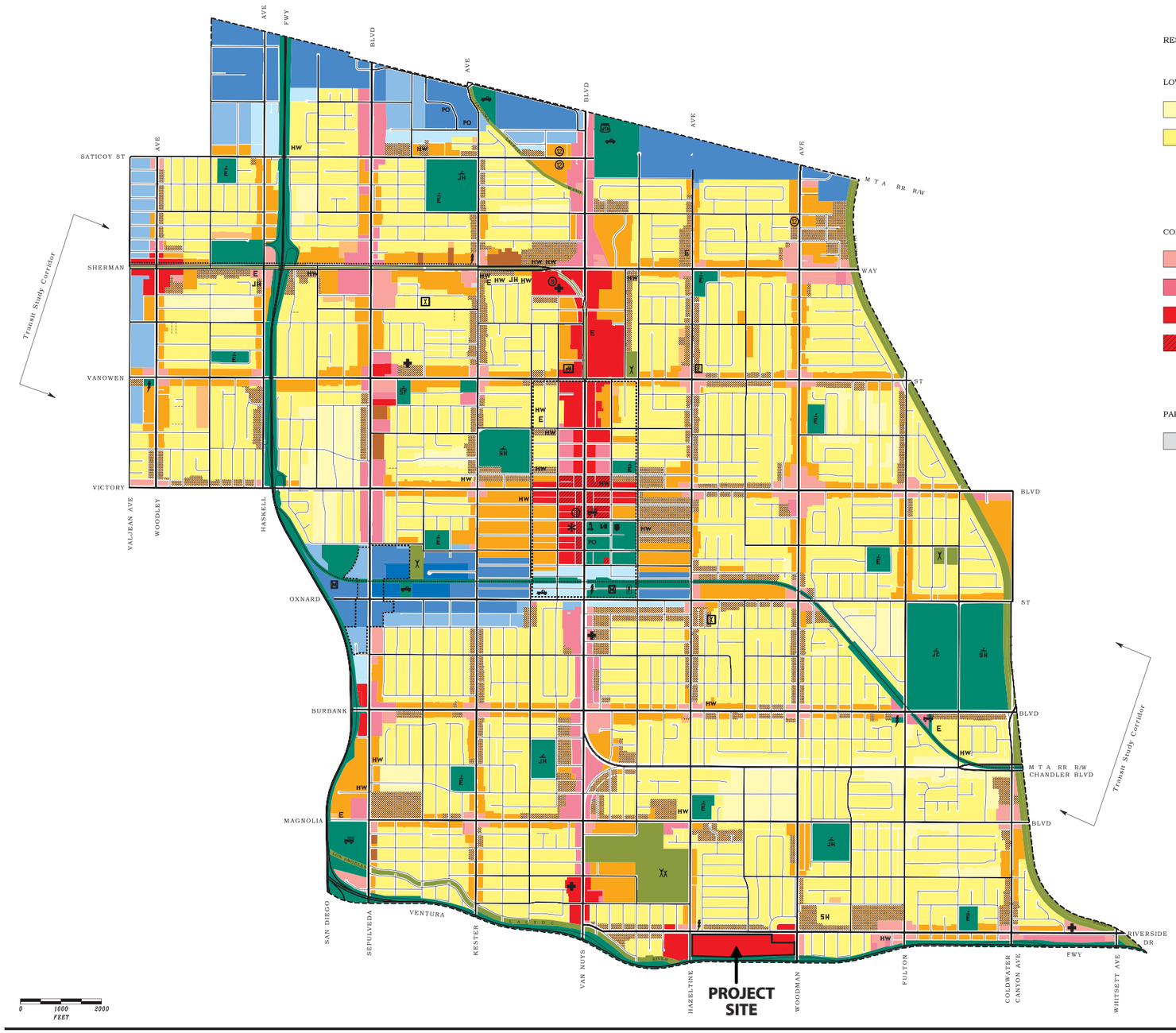
The primary land use plan for this area is the City of Los Angeles General Plan. The General Plan of the City of Los Angeles is a policy document originally adopted in 1974 that serves as a comprehensive strategy for long-term growth and development in the City. The General Plan responds to State and federal mandates to plan for the future. The City of Los Angeles used population forecasts provided by the Southern California Association of Governments (SCAG) for developing the General Plan to ensure consistency with other regional programs.

California State law (Government Code Section 65300) requires that each city prepare and adopt a comprehensive, long-term general plan for its future development. This plan is mandated to include seven elements, including land use, circulation, housing, conservation, open space, noise and safety. In addition to these, State law permits cities to include optional elements in their general plans, thereby providing local governments with the flexibility to address the specific needs and unique character of their jurisdictions. The Los Angeles General Plan is comprised of eleven elements, including the seven mandated elements and four optional elements, include those for Air Quality and Service System. In addition, the General Plan is comprised of 35 local area plans, known as Community Plans, as well as plans for the Los Angeles World Airport and the Port of Los Angeles.

The General Plan was updated and refined through adoption of the General Plan Framework Element in 1995, and re-adopted in August 2001. The Framework Element sets forth a citywide comprehensive long-range growth strategy. It defines citywide policies that will be implemented through subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. In many respects, the Framework Element is an evolution of the original General Plan, often referred to as the Centers Concept, which was adopted in 1974 and is now superseded by the Framework. However, specific land use designations are determined by the community plans and the Framework does not supersede the more detailed community and specific plans, some of which were established prior to the Framework.

The Van Nuys-North Sherman Oaks Community Plan, adopted in 1998 and last updated May 16, 2007, is the guiding community plan for the project site and surrounding area. The Community Plan identifies goals, objectives and policies related to the different land uses within the planning area. Development on the project site is subject to the Community Plan. The intent of the Community Plan is to promote an arrangement of land uses, circulation, and services that will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live in the community. Major issues addressed in the Community Plan include preservation and protection of single-family neighborhoods and residential properties, enhancement of street frontages and community space through quality urban design, and retention and advancement of economic stability.

According to the Van Nuys-North Sherman Oaks Community Plan, the project site is currently designated as Community Commercial (see *Figure 36: Existing Community Plan Designations*). The existing shopping center at the project site is consistent with this land use designation, as it



LAND USE

RESIDENTIAL [1]

		CORRESPONDING ZONES [11]
LOW DENSITY	VERY LOW	RE20,RA,RE15, RE11
	LOW	RE9,RS,R1,RU, RD6,RD5
MULTIPLE FAMILY	LOW MEDIUM I	R2,RD6 [5],RD3,RD4 RZ3,RZ4,RU,RW1
	LOW MEDIUM II	RD1.5,RD2,RW2, RZ2.2
	MEDIUM	R3
	HIGH MEDIUM	R4

COMMERCIAL

	NEIGHBORHOOD COMMERCIAL [2]	C1,C1.5,C2,C4, RAS3,RAS4
	GENERAL COMMERCIAL [2]	C1.5,C2,C4, RAS3,RAS4
	COMMUNITY COMMERCIAL [3]	CR,C2,C4, RAS3,RAS4
	REGIONAL COMMERCIAL	CR,C1.5,C2,C4,R3 R4,R5,RAS3,RAS4

INDUSTRIAL

COMMERCIAL MANUFACTURING	CM
LIMITED INDUSTRIAL	CM,MR1,M1
LIGHT INDUSTRIAL	MR2,M2
HEAVY INDUSTRIAL	M3

PARKING

PARKING	P,PB

OPEN SPACE, PUBLIC FACILITIES

OPEN SPACE	OS,A1
PUBLIC FACILITIES [13]	PF

CIRCULATION

- Freeway [7]
- Divided Major Highway II
- Divided Scenic Major Highway II
- Major Highway II
- Secondary Highway
- Collector Street [7]
- Local Street
- MTA RR R/W

SPECIAL BOUNDARY

- Commercial Core Special Study Area

ADMINISTRATIVE BOUNDARY

- Community Boundary

NOTES:
- Proposed [6]

SERVICE SYSTEMS [6]

SCHOOL SITES
- Elementary School
- Private Elem School
- Junior High School
- Private Junior H S
- Senior High School
- Private Senior H S
- Community College
- Special Facility

RECREATIONAL SITES
- Neighborhood Park
- Community Park

OTHER FACILITIES
- Police
- Fire Station
- Community Library
- Health Center
- Post Office
- Maintenance Yard
- House Of Worship
- MTA Station
- MTA Metrolink Station
- Branch Administrative Center
- Power Receiving Station
- Power Distribution Station
- Cultural/Historical Site

FIGURE 36
EXISTING COMMUNITY PLAN DESIGNATIONS

MAP SOURCE: CITY OF LOS ANGELES, PLANNING DEPARTMENT

NORTH

provides commercial uses consistent with the permitted corresponding zoning (e.g., retail, restaurant, etc.). The Community Commercial designation is within Height District 1L, which permits structures up to six stories in height.

Surrounding properties are designated a mix of commercial, residential and public facility land uses through the Community Plan. Properties immediately to the west of the project site (across Hazeltine Avenue) and to the northeast (along the west frontage of Woodman Avenue at Riverside Drive) are designated Community Commercial with a 1L Height District. Properties immediately to the east (across Woodman Avenue) of the project site are designated Neighborhood Commercial. Properties immediately to the north of the project site (directly across Riverside Drive) are designated primarily Low Medium II (Multiple Family) Residential, and Low (Low Density) Residential. Properties to the northwest of the project site, north of Riverside Drive at the intersection of Hazeltine Avenue, are designated Neighborhood Commercial. Properties to the northeast of the project site, north of Riverside Drive and east of Woodman Avenue, are designated Low Medium II Residential and Senior High School. The residential land use designations are within Height District 1, which permits up to two stories. All Community Commercial land uses are assigned Height District 1L (up to six stories), while the Neighborhood Commercial is within Height District 1VL (up to three stories).

The Community Plan includes goals, objectives and policies (collectively referred to as policy statements) for each major land use category (residential, commercial, industrial and public/institutional) as well as policy statements addressing community based services (i.e., police, fire and parks) and infrastructure (i.e., transportation). The Community Plan also addresses urban design and includes design policies for individual projects and overall community design and landscaping guidelines.

Specific land use related policies that are applicable to the project are listed later in this section under the Consistency with Adopted Plans and Policies discussion. Identification of applicable policy statements and consistency discussions for urban design, community services and transportation are addressed in other topic-specific sections of this DEIR. Please refer to Sections IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, IV: Environmental Impact Analysis: H-Public Services: Fire and Police Protection, and IV: Environmental Impact Analysis: J-Traffic, Circulation and Access, respectively, this DEIR.

(b) Los Angeles Municipal Code (LAMC)

The project site is currently zoned (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L (see *Figure 37: Existing Zoning*). All of the existing zones tied to the project site are permitted under the existing Community Commercial General Plan designation, which permits a range of commercial and related zones including CR, C1.5, C2, C4, P, and PB.

The C2 zone permits a wide range of commercial retail uses to address community needs. In the C2 zone, uses may include small and large-scale retail, business/consumer services, offices, restaurants, certain automotive services and sales, churches, schools and theaters/auditoriums.

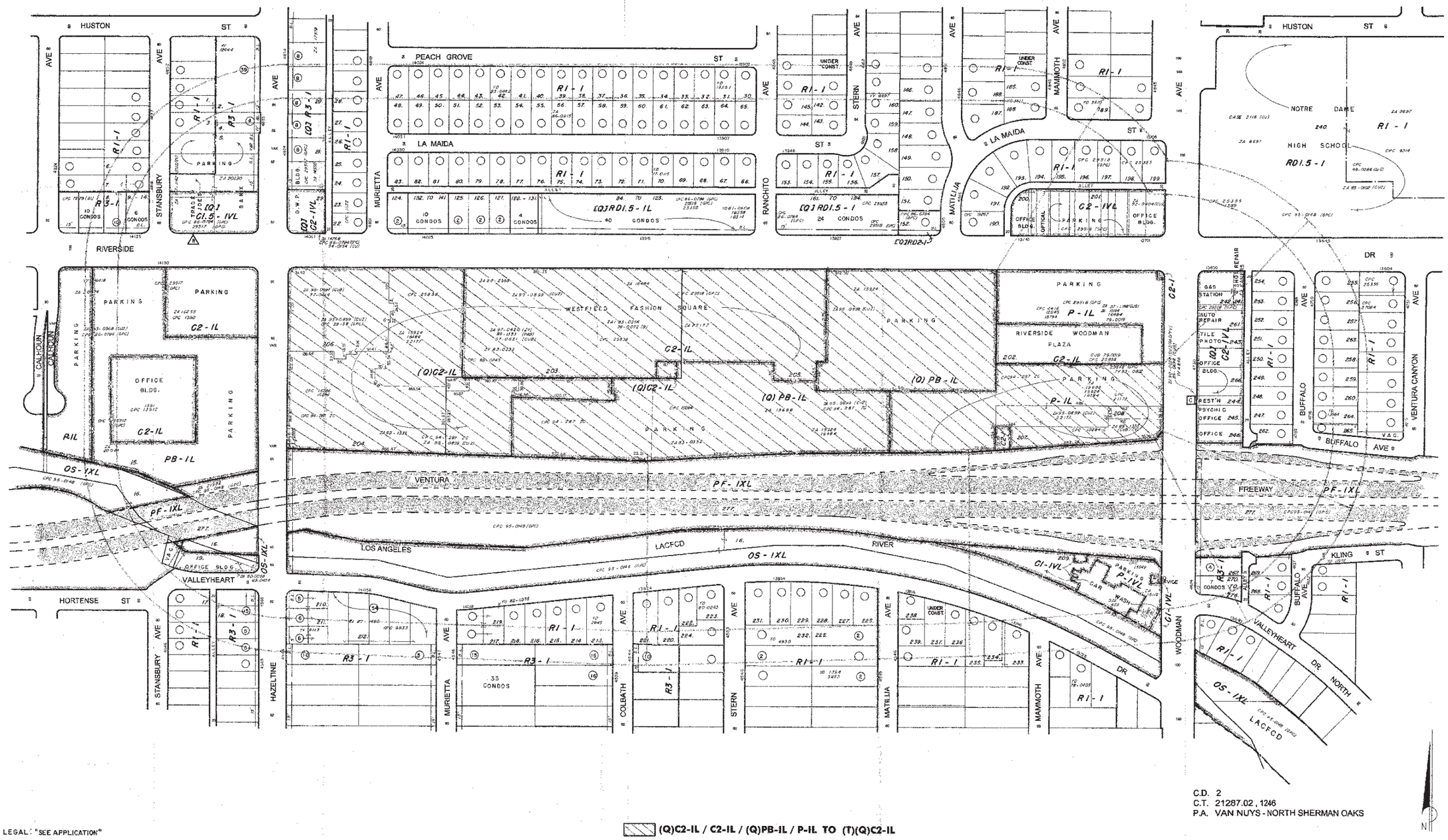


FIGURE 37
EXISTING ZONING

MAP SOURCE: PLANNING ASSOCIATES, INC.

P is an automobile parking zone that provides for public/private parking within surface and/or subterranean lot areas. PB is a parking building zone that permits public/private parking within above-grade parking structures (subject to Height District 1 limitations), as well as surface and below-grade parking. Under current City zoning regulations, a "P" or a "PB" zone is no longer necessary to develop and operate parking structures associated with adjacent commercial uses in a C2 zone.

Height District No. 1 (designated by "-1" following the land use code), typically limits building heights to two stories. However, as with the project site, portions of Height District No. 1 may be designated as Limited Height District (designated by an "L") which allows that no building or structure shall exceed six stories, nor shall it exceed 75 feet in height.

The bracketed "Q" (Q) preceding a zone indicates that use of a property for that zone is subject to qualified conditions, which are typically set forth in the conditions of approval for a development and/or an associated Conditional Use Permit. The (T) classification, also preceding the zone, indicates that the classification is tentative pending a demonstration of full compliance of conditions and development of the requested development pursuant to the zone. Specific conditions tied to the property through the previous approved zone change are provided in Appendix L: Zoning (Q) Conditions.

(c) Special Plans

LA River Revitalization Master Plan

For more than two decades, community activists have sought to formalize plans to revitalize the Los Angeles River. Such plans have been recently coordinated and developed by several agencies with oversight of the River, including the County of Los Angeles and the City of Los Angeles.

In May 2007, the City of Los Angeles recently adopted the Los Angeles River Revitalization Master Plan (LARRMP), which targets the redevelopment and revitalization of a 32-mile segment of the Los Angeles River and the land uses that surround it. The Los Angeles River presents opportunities to revitalize neighborhoods, to invest in communities, to bring nature to people, and to enhance the quality of life for people and properties proximate to the River. Through implementation of the LARRMP, the City envisions a renewed Los Angeles River with a continuous greenway of interconnected parks and amenities connecting communities along the River.

The LARRMP establishes the creation of the River Improvement Overlay (RIO), as shown in *Figure 38: Boundaries of the Los Angeles River Improvement Overlay District*, as the implementing mechanism. The RIO, which is in draft form (April 2008), defines the RIO District and will become a new Special Use District identified as Section 13.12 of the LAMC.[2] Hearings for the RIO were initiated in late 2007, however (as of August 2008) the RIO has not yet been adopted.

[2] Los Angeles, City of. 2008. *Draft Los Angeles River Improvement Overlay (RIO).* 25 August 2008 < http://cityplanning.lacity.org/Code_Studies/RIOproject/TOCRIO.pdf >.

FIGURE 38
BOUNDARIES OF THE LOS ANGELES RIVER IMPROVEMENT OVERLAY DISTRICT
MAP SOURCE: RIVER IMPROVEMENT OVERLAY, DRAFT 2007

The RIO extends from Topanga Canyon Boulevard, located just west of the headwaters of the Los Angeles River, westerly and then southerly to the point at which it flows out of the City of Los Angeles at 26th Street in the Boyle Heights area. The RIO is applicable to an area adjacent to the River corridor that is roughly defined as between one block to a one-half mile on either side of the River. The Los Angeles River parallels the Ventura Freeway immediately south of the project site and then traverses to the north side of the freeway westerly of Hazeltine Avenue and the project site, as well as surrounding properties, are included within the new RIO District.

It is the goal of the RIO to: (1) Promote sustainability of the Los Angeles River, the Greenway, the City of Los Angeles and the Region; (2) Establish a positive interface between Greenway adjacent property and the River Greenway; and (3) Create active pedestrian streets leading to the River. It is the intent of the LARRMP and RIO that the Los Angeles River Greenway becomes a public thoroughfare that seeks to promote increased levels of activity coupled with an increased awareness of the relationship between the urban lifestyle and the natural environment. Properties that are proximate to the Greenway have the unique opportunity to interface with the River and establish an orientation to both the street frontages and the Greenway.

The street network within the RIO plays an important role in enhancing and supporting pedestrian, bicycle and vehicular mobility as a means of extending the City to the Greenway and vice versa. The RIO recognizes this role through the designation of "green streets" that link areas of the RIO District to the River Greenway.

The RIO establishes requirements for private property and publicly owned facilities to comply with design categories addressing watershed, urban design and mobility alternatives. A project's compliance is evaluated based on an established threshold of points. These requirements are presented in more detail in the impact analysis discussion of this section. The project site and surrounding properties are located within the East Valley Area of the RIO. The generalized land uses with in the proposed East Valley River Improvement Overlay is shown on *Figure 39: Proposed East Valley River Improvement Overlay District*.

(2) Regional Plans

While the local planning and regulatory documents identified above establish policy at a site-specific level, regional plans also establish operational guidelines for development to enhance quality of life and manage resources on a region-wide basis. Regional land use plans that address the project area include the Southern California Association of Governments' (SCAG), Regional Comprehensive Plan (RCP), the Los Angeles County Congestion Management Plan (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (MTA), and the Air Quality Management Plan (AQMP) administered by the South Coast Air Quality Management District (SCAQMD). These policy documents are described below.

(a) SCAG Regional Comprehensive Plan

The site is located within the planning area of the Southern California Association of Governments (SCAG), a joint powers agency with responsibilities pertaining to regional issues.

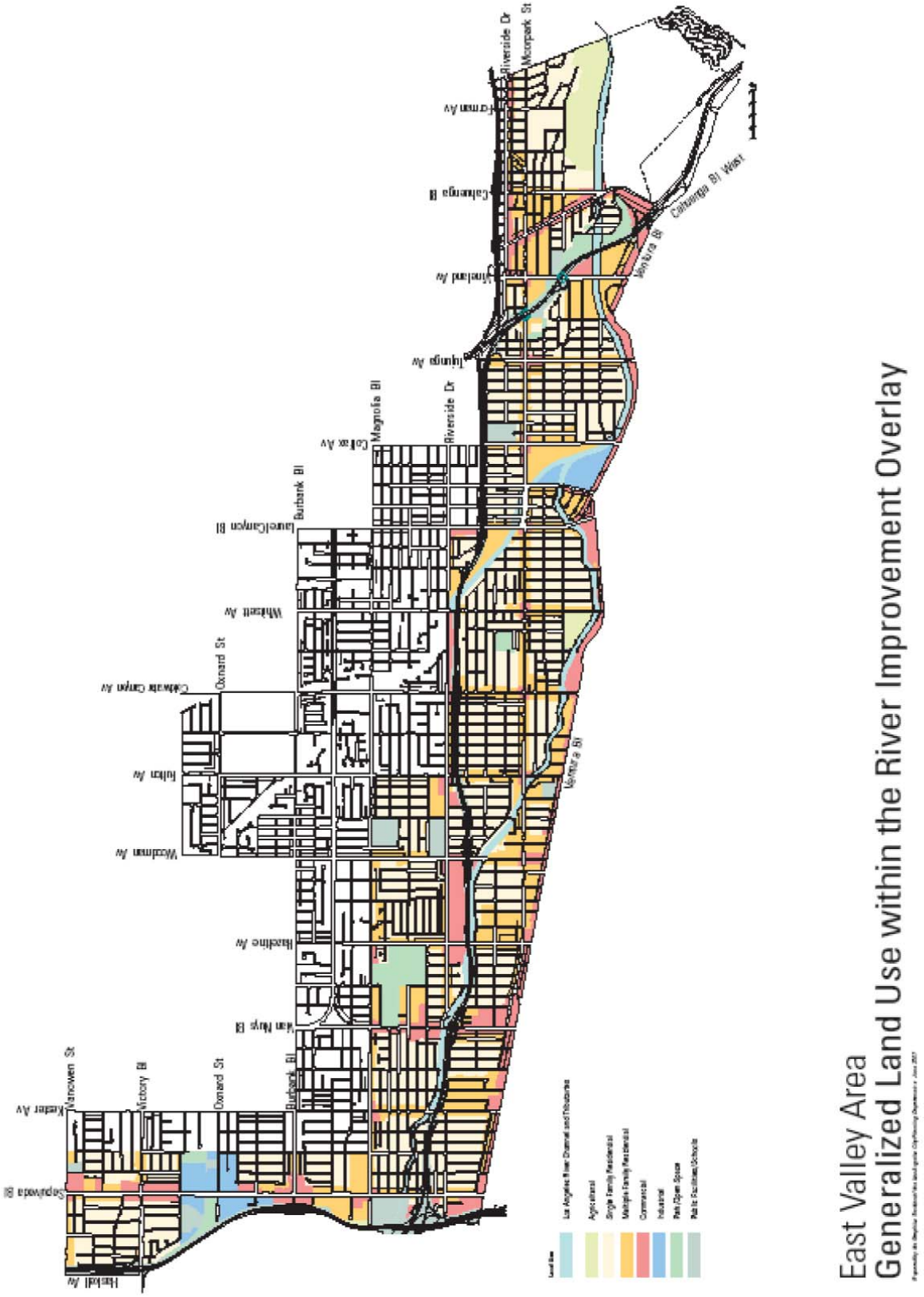


FIGURE 39
PROPOSED EAST VALLEY RIVER IMPROVEMENT OVERLAY DISTRICT
MAP SOURCE: RIVER IMPROVEMENT OVERLAY, DRAFT 2007

SCAG utilizes the Regional Comprehensive Plan and Guide (RCP) to address regional growth. The RCP is a policy document that sets broad goals for the Southern California region and identifies strategies for agencies at all levels of government to use as a decision-making guide with respect to significant issues and changes, including growth management, that are anticipated by the year 2015 and beyond. The RCP was adopted in 1996 and is currently undergoing an update process with a newly adopted RCP anticipated in 2008.

Adopted policies related to land use are contained primarily within the Growth Management chapter of the RCP. The primary goal of the Growth Management Chapter is to address issues related to growth and land consumption by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources and enhance the quality of life in the region.

In order to monitor implementation of the RCP, SCAG staff review EIRs of certain significant projects to determine consistency of such projects with applicable policies of the RCP and other related regional plans. Applicable land use related policies of the RCP that may be relevant to the Proposed Project are listed later in this section under the Consistency with Adopted Plans and Policies discussion.

(b) SCAQMD Air Quality Management Plan

The Air Quality Management Plan (AQMP) is the region's plan for improving air quality in the region and is prepared by the South Coast Air Quality Management District (SCAQMD) and the SCAG. The AQMP provides policies and control measures that reduce emissions to attain both state and federal ambient air quality standards by their applicable deadlines. Although primarily an air quality management document, the AQMP indirectly addresses land use issues as the proximate location, type and intensity of land uses has a direct relationship to the generation of air pollutant emissions. Because the AQMP is derived from growth expectations defined in the RCP, from a land use perspective, development is generally consistent with the AQMP if it is consistent with the regional growth forecasts and policy statements defined through the RCP. See also Section IV: Environmental Impact Analysis: B-Air Quality, of this DEIR for a more detailed discussion of the AQMP.

(c) MTA Congestion Management Plan

The Congestion Management Program (CMP) is a state-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990 to address the impact of local growth on the regional transportation system. The County of Los Angeles Metropolitan Transportation Authority (MTA) developed the 2004 Congestion Management Program for Los Angeles County (July, 2004). The primary purpose of the CMP is to establish procedures for assessing and determining the potential impacts on designated monitoring locations (both intersections and roadway segments) on the CMP highway system. Although primarily a traffic congestion management document, the CMP indirectly addresses land use issues as the proximate location, type and intensity of land uses has a direct relationship to the generation of vehicle trips and traffic congestion. Because the CMP is derived from growth expectations defined in the RCP, from a land use perspective, development is generally consistent with the

AQMP if it is consistent with the regional growth forecasts and policy statements defined through the RCP. See also Sections IV: Environmental Impact Analysis: B-Air Quality and IV: Environmental Impact Analysis: J-Traffic, Circulation and Access of this DEIR for a more detailed discussion of the CMP.

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section and used to determine the proposed project environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006).

The following factors are set forth in the LA CEQA Thresholds Guide for consideration, on a case-by-case basis, of the significance of potential environmental impacts:

Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and

- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;

- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and

- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

Urban Decay

The LA CEQA Thresholds Guide does not identify criteria for determining the potential significance for urban decay. The criteria below were developed for the purpose of the Urban Decay study (see Appendix H: Urban Decay Report), and are derived from the discussion in the State CEQA Guidelines Sections 15358, 15064 and 15382.

When a proposed development project is subject to CEQA, both direct and indirect (or "secondary") impacts of the project on the physical environment must be analyzed.[3] Economic and social impacts of a project, though they may be included in a CEQA document, are not to be

[3] Section 15358. California Governor's Office of Planning and Research (OPR). 2007 (as amended). *California Environmental Quality Act: Guidelines*. 1 May 2008 <http://ceres.ca.gov/ceqa/guidelines/>.

treated as "significant" impacts on the physical environment[4], as defined.[5] To the extent that there is a direct or indirect causal connection between a change in economic or social circumstances and a change in the physical environment, the economic or social change may be used to establish whether the physical change is "significant."[6]

With this statutory and interpretive guidance in mind, the courts have recognized that there is a potential for a proposed new retail development to trigger economic competition with existing retailers in the project's host community. If existing retailers are adversely affected by this competition, declines in sales could directly result in and/or lead to disinvestment, business closures, abandonment and other forms of physical deterioration that are indicative of "urban decay." If the severity of this change in physical circumstances is so substantial that it adversely affects appropriate use of the area or otherwise threatens the public health, safety or general welfare, this situation may cross a threshold that defines a "significant impact" under CEQA, such that mitigation capable of reducing the impact on that physical environment must be considered. Thus, for urban decay to be an issue within the meaning of CEQA, there must first be an adverse economic circumstance that is likely to be caused by a Proposed Project. If such an adverse effect is identified, then the severity of this economic impact must be evaluated for its potential to cause a significant change in the physical environment (i.e., "decay").

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project includes the addition of 280,000 GLSF of new area of retail and restaurant uses represented by approximately 108,000 GLSF of remaining unbuilt entitled uses (per a previous approval in 1995) and an approval for an additional 172,000 GLSF (new entitlement under the current request). The actual building area proposed will be larger than the total gross leasable area. Accounting for mechanical/electrical equipment rooms, emergency access, tenant storage space, corridors, and other City requirements, 280,000 GLSF is equivalent to approximately 426,556 net square feet or approximately 482,740 gross square feet. It should be noted that GLSF is used throughout this EIR to define the overall project entitlement and as a basis for certain analysis (i.e., traffic) as appropriate. Net and gross square feet values, another way to define the size of the Proposed Project, are used for throughout the EIR as appropriate as the basis for certain analysis that rely on this level of information. For purposes of this EIR, and in accordance with the definitions provided in Section II: Project Description; C-Project Background of this EIR, the values of 280,000 GLSF, 426,556 net square feet, an 482,740 gross square feet, are the equivalent representation of the Proposed Project.

Total new uses would include 240,000 GLSF (i.e., 355,227 gross SF) of new "in-line" retail space and 40,000 GLSF (i.e., 71,329 gross SF) of new restaurant space, in additional to approximately 1,235 new parking spaces to be contained in new parking structures.

[4] Sections 15064 and 15382. California Governor's Office of Planning and Research (OPR). 2007 (as amended). *California Environmental Quality Act: Guidelines*. 1 May 2008 <http://ceres.ca.gov/ceqa/guidelines/>.
[5] "A substantial or potentially substantial adverse change in the environment." (Public Resources Code § 21068). The focus on physical changes in the environment is further reinforced by §§ 21100 and 21151.
[6] See, in general, CEQA Guidelines §§ 15131(a) and (b), and their associated discussion section. California Governor's Office of Planning and Research (OPR). 2007 (as amended). *California Environmental Quality Act: Guidelines*. 1 May 2008 <http://ceres.ca.gov/ceqa/guidelines/>.

The Proposed Project involves a request for approval of the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Site Plan Review for the modification of two existing parking structures, reconfiguration of site driveways and internal circulation, construction of 280,000 GLSF retail space within a new two-level structure, and construction of a new six-level and a four-level parking structures.

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 280,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

- Conditional Use Permit for Commercial Corner[7] development and deviation from select development standard requirements including: (1) the 45-foot height limit to provide a building and parking structure with maximum height of 75 feet, which is no taller than the existing Macy's building, (2) allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight, (3) a requirement to provide a five foot landscaped area immediately adjacent to all street frontages; (4) the requirement to provide a minimum of fifty percent coverage with transparent windows along the first floor retail, and instead provide no glass along the Riverside Drive frontage; and (5) the restriction on tandem parking by providing tandem parking spaces in association with valet service.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction.

- Haul Route approval from the Building and Safety Commission for construction phase operations

[7] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Proposed Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site, the unified nature of the center, and for a worst case analysis of potential impacts for this DEIR, it will be assumed that the Proposed Project is subject to the Commercial Corner restrictions.

- Zone Variance to reduce on-site parking below code requirements during phase one of construction

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Proposed Project.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- The Proposed Project design seeks to promote a "high end" atmosphere, both through the type of tenants that will be located within the development and through the attention to architectural detail and landscape enhancements that promulgate a positive community ambience.

- The Proposed Project would incorporate architecture and landscape design features that will be sensitive and non-intrusive to the surrounding residential community.

- The Proposed Project design incorporates features targeted to effectuate an appropriate transition between large-scale commercial development and the nearby single-family residential neighborhoods.

- The Proposed Project design incorporates a substantial setback and building stepback (of the east parking structure) that ensures the project interfaces with residential uses would be compatible in scale by complying with required height limitations and incorporating building setbacks.

- The Proposed Project incorporates architectural building façade treatment and landscaping that would break up and minimize the scale of both new and existing commercial structures fronting Riverside Drive.

- The Proposed Project building development would enhance and bolster the existing land use buffer between the Ventura (US 101) Freeway and residential areas to the north. The shopping center development functions as a physical barrier from the freeway; new construction would further reinforce this buffer as the new east parking structure (south of Macy's department store) would interrupt the line-of-sight of the freeway from the residential neighborhood, thereby reducing visual and noise effects from traffic along the freeway.

- The Proposed Project would promote community and neighborhood revitalization by reinforcing the economic vitality of the project area, which in turn contributes toward the overall longevity of the residential neighborhoods.

- The Proposed Project, through the provision of a broader range of commercial retail and restaurant uses, would expand the availability of complementary commercial services, thereby maintaining the relationship of a commercial center within convenient proximity to community residents and reinforcing the community core concept.

- The Proposed Project would establish new commercial in-fill development within a long established commercial anchor of the Sherman Oaks community, thereby resulting in a more efficient utilization of the limited land resources within the community and avoiding the potential displacement of other land uses.

- The Proposed Project would provide architectural, landscape, signage and access improvements that would facilitate and distinguish the identity of the shopping center, while reflecting a modernized and distinctive character for the local community.

- The Proposed Project would support pedestrian activity through implementation of site access and circulation improvements that minimize pedestrian conflicts through consolidated driveways and facilitating pedestrian accessibility through and increased number and improved design of mall entrances. Pedestrian friendliness would be enhanced through an extensive landscape treatment along the Riverside Drive and Hazeltine Avenue frontages that would create a pleasant street experience for pedestrians, encourage improved natural surveillance for a safer environment, and upgrade adjacent transit stops with attractive and comfortable street furniture.

- The Proposed Project and ongoing operation of the shopping center would provide benefits equivalent to a Business Improvement District (BID) at the project site because the current mall association provides continued security, site monitoring for safety and general state of conditions, litter removal and maintenance of the physical facilities in a manner that mirrors, if not exceeds, the level of benefit that would be provided through an independent BID.

- The Proposed Project would be maintained as a closed mall campus with controlled access points and operational hours.

- The Proposed Project would provide sufficient off-street parking for all building employees and anticipated patrons and visitors, thereby minimizing the potential for parking conflicts on off-site locations.

- The Proposed Project would incorporate a range of "green strategy" project design features for water quality and hydrologic impacts that would include site design, source control, and treatment control BMPs that would be incorporated into the project.
- The Proposed Project would be located within close proximity (less than ½ mile) from other key community services, thereby adding to efficient development densities and community connectivity within the North Sherman Oaks community. Further, the Proposed Project development and other proximate services would be

conveniently accessible by local residents through an improved pedestrian access plan (i.e., cross walk at Matilija Avenue/Riverside Drive, and aesthetic treatment along Riverside Drive frontage), and accessible by more distant residents and employees through enhanced public transit options/amenities (i.e., upgraded bus stops, and coordinated bus schedules through MTA). Efficient development densities, accomplished through the consolidation and intensity of community services in the project area, contributes toward improved energy efficiency, vehicle trip reduction, vehicle miles traveled reduction, air pollutants reduction, and consistency with local and regional planning programs.

- The Proposed Project would be located within approximately 2 miles from the Metro Orange Line (Express Busway) Valley College and Woodman Stations and adjacent to stops for the MTA Routes 96 (Downtown LA to Sherman Oaks) and 158 (Chatsworth to Sherman Oaks), and LADOT Dash Route for Van Nuys/Studio City, thereby making the project site a reasonable distance to access a range of alternative transportation options for public transportation access.

- The Proposed Project would develop and implement a construction waste management plan (CWMP) that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or commingled. A minimum of 50% of the construction and demolition debris (exclusive of excavated soils and organic debris) would be recycled and/or salvaged. Excavated/exported soil would be transferred off-site as clean fill rather than landfilled. Organic landclearing debris (i.e., trees to be removed) would be processed as greenwaste. The CWMP would consider recycling cardboard, metal, brick, acoustical tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation and other similar materials used during the construction phase. The CWMP would designate a specific area(s) on the construction site for segregated or commingled collection of recyclable materials, and track recycling efforts throughout the construction process. Further, the CWMP would identify construction haulers and recyclers to handle the designated materials. Consistent with the intent to minimize waste, the CWMP would also establish a minimum project goal of 10% (post-consumer and ½ pre-consumer) for recycled content construction materials and identify material suppliers that can achieve this goal. During construction, the developer would ensure that the specified recycled content materials would be installed. The CWMP would also establish a project goal (10% minimum) for locally sourced construction materials and would identify materials and material suppliers that can achieve this goal. During construction, the developer would ensure that the specified local materials would be installed and quantify the total percentage of local materials installed.

- The Proposed Project includes the provision of a new community room which would be made available to the surrounding Sherman Oaks community and offset a potential increase demand on recreational facilities for community meeting space needs.

- The Proposed Project would provide new landscaping treatment along the Hazeltine Avenue, Riverside Drive and Woodman Avenue frontages that would enhance the

visual interest along these road way corridors and the shopping center perimeter through the addition of a sophisticated landscape treatment that includes color, depth, volume and variety.

- The Proposed Project would provide funds for the implementation of a Neighborhood Protection Program (NPP) that focuses on the prevention of "cut through" traffic in the residential neighborhoods north of the project site (across Riverside Drive). The NPP would seek to maintain the quality of the residential area through traffic control and traffic calming measures.

- The Proposed Project would provide an improved pedestrian crossing at the proposed Riverside Drive/Matilija Avenue intersection, a landscape-enhanced pedestrian corridor along Riverside Drive, and more efficient and safer site driveway entrances that strengthen community linkages to surrounding uses and support non-motorized vehicle travel options.

- The Proposed Project Landscape Plan will incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance.

- The Proposed Project would result in the addition of more building access points that would improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving public safety (through natural access control, natural surveillance and territorial reinforcement features) and pedestrian activity (through improved convenience and accessibility).

- The Proposed Project would incorporate treatment control BMPs that will minimize urban runoff and associated impacts to receiving water quality and specifically address the identified pollutants of concern. Many BMP alternatives can be easily integrated into planned landscaping, right-of-ways, and planned infrastructure. BMP alternatives that would be implemented with the Proposed Project include: (1) vegetated treatment BMPs, (2) onsite storage and reuse, (3) permeable paving, (4) roof top BMPs, and (5) media filters.

- The Proposed Project would incorporate a number of vegetated treatment BMPs, including swales, filter strips, bioretention and planter boxes. When properly designed and maintained, vegetated BMPs are among the most effective, cost efficient treatment approaches for dry and wet-weather runoff. Treatment occurs through sedimentation, filtration, adsorption to organic matter, and vegetative uptake. Additionally, vegetated treatment systems would reduce runoff volumes through soil soaking, infiltration, and evapotranspiration. On-site implementation of these systems would be integrated into surface conveyances and on-site landscaping in innovative ways that provide dual-functional site amenities.

- The Proposed Project would incorporate permeable (porous) pavement material in pavement areas (such as roadways, driveways, parking areas, and walkways). The permeable (porous) pavement materials would allow water to drain down to the underlying soil and reduce the volume of wet weather urban runoff. The Proposed Project would incorporate a mix of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, into the landscape plan and design of surface parking areas as functionally appropriate.

- The Proposed Project would employ rooftop BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of small storm events peaks and the overall runoff volume via inter-event evaporation and transpiration. Rooftop BMPs incorporated into the project design include planters and landscaping on the rooftop portion of the new parking structures, and hanging planters along the parking building tiers and along the Riverside Drive mall elevation.

- The Proposed Project would employ media filtration to separate and filter fine particulates and associated pollutants from captured stormwater.

- The Proposed Project would provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities.

- The Proposed Project would designate an area for recyclable collection and storage that is appropriately sized and located in a convenient area to serve mall tenants. The Fashion Square Mall Association would consider employing cardboard balers, aluminum can crushers, recycling chutes and other waste management technologies to further enhance and manage a recycling program at the shopping center.

- The Proposed Project would install carbon monoxide and airflow measurement equipment that would transfer the information to the HVAC system and/or Building Automation System to trigger corrective action, if applicable, and/or use the measurement equipment to trigger alarms that inform building operators or occupants of a possible deficiency in outdoor air delivery. Installation of such a system in areas where carbon monoxide concentrations may escalate (such as in the vicinity of loading docks or valet parking drop-offs) would improve both indoor and localized "hotspot" air quality.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- The Proposed Project must obtain the appropriate approvals, including zone change, variances and conditional use permits, prior to commencing project development.

Attainment of such approvals shall in turn ensure that the Proposed Project is in full compliance with local codes, procedures and regulations.

- The Proposed Project shall comply with the draft RIO and/or adopted RIO in effect at the time of project approval.

- In accordance with the SUSMP requirements, the Proposed Project shall meet (or exceed) all minimum site design and source control BMPs.

- The Proposed Project shall adopt an erosion and sediment control plan for the project site during the construction phase that would employ strategies such as temporary and permanent seeding, mulching, earth dikes, silt fencing, sediment traps and sediment basins. The erosion and sediment control plan shall comply with U.S. Environmental Protection Agency (EPA) Document No. EPA 832/R-92-005 (September 1992), Storm Water Management for Construction Activities, Chapter 3 (or the local agency equivalent erosion and sedimentation control standards and codes) and shall address soil loss, stormwater runoff, wind erosion, sedimentation, and fugitive dust at a minimum. The erosion and sediment control plan shall contribute to minimizing water quality impacts and may indirectly minimize aesthetic effects during the construction phase.

- Consistent with California laws, the Proposed Project shall prohibit smoking in the shopping center buildings, public areas, or exterior areas within 25 feet from entries, outdoor air intakes and operable windows, unless such areas are specifically designated and properly ventilated as a dedicated "smoking area".

b. Project Impacts

Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the NOP and IS process to have a potential significant environmental effect. Issues related to Land Use, Planning and Urban Decay that were determined to be less than significant, and not analyzed further, include: habitat/natural community conservation plans, or other approved local, regional, or state habitat conservation plan because there are no such plans that affect the project site. An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant of the DEIR.

(1) Land Use Compatibility

The determination of Land Use Compatibility includes a review of many environmental and policy factors. The analysis below focuses on a review of the Land Use Policies intended to ensure compatibility of adjacent uses. Analysis of physical factors which are related to Land Use Compatibility are provided elsewhere in this document. Specifically, discussion of visual compatibility is provided in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources. Discussion of air quality issues is provided in Section IV: Environmental

Impact Analysis: B-Air Quality. Discussion of noise compatibility is provided is Section IV: Environmental Impact Analysis: G-Noise. Discussion of land use impacts associated with traffic and circulation is provided in Section IV: Environmental Impact Analysis: J- Traffic, Circulation and Access.

(a) Type and Intensity of Use

The project site is situated within an existing commercial area that buffers residential land uses to the north from the Ventura Freeway (south of the project site). The Proposed Project involves an addition of commercial retail/restaurant uses that are consistent with those that already occur at the project site. Hence, the Proposed Project would not introduce new uses or result in a substantial change in use of the subject property that would conflict with, or adversely impact, surrounding land uses. The existing use of the property is also consistent with land use patterns found elsewhere within the Community Plan area, as well as throughout the City of Los Angeles. The Proposed Project incorporates several project design features (PDFs) that will further ensure that the physical development is compatible with the surrounding community.

Even with the proposed addition of 280,000 GLSF of commercial use, total development at the project site would be underutilized in comparison to the intensity of the ultimate use permitted through the current zoning. Revitalization and intensification of commercial uses at the currently underutilized site could ultimately serve to minimize the potential for land use conflicts because implementation of the Proposed Project offers an opportunity to enhance the integration of the shopping center with the surrounding uses. The Proposed Project would not exceed the development standards specified for this zone, except for minor variances requested to facilitate a more efficient project design as noted below. The floor area ratio of the shopping center at project's completion would be approximately 1.13:1, which is substantially less than the permitted 1.5 FAR.

Development of the Proposed Project at the existing shopping center would not physically disrupt, divide or isolate existing land uses in the project area or encroach upon residential uses, nor physically alter the overall character of the area. In fact, implementation of several of the PDFs could bring about a more cohesive development within the project site that affords improved access and linkages with the surrounding community and integrates visually with future green streets, creating a more pedestrian-friendly environment.

This analysis considers both the direct and indirect effects of the Proposed Project on land use compatibility. Potential noise, aesthetic or access impacts are not, by themselves, considered land use compatibility impacts unless such impacts affect the functional capacity of adjacent uses. This land use analysis considers impacts such as noise, aesthetics and access only to the extent that they affect the ability of the adjacent land uses to continue their existing function. Direct impacts due to noise, aesthetics and access are addressed in greater detail in Sections IV: Environmental Impact Analysis: G-Noise, IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, and IV: Environmental Impact Analysis: J-Traffic, Circulation and Access of this DEIR, respectively.

The Proposed Project's physical characteristics or associated activities would not prevent or substantively impair existing adjacent land uses to continue their function. Adjacent residential land uses would not be altered or physically disrupted due to the development of the Proposed Project.

(b) Hours of Operation

To operate as proposed, the Proposed Project also requires CUP approval to allow the development to operate from 5:30 a.m. to 12:00 a.m. (midnight), rather than the current permitted hours of 7:00 a.m. to 11:00 p.m. Typical operating hours of the restaurants, which include both lunch and dinner service, would extend from approximately 10:00 a.m. to 11:00 p.m. Monday through Saturday, and 11:00 a.m. to 9:00 p.m. Sunday. However, on special occasions or holidays, the restaurant uses may be open from 5:30 a.m. to 12 midnight, consistent with the request for hours of operation overall for the shopping center.

Although the requested operational hours would expand the length of time that the mall could be actively used during a single day, the extended hours are not anticipated to result in a significant change to the operational activity currently experienced at the shopping center. The expanded hours are primarily requested to accommodate the restaurant uses, which will be located on the south side of the mall. Retail stores, which are the primary use and attractant of patrons to the shopping center, would continue to operate under the existing store hours, except during special holiday hours.

(c) Consumption of Alcoholic Beverages

Pursuant to LAMC Section 12.24.W1, a specific Conditional Use Permit, referred to as a CUB, is required for the on-site sale and consumption of a full line of alcoholic beverages. The requested CUB for on-site sale and consumption of alcohol is in conjunction only with the anticipated four new sit-down restaurants proposed with the Proposed Project. The sale of alcohol would be incidental to the main use of the established shopping center.

A substantial concentration of facilities that sell alcoholic beverages does not exist in the immediate community. The addition of new restaurant uses at the project site that could serve alcoholic beverages is not anticipated to constitute an undue concentration of the sale and service of alcoholic beverages in the area.

As required of any establishment offering alcoholic beverages, the sale and service of such beverages is age-restricted and would not pose an opportunity for underage students. Further, all restaurant activities, including the sale of alcoholic beverages, would take place indoors at restaurants at the shopping center. The sale and consumption (restricted to on-site) of alcoholic beverages in association with restaurant uses at the shopping center would not detrimentally affect nearby residential or school uses, and impacts would be less than significant.

(d) Construction Activities

Construction activities can be a source of compatibility concerns. Construction of the Proposed Project would result in temporary disturbances associated with noise, localized air quality, aesthetics and traffic, which as a result may adversely impact surrounding land uses. Measures to address any adverse impacts related to these physical environments are discussed in their respective sections in this DEIR. However, construction impacts would be short-term and would be physically coordinated and scheduled to avoid and/or minimize to the extent reasonable disruption of nearby residents, local businesses and existing on-site commercial uses. Because of the precautions that would be taken to coordinate construction activities, and due to the short-term nature of such activities, potential land use impacts during the construction phase would be less than significant.

(2) Urban Decay

An analysis was completed to evaluate the potential for the operation of the Proposed Project to directly or indirectly cause "urban decay" of existing commercial retail businesses in the local area. This study, titled *Analysis of Potential "Urban Decay" as a Consequence of the Proposed Expansion of the Westfield Fashion Square Shopping Center, Sherman Oaks, California*, dated March 2008 and prepared by HR&A Advisors, Inc., is included in Appendix H: Urban Decay Report to this EIR. A summary and conclusions of the urban decay analysis are provided below.

Urban decay is described as a chain reaction of store closures and long term vacancies, ultimately destroying existing neighborhoods and leaving decaying shells in their wake. Under some circumstances, urban decay can occur due to the natural evolution of community due to a decline in economy. In other cases, decay can occur in localized areas when the economic activity of a community shifts to different area and there is not enough economic demand to support both areas. In order to predict if a new development project may result in urban decay, it must be determined whether the new retail development will attract retail sales away from existing and/or other planned future retail centers to any significant degree. Also, if sales will be attracted away, it must be determined whether the severity of this change in economic circumstances will cause disinvestment such that it is reasonably foreseeable that significant business closures, abandonment or other forms of physical deterioration such that "decay" will result.

Per CEQA Guidelines Section 15131, economic and social concerns by themselves are not considered physical impacts to the environment and do not need to be addressed through an EIR unless the impacts to social/economic circumstances leads to a measurable physical change to the environment. However, it could be argued that a project which competes with other existing commercial uses to the detriment of the viability of those uses and leads to urban decay, that a range of environmental impacts would be indirectly triggered, including a disruption of existing communities, and potential increase in crime within those areas undergoing urban decay.

The analysis considered the local market area through a comparison of the relative growth in demand for retail goods, as measured by the change in supportable retail space for particular retail store categories, with the amount of proposed additions to the supply of retail space

through the Proposed Project and other recently approved, pending and foresable future projects. In particular, the analysis focused on whether the proposed amount of floor area in each major retail and dining use category planned for the Proposed Project would exceed the likely increase in demand for those uses within the relevant market area(s) around the shopping center, as measured by the anticipated growth in population and per capita personal income that would be available for expenditure on specified retail goods and dining opportunities.

The analysis considered the regional market area (RMA) of the Proposed Project, which consists of the land area represented by all or a portion of 26 ZIP codes comprising a radius of approximately 5 miles and including all or portions of the following cities and communities: Sherman Oaks; Toluca Lake; North Hollywood; Valley Village; Encino; Studio City; Van Nuys; Valley Glen; Tarzana; Bel Air Estates; Mount Olympus; Trousdale Estates; Beverly Glen; Brentwood; Hollywood; Hollywood Hills; City of Beverly Hills; and City of Burbank. For Eating and Drinking Facilities, it is likely that patrons of the dinner restaurants will come from a more localized area than the RMA defined above; therefore, the market area for all of the Eating and Drinking Facilities space was defined as a more limited three-mile radius around the existing shopping center.

Based on an analysis of this RMA, the net addition of 240,000 GLSF of shopper goods space in the Proposed Project is projected to capture 43% of the market shares of the anticipated growth in demand for Apparel and Accessories space; 9% of the Furniture, Furnishings and Appliances space; and 8% of the Specialty or "Other" retail space over the period between the years 2007 through 2012. The proposed net addition of Eating and Drinking Facility space is projected to capture 8% of the market shares of the anticipated growth in the demand for Fast Food Restaurants and 25% of the Restaurants with Alcohol space.

The analysis concludes that, while the Proposed Project may add some new competitive retail and restaurant facilities to the regional market area, there would be no reasonable likelihood that the operation of the Proposed Project would result in significant adverse economic competition within the regional market area to the degree that this competition would lead to urban decay.

Since the Proposed Project would not result in an adverse economic circumstance, the economic effects of the project would not create significant changes in the physical environment (i.e., decay). The Proposed Project would not result in a significant effect to the environment, as defined by CEQA.

(3) Zoning (LAMC) Compliance

(a) Zoning

The Proposed Project includes a request for a zone change to (T)(Q)C2-1L, which is consistent with the existing Community Commercial designation of the General Plan/Community Plan, over the entire project site to consolidate and make consistent zoning across the project site.

A zone change, pursuant to LAMC Section 12.32, is requested to implement the Proposed Project as proposed. The requested zone change is from the existing mix of (T)(Q)C2-1L,

(Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L. This request would not necessarily provide for a change in the nature of the land uses on-site, but rather would consolidate and make consistent the zoning across the entire shopping center property and eliminate the patchwork zoning currently governing the site.

Specifically, a zone change of approximately 3.8 acres currently zoned as P-1L and approximately 9.8 acres currently zoned as (Q)PB-1L to (T)(Q)C2-1L is requested to facilitate the development of the proposed retail, restaurant and parking uses. Additionally, a zone change of approximately 13.3 acres currently zoned as C2-1L and (Q)C2-1L to (T)(Q)C2-1L is requested to facilitate the development of retail and restaurant uses. Approximately 1.9 acres of the project site is currently zoned (T)(Q)C2-1L and would not require a zone change. However, for consistency of "Q" conditions across the site, this area will be rezoned with the new "Q" conditions applied to the rest of the site.

The Proposed Project would not exceed the development standards specified for this zone, except for minor variances requested to facilitate a more efficient project design as noted below. At a total requested buildout entitlement of 280,000 GLSF, the floor area ratio of the E.P. would be approximately 1.13:1, and would be substantially less than the permitted 1.5 FAR.

Major development projects exceeding 100,000 SF are permitted in the C2 zone by CUP, through which specific design and/or operational conditions may be imposed and enforced by the City. The CUP process is discussed below.

Because the Proposed Project is consistent with the permitted uses of the C2 zone, complies with the adopted development standards, and would be appropriately conditioned through a CUP for Major Development Project, the Proposed Project would have a less than significant impact with regard to zoning compliance.

(b) Major Development Project – Conditional Use Permit

While the retail uses proposed with the Proposed Project are consistent and permitted with the requested zone change and existing general plan designation, a Conditional Use Permit (CUP) for a "Major Development Project" is requested. Per LAMC Section 12.24.U.14, a Major Development Project (MDP) CUP is required for construction of any project greater than 100,000 square feet of non-residential development necessary to ensure that the development is compatible with the surrounding neighborhoods. As the Proposed Project would exceed 100,000 square feet of commercial development, the MDP CUP requirement is triggered.

In approving any conditional use, the decision-maker must find that the proposed use is proper in relation to adjacent uses, will not be materially detrimental to the immediate neighborhood, and will be in harmony with the General Plan. By definition, the purpose of such a CUP is to afford decision-makers the opportunity to impose any special conditions deemed necessary to protect the best interests of the surrounding property or neighborhood, to ensure that the development is compatible with the surrounding properties or neighborhood, and to lessen or prevent any detrimental effect on the surrounding property or neighborhood or to secure appropriate development in harmony with the objectives of the General Plan/Community Plan. The

Proposed Project, conditioned in accordance with the intent of the MDP CUP, would result in a less than significant impact related to land use consistency and compatibility.

A CUP related to Commercial Corner development is also requested and is discussed separately below in association with project variances.

(c) Hours of Operation – Conditional Use Permit

To operate as proposed, the Proposed Project also requires through the CUP approval to allow the development to operate from 5:30 a.m. to 12:00 a.m. (midnight), rather than the current permitted hours of 7:00 a.m. to 11:00 p.m. Typical operating hours of the restaurants, which include both lunch and dinner service, would extend from approximately 10:00 a.m. to 11:00 p.m. Monday through Saturday, and 11:00 a.m. to 9:00 p.m. Sunday. However, on special occasions or holidays, the restaurant uses may be open from 5:30 a.m. to 12 midnight, consistent with the request for hours of operation overall for the shopping center.

Although the requested operational hours would expand the length of time that the mall could be actively used during a single day, the extended hours are not anticipated to result in a significant change to the operational activity currently experienced at the shopping center. The expanded hours are primarily requested to accommodate the restaurant uses, which will be located on the south side of the mall. Retail stores, which are the primary use and attractant of patrons to the shopping center, would continue to operate under the existing store hours, except during special temporary extended holiday hours (which would be consistent with the overall operational hours of the shopping center).

(d) Consuption of Alcoholic Berverages – Conditional Use Permit

Pursuant to LAMC Section 12.24.W1, a specific Conditional Use Permit, referred to as a CUB, is required for the on-site sale and consumption of a full line of alcoholic beverages. The requested CUB for on-site sale and consumption of alcohol is in conjunction with new sit-down restaurants proposed with the Proposed Project and would be incidental to the main use of the established shopping center.

The request for on-site sale and consumption of alcoholic beverages would provide for both a full line of alcoholic beverages and "wine and beer only" in conjunction with new restaurant and Dining Terrace uses, respectively, within the shopping center. Such restaurant uses would be incidental to the main shopping center use at the project site and would not be a separate stand alone use. Hence, the operation of the restaurants would be within the overall umbrella of operations defined for the shopping center.

A substantial concentration of restaurant facilities that sell alcoholic beverages does not exist in the immediate (i.e., one-quarter mile radius) community. Currently, there are three restaurants and one store within 600 feet of the project site that sell a full line of alcoholic beverages. Two of these restaurants, Bloomingdale's 59th & Lex and California Pizza Kitchen, are located at the shopping center. Up to 28,000 GLSF of the total 40,000 GLSF of new restaurant uses would be permitted to serve alcoholic beverages. This increase in alcohol-serving restaurant area is not

anticipated to constitute an undue concentration of the sale and service of alcoholic beverages in the area.

Residential properties are located across Riverside Drive from the subject site. However, the shopping center is not known to have detrimentally affected the nearby residential properties due to those uses that include the sale and service of alcoholic beverages. The only school within a potential area of influence is the Notre Dame High School located at the northeast corner of the Riverside Drive and Woodman Avenue intersection. As required of any establishment offering alcoholic beverages, the sale and service of such beverages is age-restricted and would not pose an opportunity for underage students. Further, all restaurant activities, including the sale of alcoholic beverages, would take place indoors at the shopping center. The sale and consumption (restricted to on-site) of alcoholic beverages in association with restaurant uses at the shopping center would not detrimentally affect nearby residential or school uses, and impacts would be less than significant.

(e) Variances

Although the Proposed Project would be in substantial compliance with the permitted uses and development standards of the C2 zone (see discussion above), several minor variances are requested to facilitate a more efficient project design. Some of these variances are addressed through the Conditional Use Permit process, in particular that associated with a "Commercial Corner", while other variances would be addressed as deviations to the development standards associated with the C2 zone.

While the Commercial Corner designation may not apply to the site since the legal parcel on which the project is located does not extend to the separate parcels at Riverside Drive and Woodman Avenue or Riverside Drive and Hazeltine Avenue, the Proposed Project application conservatively assumes the applicability of the Commercial Corner designation due to: (1) the functional integration of the project center with the Bloomingdale's store located on the parcel at the corner of Riverside Drive and Hazeltine Avenue; (2) the commercial zoning designation; and (3) the relationship of the site to residential properties located north of the site, across Riverside Drive.

The Commercial Corner designation relates to the site proximity and relationship to the corner intersections of Riverside Drive and Woodman Avenue and Riverside Drive and Hazeltine Avenue. Pursuant to LAMC Section 12.24.W27, for Commercial Corner developments not in conformance with the requirements established in LAMC Sections 12.22.A23(a)(2), 12.22.A23(a)(4)(i), 12.22.A23(a)(10)(i), and 12.22.A23(b)(3), a CUP is required to implement the Proposed Project. The CUP will address development standards of the "Commercial Corner" designation triggered by the location of the Bloomingdale's department store, from: (1) the 45-foot height limit to provide a building and parking structure with maximum height not to exceed 75 feet, and which would be no greater than the existing Macy's building with a maximum elevation of 722 feet above sea level, (2) allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight, (3) a requirement to provide a five foot landscaped area immediately adjacent to all street frontages; (4) the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass

along the Riverside Drive frontage; and (5) the restriction on tandem parking by providing tandem parking spaces in association with valet services.

The Proposed Project proposes modifications to the current access and internal circulation of the project site (see Section II: Project Description, for a detailed description of the proposed access and circulation). Under the proposed site plan, a deviation from a required five foot landscape area along all adjacent street frontages is requested to facilitate the new access plan and accommodate pedestrian access and improved traffic flow. Although the five foot landscape area along the street frontage is not proposed, the Proposed Project proposes an enhanced landscape program along street frontages that incorporates the building façade and planters along the building perimeter. A detailed discussion of the proposed landscape program is provided in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources of this DEIR. Even with granting of a variance to omit a five foot landscaped area along street frontages, through implementation of the proposed Landscape Plan, the Proposed Project meets the intent of providing adequate landscaping along street frontages.

The variances include a request to exceed the 45-foot height limit associated with a parcel identified as a Commercial Corner. The intent of such a height restriction is to minimize the massing at key commercial corners, thereby improving visibility and reducing building mass at key intersections. Existing buildings already developed on the project site, including the mall buildings and parking structures, exceed the 45-foot height limit. The Proposed Project entails construction of new structures that would be consistent with the 75 foot maximum height of the existing buildings. Additionally, the new construction would be located along the south half of the project site and would not be physically situated at the actual corners of the property that abut Riverside Drive. Ultimately, the existing building elevations at the Riverside Drive intersections of Hazeltine Avenue and Woodman Avenue would not be altered from what is currently observed. As an exceedence of the 45-foot height limit is an existing condition and the Proposed Project does not include a proposal to modify any portion of the building elevations that are located directly at the qualifying commercial corners, a deviation of this height restriction would be less than significant.

Because the findings can be made that the requested site plan and building design variances can be supported without detriment to the environment (as demonstrated above), approval and implementation of the requested variances related to building height, landscaped areas, parking, operational hours and building facade treatments would be less than significant.

(f) Other LAMC Approvals

Shared Parking, pursuant to LAMC Section 12.24.X20, is requested to accommodate a range of varied commercial uses. Prior development approvals at the shopping center (under ZA-95-0899-CUZ and CPC-94-0287-ZC) established a parking requirement for the entire site at 4.5 parking spaces per 1,000 square feet of GLSF which is applicable, but not limited to, retail, restaurant, and office uses. However, the project includes a request for Shared Parking to provide parking at a ratio of up to 4.5 parking spaces per 1,000 GLSF, providing approximately 5,148 parking spaces across the entire site.

Because the Proposed Project proposes an on-site parking ratio of up to 4.5 parking spaces per 1,000 SF of retail use, which is less than the current code requirement, a Shared Parking review and approval is required.

Project parking impacts are addressed in Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access of this DEIR. As discussed in that section, the analysis concludes that potential impacts due to a shared parking program are less than significant because adequate parking will be provided to accommodate the proposed uses under the reduced parking requirements. Since adequate parking is available, potential land use conflicts that could arise from project users parking off-site along local residential streets are not anticipated.

A haul route during the construction phase will be reviewed, and established prior to the initiation of demolition and/or construction to accommodate the export of approximately 147,016 cubic yards of earth and transport of building materials. The potential impacts associated with a future haul route are discussed in Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access, and were determined to be less than significant.

In summary, with approval of the requested entitlements identified above, continued use of the project site for retail/restaurant commercial uses under the Proposed Project would be in accordance with zoning regulations and result in a less than significant impact relative to zoning.

(4) Consistency with Applicable Plans and Policies

(a) Van Nuys-North Sherman Oaks Community Plan

As discussed previously, the Community Plan designates the Proposed Project site as Community Commercial. Continued use of the project site for shopping center uses (including retail, restaurant and related parking) would be consistent with this land use designation, as would be the requested underlying zone change to (T)(Q)C2-1L, which is a compatible zone under the Community Commercial designation. The Proposed Project is consistent with the adopted land use and density designation for the subject project and would not result in impact relevant to land use consistency as determined by the adopted Community Plan. However, a project must also be consistent with the related goals and policies of the Community Plan. This section assesses the Proposed Project's consistency with the applicable policy statements contained within the Community Plan. The Proposed Project does not propose any change to adopted Plans or policies, nor reclassification of applicable designations. The applicable land use related goals, objectives and policies of the Van Nuys-North Sherman Oaks Community Plan are provided in *Table 20: Consistency with Community Plan Land Use Related Goals, Objectives and Policies*, along with a discussion of the project consistency with each applicable component.

TABLE 20
CONSISTENCY WITH COMMUNITY PLAN LAND USE RELATED GOALS, OBJECTIVES AND POLICIES

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
VAN NUYS-NORTH SHERMAN OAKS COMMUNITY PLAN			
G 1	A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community.	The Proposed Project is consistent with this goal as the project has been designed to promote a safe, secure and high quality environment that will reinforce these attributes in the surrounding residential neighborhoods. The project design seeks to promote a "high end" atmosphere, both through the type of tenants that will be located within the development and through the attention to architectural detail and landscape enhancements that promulgate a positive community ambience.	Consistent
O 1-1	To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.	The Proposed Project is consistent with this objective because the project design has been tailored to preserve existing residential neighborhoods by incorporating architecture and landscape design features that are sensitive and non-intrusive to the surrounding residential community, and through implementation of a neighborhood protection program that will maintain the quality of the residential area through traffic control and traffic calming measures. Further, intensification of commercial uses at the project site serves to consolidate commercial development to fewer parcels within the community thereby reducing the potential for conversion of residential properties in the future.	Consistent
P 1-1.1	Designate specific lands to provide for adequate multi-family residential development.	This policy is not applicable because the project site is designated by the Community Plan as community commercial and the Proposed Project does not involve residential development.	NA
P 1-1.2	Protect existing single family residential neighborhood from new, out of scale development.	The Proposed Project is consistent with this policy because it proposes new development that is consistent with the City's height limitations (as granted through the requested entitlements, and because the project design incorporates features targeted to effectuate an appropriate transition between large-scale commercial development and the nearby single-family residential neighborhoods. The project design	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		ensures that the project interfaces with residential uses are compatible in scale by complying with required height limitations, incorporating building setbacks, and providing an architectural treatment and landscaping that downplays the scale of both new and existing commercial structures. See also Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources of this DEIR.	
P 1-1.3	Protect existing stable single family and low density residential neighborhoods from encroachment by higher density residential and other incompatible uses.	The Proposed Project is consistent with this policy because the project is consistent with the underlying zoning and the Community Plan, which previously considered appropriate land use patterns for the project area. For example, the Community Plan Map identifies lands where only single family residential development is permitted and it protects these areas from encroachment by designating, where appropriate, transitional residential densities which serve as buffers. The Proposed Project remains fully contained with the commercial property, it does not physically encroach on surrounding residential areas. Further, as noted above in responses to O 1-1 and P 1-1.2, incorporation of architectural features that address the scale and massing of the development and the establishing community linkages through enhanced access and landscaping elements, as well as implementation of a neighborhood protection program, serve to addressed encroachment concerns on the residential areas. In addition, the commercial development at the project site serves as a buffer between the Ventura (US 101) Freeway and residential areas to the north. The shopping center development functions as a physical barrier from the freeway, and interrupts the line-of-sight of the freeway from the residential neighborhood, thereby reducing visual and noise effects from traffic along the freeway.	Consistent
P 1-1.4	Protect the quality of the residential environment through attention to the appearance of communities, including	The Proposed Project is consistent with this policy because it incorporates relevant Urban Design Guidelines and	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
	attention to building and site design.	Standards identified in the Community Plan, and because the project design incorporates architecture and landscape features that are sensitive and non-intrusive to the surrounding residential community. See also responses to O 1-1, P1-1.2 and P 1-1.3 above. See also Section IV: Environmental Impact Analysis: A-esthetics and Visual Resources of this DEIR.	
P 1-1.5	Preserve and maintain the existing ratio of 74% of designated residential lands for single family uses.	This policy is not applicable because the project site is designated by the Community Plan as community commercial and the Proposed Project does not involve residential development.	NA
P 1-1.6	The City should promote neighborhood preservation, particularly in existing single family neighborhoods, as well as in areas with existing multiple family residences.	The Proposed Project is consistent with this policy because it is consistent with the Community Plan and promotes community and neighborhood revitalization by reinforcing the economic vitality of the project area, which in turn contributes toward the overall longevity of the residential neighborhoods. Further, the project will provide commercial uses that are complimentary to, and serve the needs of, the surrounding residential community.	Consistent
O 1-2	To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.	This policy is not applicable because the project site is designated by the Community Plan as community commercial and the Proposed Project does not involve residential development.	NA
P 1-2.1	Locate higher residential densities near commercial centers, light rail transit stations, and major bus routes where public service facilities and utilities will accommodate this development.	The Proposed Project is consistent with this policy because it continues to maintain a relationship of a commercial center within convenient proximity to community residents.	Consistent
P 1-2.2	Protect the identity of single family residential areas adjacent to transit stations.	This policy is not applicable because the project site is located more than one-half mile from a transit station.	NA
P 1-2.3	Encourage multiple residential development in commercial zones.	This policy is not applicable because the project site is designated by the Community Plan as community commercial, the Proposed Project does not involve residential development, and adequate housing is already provided in surround areas.	NA
O 1-3	To preserve and enhance the varied and distinct residential character and integrity of existing single and multi-family	The Proposed Project is consistent with this objective because the architectural design and landscape treatment of the	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
	neighborhoods.	new construction and existing building facades would establish a community-friendly scale that creates an appropriate interface with existing residential neighborhoods to the north and south, and other commercial development in the project site vicinity. See also responses G1, O 1-1, P 1-1.2, P 1-1.3, and P 1-1.4 above. See also Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources of this DEIR.	
P 1-3.1	Require a high degree of architectural compatibility with articulated landscaping for new in-fill development to protect the character and scale of existing residential neighborhoods.	The Proposed Project is consistent with this policy because the architectural design and landscape treatment of new construction and existing building facades would establish a community-friendly scale that creates an appropriate interface with existing residential neighborhoods to the north and south. The proposed landscaping concept provides for an enhanced and interesting views along the project perimeter by adding color, depth, volume and variety to the border street frontages. See also responses G1, O 1-1, P 1-1.2, P 1-1.3, and P 1-1.4 above. See also Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources of this DEIR.	Consistent
P 1-3.2	Consider factors such as neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.	This policy is not applicable because the project site is designated by the Community Plan as community commercial and the Proposed Project does not involve residential development.	NA
O 1-4	To preserve and enhance neighborhoods with a distinctive and significant historical character.	This policy is not applicable because the project site is not located within, nor adjacent to, a neighborhood of known distinctive or significant historical character.	NA
P 1-4.1	Encourage the identification and documentation of the area's historic resources.	This policy is not applicable because the project site, nor existing development, is not recognized an historic resource.	NA
O 1-5	To promote and ensure the provision of adequate housing for all persons regardless of income, age, or ethnic background.	This policy is not applicable because the project site is designated by the Community Plan as community commercial and the Proposed Project does not involve residential development.	NA
P 1-5.1	Promote greater individual choice in type, quality, price, and location of housing.	This policy is not applicable because the project site is designated by the Community Plan as community	NA

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		commercial and the Proposed Project does not involve residential development.	
P 1-5.2	Promote housing in mixed use projects in transit corridors.	This policy is not applicable because the project site is designated by the Community Plan as community commercial and the Proposed Project does not involve residential development. Further, the project site is not located along a significant transit corridor.	NA
P 1-5.3	Ensure that new housing opportunities minimize displacement of the residents.	This policy is not applicable because the project site is designated by the Community Plan as community commercial and the Proposed Project does not involve residential development.	NA
P 1-5.4	Provide for development of townhouses and other similar condominium type housing units to increase home ownership options.	This policy is not applicable because the project site is designated by the Community Plan as community commercial and the Proposed Project does not involve residential development.	NA
G 2	A strong and competitive commercial sector which best serves the needs of the community through maximum efficiency and accessibility while reserving the historic commercial and cultural character of the community.	The Proposed Project is consistent with this goal because a key objective of the project is to enhance the long-term sustainability of the shopping center through a stronger (expanded) commercial base and by responding to community needs through a broader variety of commercial and restaurant uses. The project would be integrated with surrounding land uses through sensitive site planning and building design to ensure that the existing character is retained and complemented.	Consistent
O 2-1	To conserve and strengthen viable commercial development.	The Proposed Project is consistent with this objective because a key goal of the project is to enhance and revitalize the shopping center through physical site improvements and the intensification and diversification of commercial uses on-site. The shopping center has been a key commercial component of the Sherman Oaks community since the 1960's, and would be conserved and enhanced through the Proposed Project.	Consistent
P 2-1.1	New commercial uses shall be located in existing established commercial areas or existing shopping centers.	The Proposed Project is consistent with this policy because the project site is designated by the Community Plan as community commercial, and proposed new commercial development would be located within a long established	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		commercial anchor within the Sherman Oaks community. The Proposed Project serves to expand the economic base within the community through what is essentially in-fill development. As a result, other established uses within the community would not be displaced and the project would achieve a more efficient utilization of the land.	
P 2-1.2	Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.	The Proposed Project is consistent with this policy because the project would include incorporation of architectural features that address the scale and massing of the development and the establishing community linkages through enhanced access and landscaping elements that reflect a high quality and reinforce the distinctive character of the local community. The shopping center is recognized as a distinctive community center because of it's origins as a high-end, community-oriented commercial development. As with the current Proposed Project proposal, previous development at the project site has been shaped by community input to ensure compatibility and sensitivity with surrounding uses. Further, the Proposed Project incorporates applicable Urban Design guidelines for commercial development which address this policy.	Consistent
O 2-2	To enhance the identity of distinctive commercial districts.	The Proposed Project is consistent with this Objective because the project involves architectural, landscape, signage and access improvements that will enhance the identity of the shopping center, which is a distinctive commercial center within the Sherman Oaks community.	Consistent
P 2-2.1	New development needs to add to and enhance the existing pedestrian street activity.	The Proposed Project is consistent with this policy because a key project objective is to enhance pedestrian safety and instill a community-friendly design that is more conducive to pedestrian activity. This would be accomplished through improved site access and circulation that minimizes pedestrian conflicts and facilitates pedestrian accessibility. Additionally, the project proposes a more varied and extensive landscape treatment along the Riverside Drive and Hazeltine Avenue frontages	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		(than what currently exists) that would create a pleasant street experience for pedestrians.	
P 2-2.2	Ensure that commercial in-fill projects achieve harmony in design with the rest of existing development.	The Proposed Project is consistent with this policy because the architectural design and landscape treatment of the new construction and existing building facades would establish a community-friendly scale and enhanced pedestrian atmosphere that will be in visually and operationally compatible with existing residential neighborhoods to the north and south, and other commercial development in the project site vicinity. See also responses G1, O 1-1, P 1-1.2, P 1-1.3, and P 1-1.4 above. See also Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources of this DEIR.	Consistent
P 2-2.3	Require that the older commercial business areas within pedestrian oriented districts be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses.	This policy is not applicable because the project site is not in a pedestrian oriented district.	NA
P 2-2.4	Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts incorporate retail and service oriented commercial uses.	This policy is not applicable because the project site is not in a pedestrian oriented district.	NA
P 2-2.5	Promote mixed use projects in proximity to transit stations, along transit corridors, and in appropriate commercial areas.	This policy is not applicable because the project site is located more than one-half mile from a transit station and is not located along a significant transit corridor. Further, the project site is designated as community commercial and not targeted as a mixed-use area.	NA
P 2-2.6	Encourage large mixed use projects and other large new development projects adjacent to transit stations to incorporate child care and/or other appropriate human service facilities as part of the project.	This policy is not applicable because the project site is designated by the Community Plan as community commercial and the Proposed Project does not involve residential development.	NA
O 2-3	To revitalize and reverse decline of commercial areas through the establishment of BIDS for signage, streetscape and other area improvements.	The Proposed Project is consistent with the intent of this objective because the current mall association carries out many functions akin to a Business Improvement District; and Proposed Project improvements will update and revitalize the immediate project site area. Although the shopping center is not in a known area of commercial decline, a key	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		objective of the Proposed Project is to revitalize and enhance the long-term viability of the commercial businesses located at the shopping center. The project would include improved signage, streetscape landscaping treatment, pedestrian environment, internal and local access and circulation, and other features, all of which would contribute toward the revitalization of the shopping center. The shopping mall is operated through an association which carries out a number of functions akin to a BID for the 28.8-acre property. The association is responsible for the physical upkeep and maintenance of the project site, including trash clean-up, graffiti removal and security patrol, and provides most of the benefits of a BID. Should the City and/or local business owners along the Riverside Drive corridor (in the vicinity of Woodman Avenue) seek to establish a BID for businesses in this project area in the future, the project would not preclude this opportunity.	
P 2-3.1	Encourage the establishment of BIDS along Sepulveda Boulevard between Burbank Boulevard and the Southern Pacific Railroad, Victory Boulevard between Sepulveda Boulevard and along Van Nuys Boulevard between Vanowen Street and Oxnard Street.	This policy is not applicable to the Proposed Project because the project site is not located within one of the targeted BID areas identified. See also response O 2-3 above.	NA

In summary, the Proposed Project is consistent with the Community Plan, in part due to the fact that the shopping center site has long been recognized by the community as an appropriate location for concentrated retail facilities. The proposed zone consolidation change to (T)(Q)C2-1L, and permitted uses to be developed, is consistent with the existing Community Commercial designation of the Community Plan. The Proposed Project is consistent because the project either directly contributes toward the furtherance of those policies (i.e., as through physical site improvements) or indirectly supports those policies by not creating obstacles for their realization (i.e., such as remaining consistent with land use goals). The Proposed Project will result in a less than significant impact to land use consistency as the Proposed Project is consistent with applicable policies and programs of the Community Plan.

(b) Los Angeles River Revitalization Master Plan and River Improvement Overlay

As discussed above, the project site lies within the recently designated RIO District. Although this designation is established by the LARRMP, which was adopted May 2007, the

implementing component of the RIO is not anticipated to be adopted until late 2008 as such the Proposed Project maybe exempt from all or part of the RIO requirements. However, the draft RIO (dated April 2008) establishes implementation procedures that can be reasonably expected to apply upon final adoption of the RIO. Hence, this analysis is based on the requirements as presented in the draft RIO.

All development projects within the RIO must demonstrate how the site and building design achieve the required number of threshold points for private property and publicly owned facilities. Per the draft RIO, with the exception of single family homes, projects are required to achieve a minimum of 20 points (while single family homes need only achieve a minimum of 10 points). Points are acquired through demonstration of inclusion of River-friendly project components in three separate categories: (1) watershed; (2) building design; and (3) mobility. Each commercial project must achieve the minimum number of points required per category as follows:

Watershed	10 points
Building Design	5 points
Mobility	5 points

The RIO site and building design requirements and point allocations are provided in *Table 21: Consistency with Draft River Improvement Overlay – Requirements for Private Property*, along with a discussion of qualifying project design features supporting compliance.

TABLE 21
CONSISTENCY WITH DRAFT RIVER IMPROVEMENT OVERLAY – REQUIREMENTS FOR PRIVATE PROPERTY

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
5.1	**WATERSHED CATEGORY**			
5.1.1	**Watershed-Stormwater Management**			
	Divert roof runoff into best management practices such as rain gardens, french drains, bioretention ponds, swales, cisterns or other on-site practices that would prevent flows from exiting the site.	**PDF**: The Proposed Project would employ rooftop or roof perimeter BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of the peak flow for small storm events and the overall runoff volume via inter-event evapotranspiration. Rooftop BMPs incorporated into the project design include planters and landscaping on the rooftop portion of the new parking structures, and hanging planters along the parking building tiers and along the Riverside Drive mall elevation.	2	1
	Design and install a green roof that is partially or completely covered with drought tolerant vegetation and soil, or a growing medium, planted over a waterproofing membrane. The roof	**PDF**: The Proposed Project would employ rooftop BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of the peak flow for small storm events and	2	0

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
	area dedicated as a green roof shall cover no less than 50% of the roof area.	the overall runoff volume via inter-event evapotranspiration. Rooftop BMPs incorporated into the project design include planters and landscaping on the rooftop portion of the new parking structures, and hanging planters along the parking building tiers and along the Riverside Drive mall elevation. Although the Proposed Project will employ several measures that apply to the "greening" of the roof, the overall landscape treatment, and the fact that the roof tops will be utilized for parking, does not qualify as a true "green roof".		
	Design driveways, parking areas, and hardscape spaces to be multifunctional, incorporating detention, retention, filtration or runoff to a bioswale and/or cistern, french dran, and/or other water collection system.	**PDF**: The Proposed Project would incorporate a range of "green strategy" project design features for water quality and hydrologic impacts that would include site design, source control, low impact development concepts, and treatment control BMPs that would be incorporated into the project. **PDF**: In accordance with the SUSMP requirements, the Proposed Project would meet (or exceed) all NPDES water quality objectives, including minimum site design and source control requirements. **PDF**: The Proposed Project would incorporate treatment control BMPs that will minimize urban runoff and associated impacts to receiving water quality and specifically address any identified pollutants of concern. Many BMP alternatives can be integrated into planned landscaping, right-of-ways, and planned infrastructure. A variety of BMP alternatives would be implemented with the Proposed Project to achieve compliance with SUSMP requirements; these may include: (1) vegetated treatment BMPs, (2) onsite storage and reuse, (3) permeable paving, (4) roof top BMPs, and (5) media filters. **PDF**: The Proposed Project would incorporate a number of vegetated treatment BMPs, including swales, filter	2	2

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
		strips, bioretention and planter boxes. When properly designed and maintained, vegetated BMPs are among the most effective, cost efficient treatment approaches for dry and wet-weather runoff. Treatment occurs through sedimentation, filtration, adsorption to natural organic matter, and vegetative uptake. Additionally, vegetated treatment systems would reduce runoff volumes through the soil's natural retention capacity (i.e., water uptake), infiltration, and evapotranspiration. On-site implementation of these systems would be integrated into surface conveyances and on-site landscaping in innovative ways that provide dual-functional site amenities.		
	Daylight the portion of a stream that flows throught eh property. (When applicable and only feasible if flood protection is maintained.)	The project site does not have any portion of a stream running through it.	5	0
	Remove the concrete from sides and/or bottom of a stream that flows through the property. (When applicable and only feasible if flood protection is maintained.)	The project site does not have any portion of a stream running through it.	5	0
5.1.2	**Watershed-Landscaping**			
	Select plants identified as California Friendly by the Metropolitan Water District's Be Water Wise program.		1	0
	Select indigenous native plants, as per the County's Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.		3	0
	Contract with a licensed landscape architect to design and install a landscape of native plants arranged into naturalized patterns that reflect their cultural needs, adaptations, and companion species.		2	0
	Contract with a garden designer to design and install a landscape of native plants arranged into naturalized patterns that reflect their cultural needs, adaptations, and companion species.		-	-
	Remove existing exotic weedy plants such as identified by the California Invasive Plant Council (CAL-IPC).		2	0

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
	Examples of include the Mexican fan palm (Washingtonia robusta) and fountain grass (Pennisetum setaceum).			
	Complete a class related to native plant gardening at a local nursery or college.		-	-
5.1.3	**Watershed-Water Conservation**			
	Install a temporary irrigation system and/or develop and implement a strategy to establish native and/or other drought tolerant species that do not require regular irrigation.		2	0
	Install a high-efficiency "smart" irrigation system.	**PDF**: The Proposed Project would install a high efficiency irrigation system and have its design reviewed by the City as part of the required Landscape Plan review.	2	2
	Utilize gray water or recycled stormwater for at least 50% of irrigation needs or		2	0
	Utilize gray water or recycled stormwater for 100% of irrigation needs.		3	0
	Install a dual plumbing system where feasible. Consult with the Bureau of Sanitation.		3	0
5.1.4	**Watershed-Hardscape**			
	Use hardscape materials (impervious or pervious) on no more than 50% of the site area exclusive of building footprint. The balance of the area shall be planted with native and/or drought tolerant species.		2	0
	Use porous paving instead of traditional impervious materials for at least 75% of all hardscape areas.	**PDF:** The Proposed Project would incorporate a number of vegetated treatment BMPs, which could include a combination of swales, filter strips, bioretention and planter boxes. When properly designed and maintained, vegetated BMPs are among the most effective, cost-efficient treatment approaches for dry and wet-weather runoff. Treatment occurs through sedimentation, filtration, adsorption to natural organic matter, and vegetative uptake. Additionally, vegetated treatment systems would reduce runoff volumes through the soil's natural retention capacity (i.e., water uptake),	2	2

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
		infiltration, and evapotranspiration. On-site implementation of these systems would be integrated into surface conveyances and on-site landscaping in innovative ways that provide dual-functional site amenities. **PDF:** The Proposed Project would incorporate permeable (porous) pavement materials in specific locations that would allow water to drain down to the underlying soil and reduce the volume of wet weather urban runoff. This could include a combination of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, which would be incorporated into the landscape plan and design of surface parking areas, as functionally appropriate.		
	Select hardscape materials as defined and recommended by the LARMP Landscaping Guidelines on pages 40-41 of Part II-LAR Planting Guidelines found at http://ladpw.org/wmd/watershed/LA/LAR-Planting- guidelines webversion.pdf . River rock and decomposed granite are especially recommended.		1	0
5.1.5	**Watershed-Landscape/Hardscape Maintenance**			
	Prepare and implement a maintenance manual and/or program that follows the Landscape Maintenance Guidelines defined on page 48, Part II-LAR Planting Guidelines of the LARMP Design Guidelines. This includes information about supplemental irrigation, extended maintenance, pruning, weeding and supplemental mulch.	**PDF**: The Proposed Project shall prepare a maintenance program that requires regular review and maintenance of irrigation system as well as scheduling of pruning, weeding and mulching.	1	1
	Prepare a maintenance manual and/or program for parking lots and structures that establishes regular and ongoing procedures to maintain the surfaces free of chemical residues and debris.	**PDF**: The Proposed Project shall prepare a maintenance program that requires parking lots be swept on a monthly basis and vacuum swept on a quarterly basis.	1	1
	Prepare and implement a maintenance manual and/or program that uses best management practices to provide sustainable organic		2	1

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
	horticulture, making pesticides and chemical fertilizers unnecessary.			
5.1.6	**Watershed- Open Space**			
	Provide a rear-and/or side-yard easement adjacent to the Greenway. The easement area shall be used to maximize open space for native landscaping, create active plazas or courtyards and/or provide additional pedestrian amenities visible and accessible from the Greenway. One point will be accrued for every 1% of easement relative to the overall property depth.		1 per each 1%	0
5.2	**URBAN DESIGN**			
5.2.1	**Urban Design-Connectivity**			
	Provide an entrance for employees, visitors, customers and/or clients that fronts on and is visible from the street and is open and easily accessible during business hours.	The following PDFs either individually, or in combination, meet the intent of this building design strategy: **PDF**: The Proposed Project would result in the addition of more building access points that would improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving public safety (through natural access control, natural surveillance and territorial reinforcement features) and pedestrian activity (through improved convenience and accessibility).	1	1
	Provide an entrance for employees, visitors, customers and/or clients that fronts on and is visible from the greenway and is open and easily accessible during business hours.		1	0
	Configure the entrance to be fully accessible per the American Disabilities Act (ADA), such that the auxiliary approach for persons with mobility limitations (such as a ramp next to the main path to the primary entry) would not be necessary.	**PDF**: The Proposed Project shall comply with code requirements for ADA compliance.	1	1
	Provide a transition from the public realm to the front door without excessive artificial grading. Subtle transitions in grade separation through porches and/or landscaping can be used very effectively to assist with this objective.		1	0

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
	Design, build, and provide for the on-going maintenance of a pedestrian paseo to the Greenway that is publicly accessible during daylight hours and is open to the sky.		3	0
	Design the paseo to include amenities such as: outdoor dining and seating areas; tables for board and card games; sun and shade; landscaping; sculptures and fountains.		1	0
5.2.2	**Urban Design-Vehicle Parking**			
	Site all parking (either surface or in a structure) behind or even with the building's Greenway and/or street façade and/or entryway.	**PDF**: The Proposed Project design incorporates a substantial setback and building stepback (of the east parking structure) that ensures the project interfaces with residential uses would be compatible in scale by complying with required height limitations, and incorporating building setbacks.	1	1
	Screen surface parking that is visible from the Greenway and/or street, with a landscaped barrier and/or green screen.	**PDF**: The Proposed Project would provide new landscaping treatment along the Hazeltine Avenue, Riverside Drive and Woodman Avenue frontages that would enhance the visual interest along these road way corridors and the shopping center perimeter through the addition of a sophisticated landscape treatment that includes color, depth, volume and variety.	1	1
	Screen ground floor parking behind active uses/services that are accessible from either the street and/or Greenway.		2	0
	Install automated parking lift(s) and/or an automated garage.		3	0
5.2.3	**Urban Design-Continuous Street Frontage**			
	Site all buildings close to or at the front setback line to support a pedestrian street frontage.	**PDF**: The project design seeks to promote a "high end" atmosphere, both through the type of tenants that will be located within the development and through the attention to architectural detail and landscape enhancements that promulgate a positive community ambience. **PDF**: The Proposed Project would provide new landscaping treatment along the Hazeltine Avenue, Riverside Drive and Woodman Avenue frontages that would enhance the visual interest along these road way corridors and the	1	1

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
		shopping center perimeter through the addition of a sophisticated landscape treatment that includes color, depth, volume and variety. **PDF**: The Proposed Project would provide an improved pedestrian crossing at the proposed Riverside Drive/Matilija Avenue intersection, a landscape-enhanced pedestrian corridor along Riverside Drive, and more efficient and safer site driveway entrances that strengthen community linkages to surrounding uses and support non-motorized vehicle travel options.		
	Provide vehicle access to and from the site with as few driveways as possible. Where feasible, utilize side streets and/or alleys for vehicular access.	**PDF**: The Proposed Project will reduce the number of driveways serving the site and the driveways will be designed to accommodate the anticipated demand for each driveway.	1	1
	Design the width of each driveway to meet and not exceed the standard width identified as necessary to accommodate vehicles.	**PDF**: The Proposed Project will reduce the number of driveways serving the site and the driveways will be designed to accommodate the anticipated demand for each driveway.	1	1
5.2.4	**Urban Design-Scale and Character**			
	Design the building such that the roofline within 10' of the building edge does not exceed the height of any building on an abutting property by more than 10'.		1	0
	Design the building so that it does not exceed the height of any building on an abutting property by more than 10'.		2	0
	Adaptively reuse an existing building.		2	0
5.2.5	**Urban Design-Transparency and Ventilation**			
	Design facades and locate windows to facilitate natural ventilation.		1	0
	Ground level retail: at least 50% transparency.		2	0
	Ground level offices and other commercial uses: at least 35% transparency.		2	0
	Multi-family residential, industrial and public facility uses: at least 25% transparency.		-	-
	Upper floors: at least 20%		1	0

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
	transparency.			
	Design western and southern facades to include overhangs and/or awnings and/or landscaping to minimize heat gain.		1	0
5.2.6	**Urban Design-Fences**			
	Design the building so that it serves as a security wall and thus eliminates the need for a separate wall/fence between the building façade and the Greenway and/or street.	**PDF**: The Proposed Project building development would enhance and bolster the existing land use buffer between the Ventura (US 101) Freeway and residential areas to the north. The shopping center development functions as a physical barrier from the freeway; new construction would further reinforce this buffer as the new east parking structure (south of Macy's department store) would interrupt the line-of-sight of the freeway from the residential neighborhood, thereby reducing visual and noise effects from traffic along the freeway. **PDF**: The Proposed Project Landscape Plan will incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance.	1	1
	Design any fence or screen in the setback area(s) adjacent to the Greenway to be no greater than 42 inches in height.		1	0
5.2.7	**Urban Design-Visibility**			
	Locate and design the building to protect views of surrounding urban landmarks and natural features to and from the Greenway and/or street.		1	0
	Design landscape, signage and architectural elements so that they do not obstruct pedestrian movement or views from the Greenway and/or street.	The following PDFs either individually, or in combination, meet the intent of this building design strategy: **PDF**: The project design seeks to promote a "high end" atmosphere, both through the type of tenants that will be located within the development and through the attention to architectural detail and landscape enhancements that promulgate a positive community ambience.	1	1

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
		PDF: The Proposed Project would provide new landscaping treatment along the Hazeltine Avenue, Riverside Drive and Woodman Avenue frontages that would enhance the visual interest along these road way corridors and the shopping center perimeter through the addition of a sophisticated landscape treatment that includes color, depth, volume and variety. **PDF**: The Proposed Project would provide an improved pedestrian crossing at the proposed Riverside Drive/Matilija Avenue intersection, a landscape-enhanced pedestrian corridor along Riverside Drive, and more efficient and safer site driveway entrances that strengthen community linkages to surrounding uses and support non-motorized vehicle travel options. **PDF**: The Proposed Project would provide architectural, landscape, signage and access improvements that would facilitate and distinguish the identity of the shopping center, while reflecting a modernized and distinctive character for the local community. **PDF**: The Proposed Project would support and enhance pedestrian activity through implementation of site access and circulation improvements that minimize pedestrian conflicts through consolidated driveways and facilitating pedestrian accessibility through and increased number and improved design of mall entrances. Pedestrian activity would be further enhanced through a more varied and extensive landscape treatment (than what currently exists) along the Riverside Drive and Hazeltine Avenue frontages that would create a pleasant street experience for pedestrians, encourage improved natural surveillance for a safer environment, and upgrade adjacent transit stops with attractive and comfortable street furniture.		

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
		PDF: The Proposed Project and ongoing operation of the shopping center would provide benefits equivalent to a Business Improvement District (BID) at the project site because the current mall association provides continues security, monitoring of site conditions, litter removal and maintenance of the physical facilities in a manner that mirrors, if not exceeds, the level of benefit that would be provided through an independent BID. **PDF**: The Proposed Project Landscape Plan will incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance. **PDF**: The Proposed Project would result in the addition of more building access points that would improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving public safety (through natural access control, natural surveillance and territorial reinforcement features) and pedestrian activity (through improved convenience and accessibility).		
5.2.8	**Urban Design-Site Lighting**			
	Provide site lighting that distributes light evenly and avoids harsh shadows and glare.	**PDF**: The Proposed Project will provide lighting throughout the site that will distribute light evenly across the property and shall be positioned to prevent harsh glares on public rights-of-way or adjacent properties.	1	1
	Include permanent attachments to site lighting so that the light sources are not visible from a public right of way and any off-site glare is prevented.	**PDF**: The Proposed Project will provide lighting throughout the site that will distribute light evenly across the property and shall be positioned to prevent harsh glares on public rights-of-way or adjacent properties.	1	1
	Provide site lighting that is integrated into the architecture.	**PDF**: The Proposed Project will provide lighting throughout the site that will distribute light evenly across the property and shall be positioned to prevent harsh glares on public rights-of-	1	1

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
		way or adjacent properties.		
5.2.9	**Urban Design-Visual Clutter**			
	Design trash/recycling enclosures so that dumpsters and trash bins are not visible to the general public from either the Greenway or the street.		P	P
	Screen from public view all exterior rooftop and ground-level mechanical equipment, which includes HVAC equipment, exhaust fans, wireless telecommunication facilit equipment cabinet enclosures. and satellite dishes.		P	P
	Limit building or site signage to address identification, business and operational identification, and the name of the building.		1	0
	Locate all service areas beyond the Greenway and/or street adjacent setback areas. Completely screen service areas from the public view.		1	0
	Design security features to deter criminal activity but maintain a positive image for the community. Design security grills so that they are recessed completely into pockets that conceal the grill when they are retracted. Design the pockets to be integrated into the design of the building.	The following PDFs either individually, or in combination, meet the intent of this building design strategy: **PDF**: The project design seeks to promote a "high end" atmosphere, both through the type of tenants that will be located within the development and through the attention to architectural detail and landscape enhancements that promulgate a positive community ambience. **PDF**: The Proposed Project would provide architectural, landscape, signage and access improvements that would facilitate and distinguish the identity of the shopping center, while reflecting a modernized and distinctive character for the local community. **PDF**: The Proposed Project would support and enhance pedestrian activity through implementation of site access and circulation improvements that minimize pedestrian conflicts through consolidated driveways and facilitating pedestrian accessibility through and increased number and improved design of mall entrances. Pedestrian activity	1	1

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
		would be further enhanced through a more varied and extensive landscape treatment along the Riverside Drive and Hazeltine Avenue frontages that would create a pleasant street experience for pedestrians, encourage improved natural surveillance for a safer environment, and upgrade adjacent transit stops with attractive and comfortable street furniture. **PDF**: The Proposed Project and ongoing operation of the shopping center would provide benefits equivalent to a Business Improvement District (BID) at the project site because the current mall association provides continued security, monitoring of site conditions, litter removal and maintenance of the physical facilities in a manner that mirrors, if not exceeds, the level of benefit that would be provided through an independent BID. **PDF**: The Proposed Project Landscape Plan will incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance. **PDF**: The Proposed Project would be maintained as a closed mall campus with controlled access points and operational hours. **PDF**: The Proposed Project would result in the addition of more building access points that would improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving public safety (through natural access control, natural surveillance and territorial reinforcement features) and pedestrian activity (through improved convenience and accessibility).		
	Underground the utility lines leading to the project site. One point will be accrued for every 100 feet of lines		1 per 100’	0

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
	that are undergrounded.			
5.3	**MOBILITY**			
5.3.1	**Mobility-Alternatives**			
	Pledge to provide transit passes for residents and/or employees for the first year of the building's operation.		1	0
	Allocate a permanent location, accessible and visible to the users of the building for local transit and para transit information (times, routes, rates) on bulletin boards, kiosks and/or sign boards. The information provided shall be maintained as current and up to date.	**PDF**: The Proposed Project includes a Transportation Demand Management program that will include display and distribution of transit information for both employees and patrons.	1	1
	Provide facilities for securing bicycles for at least 5% of the regular building occupants. For each additional 5% accommodated, an additional point will be rewarded, for a maximum of 3 points.	**PDF**: The Proposed Project would provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities. The provision of bicycle racks and supporting facilities would support alternative transportation options for non-motorized vehicle use, and indirectly supports public transportation and pedestrian access options.	1	1
	Provide facilities for securing bicycles for at least 15% of building occupants.		-	-
	Provide on-site locker facilities for bicyclists.	**PDF**: The Proposed Project would provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities. The provision of bicycle racks and supporting facilities would support alternative transportation	1	1

ID NO.	RIO CATEGORY	APPLICABLE PROJECT DESIGN FEATURES (PDFS) AND CONSISTENCY DISCUSSION	POSSIBLE POINTS	PROJECT POINTS CREDIT
		options for non-motorized vehicle use, and indirectly supports public transportation and pedestrian access options.		
	Provide on-site changing/shower facilities for employees.	**PDF**: The Proposed Project would provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities. The provision of bicycle racks and supporting facilities would support alternative transportation options for non-motorized vehicle use, and indirectly supports public transportation and pedestrian access options.	1	1
	Allocate at least 2% of parking spaces on-site for a third party shared car program.		1	0
	Organize and provide a van and/or carpool service for employees	**PDF**: The Proposed Project would provide a shuttle service connecting the site to a nearby Orange Line station (e.g., Van Nuys Boulevard). This service could be provided by either the provision of a private shuttle or the funding of extended hours for the existing Los Angeles Department of Transportation (LADOT) DASH line.	1	1

In summary, the Proposed Project would meet the minimum point threshold requirements for each of the three RIO categories (i.e., watershed, building design, and mobility), as well as the overall point threshold minimum of 20 points. In fact, the Proposed Project would exceed the minimum required points as follows:

Category	Minimum Required	Project Accumulated
Watershed	10 points	10 points
Building Design	5 points	13 points
Mobility	5 points	5 points
Total	20 points	28 points

Because the Proposed Project exceeds the minimum required threshold points, the project would be deemed to be in compliance with the pending RIO. Because the Proposed Project would be consistent with the RIO, it would also be consistent with the LARRMP because the project either directly contributes toward the furtherance of LARRMP policies (i.e., as through physical site improvements) or indirectly supports those policies by not creating obstacles for their realization. The Proposed Project will result in a less than significant impact to land use consistency and compatibility in the project area due to conflicts with policies and programs of the LARRMP and RIO.

(c) Other Local Programs

Although not directly related to the proposed uses under the Proposed Project, the increase in land use intensity could indirectly affect the balance of other local and regional land uses related to parks and recreation. Unlike many other public services, parks and recreational services are dependent not only on funds to support park services, but also the provision of adequate recreational and open space dedicated land uses.

The operation and management of public recreational facilities in the project area is provided by the City of Los Angeles Department of Recreation and Parks. The Department of Recreation and Parks currently operates approximately 176 recreation centers, 59 pools, 30 senior citizen centers, 7 museums and historic sites, 13 golf courses, 24 child care centers, and 7 skate parks citywide.1

The project site is currently developed with retail/shopping center facilities. No parkland, open space or recreational facilities are currently located on the project site. The Proposed Project will not result in the creation or removal of parkland or active recreational facilities. The Proposed Project includes the provision of a new community room which would be made available to the surrounding Sherman Oaks community and offset a potential increase demand on recreational facilities for community meeting space needs.

An impact to parks and open space is generally based on the number of residents and employees located on a project site that would intend to utilize park facilities. The City of Los Angeles CEQA Significance Thresholds indicate that consideration should be given to the net population increase resulting from the project, the demand for recreation services anticipated at the time of buildout, and whether the project includes features that would reduce demand for recreational services.

The project site is currently developed with retail/shopping center facilities. The potential for recreational use by employees at the site during their work shift has been analyzed. Employees at the site on a daily basis could increase to approximately 2,600, an increase of approximately 788 employees per day. However, as a substantial employment base and residential population currently exist in the San Fernando Valley, it is anticipated that the majority of the new employees would be derived from existing residential areas nearby. Hence, the Proposed Project would not necessarily result in an increase in the local population, or an increased use of park and recreational facilities in the project area. An increase of this magnitude would not generate the need for or involve the construction of new or altered park facilities since a substantial

employment base and residential population currently exist in the San Fernando Valley. The project will result in a less than significant impact to parks and recreational facilities.

(d) SCAG Regional Comprehensive Plan

Because the Proposed Project requests the addition of 280,000 GLSF, or the equivalent of approximately 482,740 gross square feet of new retail uses, resulting in approximately 788 new employees, it does not qualify as a regionally significant project, which is defined by a threshold minimum size of 500,000 square feet or 1,000 employees (per CEQA Guidelines Section 15206). However, because the total size of the shopping center would exceed one million square feet and the mall is nonetheless recognized as an important economic asset to the San Fernando Valley area, an analysis of compliance to regional policy is provided.

Adopted policies within the RCP that are related to land use are generally contained within the Growth Management chapter. Other chapters addressing water quality, transportation, air quality and open space also contain some policy statements that are relevant to land use. SCAG policies that apply to the Proposed Project generally include those that encourage jobs/housing balance, sustain economic vitality, achieve efficient use of infrastructure and community resources, and protect the environment. The applicable land use related goals, objectives and policies of the RCP are provided in *Table 22: Consistency with Applicable SCAG Regional Policies*, along with a discussion of the project consistency with each applicable component.

TABLE 22
CONSISTENCY WITH APPLICABLE SCAG REGIONAL POLICIES

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
GROWTH MANAGEMENT CHAPTER			
3.01	*The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*	The Proposed Project is consistent with this policy because it is consistent with SCAG's growth forecasts, which are the basis for plans and policies that guide development at the project site. The project is consistent with applicable regional and local plans and does not propose any changes to existing policies or planning programs.	Consistent
3.04	*Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.*	The Proposed Project is consistent with this policy because it will establish approximately 788 new permanent jobs in an area that already maintains a substantial employment base and residential population. It is anticipated that new employees for the proposed redevelopment would be drawn from nearby residential areas within the San Fernando Valley. Also, an extensive network of public transit in the project area allows for greater flexibility to balance jobs/housing needs.	Consistent
3.05	*Encourage patterns of urban development and land use which reduce costs on*	The Proposed Project is consistent with this policy as it would essentially provide	Consistent

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
	infrastructure construction and make better use of existing facilities.	infill development of an underutilized commercial site within an existing urban area that is served by existing infrastructure. The Proposed Project would make use of the existing infrastructure without creating a need for substantial additional infrastructure. In addition, the Van Nuys/Sherman Oaks area is an established urban community essentially developed according to land use patterns provided by the applicable Community Plan. The Proposed Project would be developed at an established community commercial core, which is conveniently located near residential neighborhoods and public transit corridors, thus allowing for reduced commuting distances for many employees and/or project patrons.	
3.08	*Encourage subregions to define an economic strategy to maintain the economic vitality of the subregion, including the development and use of marketing programs, and other economic incentives, which support attainment of subregional goals and policies.*	The Proposed Project is consistent with this policy as the very nature of the project is to enhance and reinforce the economic vitality of the community through a higher concentration of commercial services to support the local community. Further, the Proposed Project would not detract from the vitality of other surrounding business districts as evidenced by the Urban Decay study (see Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay).	Consistent
3.09	*Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*	The Proposed Project is consistent with this policy because the development is infill located in an area that is already urbanized and fully improved with an adequate infrastructure system and public services. Development of the project would involve lower infrastructure and public service delivery cost as compared to development in areas that are not currently served by existing infrastructure. See also Response 3.05.	Consistent
3.12	*Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*	The Proposed Project is consistent with this policy as the project site is very accessible from area roadways and public transit routes. The Proposed Project would include the following project design features that would shorten and/or avoid vehicle trips and vehicle miles traveled: **PDF**: The Proposed Project would	Consistent

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		provide an improved pedestrian crossing at the proposed Riverside Drive/Matilija Avenue intersection, a landscape-enhanced pedestrian corridor along Riverside Drive, and more efficient and safer site driveway entrances that strengthen community linkages to surrounding uses and support non-motorized vehicle travel options. **PDF**: The Proposed Project would be located within close proximity (less than ½ mile) from other key community services, thereby adding to efficient development densities and community connectivity within the North Sherman Oaks community. Further, the Proposed Project development and other proximate services would be conveniently accessible by local residents through an improved pedestrian access plan (i.e., cross walk at Matilija Avenue/Riverside Drive, and aesthetic treatment along Riverside Drive frontage), and accessible by more distant residents and employees through enhanced public transit options/amenities (i.e., upgraded bus stops, and coordinated bus schedules through MTA). Efficient development densities, accomplished through the consolidation and intensity of community services in the project area, contributes toward improved energy efficiency, vehicle trip reduction, vehicle miles traveled reduction, air pollutants reduction, and consistency with local and regional planning programs. **PDF**: The Proposed Project would provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities. The provision of bicycle racks and supporting facilities would support alternative transportation options for non-motorized vehicle use, and indirectly	

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		supports public transportation and pedestrian access options. **PDF**: The Proposed Project would provide funding for extended shuttle hours from the Orange Line station to the site during weekends and peak holiday periods.	
3.13	*Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*	The Proposed Project is consistent with this policy because it is an urban infill project located in an area serviced by an extensive transit network. See responses to 3.09 and 3.12.	Consistent
3.14	*Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems and activity centers.*	The Proposed Project is consistent with this policy as the project site is very accessible from area roadways and public transit routes. The Proposed Project would include the following project design features that would support an intensification of land uses in strategic locations serviced by transit systems and supported by activity centers: **PDF**: The Proposed Project is would be located within close proximity (less than ½ mile) from other key community services, thereby adding to efficient development densities and community connectivity within the North Sherman Oaks community. Further, the Proposed Project development and other proximate services would be conveniently accessible by local residents through an improved pedestrian access plan (i.e., cross walk at Matilija Avenue/Riverside Drive, and aesthetic treatment along Riverside Drive frontage), and accessible by more distant residents and employees through enhanced public transit options/amenities (i.e., upgraded bus stops, and coordinated bus schedules through MTA). Efficient development densities, accomplished through the consolidation and intensity of community services in the project area, contributes toward improved energy efficiency, vehicle trip reduction, vehicle miles traveled reduction, air pollutants reduction, and consistency with local and regional planning programs. **PDF**: The Proposed Project is adjacent to stops for the MTA Routes 96	Consistent

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		(Downtown LA to Sherman Oaks) and 158 (Chatsworth to Sherman Oaks), and LADOT Dash Route for Van Nuys/Studio City, thereby supporting a range of alternative transportation options for public transportation access. **PDF**: The Proposed Project would provide funding for extended shuttle hours from the Orange Line station to the site during weekends and peak holiday periods.	
3.15	*Support local jurisdictions strategies to establish mixed-use clusters and other transit oriented developments around transit stations and along transit corridors*	The Proposed Project is consistent with this policy because the development will expand the mix of services available within an established community consisting of office, retail and residential use and the project site is adequately serviced by an extensive transit network. See also responses to 3.05, 3.12 and 3.14.	Consistent
3.16	*Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*	The Proposed Project is consistent with this policy because it is an urban infill project located in an area serviced by an extensive transit network and infrastructure system. See responses to 3.05, 3.09, 3.12, 3.13 and 3.14.	Consistent
3.18	*Encourage planned development in locations least likely to cause adverse environmental impact.*	The Proposed Project is consistent with this policy because the EIR demonstrates that the project is consistent with applicable regional and local plans, and that project-related impacts have been mitigated to minimize conflicts. The project would be developed on an underutilized commercial parcel that is surrounded by urban development of similar use, scale and character to that proposed. This combination of factors minimizes potential for adverse environmental impacts. See also responses to 3.01, 3.05, 3.09, 3.12, 3.13, 3.14 and 3.16.	Consistent
3.20	*Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*	The Proposed Project is consistent with this policy as it would be built in an established urban environment, which does not include any of these resources and would not directly adversely affect these resources. The infill and intensification of commercial uses at the project site could reduce development pressures in non-urban or other more environmentally sensitive areas that more likely result in the potential for effects on these resources. It should be	Consistent

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		noted that recent mandates to establish and comply with implementation of the Los Angeles River Improvement Overlay District will further ensure that the Proposed Projects collaborates with the protection/advancement of biological resources and watershed associated with the Los Angeles River greenway corridor.	
3.21	*Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*	The Proposed Project is consistent with this policy as standard precautions would be undertaken during the construction of the project. There are no known cultural or historical resources identified at the project site. However, in the event that remains or archaeological/ paleontological resources are encountered during excavation, standard regulations and practice by City Code would require work to immediately stop until any such findings can be assessed.	Consistent
3.22	*Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*	The Proposed Project is consistent with this policy because it not located in an area of extreme hazards and the proposed buildings would be constructed in accordance with applicable seismic standards. See Sections IV: Environmental Impact Analysis: C-Geology and Soils and IV: Environmental Impact Analysis: D-Hazardous Materials and Man-Made Hazards.	Consistent
3.23	*Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage and to develop emergency response and recovery plans.*	The Proposed Project is consistent with this policy because it would not impact biological/ecological resources nor would the development be affected by typical seismic hazards nor would the project interfere with emergency response plans. Appropriate mitigation measures are recommended in the EIR address impacts related to noise. This EIR includes a construction noise assessment which determined that with incorporation of noise reducing mitigation measures, the project related construction noise would be reduced to a less than significant level. See Sections IV: Environmental Analysis: C-Geology and Soils, IV: Environmental Analysis: D-Hazardous Materials and Man-Made Hazards and IV: Environmental Analysis: G-Noise. It should be noted that recent mandates to establish and comply with implementation of the Los	Consistent

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		Angeles River Improvement Overlay District will further ensure that the Proposed Projects collaborates with the protection/advancement of biological resources associated with the Los Angeles River greenway corridor. See also responses 3.01, 3.18 and 3.20.	
3.27	*Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*	The Proposed Project is consistent with this policy because it would not pose a significant demand on police, fire and other community services, thereby affording the broader community access to such services. See also Sections IV: Environmental Analysis: Public Services: Fire and Police. **PDF**: The Proposed Project has committed to achieve LEED certifiable levels to support efforts to develop a sustainable community.	Consistent
AIR QUALITY CHAPTER (CORE) POLICIES/ACTIONS			
5.11	*Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*	The Proposed Project is consistent with this policy because the EIR demonstrates that the project is consistent with applicable regional and local plans, and that project-related impacts have been mitigated to minimize conflicts. Air quality, land use, and transportation issues are discussed in Sections IV: Environmental Analysis: B-Air Quality, IV: Environmental Analysis: F-Land Use Planning and Urban Decay, and IV: Environmental Analysis: J-Traffic, Circulation and Access, respectively. See also responses to 3.01 and 3.18.	Consistent
OPEN SPACE AND CONSERVATION CHAPTER GOALS			
9.01	*Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.*	The Proposed Project is consistent with this goal because it involves infill development that concentrates commercial uses on lands already designated for, and used as, a commercial use. Also, the Proposed Project will indirectly support community recreational needs by providing a community meeting facility and offering opportunities for casual recreational activity (such as events or indoor walking programs). Further, the Proposed Project would not adversely impact park and recreational facilities located in the project area.	Consistent

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
CORE WATER QUALITY CHAPTER POLICIES			
11.02	*Encourage "watershed management" programs and strategies encouraged, recognizing the primary role of local governments in such efforts.*	The Proposed Project is consistent with this policy because the project design and site planning incorporate a range of project design features that minimize pollutant runoff and manage runoff volumes. A discussion of the specific best management practices (BMPs) to be incorporated into the Proposed Project, and the water quality results, is provided in Section IV: Environmental Impact Analysis: E-Water Resources.	Consistent
11.07	*Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*	As discussed in Section IV: Environmental Impact Analysis: E-Water Resources, LADWP, the water supplier for the Proposed Project, is working to increase a portion of its supply that is derived from recycled water. Although a dual water system for the delivery of reclaimed water to the project site is not currently in place, landscape areas incorporated into the Proposed Project would provide an opportunity for the use of reclaimed water in the future if delivery infrastructure is developed. Because the Proposed Project relies on water provided by LADWP, and LADWP derives a portion of its water supply from reclaimed water, the project is indirectly consistent with this policy.	Consistent
REGIONAL TRANSPORTATION PLAN (2004) GOALS			
G 1.0	*Maximize mobility and accessibility for all people and goods in the Region.*	The Proposed Project is consistent with this goal because the development includes measures which improve the local flow of traffic (thereby minimizing congestion) and expanding opportunities for pedestrian, bicycle and public transit access between existing residential uses and the expanded commercial uses at the project site. See also responses to 3.05, 3.12 and 3.14.	Consistent
G 4.0	*Maximize the productivity of our transportation system.*	The Proposed Project is consistent with this goal because the location of infill commercial development proximate to key components of the transit network, and the implementation of mitigation measures to improve traffic flow on local streets, will enhance the productivity of the established transportation system in the project area. See Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access. See also responses to 3.05, 3.12, 3.13, 3.14, 3.15	Consistent

ID NO.	POLICY STATEMENT	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		and 3.16.	
G 5.0	*Protect the environment, improve air quality and promote energy efficiency.*	**PDF**: The Proposed Project has committed to achieve LEED certifiable levels to support efforts to develop a sustainable community. The Proposed Project is consistent with this goal because the incorporation of project design features, implementation of recommended mitigation measures, and compliance with standard conditions, rules and regulations, will ensure that development of the Proposed Project is completed in a manner that protects the environment, improves air quality and promotes energy efficiency. See also responses to 3.01, 3.12, 3.13, 3.14, 3.15, 3.16, 3.18, 3.20, 3.21, 3.23, 5.11 and 11.02.	Consistent
G 6.0	*Encourage land-use and growth patterns that complement our transportation investments.*	The Proposed Project is consistent with this policy because the development will expand the mix of services available within an established community, and the project site is adequately serviced by an extensive transit network. See also responses to 3.05, 3.12, 3.14 and 3.15.	Consistent

In summary, the Proposed Project is consistent with the RCP because the project either directly contributes toward the furtherance of the RCP policies (i.e., as through the provision of jobs), or indirectly supports the RCP policies by not creating obstacles for their realization (i.e., opportunity for greater efficiency of transit infrastructure). The Proposed Project will result in a less than significant impact to land use consistency as the Proposed Project will not create any conflict with policies and programs of SCAG's regional plans, including the RCP.

(e) Other Regional Programs

Other regional plans that address land use in the project area include the Los Angeles County Congestion Management Plan (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (MTA) and the Air Quality Management Plan (AQMP) administered by the South Coast Air Quality Management District (SCAQMD). However, because the policy statements in both the AQMP and the CMP are derived from assumptions and growth expectations defined in the RCP, development that is generally consistent with the RCP would be consistent also with the AQMP and CMP. Because the Proposed Project is consistent with the RCP and growth forecasts, the Proposed Project is consistent with these other regional programs as well with regard to land use considerations. Both the AQMP and the CMP include additional policy statements that are directed toward achieving physical reductions in air pollutant emissions and traffic congestion, and those aspects are considered separately under the technical analysis related to air quality and traffic. See also Sections IV: Environmental Impact Analysis: B-Air Quality and IV: Environmental Impact Analysis: J-Traffic, Circulation and

Access of this DEIR for a more detailed discussion of the AQMP and CMP on aspects other than land use.

(5) Cumulative Impacts

The Proposed Project will result in a less than significant land use impact. The Proposed Project is consistent with the current Community Commercial designation of the Van Nuys-North Sherman Oaks Community Plan. As such, the project will not require a general plan amendment that could directly or indirectly generate a potential land use impact. The Proposed Project is consistent with other applicable land use plans such as the RCP, LARRMP and Draft RIO. The project is proposed on the existing shopping center site and will not extend past existing site boundaries, reducing potential land use impacts attributable to encroachment onto other properties. The Proposed Project will not divide an established community.

Section III: General Description of Environmental Setting of this DEIR provides a list of projects that are planned or are under construction in the project area. Development attributable to past, present and probable future projects would be development planned for as a part of the local land use projections of the City of Los Angeles and part of the existing baseline. These projections are utilized regionally by SCAG and SCAQMD, and thus would not represent new unanticipated growth.

Anticipated uses include office space and retail/commercial uses. None of the related projects are requesting General Plan Amendments. As a result the related projects are considered consistent with the General Plan. Since the proposed Project and other developments planned for the area are consistent with the overall existing and planned land use patterns in the area, cumulative impacts in this regard are not expected. As discussed above, the Proposed Project is compatible with existing uses immediately surrounding the site.

The identified related projects are not located immediately adjacent to the project site such that they could, in relation to the project site, divide an established community. Additionally, land use impacts due to conflict with applicable plans such as the General Plan are typically site specific and will be identified during environmental analysis for specific related projects. Cumulative land use impacts are less than significant. No cumulatively considerable impact is anticipated as a result of the Project when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

4. MITIGATION PROGRAM

With the incorporation of the assumed PDFs and SCAs, the Proposed Project would not result in any significant land use compatibility or land use plan consistency impacts. To ensure the Proposed Project is consistent with these assumptions, the follow mitigation measures are recommended:

MM LU-1: The Proposed Project must obtain the appropriate approvals, including zone change, variances and conditional use permits, prior to commencing project

development. Attainment of such approvals shall in turn ensure that the Proposed Project is in full compliance with local codes, procedures and regulations.

MM LU-2: The Proposed Project shall comply with the draft RIO and/or adopted RIO in effect at the time of project approval.

MM LU-3: In accordance with the SUSMP requirements, the Proposed Project shall meet (or exceed) all minimum site design and source control BMPs.

MM LU-4: The Proposed Project shall adopt an erosion and sediment control plan for the project site during the construction phase that would employ strategies such as temporary and permanent seeding, mulching, earth dikes, silt fencing, sediment traps and sediment basins. The erosion and sediment control plan shall comply with U.S. Environmental Protection Agency (EPA) Document No. EPA 832/R-92-005 (September 1992), Storm Water Management for Construction Activities, Chapter 3 (or the local agency equivalent erosion and sedimentation control standards and codes) and shall address soil loss, stormwater runoff, wind erosion, sedimentation, and fugitive dust at a minimum. The erosion and sediment control plan shall contribute to minimizing water quality impacts and may indirectly minimize aesthetic effects during the construction phase.

MM LU-5: Consistent with California laws, the Proposed Project shall prohibit smoking in the shopping center buildings, public areas, or exterior areas within 25 feet from entries, outdoor air intakes and operable windows, unless such areas are specifically designated and properly ventilated as a dedicated "smoking area".

MM LU-6: The Proposed Project shall include the provision of a new community room to be made available to the surrounding Sherman Oaks community and to offset a potential increase demand on recreational facilities for community meeting space needs.

MM LU-7: The Proposed Project shall provide new landscaping treatment along the Hazeltine Avenue, Riverside Drive and Woodman Avenue frontages that would enhance the visual interest along these road way corridors and the shopping center perimeter through the addition of a sophisticated landscape treatment that includes color, depth, volume and variety.

MM LU-8: The Proposed Project shall provide funds for the implementation of a Neighborhood Protection Program (NPP) that focuses on the prevention of "cut through" traffic in the residential neighborhoods north of the project site (across Riverside Drive). The NPP would seek to maintain the quality of the residential area through traffic control and traffic calming measures.

MM LU-9: The Proposed Project shall provide an improved pedestrian crossing at the proposed Riverside Drive/Matilija Avenue intersection, a landscape-enhanced pedestrian corridor along Riverside Drive, and more efficient and safer site

driveway entrances that will serve to strengthen community linkages to surrounding uses and support non-motorized vehicle travel options.

MM LU-10: The Proposed Project Landscape Plan shall incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance.

MM LU-11 The Proposed Project shall incorporate building access points that would improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving public safety (through natural access control, natural surveillance and territorial reinforcement features) and pedestrian activity (through improved convenience and accessibility).

MM LU-12: The Proposed Project shall incorporate treatment control BMPs that will minimize urban runoff and associated impacts to receiving water quality and specifically address the identified pollutants of concern. Many BMP alternatives can be easily integrated into planned landscaping, right-of-ways, and planned infrastructure. BMP alternatives that would be implemented with the Proposed Project include: (1) vegetated treatment BMPs, (2) onsite storage and reuse, (3) permeable paving, (4) roof top BMPs, and (5) media filters.

MM LU-13: The Proposed Project shall incorporate a number of vegetated treatment BMPs, including swales, filter strips, bioretention and planter boxes. When properly designed and maintained, vegetated BMPs are among the most effective, cost efficient treatment approaches for dry and wet-weather runoff. Treatment occurs through sedimentation, filtration, adsorption to organic matter, and vegetative uptake. Additionally, vegetated treatment systems would reduce runoff volumes through soil soaking, infiltration, and evapotranspiration. On-site implementation of these systems would be integrated into surface conveyances and on-site landscaping in innovative ways that provide dual-functional site amenities.

MM LU-14: The Proposed Project shall incorporate permeable (porous) pavement material in pavement areas (such as roadways, driveways, parking areas, and walkways). The permeable (porous) pavement materials would allow water to drain down to the underlying soil and reduce the volume of wet weather urban runoff. The Proposed Project would incorporate a mix of porous concrete, pervious asphalt, pervious pavers, grass/gravel pavers, and crushed stone, into the landscape plan and design of surface parking areas as functionally appropriate.

MM LU-15: The Proposed Project shall employ rooftop BMPs for filtering and/or capturing stormwater in order to contribute toward the reduction of small storm events peaks and the overall runoff volume via inter-event evaporation and transpiration. Rooftop BMPs incorporated into the project design include planters and landscaping on the rooftop portion of the new parking structures, and hanging

planters along the parking building tiers and along the Riverside Drive mall elevation.

MM LU-16: The Proposed Project shall employ media filtration to separate and filter fine particulates and associated pollutants from captured stormwater.

MM LU-17: The Proposed Project shall provide bicycle racks at a ratio of 2% of the total number of parking spaces on-site, as well as lockers, changing rooms and showers inside the shopping center. A minimum of 20 additional bicycle spaces (in racks) would be provided at multiple locations through out the site. Four showers (two per each gender) would be provided in a dedicated shower facility area. Lockers would be provided in conjunction with the shower facilities.

MM LU-18: The Proposed Project shall designate an area for recyclable collection and storage that is appropriately sized and located in a convenient area to serve mall tenants. As appropriate, the Fashion Square Mall Association shall implement the use of cardboard balers, aluminum can crushers, recycling chutes and other waste management technologies to further enhance and manage a recycling program at the shopping center.

MM LU-19: The Proposed Project shall install carbon monoxide and airflow measurement equipment that would transfer the information to the HVAC system and/or Building Automation System to trigger corrective action, if applicable, and/or use the measurement equipment to trigger alarms that inform building operators or occupants of a possible deficiency in outdoor air delivery. Installation of such a system in areas where carbon monoxide concentrations may escalate (such as in the vicinity of loading docks or valet parking drop-offs) would improve both indoor and localized "hotspot" air quality.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

With implementation of the standard conditions and project design features, the Proposed Project would not result in significant land use compatibility or land use plan consistency impacts on a project-level or cumulative basis; it would not result in significant unavoidable impacts.

IV. ENVIRONMENTAL IMPACT ANALYSIS

G. NOISE

The following analysis of noise impacts is based primarily upon the *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*, prepared by Terry A. Hayes Associates LLC and dated February 26, 2008. Noise calculation sheets are provided in Appendix D: Noise of this DEIR.

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

The following discussion focuses on providing noise and ground-borne vibration background information. In addition, existing noise and ground-borne conditions are characterized.

(1) Characteristics of Sound

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately three to 140 dBA. *Figure 40: A-Weighted Decibel Scale* provides examples of A-weighted noise levels from common sounds.

(a) Noise

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level (Leq).

Community Noise Equivalent Level. CNEL is a 24-hour continuous Leq with five dBA added to noise occurring between 7:00 p.m. and 10:00 p.m. and ten dBA added to noise levels occurring between 10:00 p.m. to 7:00 a.m. The added values are used to account for added sensitivity during evening and typical nighttime sleeping hours.[1]

Equivalent Noise Level. Leq is the average noise level on an energy basis for any specific time period. The Leq, if constant over a specified time period, would contain the same sound energy as the actual sound that varies in level with time.[2]

(i) Effects of Noise

Noise is generally defined as unwanted sound. The degree to which noise can impact the human environment range from levels that interfere with speech and sleep (annoyance and nuisance) to

[1] Cowan, James P. 1994. *Handbook of Environmental Acoustics*. Wiley, John & Sons, Inc. 6 June 2008 <http://www.wiley.com/WileyCDA/WileyTitle/productCd-0471285846.html>.
[2] *Ibid*

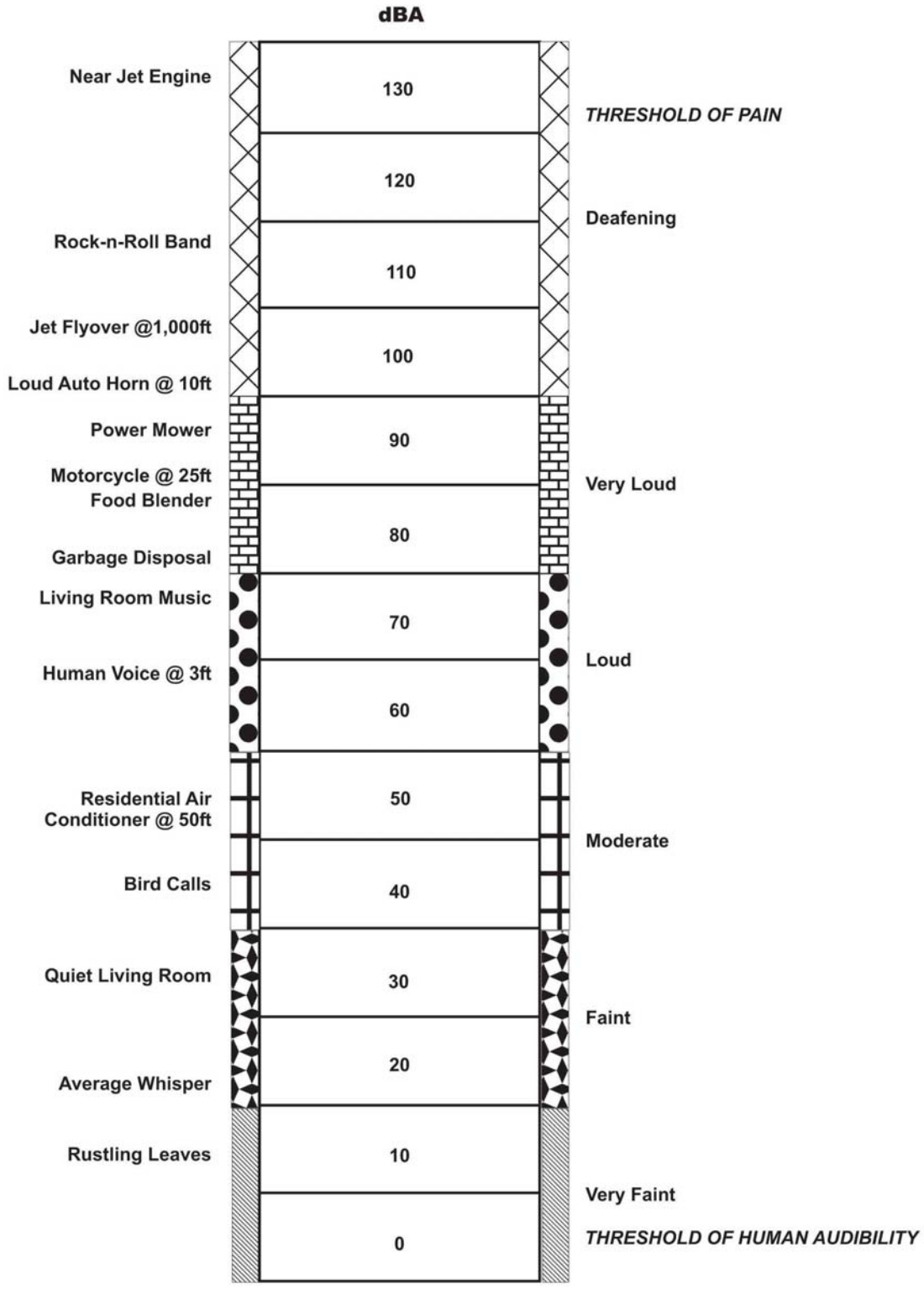


FIGURE 40
A-WEIGHTED DECIBEL SCALE

SOURCE: COWAN, JAMES P.,
HANDBOOK OF ENVIRONMENTAL ACOUSTICS

levels that cause adverse health effects (hearing loss and psychological effects). Human response to noise is subjective and can vary greatly from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes

Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately three dBA. A change of at least five dBA would be noticeable and would likely evoke a community reaction. A ten-dBA increase is subjectively heard as a doubling in loudness and would most certainly cause a community response.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately six dBA over hard surfaces and 7.5 dBA over soft surfaces for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on.

Generally, noise is most audible when traveling by direct line-of-sight[3]. Barriers, such as walls, berms, or buildings, that break the line-of-sight between the source and the receiver greatly reduces noise levels from the source since sound can only reach the receiver by bending over the top of the barrier (diffraction). Sound barriers can reduce sound levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

(b) Ground-borne Vibration

(i) Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment.

(ii) Vibration Definitions

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV in inches per second is often used to describe vibration impacts to buildings. The root mean square (RMS) amplitude is most frequently used to describe the affect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal.

[3] Line-of-sight is an unobstructed visual path between the noise source and the noise receptor.

Decibel notation (Vdb) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration[4].

(iii) Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration (e.g., electron microscopes).

To counter the effects of ground-borne vibration, the Federal Railway Administration (FRA) has published guidance relative to vibration impacts. According to the FRA, fragile buildings can be exposed to ground-borne vibration levels of 0.5 inches per second PPV without experiencing structural damage.[5]

In contrast to noise, ground-borne vibration is not a phenomenon that most people experience every day. The background vibration velocity level in residential areas is usually 50 Vdb RMS or lower, well below the threshold of perception for humans, which is around 65 Vdb RMS.[6] Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

(2) Existing Local Noise Conditions

The existing noise environment of the project area is characterized by vehicular traffic and noises typical to a dense urban area (e.g., people conversing). Vehicular traffic is the primary source of noise in the project vicinity.

(a) Ambient Noise Levels

Two sets of ambient sound readings were taken at the project site and the surrounding area using a Quest Q-400 Noise Dosimeter. Noise monitoring, for 15 minute intervals, was completed along Riverside Drive between 8:45 a.m. and 12:10 p.m. on December 5, 2006. This monitoring period represented the peak season at Westfield Fashion Square and, as such, ambient noise levels in the project vicinity were higher than the typical daily ambient noise level. Noise monitoring was also completed between 11:00 a.m. and 2:30 p.m. on August 15, 2007. This monitoring period represented the off-peak season at the Westfield Fashion Square and, as such, ambient noise levels in the project vicinity were similar to the typical daily ambient noise level.

[4] U.S. Department of Transportation, Federal Transit Administration. 1995 1st edition; 2006 2nd edition. *Transit Noise and Vibration Impact Assessment*. Washington D.C.: Author. 6 June 2008 <http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf>.
[5] U.S. Department of Transportation, Federal Railroad Administration. 1998 (December). *High-Speed Ground Transportation Noise and Vibration Impact Assessment*. Washington D.C.: Parsons Transportation Group. 6 June 2008 <http://www.fra.dot.gov/downloads/RRDev/nvman.pdf >.
[6] U.S. Department of Transportation, Federal Transit Administration. 1995 1st edition; 2006 2nd edition. *Transit Noise and Vibration Impact Assessment*. Washington D.C.: Author. 6 June 2008 <http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf>.

These readings were used to establish existing ambient noise conditions and to provide a baseline for evaluating construction and operational noise impacts. Noise monitoring locations are shown in *Figure 41: Noise Monitoring Locations*. As shown in *Table 23: Existing Noise Measurements*, existing ambient sound levels range between 72.0 to 75.7 dBA (Leq) during the peak season and between 65.5 and 68.4 dBA (Leq) during the off-peak season.

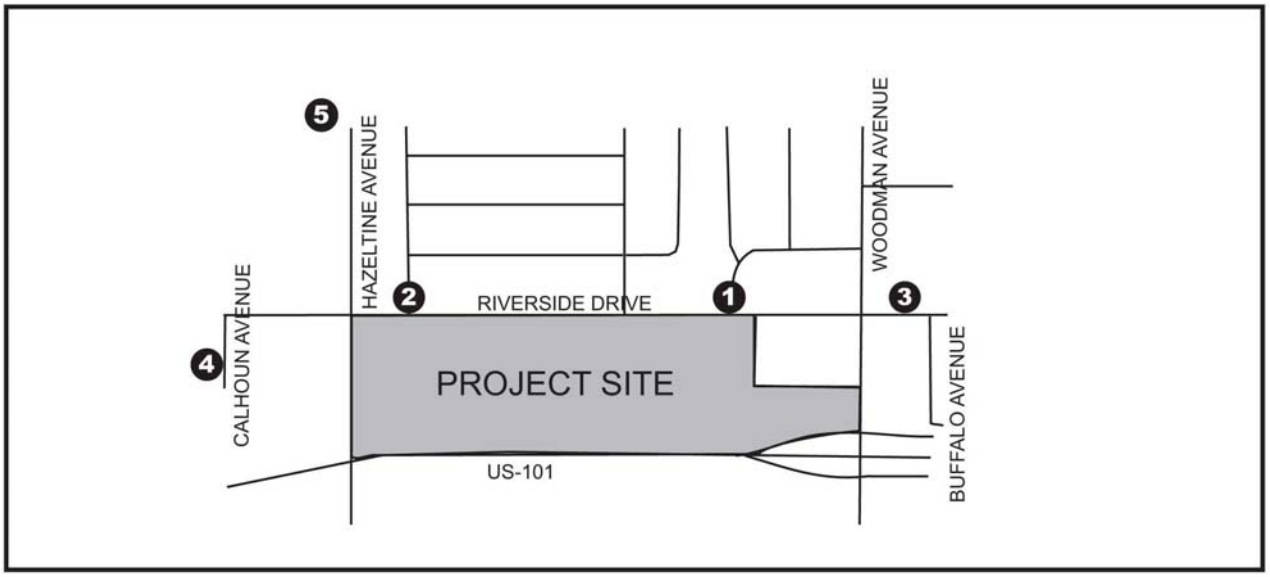
(b) Roadway Noise

As stated earlier, vehicular traffic is the predominant noise source in the project vicinity. Using existing traffic volumes (Year 2007) provided by the project traffic consultant and the Federal Highway Administration (FHWA) RD-77-108 noise calculation formulas, CNEL was calculated for various roadway segments near the project site. Existing weekday and weekend mobile noise levels are shown in *Table 24: Existing Estimated Community Noise Equivalent Level –Weekday* and *Table 25: Existing Estimated Community Noise Equivalent Level –Weekend*, respectively. As shown in *Table 24: Existing Estimated Community Noise Equivalent Level –Weekday*, weekday mobile noise levels in the project area range from 71.0 to 74.1 dBA CNEL. As shown in *Table 25: Existing Estimated Community Noise Equivalent Level –Weekend*, weekend noise levels in the project area range from 70.5 to 73.6 dBA CNEL.

TABLE 23
EXISTING NOISE MEASUREMENTS [1]

KEY TO *FIGURE 41: NOISE MONITORING LOCATIONS*	NOISE MONITORING LOCATION	DURATION (MINUTES)	SOUND LEVEL (DBA, LEQ)			
			TIME	PEAK SEASON	TIME	OFF-PEAK SEASON
1	Multi-Family Residence on Riverside Drive	15	9:27 a.m.	75.7	11:53 a.m.	66.2
2	Multi-Family Residence on Riverside Drive	15	9:07 a.m.	72.0	12:15 p.m.	68.3
3	Notre Dame High School	15		-	11:26 a.m.	67.1
4	Single-Family Residence on Calhoun Avenue and Riverside Drive	15		-	1:30 p.m.	65.5
5	Van Nuys Sherman Oaks Park on Hazeltine Avenue	15		-	12:55 p.m.	68.4

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.



LEGEND:

Noise Monitoring Locations

1. Multi-Family Residence on Riverside Drive
2. Multi-Family Residence on Riverside Drive
3. Notre Dame High School
4. Single-Family Residence on Calhoun Avenue
5. Van Nuys Sherman Oaks Park

FIGURE 41
NOISE MONITORING LOCATIONS

SOURCE: TAHA, 2007

NORTH

TABLE 24
EXISTING ESTIMATED COMMUNITY NOISE EQUIVALENT LEVEL – WEEKDAY [1][2]

ROADWAY SEGMENT	ESTIMATED CNEL DBA [3]
Riverside Drive between Van Nuys Boulevard and Hazeltine Avenue	71.2
Riverside Drive between Hazeltine Avenue and Woodman Avenue	73.3
Riverside Drive between Woodman Avenue and Sunnyslope Avenue	73.3
Woodman Avenue between Magnolia Boulevard and Riverside Drive	74.1
Woodman Avenue between US 101 Westbound Ramps and Moorpark Street	74.1
Hazeltine Avenue between Fashion Square Lane and Moorpark Street	73.1
Hazeltine Avenue between Magnolia Boulevard and Riverside Drive	73.8

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] The predicted CNELs were calculated as peak hour Leq and converted into CNEL using the California Department of Transportation Technical Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of average daily traffic and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.
[3] CNEL is presented at the property line of the sensitive receptor nearest to the roadway segment.

TABLE 25
EXISTING ESTIMATED COMMUNITY NOISE EQUIVALENT LEVEL – WEEKEND [1][2]

ROADWAY SEGMENT	ESTIMATED CNEL DBA [3]
Riverside Drive between Van Nuys Boulevard and Hazeltine Avenue	70.5
Riverside Drive between Hazeltine Avenue and Woodman Avenue	72.7
Riverside Drive between Woodman Avenue and Sunnyslope Avenue	72.1
Woodman Avenue between Magnolia Boulevard and Riverside Drive	73.5
Woodman Avenue between US 101 Westbound Ramps and Moorpark Street	73.6
Hazeltine Avenue between Fashion Square Lane and Moorpark Street	72.3
Hazeltine Avenue between Magnolia Boulevard and Riverside Drive	73.0

[1] Source: Terry A Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] The predicted CNELs were calculated as peak hour Leq and converted into CNEL using the California Department of Transportation Technical Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of average daily traffic and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.
[3] CNEL is presented at the property line of the sensitive receptor nearest to the roadway segment.

(c) Ambient Vibration Levels

Similar to the environmental setting for noise, the vibration environment is dominated by traffic from nearby roadways. Heavy trucks can generate ground-borne vibrations that vary depending on vehicle type, weight, and pavement conditions. According to the Federal Transit Administration, heavy-duty vehicles do not typically generate perceptible ground-borne vibration because rubber tires and suspension systems provide vibration isolation on smooth roadways.[7] Roadways surrounding the project site are typical urban roadways and vibration is not perceptible at the project site.

[7] U.S. Department of Transportation, Federal Transit Administration. 1995 1st edition; 2006 2nd edition. *Transit Noise and Vibration Impact Assessment*. Washington D.C.: Author. 6 June 2008 <http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf>.

(d) Noise-Sensitive Receptors

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. Sensitive receptors near the project site include:

- Multi-family residences located approximately 120 feet north of the project site, across Riverside Drive
- Single-family residences located approximately 250 feet east of the project site, across Woodman Avenue
- Notre Dame High School located approximately 575 feet northeast of the project site, across Riverside Drive
- Single-family residences located approximately 700 feet west of the project site on Calhoun Avenue and Riverside Drive
- Van Nuys Sherman Oaks Park located approximately 800 feet northeast of the project site, along Hazeltine Avenue

Noise measurements at nearby sensitive receptors were taken as part of this Noise Assessment and those locations are shown on *Figure 41: Noise Monitoring Locations* and existing noise measurements at these locations are reflected on *Table 24: Existing Estimated Community Noise Equivalent Level – Weekday*.

The above sensitive receptors represent the nearest sensitive land uses with the potential to be impacted by the Proposed Project. Additional single-family and multi-family residences are located in the surrounding community, within one-quarter mile of the project site.

b. Regulatory and Policy Setting

(1) City of Los Angeles Standards and Guidelines

The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Regarding construction, the Los Angeles Municipal Code (LAMC) indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. the following day, since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence[8]. No person, other than an

[8] Chapter IV, Article 1, Section 41.40, January 29, 1984 and Chapter XI, Article 2, Section 112.04, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on any Sunday.

The LAMC also specifies the maximum noise level of powered equipment.[9] Any powered equipment that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

The City of Los Angeles has published the L.A. CEQA Thresholds Guide (2006), which includes significance thresholds for construction and operational noise. For construction noise, the significance thresholds apply if activity occurs within 500 feet of a noise sensitive use or between the hours identified in the Noise Ordinance. For operational noise, the significance thresholds apply if the Proposed Project introduces a stationary noise source likely to be audible beyond the property line of the project site or if the project includes 75 or more dwelling units, 100,000 square feet or greater of nonresidential development, or has the potential to generate 1,000 or more average daily vehicle trips.

(2) Vibration Guidelines

There are no adopted City standards for ground-borne vibration.

2. THRESHOLDS OF SIGNIFICANCE

The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses.

Construction Noise

A significant construction noise impact would result if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a sensitive receptor;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a sensitive receptor; or

[9]Chapter XI, Article 2, Section 112.05, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

- Construction activities would exceed the ambient noise level by 5 dBA at a noise receptor between the hours of 9:00 p.m. and 7:00 a.m., Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.

Operational Noise

A significant operational noise impact would result if:

- Project-related mobile noise causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (*Table 26: Land Use Compatibility for Community Noise Environments*), or any 5 dBA or greater noise increase.

- Stationary noise sources increase ambient noise levels by 5 dBA or greater.

TABLE 26
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS [1]

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE (DBA, CNEL)					
	55	60	65	70	75	80
Residential - Low Density Single-Family, Duplex, Mobile Homes						
Residential - Multi-Family						
Transient Lodging - Motels Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						
Sports Arena, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Recreation, Cemeteries						
Office Buildings, Business Commercial and Professional						
Industrial, Manufacturing, Utilities, Agriculture						

TABLE 26
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS [1]

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE (DBA, CNEL)					
	55	60	65	70	75	80
Normally Acceptable Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.						
Conditionally Acceptable New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditionally will normally suffice.						
Normally Unacceptable New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.						
Clearly Unacceptable New construction or development should generally not be undertaken.						

[1] Source: California Office of Noise Control, Department of Health Services

Ground-borne Vibration

There are no adopted State or City of Los Angeles ground-borne vibration standards. Based on federal guidelines, the Proposed Project would result in a significant construction or operational vibration impact if:

- The Proposed Project would expose buildings to the Federal Railway Administration building damage threshold level of 0.5 inches per second PPV.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project would involve the construction and operation of approximately 280,000 GLSF of retail and restaurant uses, as well as associated parking facilities (including both surface lots and multi-level structures). The proposed retail expansion (two-levels of shopping plus one subterranean parking level) and the main six-level parking structure (one-level at grade plus five-levels above grade) will be constructed primarily in the space between the existing shopping center (located immediately adjacent to the Riverside Drive frontage) and the Ventura (US 101) Freeway that is currently occupied by a portion of the existing mall parking structure and surface parking. A second four-level parking structure (one-level at grade plus three-levels above grade) will be constructed on the eastern portion of the project site (adjacent to Woodman Avenue) on an area currently developed with surface parking. The new parking structures would be designed

with openings between the parking levels. Also, two new loading docks will be constructed along the south side of the new mall buildings. One existing loading dock, currently along Riverside Drive at the proposed tunnel entrance, would be relocated south the mall structure.

The Proposed Project would involve the construction and operation of a typical retail shopping mall. The Proposed Project would not include any unusual sources of noise relative to an urban area or unusual project characteristics during its operation phase. During the construction phase, the Proposed Project would utilize sonic pile driving equipment to construct some of the proposed structures (i.e., the six-level parking structure). The Proposed Project includes a request to extend the length of its allowable hours of operation from 7:00 a.m. - 11:00 p.m. to permit hours between 5:30 a.m. - 12 midnight in order to facilitate mall operations.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- The Proposed Project would include certain features to reduce exposure of sensitive receptors to operational noise. For example, mechanical equipment would be enclosed or located on roofs, and mechanical equipment noise would not increase ambient noise levels by 5 dBA or more at the nearest sensitive receptor. In addition, the new loading docks would be located behind mall structures and away from sensitive receptors. As a result, activity associated with the new loading docks would not increase ambient noise levels by 5 dBA or more at the nearest sensitive receptors (e.g. residences on Riverside Drive).

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- The City of Los Angeles Noise Ordinance has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Regarding construction, the LAMC indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. the following day, since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence.[10] No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on any Sunday.

- The LAMC also specifies the maximum noise level of powered equipment or powered hand tools.[11] Any powered equipment or hand tool that produces a maximum noise

[10] Chapter IV, Article 1, Section 41.40, January 29, 1984 and Chapter XI, Article 2, Section 112.04, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.
[11] Chapter XI, Article 2, Section 112.05, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

b. Project Impacts

An Initial Study (IS) was prepared for the Proposed Project. Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the Notice of Preparation (NOP) and IS process to have a potential significant environmental effect. Issues related to Noise that were determined to be less than significant, and are not addressed further, include: airport noise and railroad noise. An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant.

(1) Construction (Short-Term) Noise

Construction of the Proposed Project would result in temporary increases in ambient noise levels in the project area on an intermittent basis. The increase in noise would likely result in a temporary annoyance to nearby residents during the construction activity. Noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.

Construction activities require the use of noise-generating equipment, such as jackhammers, pneumatic impact equipment, saws, and tractors. Typical noise levels from various types of equipment that may be used during construction are listed in *Table 27: Maximum Noise Levels of Common Construction Machines*. The table shows noise levels at distances of 50 and 100 feet from the construction noise source.

TABLE 27
MAXIMUM NOISE LEVELS OF COMMON CONSTRUCTION MACHINES [1]

NOISE SOURCE	NOISE LEVEL (DBA, LEQ) [2]	
	50 FEET	100 FEET
Front Loader	80	74
Cranes (moveable)	82	76
Jackhammers	90	84
Generators	77	71
Concrete Pumps	83	77
Back Hoe	84	78
Pile Driving (Peaks)	101	95
Scraper/Grader	87	81
Paver	87	81

[1] Source: City of Los Angeles, *L.A. CEQA Thresholds Guide*, 2006.
[2] Assumes a 6-dBA drop-off rate for noise generated by a "point source" and traveling over hard surfaces.

Whereas *Table 27: Maximum Noise Levels of Common Construction Machines* shows the noise level of each equipment, the noise levels shown in *Table 28: Outdoor Construction Noise Levels* take into account the likelihood that more than one piece of construction equipment would be in operation at the same time and lists the typical overall noise levels that would be expected for each phase of construction. These noise levels are based on surveys conducted by the USEPA in the early 1970s. Since 1970, regulations have been enforced to improve noise generated by certain types of construction equipment to meet worker noise exposure standards. However, many older pieces of equipment are still in use. Thus, the construction phase noise levels indicated in *Table 28: Outdoor Construction Noise Levels* represent worst-case conditions. As the table shows, the highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. The noise source is assumed to be active for 40 percent of the eight-hour workday (consistent with the USEPA studies of construction noise), generating a noise level of 89 dBA at a reference distance of 50 feet.

TABLE 28
OUTDOOR CONSTRUCTION NOISE LEVELS [1]

CONSTRUCTION PHASE	NOISE LEVEL AT 50 FEET (DBA)
Ground Clearing	84
Excavation	89
Foundations	78
Erection	85
Finishing	89
[1] Source: City of Los Angeles, *L.A. CEQA Thresholds Guide*, 2006..	

The noise level during the construction period at each receptor location was calculated by (1) making a distance adjustment to the construction source sound level and (2) logarithmically adding the adjusted construction noise source level to the ambient noise level. The estimated construction noise levels at sensitive receptors are shown in *Table 29: Construction Noise Impact-Unmitigated*. Noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. As shown in *Table 29: Construction Noise Impact-Unmitigated*, noise generated by construction activity would exceed the 5-dBA incremental increase significance threshold at residential land uses along Riverside Drive during the peak and off-peak season at Westfield Fashion Square. It is important to note that construction activity would occur intermittently during the day and would not occur within noise-sensitive hours (10:00 p.m. to 7:00 a.m.). Regardless, the Proposed Project would result in a significant construction impact without implementation of mitigation measures.

TABLE 29
CONSTRUCTION NOISE IMPACT – UNMITIGATED [1]

KEY TO *FIGURE 41: NOISE MONITORING LOCATIONS*	DISTANCE (FEET) [2]	MAXIMUM CONSTRUCTION NOISE LEVEL (DBA, LEQ) [3]	EXISTING AMBIENT (DBA, LEQ) [4]	NEW AMBIENT (DBA, LEQ) [5]	INCREASE	IMPACT
OFF-PEAK SEASON AT WESTFIELD FASHION SQUARE						
#1 Multi-Family Residence on Riverside Drive	120	81.4	66.2	81.5	15.3	Yes
#2 Multi-Family Residence on Riverside Drive	120	81.4	68.3	81.6	13.3	Yes
#3 Notre Dame High School	575	67.8	67.1	70.5	3.4	No
#4 Single-Family Residence on Calhoun Avenue	750	65.5	65.5	68.5	3.0	No
#5 Van Nuys Sherman Oaks Park on Hazeltine Avenue	800	65	68.4	70.0	1.6	No
PEAK SEASON AT WESTFIELD FASHION SQUARE						
#1 Multi-Family Residence on Riverside Drive	120	81.4	69.3	81.7	12.4	Yes
#2 Multi-Family Residence on Riverside Drive	120	81.4	70.3	81.7	11.4	Yes

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] Distance of noise source from receptor.
[3] Construction noise source's sound level at receptor location, with distance and building adjustment.
[4] Pre-construction activity ambient sound level at receptor location.
[5] New sound level at receptor location during the construction period, including noise from construction activity.

The Proposed Project would utilize sonic pile driving to construct the six-level parking structure. Pile driving would potentially generate a noise level of 101 dBA Leq. The nearest sensitive receptor would be approximately 400 feet north of pile driving activity. The ambient noise level at this sensitive receptor is approximately 66.2 dBA Leq. At 400 feet, sonic pile driving would generate a maximum noise level of approximately 83 dBA Leq. This noise level would be reduced by 5 dBA to 78 dBA Leq by intervening structures that block the line-of-site between pile driving and the sensitive receptor. When added to the existing ambient noise level, pile driving activity would increase the ambient noise level by approximately 12.1 dBA. This would exceed the 5-dBA Leq incremental increase significance threshold and, as such, pile driving would result in a significant impact without implementation of mitigation measures.

In addition to on-site construction noise, haul trucks would require access to the project site during construction activity. Trucks would likely travel along Riverside Drive to reach the project site. As a result, residential land uses along Riverside Drive would potentially experience increased noise levels from haul trucks. Adding ten truck trips per hour along Riverside Drive would increase the CNEL by approximately 0.2 dBA. This increase would be less than the 3-dBA CNEL incremental increase significance threshold and, as such, haul truck noise would result in a less than significant impact.

Additional sensitive receptors are located north, east, and west of the project site. These sensitive receptors would also experience increases in ambient noise levels due to construction activity. However, these increases would be less than those presented for the multi-family residences along Riverside Drive due to distance and building attenuation (the multi-family residences along Riverside Drive would act as a noise barrier to the residential buildings behind them).

(2) Operational (Long-Term) Noise

The predominant operational noise source for the Proposed Project is vehicular traffic. According to the traffic report prepared by Linscott, Law & Greenspan, Engineers, the Proposed Project would generate 4,964 net weekday daily vehicle trips and 6,252 net weekend daily vehicle trips[12].

To ascertain off-site noise impacts, traffic was modeled under future year (2012) no project and with project conditions utilizing FHWA RD-77-108 noise calculation formulas. Results of the weekday analysis are summarized in *Table 30: Existing and Future Estimated Community Noise Equivalent Level – Weekday*. The greatest project-related noise increase would be 0.4 dBA CNEL and would occur along Riverside Drive between Hazeltine and Woodman Avenues. Weekday roadway noise levels attributed to the Proposed Project would increase by less than 3 dBA CNEL at all analyzed segments.

TABLE 30
EXISTING AND FUTURE ESTIMATED COMMUNITY NOISE EQUIVALENT LEVEL – WEEKDAY [1][2]

ROADWAY SEGMENT	ESTIMATED CNEL DBA [3]				
	EXISTING (2007)	NO PROJECT (2012)	PROJECT (2012)	PROJECT IMPACT	CUMULATIVE IMPACT
Riverside Drive between Woodman Avenue and Hazeltine Avenue	73.3	73.9	74.3	0.4	1.0
Riverside Drive between Hazeltine Avenue and Van Nuys Boulevard	71.2	71.7	71.9	0.2	0.7
Riverside Drive between Woodman Avenue and Sunnyslope Avenue	73.3	74.2	74.2	0.0	0.9
Woodman Avenue between Magnolia Boulevard and Riverside Drive	74.1	74.5	74.6	0.1	0.5
Woodman Avenue between US 101 Westbound Ramps and Moorpark Street	74.1	74.7	74.7	0.0	06
Hazeltine Avenue between Fashion Square Lane and Moorpark Street	73.1	73.6	73.7	0.1	0.6
Hazeltine Avenue between Magnolia Boulevard and Riverside Drive	73.8	74.3	74.5	0.2	0.7

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] The predicted CNELs were calculated as peak hour Leq and converted into CNEL using the California Department of Transportation Technical Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of average daily traffic and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.
[3] CNEL is presented at the property line of the sensitive receptor nearest to the roadway segment.

[12] Linscott, Law & Greenspan, Engineers. 2008 (August 5). *Traffic Impact, Parking, and Site Access Study for the Westfield Fashion Square Expansion Project*. Pasadena, CA: Author. [See Appendix I of this Draft EIR]

Results of the weekend analysis are summarized in *Table 31: Existing and Future Estimated Community Noise Equivalent Level – Weekend*. The greatest project-related noise increase would be 0.5 dBA CNEL and would also occur along Riverside Drive between Hazeltine and Woodman Avenues. Weekend roadway noise levels attributed to the Proposed Project would increase by less than 3 dBA CNEL at all analyzed segments.

Mobile noise generated by the Proposed Project would not cause the ambient noise level measured at the property line of the affected uses to increase by three decibels CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (*Table 26: Land Use Compatibility for Community Noise Environments*) or any five- decibel or more increase in noise level. The Proposed Project would result in a less than significant mobile noise impact.

TABLE 31
EXISTING AND FUTURE ESTIMATED COMMUNITY NOISE EQUIVALENT LEVEL – WEEKEND [1][2]

ROADWAY SEGMENT	ESTIMATED CNEL DBA [3]				
	EXISTING (2007)	NO PROJECT (2012)	PROJECT (2012)	PROJECT IMPACT	CUMULATIVE IMPACT
Riverside Drive between Woodman Avenue and Hazeltine Avenue	72.7	73.3	73.8	0.5	1.1
Riverside Drive between Hazeltine Avenue and Van Nuys Boulevard	70.5	71.2	71.5	0.3	0.1
Riverside Drive between Woodman Avenue and Sunnyslope Avenue	72.1	72.9	73.1	0.2	0.1
Woodman Avenue between Magnolia Boulevard and Riverside Drive	73.5	74.1	74.2	0.1	0.7
Woodman Avenue between US 101 Westbound Ramps and Moorpark Street	73.6	74.3	74.4	0.1	0.8
Hazeltine Avenue between Fashion Square Lane and Moorpark Street	72.3	72.8	73.0	0.2	0.7
Hazeltine Avenue between Magnolia Boulevard and Riverside Drive	73.0	73.6	73.8	0.2	0.8

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] The predicted CNELs were calculated as peak hour Leq and converted into CNEL using the California Department of Transportation Technical Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of average daily traffic and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.
[3] CNEL is presented at the property line of the sensitive receptor nearest to the roadway segment.

(a) Roof-Top and Mechanical Equipment

Potential stationary noise sources related to the long-term operations of the Proposed Project includes mechanical equipment (e.g., parking structure air vents and heating, ventilation, and air conditioning (HVAC) equipment.) Mechanical equipment would be designed so as to be located within an enclosure or confined to the rooftop of the proposed structure. In addition, mechanical equipment would be screened from view as necessary to comply with the City of Los Angeles Noise Ordinance requirements for both daytime (50 dBA) and nighttime (40 dBA) noise levels at residential land uses. Operation of mechanical equipment would not be anticipated to increase ambient noise levels by 5 dBA or more. Stationary noise would result in a less than significant impact with mitigation construction screen.

(b) Parking Facilities

Project-related parking would include a subterranean parking structure under the proposed shopping mall, a six-level parking structure south of the existing Macy's parking structure, and a four-level parking structure located off of Woodman Avenue at the eastern end of the project site. Noise generated by activity associated with the subterranean parking structure would not exceed an increase of 5 dBA (and therefore would not be audible) at locations off the project site and would not increase ambient noise levels.

The four-level parking structure would be located off of Woodman Avenue at the eastern end of the project site. This area is currently utilized for surface parking. The nearest sensitive receptors to the parking structure would be located approximately 250 feet east of the project site. Noise sources associated with the parking structure include vehicle movement, slamming doors, and car alarms. Parking activity typically generates a noise level of 63 dBA Leq at 50 feet, including rooftop noise.[13] Based on distance attenuation, the parking-related noise levels would be approximately 52.5 dBA Leq. Mobile-source related noise levels are approximately 73.2 dBA along Woodman Avenue, North of Highway 101. When added to this noise level, parking-related noise would increase the ambient noise level by less than 0.1 dBA. This level is less than the 5-dBA significance threshold, which would result in a less than significant impact.

The Proposed Project would include a six-level parking structure located south of the existing Macy's parking lot. This parking structure would be located approximately 300 feet south of the nearest sensitive receptor (i.e. residences on Riverside Drive). As shown in *Table 23: Existing Noise Measurements*, the monitored noise levels along the portion of Riverside Drive in front of the residential land uses are 66.2 and 68.3 dBA Leq. Adding parking-related noise (i.e., 63 dBA Leq) to the existing noise level along Riverside Drive would increase the existing noise levels by less than 0.1 dBA. This is less than the 5-dBA significance threshold and, as such, parking activity noise would not significantly impact sensitive receptors north of the project site.

The Proposed Project would increase vehicle access to the project site. The current vehicular traffic on Riverside Drive, Hazeltine Avenue, Woodman Avenue and the nearby Ventura Freeway (US 101) generates the majority of the ambient noise in the project area. Under the Proposed Project access scheme, vehicles would enter/exit the new parking structure at a new signalized driveway with direct access to the structure. This access would be located at the existing driveway between Macy's and Woodman Avenue. There will be a dual turn lane for westbound traffic as well as a dedicated right-turn lane for eastbound traffic. The driveway will consist of three outbound lanes and two inbound lanes. Five cars occupying each access lane and traveling at 25 miles per hour would produce a cumulative noise level of 67.0 dBA Leq at 50 feet. The nearest sensitive receptor to the new access point is located 75 feet to the north. Based on distance attenuation and the existing ambient noise level at the nearest sensitive receptor, the resulting noise level would be 68.1 dBA Leq. This would be an increase of 1.9 dBA. This level is less than the 5-dBA significance threshold, which would result in a less than significant impact with mitigation incorporated.

[13] Terry A. Hayes Associates, LLC. 2008 (February 26). *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*. Culver City, CA: Author. [See Appendix D of this Draft EIR]

The Proposed Project would change the hours of operation from 7:00 a.m. to 11:00 p.m. to 5:30 a.m. to 12:00 a.m. According to the traffic analysis, the shared parking demand at 6:00 a.m. and 12:00 a.m. would be 110 and 32 vehicles, respectively. A doubling of traffic volumes is typically needed to audibly increase ambient noise levels. The extended hours of operation would not double traffic volumes along any roadway segment. The increase in ambient noise levels would be less than the 5-dBA significance threshold, which would result in a less than significant parking and circulation impact.

(c) Loading Docks and Truck Access Areas

Two existing loading docks are located along Riverside Drive. These loading docks would continue to operate between the same hours and under their existing parameters (approximately two large trucks operating simultaneously on a daily basis). The Proposed Project would include construction of two new loading docks on the south side of the property to accommodate expanded retail and restaurant uses. These loading docks would be shielded from sensitive receptors by mall structures. The structures would act as a noise barrier and would prevent increased ambient noise levels by more than 5 dBA from the proposed loading docks at off-site sensitive receptors. The Proposed Project would not result in additional noise sources due to the operation of the loading docks. Operational noise levels would not change substantially along the Riverside Drive frontage. The Proposed Project would result in a less than significant operational noise impact due to loading dock operations.

(3) Vibration

(a) Construction

As shown in *Table 32: Vibration Velocities for Construction Equipment*, use of heavy equipment (e.g., a sonic pile driver) generates vibration levels of 0.170 inches per second PPV at a distance of 25 feet. The nearest structure to the pile driving activity would be approximately 50 feet east of the project site and could experience vibration levels of 0.06 inches per second PPV. Vibration levels would not exceed the potential building damage thresholds of 0.5 inches per second PPV. Construction activity associated with the Proposed Project would comply with the standards established in the Noise Ordinance. Construction activity would be prohibited between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, or between the hours of 6:00 p.m. and 8:00 a.m. on Saturday, Sunday, or public holiday. As such, construction-related vibration associated with the Proposed Project would result in a less than significant impact.

TABLE 32
VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT [1]

EQUIPMENT	PPV AT 25 FEET (INCHES/SECOND) [2]
Sonic Pile Driver	0.170
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076

[1] Source: Federal Transit Authority, Transit Noise and Vibration Impact Assessment, April 1995.
[2] Fragile buildings can be exposed to ground-borne vibration levels of 0.5 inches per second PPV without experiencing structural damage.

(b) Operational

The Proposed Project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration would result in a less than significant impact.

(4) Consistency with Applicable Plans and Policies

Consistency with applicable plans and policies, including land use and design policies which indirectly address noise, is discussed in detail in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this EIR.

(5) Cumulative Impacts

Due to the distance between the Proposed Project and the nearest related project, approximately 1,000 feet north of the site, no cumulative noise impacts are anticipated.
When calculating future traffic impacts, the traffic study took 17 related projects into consideration. Thus, the future traffic results without and with the Proposed Project already account for the cumulative impacts from these other projects. Accordingly, the noise impacts are generated directly from the traffic analysis results, the future without project and future with project noise impacts described in this report already reflect cumulative impacts.

Table 30: Existing and Future Estimated Community Noise Equivalent Level – Weekday and *Table 31: Existing and Future Estimated Community Noise Equivalent Level – Weekend* present the cumulative increase in future traffic noise levels at various intersections (i.e., 2010 "No Project" conditions plus Proposed Project traffic) for the weekday and weekend conditions, respectively. Regarding weekdays, the maximum cumulative roadway noise increase would be would be 1.0 dBA CNEL and would occur along Riverside Drive between Woodman and Hazeltine Avenues. As such, cumulative weekday roadway noise levels would not exceed the 3-dBA threshold and would not result in a perceptible change in noise level. The Proposed Project would not result in a cumulatively considerable impact with respect to roadway noise.

Regarding weekends, the maximum cumulative roadway noise increase would be 1.1 dBA CNEL and would occur along Riverside Drive between Woodman Avenue and Van Nuys Boulevard. As such, cumulative weekend roadway noise levels would not exceed the 3-dBA threshold and would not result in a perceptible change in noise level. The Proposed Project would not result in a cumulatively considerable impact with respect to roadway noise and thus, mobile noise would result in a less than significant impact.

The predominant vibration source near the project site is heavy trucks traveling on the local roadways. Neither the project nor related projects would substantially increase heavy-duty vehicle traffic near the project site and would not cause a substantial increase in heavy-duty

trucks on local roadways. As such, the Proposed Project would not add to a cumulative vibration impact.

4. MITIGATION PROGRAM

MM N-1: The City of Los Angeles Noise Ordinance has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Regarding construction, the LAMC indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. the following day, since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence.[14] No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on any Sunday.

The LAMC also specifies the maximum noise level of powered equipment or powered hand tools.[15] Any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

MM N-2: The Proposed Project will include certain features to reduce exposure of sensitive receptors to operational noise. For example, mechanical equipment would be enclosed or located on roofs, and mechanical equipment noise would not increase ambient noise levels by more than 5 dBA at off-site locations. In addition, the new loading docks would be located behind mall structures and away from sensitive receptors. As a result, activity associated with the new loading docks would not increase ambient noise levels by 5 dBA or more at the nearest sensitive receptors (e.g. residences on Riverside Drive).

MM N-3: All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.

MM N-4: Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).

[14] Chapter IV, Article 1, Section 41.40, January 29, 1984 and Chapter XI, Article 2, Section 112.04, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.
[15] Chapter XI, Article 2, Section 112.05, August 8, 1996. Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

MM N-5: Equipment staging areas shall be located on the southern portion of the project site, as far as possible from multi-family residences on.

MM N-6: During phase 2 parking structure construction and phase 3 demolition and excavation of the tunnel area, temporary sound barriers (not to exceed a maximum height of ten feet) capable of achieving sound attenuation of at least 10 dBA (e.g., sound attenuation blanket) shall be constructed, such that the line-of-sight is blocked from active construction areas to residential land uses on Riverside Drive.

MM N-7: Construction workers shall be required to park at designated locations and shall be prohibited from parking on nearby residential streets.

MM N-8: Pile drivers shall be shrouded with acoustically absorptive shields capable of reducing noise by at least 9 dBA at all times during pile driving operations.

MM N-9: Pile driving activity shall be scheduled for times that have the least impact on adjacent sensitive receptors.

MM N-10: Consistent with previous Conditions of Approval, all residential units located within 2,000 feet of the construction site shall be sent a notice regarding the construction schedule of the Proposed Project. A sign, legible at a minimum distance of 50 feet, shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.

MM N-11: A "noise disturbance coordinator" shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, posted at the construction site shall list the telephone number for the disturbance coordinator.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

a. Construction

Mitigation Measure N-3 would reduce construction noise levels by 3 dBA, and Mitigation Measure N-6 would reduce construction noise levels by approximately 10 dBA. The noise disturbance coordinator (Mitigation Measure N-11) would ensure that noise complaints would be resolved. The other Mitigation Measures (N-4, N-5, and N-10) would assist in attenuating construction noise levels. Should pile driving be necessary, Mitigation Measures N-8 and N-9 would reduce pile driving noise by at least 9 dBA. The resulting incremental increase in ambient

noise levels due to pile driving at the nearest sensitive receptor would be 4.6 dBA. *Table 33: Construction Noise Impact-Mitigated*, displays the construction noise impacts taking into consideration the 15 dBA of noise reduction from Mitigation Measures N-3 and N-6. As shown on *Table 33: Construction Noise Impact-Mitigated*, the construction noise level increase with mitigation at the multi-family residences on Riverside Drive would be less than 5 dBA. As such, construction noise would result in a less than significant impact with mitigation incorporated.

TABLE 33
CONSTRUCTION NOISE IMPACT – MITIGATED [1]

KEY TO *FIGURE 41: NOISE MONITORING LOCATIONS*	DISTANCE (FEET) [2]	MAXIMUM CONSTRUCTION NOISE LEVEL (DBA, LEQ) [3]	EXISTING AMBIENT (DBA, LEQ) [4]	NEW AMBIENT (DBA, LEQ) [5]	INCREASE	IMPACT
OFF-PEAK SEASON AT WESTFIELD FASHION SQUARE						
#1 Multi-Family Residence on Riverside Drive	120	69.4	66.2	71.1	4.9	No
#2 Multi-Family Residence on Riverside Drive	120	69.4	68.3	71.9	3.6	No
#3 Notre Dame High School	575	64.8	67.1	69.1	2.0	No
#4 Single-Family Residence on Calhoun Avenue	750	62.5	65.5	67.3	1.8	No
#5 Van Nuys Sherman Oaks Park on Hazeltine Avenue	800	61.9	68.4	69.3	0.9	No
PEAK SEASON AT WESTFIELD FASHION SQUARE						
#1 Multi-Family Residence on Riverside Drive	120	69.4	69.3	72.4	3.1	No
#2 Multi-Family Residence on Riverside Drive	120	69.4	70.3	72.9	2.6	No

[1] Source: Terry A. Hayes Associates LLC, Sherman Oaks Fashion Square Expansion Project Air Quality and Noise Impact Report, February 26, 2008.
[2] Distance of noise source from receptor.
[3] Construction noise source's sound level at receptor location, with distance and building adjustment.
[4] Pre-construction activity ambient sound level at receptor location.
[5] New sound level at receptor location during the construction period, including noise from construction activity.

b. Operational

The project-related operational noise would result in a less than significant impact and no mitigation is necessary.

c. Vibration

The project-related operational ground-borne vibration would result in a less than significant impact.

IV. ENVIRONMENTAL IMPACT ANALYSIS

H. PUBLIC SERVICES: FIRE

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

Fire protection and emergency medical service to the project site is provided by the Los Angeles Fire Department (LAFD). The LAFD responds to incidents requiring fire protection and emergency medical care with LAFD personnel and emergency medical technicians. According to the LAFD, fire protection services would primarily be provided by three fire stations. They are the closest to the project site and would potentially provide the shortest response time in the event of an emergency. All three primary-serving LAFD fire stations are located within 2.5 miles of the project site. These stations include:

Fire Station No. 102 13200 Burbank Boulevard Sherman Oaks, CA 91423	Task Force Station (Truck & Engine Company) Distance to Site: Approximately 2.0 miles
Fire Station No. 88 5101 Sepulveda Boulevard Sherman Oaks, CA 91403	Task Force Station (Truck & Engine Company) Air Utility, Hazardous Materials Unit Distance to Site: Approximately 1.9 miles
Fire Station No. 39 14415 Sylvan Street Van Nuys, CA 91401	Task Force Station (Truck & Engine Company) Rescue Ambulance Distance to Site: Approximately 2.5 miles

Fire Station No. 102, which is located approximately 2.0 miles northeast of the project site, is designated by the LAFD as the jurisdictional fire station that would be "first-due" to the project site; however, any one of the three stations above could provide the initial response under normal conditions. If necessary during a major emergency, additional fire protection and emergency services would be provided by other stations within the LAFD system.

The adequacy of fire protection is based on the required fire-flow (measured in gallons per minute), response distance from existing fire stations and the Fire Department's judgment for needs in the area. Based on preliminary input from LAFD[1], the project site is currently considered to be adequately served by LAFD services.

b. Regulatory and Policy Setting

The Fire Protection and Prevention Plan (FPPP) of the City of Los Angeles provides an official guide to City Departments, other governmental agencies, developers and interested citizens for the construction, maintenance and operation of fire facilities. It is intended to promote fire

[1] Los Angeles Fire Department Hydrants & Access Unit, Terry O'Connell, telephone contact on August 2007.

prevention by maximizing fire safety and education and minimizing loss of life through fire prevention programs.

The Van Nuys-North Sherman Oaks Community Plan (Community Plan) includes goals, objectives and policies that specifically address policy-level guidelines for fire protection services in the project area. In summary, the Community Plan establishes policies that strive to ensure that adequate levels of fire protection services are provided and maintained, and to provide comprehensive fire protection and life safety support for all current and future population and land uses.

Specific fire protection related policies that are applicable to the project area are listed below in this section under the Consistency with Applicable Plans and Policies discussion. For an analysis of the Proposed Project's consistency with other land use policies of the Community Plan, please refer to Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this DEIR.

Neither the project site, nor the immediate surrounding vicinity, is located within a special fire hazard zone, such as a Very High Fire Hazard Severity Zone or a Brush Clearance Zone (previously referred to as a Mountain District Zone and Buffer Zone, respectively).

The LAMC and the Building Code includes many regulations that address fire protection, life safety and emergency access requirements that are implemented in development projects. Often, adherence with mandated code requirements serves to adequately mitigation most fire safety concerns for development projects. Specific applicable fire code requirements are identified later in this section.

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section and used to determine the proposed project environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006).

The City of Los Angeles CEQA Significance Thresholds for fire protection indicates that a project could result in a significant impact to fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project involves the intensification of land uses at the project site through the addition of 280,000 GLSF of commercial use structures, and the reconfiguration of the internal site circulation to provide more efficient and direct access throughout the project site.

The site design and project operational characteristics have incorporated characteristics that would improve and enhance fire protection and life.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- Fashion Square Lane will be reconfigured and improved to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) for its entire length along the south edge of the shopping center from Hazeltine Avenue to Riverside Drive. This fire lane shall be unobstructed except for the connection from the existing west parking structure to the new mall. However, this limited area shall have a minimum vertical clearance of 17 feet.

- New Proposed Project buildings, including parking structures, shall be fully sprinklered.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- The Proposed Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, which is an element of the General Plan of the City of Los Angeles (CPC 19708).

- In accordance with the City of Los Angeles building permit review process, definitive plans and specifications shall be submitted to the Fire Department and any requirements for necessary permits shall be satisfied prior to commencement and/or occupation of any portion of the Proposed Project. Typical site plan and building permit requirements would include, but not be limited to, the following:

    - All first story portions of any habitable building shall be within 300 feet of an approved fire hydrant.

    - A building smoke alarm system designed to detect any smoke in the building's air-handling systems shall be installed. The system shall cause an alarm to be announced at the central fire control station.

    - A fire alarm system shall be installed which uses a dependable method of sounding a fire alarm throughout the building.

    - All decorative landscaping surrounding project structures shall use fire-resistant plants and materials.

    - Brush in the area adjacent to proposed development shall be cleared or thinned periodically by the applicant under supervision of the LAFD.

- New fire hydrants and/or top upgrades to existing fire hydrants shall be installed in accordance with the Los Angeles Fire Code.

- Adequate public and private fire hydrants will be required. The number and location of these hydrants will be determined by the Fire Department after review of the Plot Plan.

- Access for Fire Department apparatus and personnel to and into all structures shall be required.

- At least two different ingress/egress roads for each area, which will accommodate major fire apparatus and provide for major evacuation during emergency situations, shall be required.

- Fire lanes, where required, and dead-ending streets should terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane should be greater than 700 feet in length or secondary access shall be required.

- Construction of public or private roadways in the proposed development shall not exceed 15 percent in grade, unless otherwise approved.

- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane, unless otherwise approved.

- Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

- Additional vehicular access may be required by the Fire Department where buildings exceed 35 feet in height.

- Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the Fire Department.

- The Project shall utilize standard cut-corners on all turns, if applicable.

- Fire Department access shall remain clear and unobstructed during demolition.

- If applicable, fire lanes and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

- If applicable, where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the

outside radius to a vertical point 13 feet 6 inches above the paved surface on the roadway. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

- Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.

b. Project Impacts

The adequacy of fire protection services for the Proposed Project is based on required fire flow, response distance from existing fire stations, equipment access, and the LAFD's judgment regarding needs and service in the project area.

(1) Fire Flow

Fire flow is the quantity of water available (or needed) for fire protection. Fire flow is described in terms of volume and water pressure and is generally measured by gallons per minute (gpm) and duration of the flow. The quantity of water required for fire protection varies based on land use(s). Fire flow requirements vary from 2,000 gpm in Low-Density Residential areas to 12,000 gpm in high-density commercial areas.

Based on a review of the Proposed Project land uses, the LAFD has indicated that a fire flow of 9,000 gpm from any 4 to 6 hydrants on the same block flowing simultaneously is required. A minimum residual water pressure of 20 psi must remain in the system while the required fire flow is being delivered. The actual number and location of required fire hydrants would be determined during the Fire Department's review of the finalized plot plan.

Currently, adequate water pressure is available to serve the Proposed Project and other land uses in the project vicinity. The existing system has a fire flow capacity of at least 9,000 gpm, which meets LAFD required fire flow for both the existing shopping center and the Proposed Project.

The Proposed Project would expand existing retail facilities with similar uses. As a result, the required fire-flow at the site is not anticipated to change. Additional fire hydrants, spaced and sized according to LAMC requirements, will be implemented during building construction based on the approved site plan. Temporary water supplies for fire protection during the construction activities will also be provided in accordance with LAFD recommendations.

Due to the adequacy of existing fire flow, and that the Proposed Project would not alter fire flow requirements at the project site due to a change in use, upgrades to the fire flow system are not anticipated. The Proposed Project will result in a less than significant impact to fire flow capacity and fire protection services.

(2) Fire Protection Facilities and Service

Fire protection facilities and service include equipment and personnel operated through the LAFD, or affiliate agencies, which respond to emergency calls. Typical facilities include fire stations, fire trucks, personnel and necessary apparatus. Other specialized facilities may include helicopters and hazardous materials response units.

The LAFD requires that all projects either: (1) be located within 1.5 miles of the nearest fire station, or (2) if this distance cannot be achieved, include an interior sprinkler system in the development as a means of fire protection.

The project site is currently developed and is considered to be adequately served by LAFD services. However, Fire Station No. 102, which is designated by the LAFD as the fire station that services the project site, is located approximately 2.0 miles northeast of the project site and exceeds the guideline proximity target distance of 1.5 miles. Under the LAFD criteria, the Proposed Project would be required to include an interior sprinkler system.

The Proposed Project would install an automatic fire sprinkler system and two electric/emergency driven fire pumps with a combined capacity of 1,250 gallons per minute.

LAFD has indicated that intersections operating with a Level of Service (LOS) of E or F can have impacts on fire protection services. Ambient traffic increases, as well as potential traffic impacts resulting from the proposed and related projects, could result in a LOS of E or F during peak hours at intersections throughout the San Fernando Valley. Column [1] of *Table 45: Summary of Volume to Capacity Ratios and Levels of Service Weekday AM and PM Peak Hours* and *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hour*, in Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access, identifies intersections within the project area that currently operate at an LOS or E of F. Column [3] of *Table 45: Summary of Volume to Capacity Ratios and Levels of Service Weekday AM and PM Peak Hours* and *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hour*, indicates the number of intersections that are anticipated to operate at a LOS of E or F in the future without the project.

As identified in the Column [5] of *Table 45: Summary of Volume to Capacity Ratios and Levels of Service Weekday AM and PM Peak Hours* and *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hour*, the Proposed Project will not increase the number of intersections operating at a LOS of E or F and will not decrease the LOS at intersections already operating at these conditions. The Proposed Project will not result in a significant impact on fire services due to intersection conditions, and the Proposed Project would not significantly impact response times.

Because existing fire protection services are considered to be adequate at the project site, and development of the Proposed Project with the incorporation of the PDFs will not necessitate new additional fire station facilities or personnel, the Proposed Project will result in a less than significant impact to fire protection facilities and services.

(3) On-Site Fire Safety Design and Operations

The current site design includes a proposed fire/emergency vehicle lane along the southern property boundary, extending from Woodman Avenue to Hazeltine Avenue via Fashion Square Lane. Discussions with the LAFD to date indicate acceptable circulation for emergency vehicles and fire protection with this design.

The Proposed Project would maintain adequate access for the LAFD. Compliance will be confirmed by the LAFD during plot plan review prior to construction. The Proposed Project would not result in a significant impact on fire department access to the proposed site or adjacent properties.

(4) Consistency with Applicable Plans and Policies

The Proposed Project does not propose any change to adopted Plans or policies, nor reclassification of applicable designations. The applicable fire service related goals, objectives and policies of the Van Nuys-North Sherman Oaks Community Plan are provided in *Table 34: Consistency with Community Plan Fire Protection Services Related Goals, Objectives and Policies*, along with a discussion of the project consistency with each applicable component. In summary, the Proposed Project is consistent with the fire protection services related goals, objectives and policies because the project either directly contributes toward the furtherance of those policies (i.e., as through physical site improvements) or indirectly supports those policies by not creating obstacles for their realization (i.e., such as remaining consistent with land use goals). The Proposed Project will result in a less than significant impact to fire protection services in the project area due to conflicts with policies and programs supporting the provision for adequate and comprehensive fire and life safety services.

TABLE 34
CONSISTENCY WITH COMMUNITY PLAN FIRE PROTECTION RELATED GOALS, OBJECTIVES AND POLICIES

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
VAN NUYS-NORTH SHERMAN OAKS COMMUNITY PLAN			
G 10	Protect the community through a comprehensive fire and life safety program.	The Proposed Project is consistent with this goal because it incorporates design and operational measures (i.e., on-site fire hydrants and sprinklered structures) that will reduce the demand on available fire facilities and services. Further, design elements are included to enhance the overall safety of both mall occupants and the general public safety in the immediate vicinity. Please refer to the analysis of fire protection services in Section IV: Environmental Impact Analysis: H-Public Services: 1-Fire, of this EIR.	Consistent

TABLE 34 (CONTINUED)
CONSISTENCY WITH COMMUNITY PLAN FIRE PROTECTION RELATED GOALS, OBJECTIVES AND POLICIES

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
O 10-1	Ensure that fire facilities and protection services are sufficient for the existing and future population and land uses.	The Proposed Project is consistent with this objective because the project design reflects fire safety components (i.e., on-site fire hydrants and improved emergency access) that will reduce demand for services thereby providing for a more efficient utilization of available fire protection facilities and personnel throughout the service area. Additionally increased City revenues generated by the project will be available to fund fire protection services to levels appropriate for the demand.	Consistent
P 10-1.1	Coordinate with the Fire Department as part of the review of significant development projects and the General Plan Amendments affecting land use to determine the impact on service demands.	The Proposed Project is consistent with this policy as the applicant has already initiated and will continue to coordinate with, and obtain input from, the Fire Department in order to determine the potential impacts to fire protection services and identify appropriate design modifications and mitigation measures. Please refer to the analysis of fire protection services in Section IV: Environmental Impact Analysis: H-Public Services: 1-Fire, of this EIR.	Consistent

(5) Cumulative Impacts

Future development has the potential to increase the population and density of the area and could potentially have a cumulative impact on fire protection services. A review of the related projects indicates that there are no General Plan Amendment cases requested. As such, the identified related projects are presumed to be consistent with growth impacts within the Community Plan Area. Any cumulative development would be subject to fire protection and safety measures, as with the proposed Project, to adequately mitigate fire protection impacts. The related projects would be required to comply with all LAFD development review criteria. Further population increases within the fire service area due to cumulative growth would not increase above anticipated Community Plan levels, and, would not result in a significant related projects impact on fire services.

As discussed above, the Proposed Project will result in a less than significant impact to fire protection, and fire response effectiveness will not be impacted by traffic congestion from the Proposed Project as all project-related roadway impacts will be fully mitigated. Hence, the Proposed Project will not contribute to a cumulative impact to fire protection. The Proposed

Project would have a less than significant impact and would not substantially contribute to cumulative impacts.

4. MITIGATION PROGRAM

Compliance with the LAMC will be required. Many of the LAMC requirements serve to reduce fire safety concerns to less than significant levels.

MM PSF-1: The Proposed Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, which is an element of the General Plan of the City of Los Angeles (CPC 19708).

MM PSF-2: In accordance with the City of Los Angeles building permit review process, definitive plans and specifications shall be submitted to the Fire Department and any requirements for necessary permits shall be satisfied prior to commencement and/or occupation of any portion of the Proposed Project. Typical site plan and building permit requirements would include, but not be limited to, the following:

- All first story portions of any habitable building shall be within 300 feet of an approved fire hydrant.
- A building smoke alarm system designed to detect any smoke in the building's air-handling systems shall be installed. The system shall cause an alarm to be announced at the central fire control station.
- A fire alarm system shall be installed which uses a dependable method of sounding a fire alarm throughout the building.
- All decorative landscaping surrounding project structures shall use fire-resistant plants and materials.
- Brush in the area adjacent to proposed development shall be cleared or thinned periodically by the applicant under supervision of the LAFD.
- New fire hydrants and/or top upgrades to existing fire hydrants shall be installed in accordance with the Los Angeles Fire Code.
- Adequate public and private fire hydrants will be required. The number and location of these hydrants will be determined by the Fire Department after review of the Plot Plan.
- Access for Fire Department apparatus and personnel to and into all structures shall be required.

- At least two different ingress/egress roads for each area, that will accommodate major fire apparatus and provide for major evacuation during emergency situations shall be required.

- Fire lanes, where required, and dead-ending streets should terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane should be greater than 700 feet in length or secondary access shall be required.

- Construction of public or private roadways in the proposed development shall not exceed 15 percent in grade, unless otherwise approved.

- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane, unless otherwise approved.

- Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

- Additional vehicular access may be required by the Fire Department where buildings exceed 35 feet in height.

- Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the Fire Department.

- The Project shall utilize standard cut-corners on all turns, if applicable.

- Fire Department access shall remain clear and unobstructed during demolition.

- If applicable, fire lanes and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

- If applicable, where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface on the roadway. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

- Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to

withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.

MM PSF-3: Fashion Square Lane will be reconfigured and improved to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) for its entire length along the south edge of the shopping center from Hazeltine Avenue to Riverside Drive. This fire lane shall be unobstructed except for the connection from the existing west parking structure to the new mall. However, this limited area shall have a minimum vertical clearance of 17 feet.

MM PSF-4: New Proposed Project buildings, including parking structures, shall be fully sprinklered.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

The implementation of the identified standard conditions of approval and project design features (incorporated into the Mitigation Program above) reduce all potential Proposed Project and cumulative impact to less than significant levels.

IV. ENVIRONMENTAL IMPACT ANALYSIS

H. PUBLIC SERVICES: POLICE

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

Police protection services are provided by the Los Angeles Police Department (LAPD), which operates 18 (area) stations citywide within four (regional) Bureaus. The project site is located in the Van Nuys Division, which is one of six divisions within the broader Valley Bureau area. The Van Nuys Division is located at 6240 Van Nuys Boulevard, Van Nuys, California, approximately 2.3 miles northwest of the project site, and serves the Sherman Oaks area in addition to the surrounding communities of Van Nuys, Blythe Street and Ventura Business District.

Currently there are 254 sworn officers and 40 non-sworn employees providing service to the Van Nuys Division area. Officers are dispatched over three watches in a 24-hour period. The Van Nuys Station serves a population of approximately 280,814 people over a 28.8 square mile area. In the event that a situation should arise that requires additional staffing, additional officers can be called in from other LAPD Districts. The average response time to emergency calls for service in Van Nuys during 2006 was 7 minutes. This is consistent with City-wide averages during 2006. The level of police services in the community is currently constrained as the Van Nuys Division, staffed at a ratio of 1 officer per 900 population, which is slightly below the City's goal of 1 officer per 758 population. However, crime rates in the vicinity are generally lower than those observed in other similar urban areas within the City. The Van Nuys Division of the Los Angeles Police Department has no plans for expansion of their facilities at this time. [1]

The project site is located within Basic Car unit area 9A79 and Reporting District 976 of the Van Nuys Division of the Los Angeles Police Department. In 2006 an estimated 7,740 crimes were reported in the Van Nuys Community Police Station area. 6,718 were property crimes, and 1,022 were violent crimes. The predominant crimes in Reporting District 976 were property crimes, including burglary, shoplifting, and vehicle theft.[2]

The shopping center is currently patrolled by Professional Security Consultants (PSC), a private security service that provides monitoring and security for the entire property on a 24-hour basis. Building interiors are monitored by foot patrol and closed circuit television (CCTV). The site exterior is patrolled by personnel on foot, bicycle, golf cart and truck. Exterior patrol covers building perimeters, parking structures and open surface parking lots. During the nighttime/early morning hours (i.e., graveyard shift), security personnel monitor the Riverside Drive frontage to ensure noise compliance and security issues are observed along the loading dock areas.

[1] Per phone call with Officer Anthony Cabunoc, Los Angeles Police Department, Van Nuys Division on October 17, 2007.
[2] Per phone call with Officer Anthony Cabunoc, Los Angeles Police Department, Van Nuys Division on October 17, 2007.

b. Regulatory and Policy Setting

The Van Nuys-North Sherman Oaks Community Plan (Community Plan) includes goals, objective and policies that specifically address policy-level guidelines for police services in the project area. In summary, the Community Plan establishes policy that strives to ensure that adequate police facilities and services are available to provide for the public safety needs of the community based on current and future needs. A key emphasis of the Community Plan is the promotion of Crime Prevention Through Environmental Design (CPTED) strategies that employ natural access control, natural surveillance and territorial reinforcement features to minimize opportunities for criminal and destructive activity, and thereby minimize demand on police services, facilities and personnel.

Specific police services related policies that are applicable to the project area are listed later in this section under the Consistency with Applicable Plans and Policies discussion. For an analysis of the Proposed Project's consistency with other land use policies of the Community Plan, please refer to Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this DEIR.

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section and used to determine the proposed project's environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006).

According to the City of Los Angeles CEQA Significance Thresholds, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;

- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and

- Whether the project includes security and/or design features that would reduce the demand for police services.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project involves the intensification of commercial/retail land uses through the addition of 280,000 GLSF of new structures and reconfiguration of the internal site circulation to provide more efficient and direct access throughout the project site.

The shopping center is currently patrolled on a full-time by a private security service, which covers both interior and exterior portions of the project site using a combination of foot and vehicle-assisted patrols, as well as CCTV monitoring. Similar security service will be maintained with the Proposed Project and adjusted accordingly to accommodate the new site plan and activity levels.

In addition to the roving security patrol and video surveillance, the Proposed Project design incorporates other attributes such as security lighting, enhanced emergency access, natural surveillance opportunities, etc., that will help improve on-site safety and security. Such design and operational characteristics function as project design features (PDFs).

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- The Proposed Project Landscape Plan will incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance.

- The Proposed Project shall be maintained as a closed mall campus with controlled access points and operational hours.

- The Proposed Project shall result in the addition of more building access points that will improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving opportunities for CPTED principals that employee natural access control, natural surveillance and territorial reinforcement features.

- The Proposed Project shall provide organized roving security patrol, video surveillance, and security lighting to ensure the safety and security of patrons, tenants and employees.

- The Proposed Project includes reconfiguration of Fashion Square Lane to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) through its entire length of along the south edge of the project site adjacent to proposed structures affording maximum accessibility for emergency service personnel and vehicles.

- The Proposed Project shall provide sufficient off-street parking for all building employees and anticipated patrons and visitors, thereby minimizing the potential for parking conflicts on off-site locations and providing parking within a controlled environment that can be monitored by on-site patrol and surveillance operations.

- Directional and security lighting will be required for safety purposes. Through a new plan, lighting can enhance safety along the Riverside Drive and Hazeltine Avenue frontages and add to the perceived security of the neighborhood in general. Lighting would be incorporated into the streetscape environment at several levels, including the use of bollards, wall reveals, seating areas, and crosswalks. The use of plaza strip

lighting will afford additional security lighting but with a park-like feel and without significant light intrusion to the surrounding neighborhood.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- All businesses within the development desiring to sell or allow consumption of alcoholic beverages will require licensing through Alcohol and Beverage Control and approval by the LAPD.

b. Project Impacts

Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the NOP and IS process to have a potential significant environmental effect. Issues related to Police Services that were determined to be less than significant and are not analyzed further, include: short-term demand for police services during construction activity. An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant in this DEIR.

The adequacy of police services for the Proposed Project is based on a review of the size of the population and geographic area served, the number and type of calls for service, and other community characteristics that may create special service needs.

(1) Police Protection Facilities and Service

Retail land uses similar to the Proposed Project typically result in police response calls for retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons. Although there is not a direct proportional relationship, the incidence for such calls generally increases with the level of intensity of on-site activity and increases in traffic on local roadways. Because the Proposed Project will increase the use intensity of the site and contribute to additional traffic on local roadways, an increase in the number of reported crimes can be anticipated. The nature of such calls is typical of those experienced with commercial development and does not represent any unique law enforcement issues. The Proposed Project includes numerous on-site design and operational strategies (such as more efficient parking and access configurations, nighttime security lighting, on-site security patrol, etc.) that will enhance public safety and incorporate CPTED strategies, which in turn minimize the risk for criminal activity.

The Proposed Project includes expansion of the existing retail and restaurant uses at the Square shopping center. The project site is currently developed with uses that require similar LAPD resources as those anticipated with the Proposed Project. The Proposed Project does not include a residential component that could result in a direct increase in population due to new residents (and thereby an increased demand for police services, or new or physically altered police facilities).

The Proposed Project could result in an increase of approximately 788 employees at the shopping center. Based on the location of the shopping center within the heavily populated San Fernando Valley, it is anticipated that an adequate workforce is locally available and the Proposed Project will not increase the resident population of the community indirectly. Using population conversion factors provided in the LA CEQA Thresholds Guide, a police service population for the Proposed Project is estimated at 675 persons.

The City of Los Angeles Police Department uses a ratio of approximately 758 residents to one officer when determining if additional staffing is necessary. Based on the criteria, the Proposed Project may generate the need for an additional 0.9 officers. However, current response times in the Van Nuys area are consistent with City-wide averages, thus additional staffing for this division is currently deemed unwarranted by LAPD.[3] Further, incorporation of on-site safety design and operational features may offset this service need. The Proposed Project will incorporate on-site private security measures, such as security officers, security cameras, security lighting, and design features that will reduce the demand for police protection at the site. The resultant impact to police protection services due to the Proposed Project is less than significant.

(2) Crime Rates

The Proposed Project includes a request for a Conditional Use Permit to allow the on-site sale and consumption of alcoholic beverages (CUB) in association with up to approximately 40,000 GLSF of new restaurant uses to be located within the shopping center, of which approximately 28,000 GLSF could include the service of alcoholic beverages. Although some of the restaurants may have direct exterior access and may have operational hours (i.e., to 12:00 midnight on weekends) that are somewhat different than the main mall campus, the restaurants that would serve alcoholic beverages would be incidental to the main retail use of the shopping center. Approval of the requested CUB would be based on a finding that the Proposed Project would not result in an undue concentration of uses which dispense alcoholic beverages. Because the restaurants would be primarily family-style, incidental to the shopping center, and located indoors, the potential for crimes associated with public drunkenness and disorderly conduct is considered to be less than significant. Further, the CUB itself offers a vehicle to revoke the sale/consumption of alcoholic beverages at the project site should serious issues related to such arise and demonstrate a serious impediment to the safety of the community.

(3) On-Site Safety Design and Operations

The Proposed Project incorporates design and operational measures that will reduce the demand on police facilities and services by addressing crime concerns on the "front end" within the project site. Specifically, the Proposed Project incorporates many Crime Prevention Through Environmental Design (CPTED) strategies that address natural access control, natural surveillance, and territorial reinforcement. Examples of CPTED strategies integrated into the building design and public space areas include:

[3] Per phone call with Officer Anthony Cabunoc, Los Angeles Police Department, Van Nuys Division on October 17, 2007.

- Use of wall-hugging vines and bamboo screening as a graffiti deterrent and minimizing hidden spaces

- Maintaining a closed mall campus with controlled access points and operational hours

- Adding more building access points that improve public access and circulation throughout the mall and minimize walking distances from remote parking areas

Further, the Proposed Project will provide organized roving security patrol, video surveillance, and security lighting that will improve safety and help reduce potential impacts to LAPD services by serving as a first level of enforcement and as a deterrent. It is anticipated that these deterrents will affect the site perimeter and adjacent areas enhancing the overall public safety in the immediate vicinity.

The Proposed Project includes reconfiguration of Fashion Square Lane to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) through its entire length of along the south edge of the project site adjacent to proposed structures affording maximum accessibility for emergency service personnel and vehicles.

In addition, the Proposed Project will provide sufficient off-street parking for all building employees, anticipated patrons and visitors, thereby minimizing the potential for parking conflicts at off-site locations, and providing parking within a controlled environment that can be monitored by on-site patrol and surveillance operations.

As discussed above, the Proposed Project incorporates numerous project elements and design considerations which target enhanced safety, deterrents to criminal activity and minimizing demand for outside police services. As a result, it is anticipated the overall net effect to LAPD police services are less than significant with implementation of recommended mitigation measures that target communication and cooperation with LAPD on crime preventative measures and enhanced emergency response.

Although adequate site safety measures will be provided with the Proposed Project, some of the nearby residents have expressed concern that the Proposed Project may nonetheless result in a potential increase in localized crime and/or traffic enforcement incidents. In particular, the surrounding residential community is concerned that project patrons may park along adjacent off-site streets, including within residential neighborhoods to the north, for convenience. A key goal of the Proposed Project is to provide a more convenient and efficient access and internal circulation system within the project site, and to provide convenient parking options. It is anticipated that the access, circulation and parking enhancements will provide sufficient incentive for patrons to park on-site at the shopping center. Further, several measures to address pass-through traffic, neighborhood protection and traffic calming (such as restricted access to Matilija Avenue from Riverside Drive) are proposed to address project traffic. The Proposed Project will fund the study and implementation of measures that will discourage the use of residential streets north of the center as either a “cut-through” to avoid congestion or for parking. This work is called a neighborhood protection plan. The neighborhood protection plan will

provide additional disincentive to park in adjacent neighborhoods to the north of the project site. As a result, vehicle enforcement concerns due to the project are anticipated to be less than significant.

(4) Consistency with Applicable Plans and Policies

The Proposed Project does not propose any change to adopted Plans or policies, nor reclassification of applicable designations. The applicable police services related goals, objectives and policies of the Van Nuys-North Sherman Oaks Community Plan are provided in *Table 35: Consistency with Community Plan Police Services Related Goals, Objectives and Policies*, along with a discussion of the project consistency with each applicable component. In summary, the Proposed Project is consistent with the police services related goals, objectives and policies because the project either directly contributes toward the furtherance of those policies (i.e., as through physical site improvements) or indirectly supports those policies by not creating obstacles for their realization (i.e., such as remaining consistent with land use goals). The Proposed Project will result in a less than significant impact to police services in the project area due to conflicts with policies and programs supporting the provision for adequate police protection services.

TABLE 35
CONSISTENCY WITH COMMUNITY PLAN POLICE PROTECTION RELATED GOALS, OBJECTIVES AND POLICIES

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
VAN NUYS-NORTH SHERMAN OAKS COMMUNITY PLAN			
G 9	A community with adequate police facilities and services to provide for the public safety needs of the community.	The Proposed Project is consistent with this goal because it incorporates design and operational measures, as well as organized patrol, which will reduce the demand for available police facilities and services by addressing crime concerns on the "front end" within the project site and minimizing the need to call for outside police patrol. Further, these deterrents will affect the site perimeter and adjacent areas enhancing the overall public safety in the immediate vicinity. Specific PDFs incorporated into the Proposed Project that ensure consistency are discussed in the analysis of police services in Section IV: Environmental Impact Analysis: H-Public Services: 2-Police, of this EIR.	Consistent
O 9-1	To provide adequate police facilities and personnel to correspond with population and service demands.	The Proposed Project is consistent with this objective because design elements of the project will reduce demand for services thereby providing for a more efficient utilization of available police	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		facilities and personnel throughout the service area. Specific PDFs incorporated into the Proposed Project that ensure consistency are discussed in the analysis of police services in Section IV: Environmental Impact Analysis: H-Public Services: 2-Police, of this EIR. Additionally increased City revenues generated by the project will be available to fund police services to levels appropriate for the demand.	
P 9-1.1	Coordinate with Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	The Proposed Project is consistent with this policy as the applicant has initiated and will continue to coordinate with, and obtain input from, the Police Department in order to determine the potential impacts to police protection services and identify appropriate design modifications and mitigation measures. Please refer to the analysis of police protection services in Section IV: Environmental Impact Analysis: H-Public Services: 2-Police, of this EIR.	Consistent
P 9-1.2	Promote the implementation of Crime Prevention Through Environmental Design (CPTED) strategies including natural access control, natural surveillance and territorial reinforcement.	The Proposed Project is consistent with this policy because the project design and operational characteristics incorporate the necessary CPTED strategies that address natural access control, natural surveillance, and territorial reinforcement. Examples of CPTED strategies integrated into the building design and public space areas include: • Use of wall-hugging vines and bamboo screening as a graffiti deterrent and minimizing hidden spaces • Maintaining a closed mall campus with controlled access points and operational hours • Adding more building access points that improve public access and circulation throughout the mall and minimize walking distances from remote parking areas	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		Please refer to the analysis of police protection services in Section IV: Environmental Impact Analysis: H-Public Services: 2-Police, of this EIR.	

(5) Cumulative Impacts

As discussed above, the Proposed Project will result in a less than significant impact to police services, and police response effectiveness will not be compromised by traffic congestion from the Proposed Project as all project-related roadway impacts will be fully mitigated. Hence, the Proposed Project will not lessen the level of police services in the community and will not contribute to a cumulative impact to the provision of police services.

Future development has the potential to increase the population and density of the area and could potentially have a cumulative impact on police services. A review of the related projects indicates that there are no General Plan Amendment cases requested. As such, the identified related projects are presumed to be consistent with growth impacts within the Community Plan Area. As with the Proposed Project, it is anticipated that any cumulative development would be subject to police protection and safety measures to adequately mitigate police service impacts. Any cumulative development would be required to comply with any LAPD development review criteria. Population increases within the police service area due to cumulative growth would not increase above anticipated Community Plan levels, and would not result in a significant related projects impact on police services.

4. MITIGATION PROGRAM

MM PSP-1: All businesses within the development desiring to sell or allow consumption of alcoholic beverages will require licensing through Alcohol and Beverage Control and approval by the LAPD.

MM PSP-2: The Proposed Project Landscape Plan will incorporate wall-hugging vines and bamboo screening as CPTED strategies which function as graffiti deterrents, minimization of hidden spaces, and creation of more open area for natural surveillance.

MM PSP-3: The Proposed Project shall be maintained as a closed mall campus with controlled access points and operational hours.

MM PSP-4: The Proposed Project shall result in the addition of more building access points that will improve public access and circulation throughout the mall and minimize walking distances from remote parking areas, thereby improving opportunities for CPTED principals that employee natural access control, natural surveillance and territorial reinforcement features.

MM PSP-5: The Proposed Project shall provide organized roving security patrol, video surveillance, and security lighting to ensure the safety and security of patrons, tenants and employees.

MM PSP-6: The Proposed Project includes reconfiguration of Fashion Square Lane to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) through its entire length of along the south edge of the project site adjacent to proposed structures affording maximum accessibility for emergency service personnel and vehicles.

MM PSP-7: The Proposed Project shall provide sufficient off-street parking for all building employees and anticipated patrons and visitors, thereby minimizing the potential for parking conflicts on off-site locations and providing parking within a controlled environment that can be monitored by on-site patrol and surveillance operations.

MM PSP-8: Directional and security lighting will be required for safety purposes. Through a new plan, lighting can enhance safety along the Riverside Drive and Hazeltine Avenue frontages and add to the perceived security of the neighborhood in general. Lighting would be incorporated into the streetscape environment at several levels, including the use of bollards, wall reveals, seating areas, and crosswalks. The use of plaza strip lighting will afford additional security lighting but with a park-like feel and without significant light intrusion to the surrounding neighborhood.

MM PSP-9: Incorporate into the plans the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to Design Out Crime Guidelines: Crime Prevention Through Environmental Design published by the Los Angeles Police Department's Crime Prevention Section (located at Parker Center, 150 N. Los Angeles Street, Room 818, Los Angeles, (213) 485-3134. These measures shall be approved by the Police Department prior to the issuance of building permits.

MM PSP-10: Elevators, lobbies, and parking areas shall be well illuminated and designed with minimum dead space to eliminate areas of concealment.

MM PSP-11: The Project Applicant shall consult with the LAPD Crime Prevention Unit on any additional crime prevention features appropriate to the design of the Proposed Project, and shall incorporate such measures to the extent feasible and practical.

MM PSP-12: Upon completion of the Proposed Project, the Fashion Square Mall Association shall provide the Van Nuys Division Commanding Officer with a diagram of each

portion of the property, including access routes and additional information that might facilitate police response.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

Implementation of the identified standard conditions of approval, project design features and recommended mitigation measures reduce all potential Proposed Project and cumulative impacts to less than significant levels.

IV. ENVIRONMENTAL IMPACT ANALYSIS

I. PUBLIC UTILITIES: SOLID WASTE

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

Solid waste generated at the project vicinity is generally disposed of at the Sunshine Canyon Landfill located off San Fernando Road in the Sylmar area of the San Fernando Valley near the Interstate 210, 5 and Highway 14 interchange. The landfill is owned by Brown-Farris Industries (BFI) which operates the facility under permits for both the City of Los Angeles portion and a County of Los Angeles portion. The City side of Sunshine Canyon Landfill is permitted to accept approximately 5,500 tons of waste per day and 30,000 tons per week[1]. The County portion of the landfill provides additional disposal capacity of approximately 6,600 tons per day with 11.2 million tons of remaining capacity[2]. The City/County Landfill will provide 30 years of disposal capacity at an average rate of 11,000 tons per day[3]. Although solid waste generated at the project site is expected to go to Sunshine Canyon Landfill, *Table 36: Existing Landfill Facilities in Los Angeles County* identifies the landfill facilities that would have the capacity to serve the project site and project area if capacity was not available at Sunshine Canyon Landfill. This table identifies the permitted daily quantities, number of operating days per week, expiration dates of current permits, and the average collection quantities of potential landfills for the project area.

b. Regulatory and Policy Setting

The Los Angeles Countywide Integrated Waste Management Plan identifies goals for solid waste that encourage the continued development of an integrated solid waste management system to assist jurisdictions in maximizing waste reduction, eliminate barriers and promote intergovernmental cooperation among jurisdictions to create new opportunities for diversion programs, encourage stronger long-term markets for material diversion[4]. In an effort to remain proactive in planning for solid waste alternatives, the City of Los Angeles prepared a Background Studies Summary Report. This Report is the preliminary step in a multi-phase effort to consolidate multiple planning and implementation document and establish a current baseline of system operating conditions to facilitate future planning efforts[5] Goals identified in this Report include maximum waste diversion, adequate collection and disposal of mixed solid waste, and adequate recycling programs.

[1] California Integrated Waste Management Board (CIWMB). 2003 (May 21). Solid Waste Facility Permit (SWFP) for the Sunshine Canyon Landfill. 12 June 2008 <http://sunshinecanyonlandfill.com/regulatory/pdf/SWFP_(Issued_5-21-03).pdf >.
[2] Sunshine Canyon Landfill. 2007. *Sunshine Canyon Landfill* Website. 22 May 2008 <http://www.sunshinecanyonlandfill.com/index.htm>.
[3] Sunshine Canyon Landfill. 2007. *Sunshine Canyon Landfill* Website. 22 May 2008 <http://www.sunshinecanyonlandfill.com/index.htm>.
[4] Los Angeles County Department of Public Works (LACDPW), Environmental Programs Division. 1997 (June). *Los Angeles County Integrated Waste Management Plan*. Los Angeles, CA: the County. 12 June 2008 <http://ladpw.org/epd/tf/about.cfm>.
[5] Los Angeles Department of Public Works, Bureau of Sanitation. 2006 (January). *City of Los Angeles Solid Waste Planning Background Studies Summary Report.* 12 June 2008 <http://www.lacity.org/san/solid_resources/pdfs/rfp-swirp-appendix-b3.pdf>.

TABLE 36
EXISTING LANDFILL FACILITIES IN LOS ANGELES COUNTY [1]

FACILITY	LOCATION	PERMITTED DAILY DISPOSAL (TONS) [2]	AVERAGE DAILY WASTE RECEIVED IN 2000 (TONS)	USAGE RESTRICTIONS	REMAINING CAPACITY	STATUS [3]
Antelope Valley Landfill	Antelope Valley	1	570	None	7,800,000 tons	CUP issued 4/18/1992
Bradley West Landfill	Sunland	10	7,610	None	3,100,000 tons	Amended 12/31/1993
Calabasas Landfill	Agora	3	1,100	Wasteshed [4]	11,700,000 tons	CUP expires 3/18/2006 Expected to close before 2006
Chiquita Canyon Landfill	Valencia	5	4,420	None	20,100,000 tons	CUP expires upon reaching permitted capacity.
Commerce RTE	Commerce	1	360	None	n/a	n/a
Lancaster Landfill	Lancaster	1	450	None	12,700,000 tons	n/a
Puente Hills Landfill	Whittier	13	13,200	No refuse from cities greater than 2,500,000 [5]	41,184,000 tons [6]	CUP expires 08/01/2012
Scholl Canyon Landfill	Glendale	3	1,410	Wasteshed [4][5]	8,900,000	CUP expires 11/2013
Southeast Resource Recovery	Long Beach	2	1,360	None	n/a	CUP expires upon reaching permitted capacity.
Spadra Landfill	Walnut	2	540	None	closed 2000	n/a

[1] Source: *Draft Environmental Impact Report 4000 Workman Mill Road*. County of Los Angeles Department of Regional Planning. September 2002. Original Source: "*Continued Operation of the Puente Hills Landfill," Environmental Impact Report*, Sanitation Districts of Los Angeles County, January 2002.
[2] Based on a six-day work week.
[3] Available capacity at end of 2000.
[4] Wasteshed includes jurisdictions in proximity to the site that have historically used the site.
[5] All Sanitation Districts solid waste facilities restrict waste from any county, besides Los Angeles County, having a population greater than 2,000,000. However, currently Scholl Canyon Landfill only accepts waste from its own wasteshed which primarily includes the City of Glendale.
[6] Based on 13,200 tons per day, 6 days a week, 52 weeks per year until the CUP expires in 2013. Per phone conversation between Monique Salezar, Los Angeles County Sanitation Districts, and Carrie Riordan, Planning Associates, Inc., March 3, 2004

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section and used to determine the proposed project environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006). The determination of significance shall be made on a case-by-case basis, considering the following factors:

- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;

- Need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and

- Whether the project conflicts with solid waste policies and objectives in the City's Source Reduction Recycling Element (SRRE) or its updates, the City's Solid Waste Management Policy Program (CiSWMPP), the Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project includes the addition of approximately 280,000 GLSF of new retail and restaurant uses at the existing shopping center that would generate additional waste at the project site. Solid waste programs and disposal procedures would continue to operate as they do with the existing shopping center. To implement the Proposed Project, an existing three-level parking structure and some surface parking area would be demolished and new construction of a two-level retail building and two multi-level parking structures is proposed.

The Proposed Project would develop and implement a construction waste management plan (CWMP) that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or comingled. A minimum of 50% of the construction and demolition debris (exclusive of excavated soils and organic debris) would be recycled and/or salvaged. Excavated/exported soil would be transferred off-site as clean fill rather than landfilled. Organic landclearing debris (i.e., trees to be removed) would be processed as greenwaste. The CWMP would consider recycling cardboard, metal, brick, acoustical tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation and other similar materials used during the construction phase. The CWMP would designate a specific area(s) on the construction site for segregated or commingled collection of recyclable materials, and track recycling efforts throughout the construction process. Further, the CWMP would identify construction haulers and recyclers to handle the designated materials. Consistent with the intent to minimize waste, the CWMP would also would establish a minimum project goal of 10% (post-consumer and ½ pre-consumer) for recycled content construction materials and identify material suppliers that can achieve this goal. During construction, the Applicant would ensure that the specified

recycled content materials would be installed. The CWMP would also establish a project goal (10% minimum) for locally sourced construction materials and would identify materials and material suppliers that can achieve this goal. During construction, the Applicant would ensure that the specified local materials would be installed and quantify the total percentage of local materials installed.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- The Proposed Project would develop and implement a construction waste management plan (CWMP) that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or commingled. A minimum of 50% of the construction and demolition debris (exclusive of excavated soils and organic debris) would be recycled and/or salvaged. Excavated/exported soil would be transferred off-site as clean fill rather than landfilled. Organic landclearing debris (i.e., trees to be removed) would be processed as greenwaste. The CWMP would consider recycling cardboard, metal, brick, acoustical tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation and other similar materials used during the construction phase. The CWMP would designate a specific area(s) on the construction site for segregated or commingled collection of recyclable materials, and track recycling efforts throughout the construction process. Further, the CWMP would identify construction haulers and recyclers to handle the designated materials. Consistent with the intent to minimize waste, the CWMP would also establish a minimum project goal of 10% (post-consumer and ½ pre-consumer) for recycled content construction materials and identify material suppliers that can achieve this goal. During construction, the developer would ensure that the specified recycled content materials would be installed. The CWMP would also establish a project goal (10% minimum) for locally sourced construction materials and would identify materials and material suppliers that can achieve this goal. During construction, the developer would ensure that the specified local materials would be installed and quantify the total percentage of local materials installed.

- The Proposed Project would designate an area for recyclable collection and storage that is appropriately sized and located in a convenient area to serve mall tenants. The Fashion Square Mall Association would consider employing cardboard balers, aluminum can crushers, recycling chutes and other waste management technologies to further enhance and manage a recycling program at the shopping center.

- The Proposed Project will implement a recycling program, which include recycling of more the 90% of corrugated cardboard waste, which is the single largest component of the shopping centers waste. The Proposed Project will also implement a program to separates water from organic waste in the food preparation process through "pulper" equipment. This reduces fuel cost in transporting the waste.

- In addition, and consistent with PDFs described in Section IV: Environmental Impact Analysis: B-Air Quality of this EIR, the Proposed Project is designed and will be

built and operated in a manner consistent with the requirements to achieve LEED[6] certification. Although specific measures that would be employed are listed above, the application of other LEED certifiable measures would incrementally result in further reduction of solid waste and the long-term impact to local landfills. The Proposed Project will implement a variety of design and operational features, including waste recycling and stream reduction programs, to achieve LEED certification.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- The Propose Project would comply with the Countywide Integrated Waste Management Plan and meet targeted waste stream reduction requirements as provided in the plan.

b. Project Impacts

The Proposed Project is anticipated to generate solid waste during both construction and operational activities at the project site. Construction waste would be short-term and represents a one-time generation of waste while operation waste will be long-term and ongoing for the life of the shopping center. Both scenarios are discussed below.

(1) Construction Waste

Construction waste includes waste from both the demolition and construction processes. Demolition of the existing "south" three-level parking structure that feeds the shopping center and construction of the proposed retail/restaurant expansion and two new parking structures will generate construction waste. Demolition of the existing parking structure, at approximately 120,000 square feet, would produce a one-time occurrence of approximately 9,300 tons of waste[7]. Construction of the proposed 280,000 GLSF expansion of the shopping center is anticipated to generate approximately 319 tons of waste[8], also a one-time occurrence. Excavation for the subterranean parking level will generate approximately 147,016 cubic yards of earth material to be removed from the project site. These soils are anticipated to be transported as fill to some other location and would not be disposed as landfill.

During construction activities, a considerable portion of both demolition and construction materials while be recycled and used either in on-site construction and/or hauled off-site for recycling, therefore reducing waste materials being transported to landfills serving the project area. In an effort to minimize the amount of construction waste being taken to landfills, the

[6] LEED is the Leadership in Energy and Environmental Design (LEED) certification from the United States Green Building Council. LEED is a green building rating system that was designed to guide and distinguish high-performance commercial projects. LEED promotes a whole-building approach to sustainability by recognizing performance in five key areas of human and environmental health: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality. Source: United States Green Building Council, *Leadership in Energy and Environmental Design*, www.usgbc.org/LEED, 2007.
[7] Assumes 155 pounds of demolition waste per square foot. City of Antioch, California website. http://ci.antioch.ca.us/Environment/cdro/antiochinfoconversions.pdf
[8] Assumes 1.14 tons per 1,000 square feet of construction waste. City of Santa Monica Building Program website. http://greenbuildings.santa-monica.org/appendices/apawastegeneration.html

Project Applicant would require primary construction contractors to provide separate receptacles for materials that can be recycled such as wood scraps, metal scraps, and cardboard. Individual contractors would be required to emphasize diversion planning rather than demolition, to ensure that the maximum amount of recyclable materials are separated and placed in the appropriate bins. Given the amount of remaining landfill capacity and the recycling measures to be used during construction of the Proposed Project, demolition and construction activities associated with the project are anticipated to result in a less than significant solid waste impact.

(2) Operational Waste

The site is currently developed with approximately 867,000 GLSF, including approximately 842,045 GLSF of retail space and approximately 24,955 GLSF utilized by the food court area. The existing shopping center development generates approximately 2,818 pounds per day of solid waste.[9]

The Proposed Project would result in approximately 1,147,000 GLSF total including approximately 1,075,223 GLSF of retail, approximately 28,000 GLSF of sit-down restaurants, and approximately 43,777 GLSF of the Gourmet Dining Terrace. The total development, including implementation of the Proposed Project, is anticipated to result in approximately 4,739 pounds of solid waste per day, an increase of approximately 1,921 pounds per day of solid waste.

The City of Los Angeles CEQA Thresholds of Significance indicate that a determination of significance should give consideration to the amount of projected waste generation, the need for additional solid waste collection routes, and whether the project conflicts with identified solid waste policies. The Proposed Project includes expansion of an existing shopping center that is currently adequately served with waste disposal services. There are existing service routes to and from the project site, and within the surrounding, fully-developed community. The Proposed Project would result in a less than significant solid waste impact due to the need for additional solid waste collection routes.

The Proposed Project will comply with all applicable federal, state, and local laws and regulations related to solid waste generation, collection and disposal. The Proposed Project will result in a less than significant solid waste impact since it will achieve compliance with solid waste regulations or conflicts with applicable solid waste plans and regulations.

The Proposed Project would result in a less than significant solid waste impact and would be served by a permitted landfill with sufficient capacity.

(3) Consistency with Applicable Plans and Policies

Consistency with applicable plans and policies, including land use and design policies which indirectly address solid waste, is discussed in detail in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this EIR.

[9] Assumes generation rate of 2.5 pounds per 1,000 gross leaseable square feet of retail space, and 1.0 pounds per seat of food court and sit-down restaurant uses. Assumes a worst-case scenario of 35 square feet per restaurant seat.

(4) Cumulative Impacts

The identified related projects (see Section III: General Description of the Environmental Setting: B-Related Projects, of this EIR) could result in a solid waste generation of approximately 4,900 pounds per day, or 2.46 tons.[10] With the Proposed Project's estimated increase in solid waste, the total cumulative increase in solid waste from the project area is approximately 6,800 pounds per day or 3.4 tons. The Sunshine Canyon Landfill, which would accept waste from this area of the City of Los Angeles, is permitted to accept approximately 5,500 tons of waste per day and 30,000 tons per week.[11] City of Los Angeles CEQA Significance Thresholds indicate that a determination of significance should give consideration to the amount of projected waste generation, the need for additional solid waste collection routes, and whether the project(s) conflicts with identified solid waste polices. The related project area is currently served with waste disposal services. There are existing service routes to and from the fully-developed area.

All related projects would be required to comply will all applicable federal, state and local laws and regulations related to solid waste generation, collection, and disposal, including the Los Angeles Countywide Integrated Waste Management Plan which identifies goals for incrementally reducing the regional waste stream over a the long-term. As such, the related projects will result in a less than significant impact due to conflicts with applicable solid waste plans and regulations.

Related projects would result in a less than significant solid waste impact due to the need for additional solid waste services, and the Proposed Project would not contribute substantially to a cumulative impact to solid waste.

4. MITIGATION PROGRAM

MM PU-1: The Proposed Project shall comply with the Countywide Integrated Waste Management Plan and meet targeted waste stream reduction requirements as provided in the plan.

MM PU-2: The Proposed Project shall develop and implement a construction waste management plan (CWMP) that identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or commingled. A minimum of 50% of the construction and demolition debris (exclusive of excavated soils and organic debris) shall be recycled and/or salvaged. Excavated/exported soil shall be transferred off-site as clean fill rather than landfilled. Organic landclearing debris (i.e., trees to be removed) shall be processed as greenwaste. The CWMP include measures for the recycling cardboard, metal, brick, acoustical tile, concrete, plastic, clean wood, glass, gypsum wallboard, carpet and insulation and other similar materials used during the construction phase. The CWMP shall designate a specific area(s) on the

[10] Assumes generation rate of 2.5 pounds per 1,000 square feet of retail space, and 1.0 pounds per seat of food court and sit-down restaurant uses. Assumes a worst-case scenario of 35 square feet per restaurant seat.
[11] California Integrated Waste Management Board (CIWMB). 2003 (May 21). Solid Waste Facility Permit (SWFP) for the Sunshine Canyon Landfill. 12 June 2008 <http://sunshinecanyonlandfill.com/regulatory/pdf/SWFP_(Issued_5-21-03).pdf >.

construction site for segregated or commingled collection of recyclable materials, and track recycling efforts throughout the construction process. The CWMP shall identify construction haulers and recyclers to handle the designated materials. Consistent with the intent to minimize waste, the CWMP shall also establish a minimum project goal of 10% (post-consumer and ½ pre-consumer) for recycled content construction materials and identify material suppliers that can achieve this goal. During construction, the developer shall ensure that the specified recycled content materials would be installed. The CWMP shall also establish a project goal (10% minimum) for locally sourced construction materials and would identify materials and material suppliers that can achieve this goal. During construction, the developer shall ensure that the specified local materials would be installed and quantify the total percentage of local materials installed.

MM PU-3: The Proposed Project shall designate an area for recyclable collection and storage that is appropriately sized and located in a convenient area to serve mall tenants. As feasible, the Fashion Square Mall Association shall employ cardboard balers, aluminum can crushers, recycling chutes and other waste management technologies to further enhance and manage a recycling program at the shopping center.

MM PU-4: The Proposed Project shall be designed, built and operated in a manner consistent with the requirements to achieve LEED certification. The Proposed Project will implement a variety of design and operational features, including waste recycling and stream reduction programs, to achieve LEED certification.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

With compliance of applicable standard conditions and implementation of the project design features (including attaining LEED certification), which have been incorporated into the Mitigation Program above, the Proposed Project would result in a less than significant solid waste impact and would be served by a permitted landfill with sufficient capacity.

IV. ENVIRONMENTAL IMPACT ANALYSIS

J. TRAFFIC, CIRCULATION AND ACCESS

A traffic study was prepared for the Proposed Project by Linscott, Law & Greenspan, Engineers, dated August 5, 2008 (see Appendix I: Traffic Study). The traffic study has been prepared through coordination with the City of Los Angeles Department of Transportation (LADOT).

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

(1) Local Street and Freeway System

The City of Los Angeles utilizes the roadway categories recognized by regional, state and federal transportation agencies. There are four categories in the roadway hierarchy, ranging from freeways with the highest capacity to two-lane undivided roadways with the lowest capacity. The roadway categories are summarized as follows:

- *Freeways* are limited-access and high speed travel ways included in the state and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses. Regional freeways in the Sherman Oaks area are the Ventura (US 101) Freeway, which runs east-west just south of the project site, and the San Diego (I-405) Freeway, which runs north-south several miles to the west of the project site.

- *Arterial* roadways are major streets that primarily serve through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and their major intersections are signalized. This roadway type is divided into two categories: principal and minor arterials. For the City of Los Angeles, these are referred to as Major and Secondary Highways. Principal arterials are typically four-or-more lane roadways and serve both local and regional through-traffic. Minor arterials are typically two-to-four lane streets that service local and commute traffic. Woodman Avenue, Riverside Drive and Van Nuys Boulevard are principal (major) arterials and also referred to as Major Highways. Hazeltine Avenue and Magnolia Boulevard are local examples of secondary (minor) arterials.

- *Collector* roadways are streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. They connect local streets to arterials and are typically designed with two through travel lanes (i.e., one through travel lane in each direction) that may accommodate on-street parking. They may also provide access to abutting properties.

- *Local* roadways distribute traffic within a neighborhood or similar adjacent neighborhoods and are not intended for use as a through-street or a link between higher capacity facilities such as collector or arterial roadways. Local streets are fronted by residential uses and do not typically serve commercial uses.

Regional access to the shopping center is provided by US 101 (Ventura) Freeway. Local access is provided via Hazeltine Avenue, Riverside Drive, and Woodman Avenue. A brief discussion of these and other important roadways in the project vicinity is provided below:

Beverly Glen Boulevard is a north-south oriented roadway that is located west of the project site. Beverly Glen Boulevard is designated as a Secondary Highway (i.e., arterial) in the City of Los Angeles General Plan Transportation Element. One through travel lane is provided in each direction on Beverly Glen Boulevard within the study area. An exclusive left-turn lane is provided in the northbound direction on Beverly Glen Boulevard at the Ventura Boulevard intersection. Parking is prohibited along both sides of Beverly Glen Boulevard in the project vicinity. Beverly Glen Boulevard is posted for a speed limit of 25 miles per hour near the project site. Beverly Glen Boulevard is also a designated scenic highway (see Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources).

Hazeltine Avenue is a north-south oriented roadway that borders the project site to the west. Hazeltine Avenue is designated as a Secondary Highway (i.e., arterial) in the City of Los Angeles General Plan Transportation Element. Two through travel lanes are provided in each direction on Hazeltine Avenue within the study area. Exclusive left-turn lanes in each direction are provided on Hazeltine Avenue at the Magnolia Boulevard, Riverside Drive, Fashion Square Lane, Moorpark Street and Ventura Boulevard intersections. An exclusive right-turn lane is provided in the northbound direction on Hazeltine Avenue at the Riverside Drive intersection. Parking is allowed along both sides of Hazeltine Avenue in the project vicinity, except between Riverside Drive and Fashion Square Lane where parking is prohibited. Hazeltine Avenue is posted for a speed limit of 35 miles per hour near the project site.

Magnolia Boulevard is an east-west oriented roadway that is located north of the project site. Magnolia Boulevard is designated as a Secondary Highway (i.e., arterial) in the City of Los Angeles General Plan Transportation Element. Two through travel lanes in each direction are provided on Magnolia Boulevard in the project vicinity. Exclusive left-turn lanes are provided in each direction on Magnolia Boulevard at the Hazeltine Avenue and Woodman Avenue intersections. Two-hour parking between the hours of 8:00 A.M. and 6:00 P.M. is provided along both sides of Magnolia Boulevard in the project vicinity. Magnolia Boulevard is posted for a speed limit of 35 miles per hour near the project site.

Matilija Avenue is a north-south oriented roadway that is located north of the project site. Matilija Avenue is designated as a Local Street in the City of Los Angeles General Plan Transportation Element. One through travel lane is provided in each direction on Matilija Avenue within the study area. Parking is allowed along both sides of Matilija Avenue in the project vicinity. There is no posted speed limit on Matilija Avenue within the project study area, thus it is assumed to be a prima facie speed limit of 25 miles per hour.

Moorpark Street is an east-west oriented roadway that is located south of the project site. Moorpark Street is designated as a Secondary Highway (i.e., arterial) in the City of Los Angeles General Plan Transportation Element. One through travel lane in each direction is provided on Moorpark Street in the project vicinity. Exclusive left-turn lanes are provided in each direction on Moorpark Street at the Tyrone Avenue, Hazeltine Avenue, and Woodman Avenue intersections. Exclusive right-turn lanes are provided in the eastbound directions on Moorpark Street at the Tyrone Avenue and Hazeltine Avenue intersections and in both directions at the Woodman Avenue intersection. Curbside parking is allowed along both sides of Moorpark Street in the project vicinity, except east of Woodman Avenue where two-hour parking between the hours of 8:00 A.M. and 6:00 P.M. is provided along both sides of Moorpark Street. Moorpark Street is posted for a speed limit of 35 miles per hour near the project site.

Riverside Drive is an east-west oriented roadway that borders the project site to the north. Riverside Drive is designated as a Major Highway Class II (i.e., arterial) in the City of Los Angeles General Plan Transportation Element. Two through travel lanes in each direction are provided on Riverside Drive in the project vicinity. Exclusive left-turn lanes are provided in each direction on Riverside Drive at the Hazeltine Avenue and Woodman Avenue intersections. Dual left-turn lanes are provided in the westbound direction on Riverside Drive at the Van Nuys Boulevard intersection. Exclusive right-turn lanes are provided on Riverside Drive in each direction at the Woodman Avenue intersection and in the westbound direction at the Van Nuys Boulevard intersection. One-hour parking between the hours of 8:00 A.M. and 6:00 P.M. is provided along the north side of Riverside Drive in the project vicinity. Two-hour parking between the hours of 8:00 A.M. and 6:00 P.M. is provided along the south side of Riverside Drive in the project vicinity. Class II bike lanes are provided in each direction on Riverside Drive between Riverside Drive and Moorpark Street. Riverside Drive is posted for a speed limit of 35 miles per hour near the project site.

Tyrone Avenue is a north-south oriented roadway that is located west of the project site. Tyrone Avenue is designated as a Secondary Highway (i.e., arterial) south of Moorpark Street in the City of Los Angeles General Plan Transportation Element. North of Moorpark Street, Tyrone Avenue is designated as a Local Street. One through travel lane is provided in each direction on Tyrone Avenue within the study area. An exclusive left-turn lane is provided in the southbound direction on Tyrone Avenue at the Ventura Boulevard intersection. Exclusive right-turn lanes are provided on Tyrone Avenue at the Ventura Boulevard intersection. Exclusive right-turn lanes are provided on Tyrone Avenue in the northbound direction at the Moorpark Street intersection and in the southbound direction at the Ventura Boulevard intersection. Parking is allowed along Ventura Boulevard where parking is prohibited along both sides of Tyrone Avenue. There is no posted speed limit on Tyrone Avenue within the project study area, thus it is assumed to be a prima facie speed limit of 25 miles per hour.

US 101 (Ventura) Freeway is a major north-south freeway that extends across northern and southern California. In the project vicinity, five mainline travel lanes are provided in each direction on US 101 Freeway. Both northbound and southbound ramps are provided on US 101 Freeway at Woodman Avenue, which borders the project site to the east. Northbound and southbound ramps are also provided at Van Nuys Boulevard, which is located approximately one-half mile west of the project site.

Van Nuys Boulevard is a north-south oriented roadway that is located west of the project site. Van Nuys Boulevard is designated as a Major Highway Class II (i.e., arterial) in the City of Los Angeles Transportation Element of the General Plan. Three travel lanes are provided in each direction on Van Nuys Boulevard within the study area. Exclusive left-turn lanes are provided in the southbound direction on Van Nuys Boulevard at the US 101 Freeway Eastbound Ramps and Riverside Drive intersections. Dual left-turn lanes are provided in the northbound direction on Van Nuys Boulevard at the US 101 Freeway Westbound Ramps intersection. Parking is prohibited along both sides of Van Nuys Boulevard between Riverside Drive and just south of the US 101 Freeway Eastbound Ramps. Two-hour metered parking between the hours of 9:00 A.M. and 3:00 P.M. is provided along both sides of Van Nuys Boulevard north of Riverside Drive. Van Nuys Boulevard is posted for a speed limit of 35 miles per hour near the project site.

Ventura Boulevard is an east-west oriented roadway that is located south of the project site. Ventura Boulevard is designated as a Major Highway Class II (i.e., arterial) in the City of Los Angeles General Plan Transportation Element. Two through lanes are provided in each direction on Ventura Boulevard in the project vicinity. Exclusive left-turn lanes are provided in each direction on Ventura Boulevard at the Tyrone Avenue/Beverly Glen Boulevard, Hazeltine Avenue, and Woodman Avenue intersections. Two-hour metered parking is provided from 8:00 A.M. to 6:00 P.M. along both sides of Ventura Boulevard in the project vicinity. Ventura Boulevard is posted for a speed limit of 35 miles per hour near the project site. Ventura Boulevard is also regulated by polices set forth in the City's Ventura/Cahauanga Specific Plan (see Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay).

Woodman Avenue is a north-south oriented roadway that borders the project site to the east. Woodman Avenue is designated as a Major Highway Class II (i.e., arterial) in the City of Los Angeles General Plan Transportation Element. Two through travel lanes are provided in each direction on Woodman Avenue within the study area. Exclusive left-turn lanes are provided in each direction on Woodman Avenue at the Magnolia Boulevard, Moorpark Street, and Ventura Boulevard intersections. Exclusive let-turn lanes are provided on Woodman Avenue in the northbound direction at the US 101 Freeway Westbound Ramp intersection and in the southbound direction at the US 101 Freeway Westbound Ramps and Riverside Drive intersections. Dual left-turn lanes are provided in the northbound direction on Woodman Avenue at the Riverside Drive intersection. Exclusive right-turn lanes are provided on Woodman Avenue in each direction at the Riverside Drive intersection and in the southbound direction at the Ventura Boulevard intersection. Curbside parking is allowed along both sides of Woodman Avenue in the project vicinity, except north of Riverside Drive where one-hour parking between the hours of 8:00 A.M. and 4:00 P.M. is provided along the west side of Woodman Avenue and south of Moorpark Street, where two-hour parking between the hours of 8:00 A.M. and 6:00 P.M. is provided along both sides of Woodman Avenue. Woodman Avenue is posted for a speed limit of 35 miles per hour near the project site.

(2) Public Transit

Public bus transit service in the project vicinity is provided by the Los Angeles County Metropolitan Transportation Authority (MTA) and the City of Los Angeles Department of Transportation (LADOT). The MTA's Orange Line, a rapid bus transit service operating in a

separate dedicated right-of-way that provides east-west service across the San Fernando Valley is located approximately 0.75 miles north of the project site. The LADOT DASH service provides a convenient connection between the Orange Line's stop in Van Nuys to the shopping center. A summary of existing transit routes that serve the project vicinity is provided in *Table 37: Existing Transit Routes* and illustrated in *Figure 42: Existing Public Transit Routes*.

TABLE 37
EXISTING TRANSIT ROUTES [1]

ROUTE	DESTINATIONS	ROADWAY NEAR SITE	NO. OF BUSES DURING PEAK HOUR		
			DIR	AM	PM
MTA Route 96	Downtown LA to Sherman Oaks (via Griffith Park, Burbank, Universal City)	Riverside Dr, Van Nuys Blvd, Ventura Blvd, Tyrone Ave, Moorpark St	EB WB	2 2	1 2
MTA Route 150/240	Canoga Park to Universal City (via Woodland Hills, Tarzana, Sherman Oaks)	Ventura Blvd	EB WB	6 8	6 7
MTA Route 158	Chatsworth to Sherman Oaks (via Northridge, Arleta, Van Nuys)	Woodman Ave, Ventura Blvd, Moorpark St	NB SB	3 3	2 3
MTA Route 183	Glendale to Sherman Oaks (via Burbank, North Hollywood)	Magnolia Blvd, Ventura Blvd	EB WB	2 2	2 2
MTA Route 233	Lake View Terrace to Westwood (via Pacoima, Van Nuys, Sherman Oaks, UCLA)	Van Nuys Blvd, Moorpark St, Ventura Blvd, Tyrone Ave	NB SB	12 12	13 12
MTA Route 237	Encino to Sherman Oaks (Via Van Nuys, Northridge, Granada Hills)	Van Nuys Blvd, Moorpark St, Ventura Blvd, Tyrone Ave	NB SB	1 1	1 2
MTA Route 750	Universal City to Woodland Hills (via Sherman Oaks, Tarzana)	Ventura Blvd	EB WB	6 10	11 7
MTA Route 761	Pacoima to Westwood (via Panorama City, Sherman Oaks)	Van Nuys Blvd, Ventura Blvd	NB SB	5 9	11 5
LADOT Dash Van Nuys/ Studio City	Van Nuys to Studio City (via Sherman Oaks)	Moorpark St, Hazeltine Ave	NB SB	3 3	3 3
Metro Orange Line Route 901	North Hollywood to Warner Center (via Valley Village, Van Nuys, Tarzana, Winnetka)	Woodman Ave	WB EB	12 12	12 12

[1] Sources: Los Angeles County Metropolitan Transportation Authority (LACMTA) and City of Los Angeles Department of Transportation (LADOT).

Specifically, MTA Route 96 runs directly adjacent to the project site along Riverside Drive and provides service between Downtown Los Angeles and Sherman Oaks. MTA Route 158, which provides service between Chatsworth and Sherman Oaks via Northridge, Arleta and Van Nuys, runs adjacent to the project site along Woodman Avenue. Also, the LADOT Dash/Van Nuys (LDVAN) runs adjacent to the project site along Hazeltine Avenue and provides service throughout Van Nuys and Studio City. Bus stops are currently located at the intersections of Hazeltine Avenue/Riverside Drive and Woodman Avenue/Riverside Drive.

FIGURE 42
EXISTING PUBLIC TRANSIT ROUTES

MAP SOURCE: METROPOLITAN TRANSPORTATION AUTHORITY

NORTH

(3) Access and Local Circulation

Vehicular access to the existing shopping center is currently provided via five driveways: two driveways on Hazeltine Avenue, two driveways on Riverside Drive, and one driveway on Woodman Avenue (see *Figure 11: Existing Site Circulation and Access: Riverside Drive* and *Figure 12: Existing Site Circulation and Access: Hazeltine Avenue* in Section II: Project Description: F-Project Characteristics. Also, five service/loading accessways are located on Riverside Drive, east of Hazeltine Avenue. These service driveways do not provide access to patron entrances or parking areas. All of the non-service driveways provide direct access to the parking areas for the existing shopping center. The southerly Hazeltine Avenue and the easterly Riverside Drive driveways form the end points for Fashion Square Lane, an existing private internal circulation roadway within the project site that runs a circuitous route through the large surface parking lot area on the southern portion of the project site.

The two driveways on Riverside Drive (easterly of the Macy's department store) both currently accommodate left-turn and right-turn ingress and right-turn-only egress movements. Both of the Riverside Drive driveways are stop sign controlled. The easterly Riverside Drive driveway is located immediately adjacent to an existing driveway that services the adjacent Riverside Woodman Plaza, a "not a part" commercial retail center east of the shopping center.

The Hazeltine Avenue north project driveway and the Woodman Avenue project driveway currently accommodate right-turn ingress and egress movements only. The Hazeltine Avenue south driveway currently accommodates left-turn and right-turn ingress and egress movements. The Hazeltine Avenue South driveway (at Fashion Square Lane) currently has one lane entering the parking structure with existing parking spaces located directly off the travel lane.

(4) Parking

Parking is currently provided in on-site parking structures and surface parking lots. Vehicular access to the on-site parking facilities is provided by Hazeltine Avenue, Riverside Drive and Woodman Avenue. Prior development approvals at the shopping center (e.g., ZA-95-0899 (CUZ) and CPC 94-0287 (ZC)) have established the parking requirement for the site at 4.5 parking spaces per 1,000 square feet of gross leasable floor area (applicable to retail, restaurant, office, etc.). The existing shopping center provides approximately 867,000 square feet of gross leasable floor area, thereby yielding a current parking requirement for approximately 3,902 parking spaces on-site.

(5) Existing Traffic Conditions and Levels of Service

(a) Study Intersections

The following 18 study intersections were selected for analysis by LADOT staff for inclusion in the traffic analysis:

1. Van Nuys Boulevard / Riverside Drive
2. Van Nuys Boulevard / US 101 Freeway Westbound (WB) Ramps
3. Van Nuys Boulevard / US 101 Freeway Eastbound (EB) Ramps
4. Tyrone Avenue / Moorpark Street
5. Tyrone Avenue-Beverly Glen Boulevard / Ventura Boulevard
6. Hazeltine Avenue / Magnolia Boulevard
7. Hazeltine Avenue / Riverside Drive
8. Hazeltine Avenue / Fashion Square Lane
9. Hazeltine Avenue / Moorpark Street
10. Hazeltine Avenue / Ventura Boulevard
11. Woodman Avenue / Magnolia Boulevard
12. Woodman Avenue / Riverside Drive
13. Woodman Avenue / US 101 Freeway Westbound (WB) Ramps
14. Woodman Avenue / US 101 Freeway Eastbound (EB) Ramps
15. Woodman Avenue / Moorpark Street
16. Woodman Avenue / Ventura Boulevard
17. Matilija Avenue/Riverside Drive
18. New Westerly Project Driveway/Riverside Drive

These study intersections were selected based on several factors including: (1) the proximity of the intersections to the site, (2) the relative percentage of project-related traffic anticipated to travel through the intersections, and (3) the potential for project-related traffic to add to the turning movements at the intersections. Sixteen of the 18 study intersections are presently controlled by traffic signals. The Matilija Avenue/Riverside Drive intersection is currently two-way stop sign controlled with the stop signs facing the minor street. The existing lane configurations at the 18 study intersections are shown in *Figure 43: Existing Lane Configuration at Study Intersections*.

(b) Level of Service

To establish existing baseline conditions for level of service (LOS) in the project site vicinity, manual counts of vehicular turning movements were conducted at each of the 18 study intersections. To determine a typical week day conditions, manual counts were taken during the weekday morning (A.M.) and afternoon (P.M.) commuter periods to determine the peak hour traffic volumes. Specifically, manual weekday counts were conducted in November 2005 from 7:00 to 10:00 A.M. to determine the A.M. peak commuter hour, and from 3:00 to 6:00 P.M. to

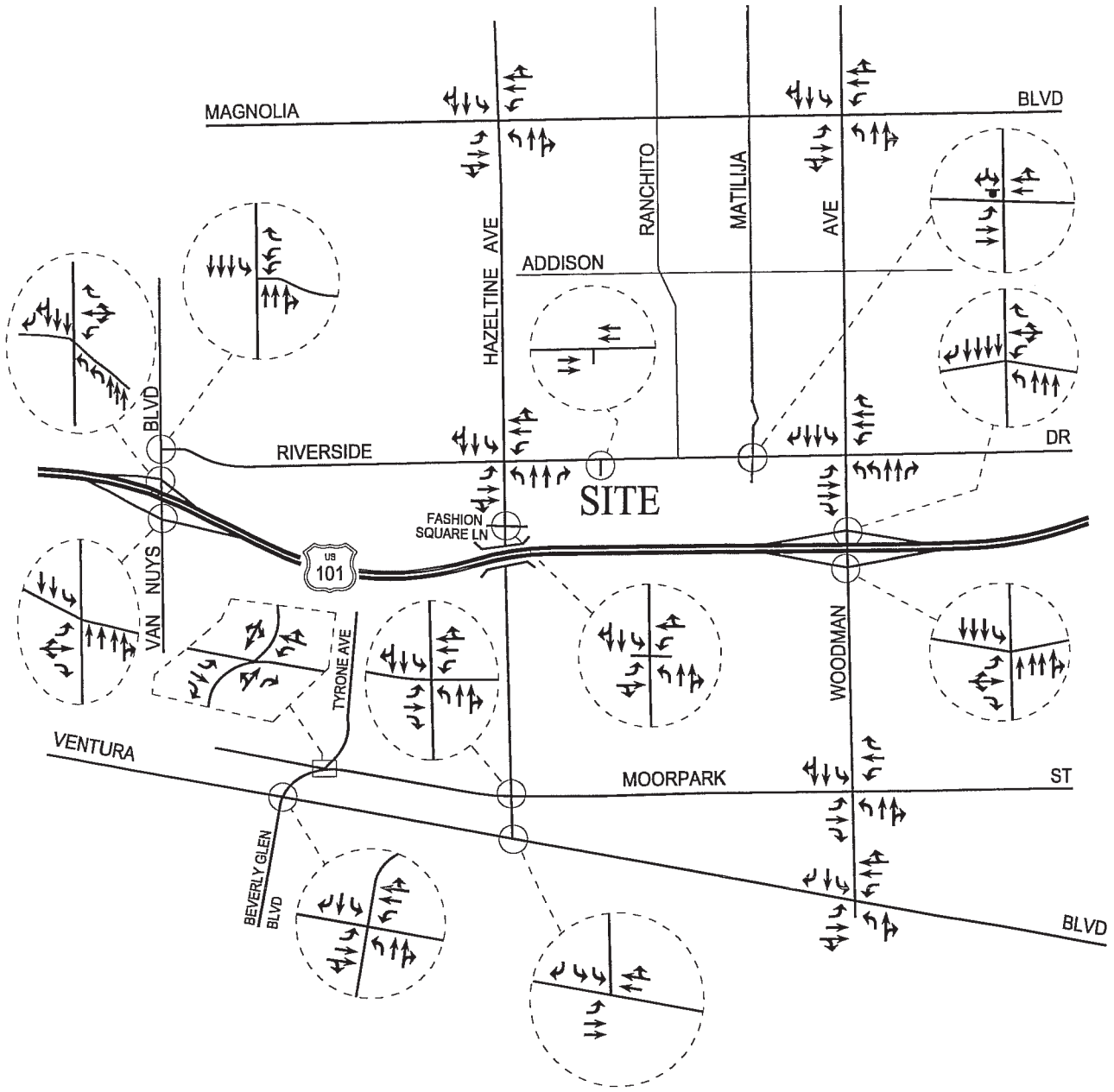


FIGURE 43
EXISTING LANE CONFIGURATION AT STUDY INTERSECTIONS
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

determine the P.M. peak commuter hour, timeframes which are generally associated with metropolitan Los Angeles peak commuter hours.[1]

Commercial uses typical to those on both the project site and surrounding area may have higher traffic activity during the weekends. Hence, typical weekend conditions on the local street system were also assessed for a Saturday mid-day peak hour. The weekend conditions assessment focuses on seven of the 18 study intersections (see above) since they are located immediately adjacent to the project site and include:

Int. No. 7: Hazeltine Avenue / Riverside Drive
Int. No. 8: Hazeltine Avenue / Fashion Square Lane
Int. No. 12: Woodman Avenue / Riverside Drive
Int. No. 13: Woodman Avenue / US 101 Freeway Westbound (WB) Ramps
Int. No. 14 : Woodman Avenue / US 101 Freeway Eastbound (EB) Ramps
Int. No. 17: Matilija Avenue/Riverside Drive
Int. No. 18: New Westerly Project Driveway/Riverside Drive

Manual counts of vehicular turning movements at these seven adjacent study intersections, which were selected because they are immediately adjacent to the project site, were conducted in March 2007 from 1:00 P.M. to 3:00 P.M. on a Saturday to determine the Saturday mid-day peak hour conditions.

The results of the manual counts and resultant observed vehicle movements at the 18 study intersections during the weekday A.M. and P.M. peak hours are shown in *Figure 44: Existing Traffic Volumes – Weekday AM Peak Hour, Figure 45: Existing Traffic Volumes – Weekday PM Peak Hour*, and on *Table 38: Existing 2007 Weekday Traffic Volumes*. The results of the manual counts and resultant observed vehicle movements at the seven adjacent study intersections during the weekend mid-day peak hours are shown in *Figure 46: Existing Traffic Volumes – Saturday Mid-Day Peak Hour*. The existing weekend traffic from the project site is shown on *Figure 47: Project Traffic Volumes – Saturday Mid-Day Peak Hour* and on *Table 39: Existing 2007 Weekend Traffic Volumes*. Summary data worksheets of the manual traffic counts at the study intersections are contained in Appendix D of Appendix I: Traffic Study.

[1] For assessment purposes intersection volumes from 2005 were increased at a rate of two percent (2.0%) per year to reflect year 2007 conditions. Additional manual traffic counts were conducted in November 2007 at 17 of the study intersections to verify that the 2005 traffic count extrapolations remain representative of current (and projected) conditions. Following this comparison, it was determined that the 2007 traffic counts (as aggregated) were approximately 6.6 percent and 0.5 percent lower during A.M. peak and P.M. peak hours, respectively. These differences are within the normal expected variation range. Hence, the 2005 adjusted traffic counts presented in the Traffic Study, and referenced throughout this analysis, are reasonably consistent with the 2007 counts. Further, the 2005 adjusted traffic counts are more conservative (i.e., "worst-case") and provide a reasonable representation of traffic volumes in the study area. Source: Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Traffic Count Comparison* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

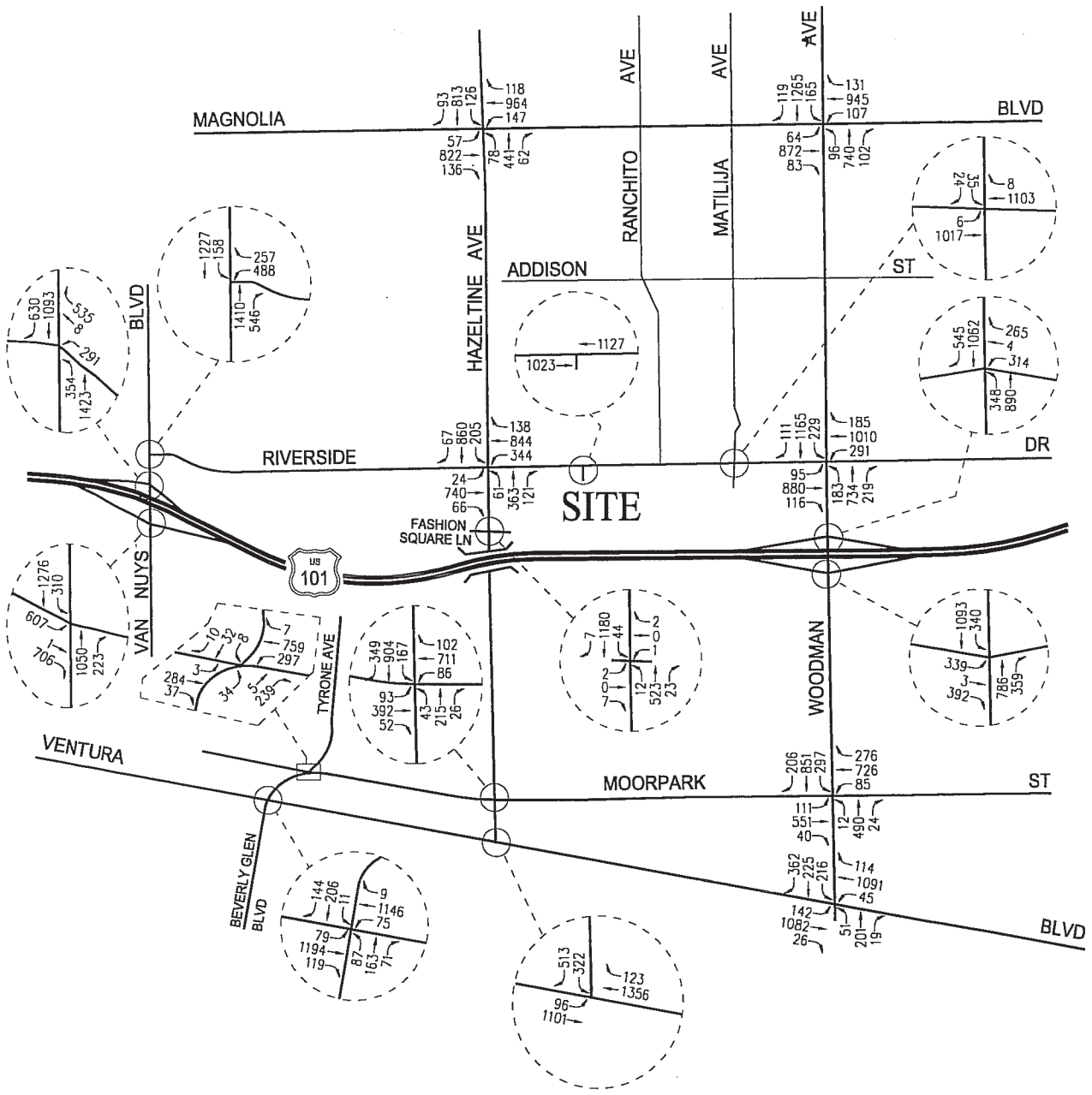


FIGURE 44
EXISTING TRAFFIC VOLUMES – WEEKDAY AM PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

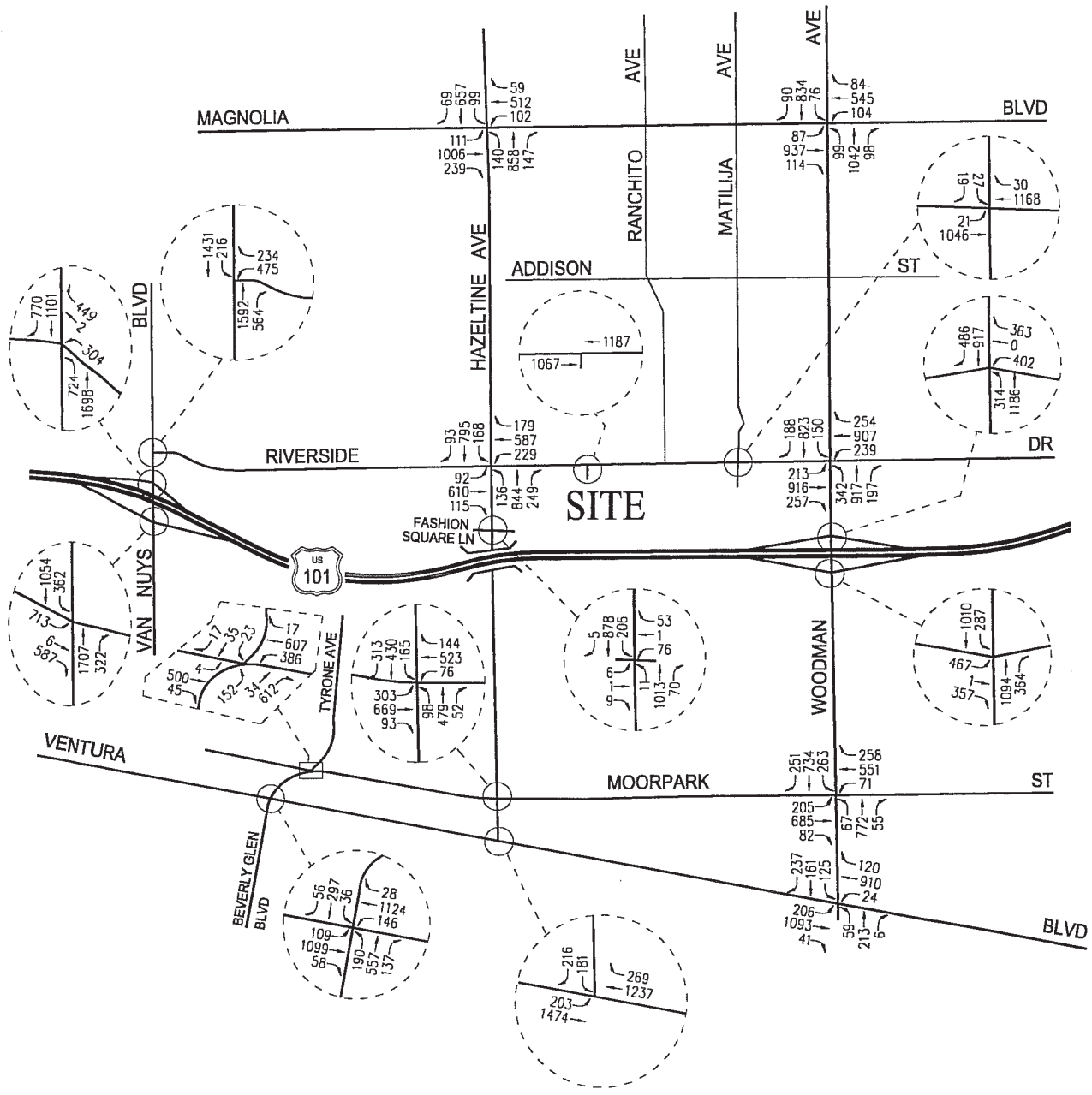


FIGURE 45
EXISTING TRAFFIC VOLUMES – WEEKDAY PM PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

TABLE 38
EXISTING 2007 WEEKDAY TRAFFIC VOLUMES [1]

NO.	INTERSECTION	DIR	AM PEAK HOUR		PM PEAK HOUR	
			BEGAN	VOLUME	BEGAN	VOLUME
1	Van Nuys Blvd/ Riverside Dr	NB	8:15	1,956	3:00	2,156
		SB		1,385		1,647
		EB		0		0
		WB		745		709
2	Van Nuys Blvd/ US 101 Freeway WB Ramps	NB	8:15	1,776	3:00	2,422
		SB		1,723		1,871
		EB		0		0
		WB		834		755
3	Van Nuys Blvd/ US 101 Freeway EB Ramps	NB	8:45	1,273	3:00	2,029
		SB		1,586		1,415
		EB		1,315		1,306
		WB		0		0
4	Tyrone Ave/Moorpark St	NB	7:30	279	5:00	798
		SB		51		75
		EB		324		549
		WB		1,064		1,010
5	Tyrone Ave/ Beverly Glen Blvd/ Ventura Blvd	NB	7:30	321	3:45	885
		SB		361		390
		EB		1,392		1,267
		WB		1,230		1,298
6	Hazeltine Ave/ Magnolia Blvd	NB	7:30	581	5:00	1,145
		SB		1,032		825
		EB		1,015		1,356
		WB		1,228		673
7	Hazeltine Ave/Riverside Dr	NB	7:30	545	5:00	1,229
		SB		1,132		1,056
		EB		830		817
		WB		1,327		994
8	Hazeltine Ave/ Fashion Square Lane	NB	7:30	558	5:00	1,094
		SB		1,231		1,089
		EB		9		17
		WB		3		130
9	Hazeltine Ave/Moorpark St	NB	7:45	284	4:45	629
		SB		1,421		908
		EB		537		1,064
		WB		900		743

TABLE 38 (CONTINUED)
EXISTING 2007 WEEKDAY TRAFFIC VOLUMES [1]

NO.	INTERSECTION	DIR	AM PEAK HOUR		PM PEAK HOUR	
			BEGAN	VOLUME	BEGAN	VOLUME
10	Hazeltine Ave/Ventura Blvd	NB	7:45	0	5:00	0
		SB		835		397
		EB		1,197		1,676
		WB		1,479		1,506
11	Woodman Ave/ Magnolia Blvd	NB	7:30	938	5:00	1,239
		SB		1,549		1,000
		EB		1,019		1,139
		WB		1,184		733
12	Woodman Ave/ Riverside Dr	NB	7:30	1,137	3:15	1,456
		SB		1,505		1,161
		EB		1,091		1,386
		WB		1,486		1,400
13	Woodman Ave/ US 101 Freeway WB Ramps	NB	7:30	1,239	5:00	1,500
		SB		1,607		1,403
		EB		0		0
		WB		583		765
14	Woodman Ave/ US 101 Freeway EB Ramps	NB	8:00	1,145	4:45	1,458
		SB		1,433		1,297
		EB		734		825
		WB		0		0
15	Woodman Ave/Moorpark St	NB	7:45	526	5:00	893
		SB		1,354		1,248
		EB		702		972
		WB		1,087		880
16	Woodman Ave/ Ventura Blvd	NB	7:45	270	4:45	279
		SB		803		523
		EB		1,250		1,340
		WB		1,250		1,054
17	Matilija Ave/ Fashion Square Ln/ Riverside Dr	NB	7:30	0	5:00	0
		SB		59		46
		EB		1,023		1,067
		WB		1,112		1,198
18	New Project Driveway/ Riverside Dr	NB	7:30	0	5:00	0
		SB		0		0
		EB		1,023		1,067
		WB		1,127		1,187

[1] Counts conducted in 2005 by Accutek Traffic Data and increased by 2 percent annually to reflect year 2007 conditions.

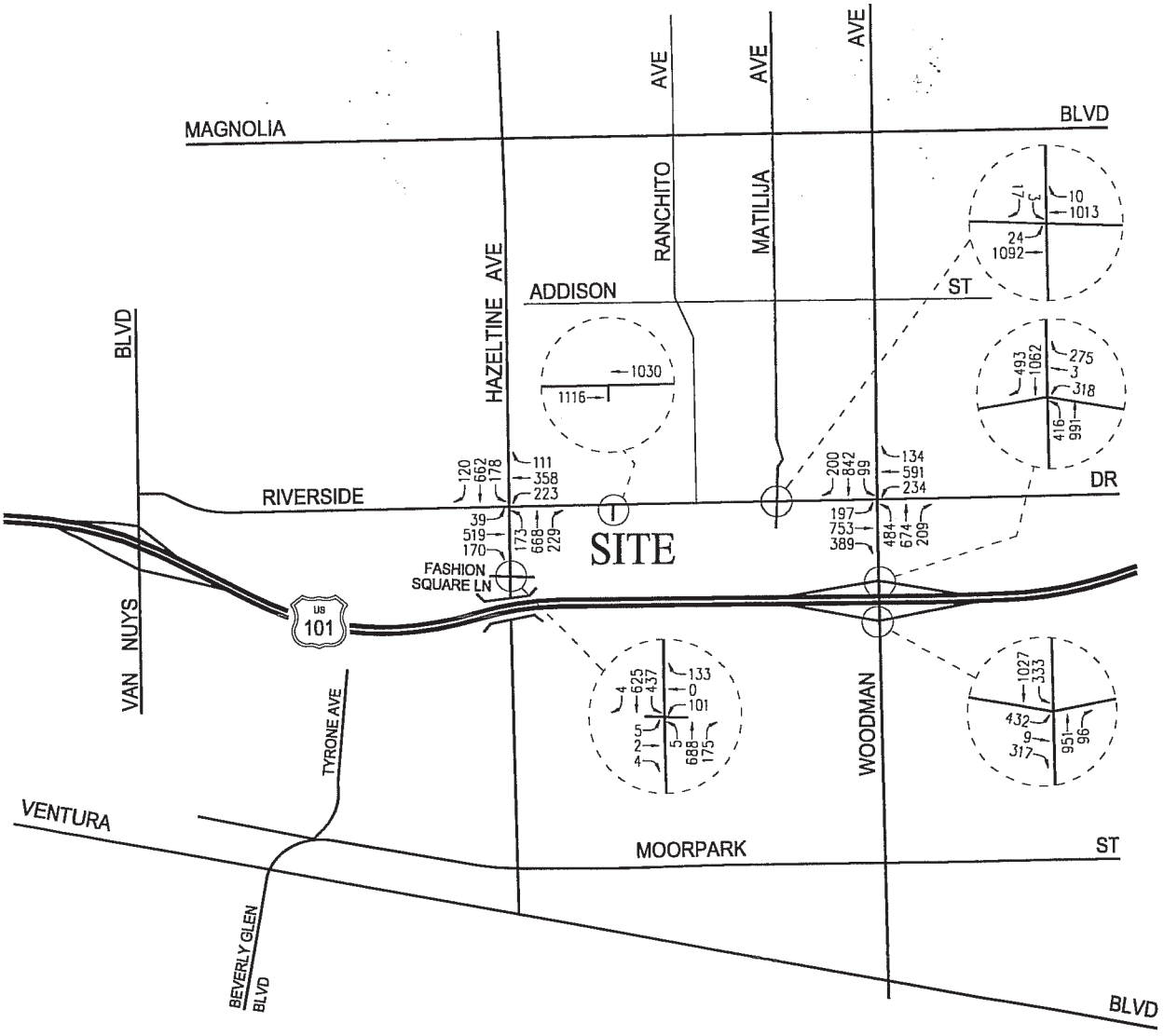
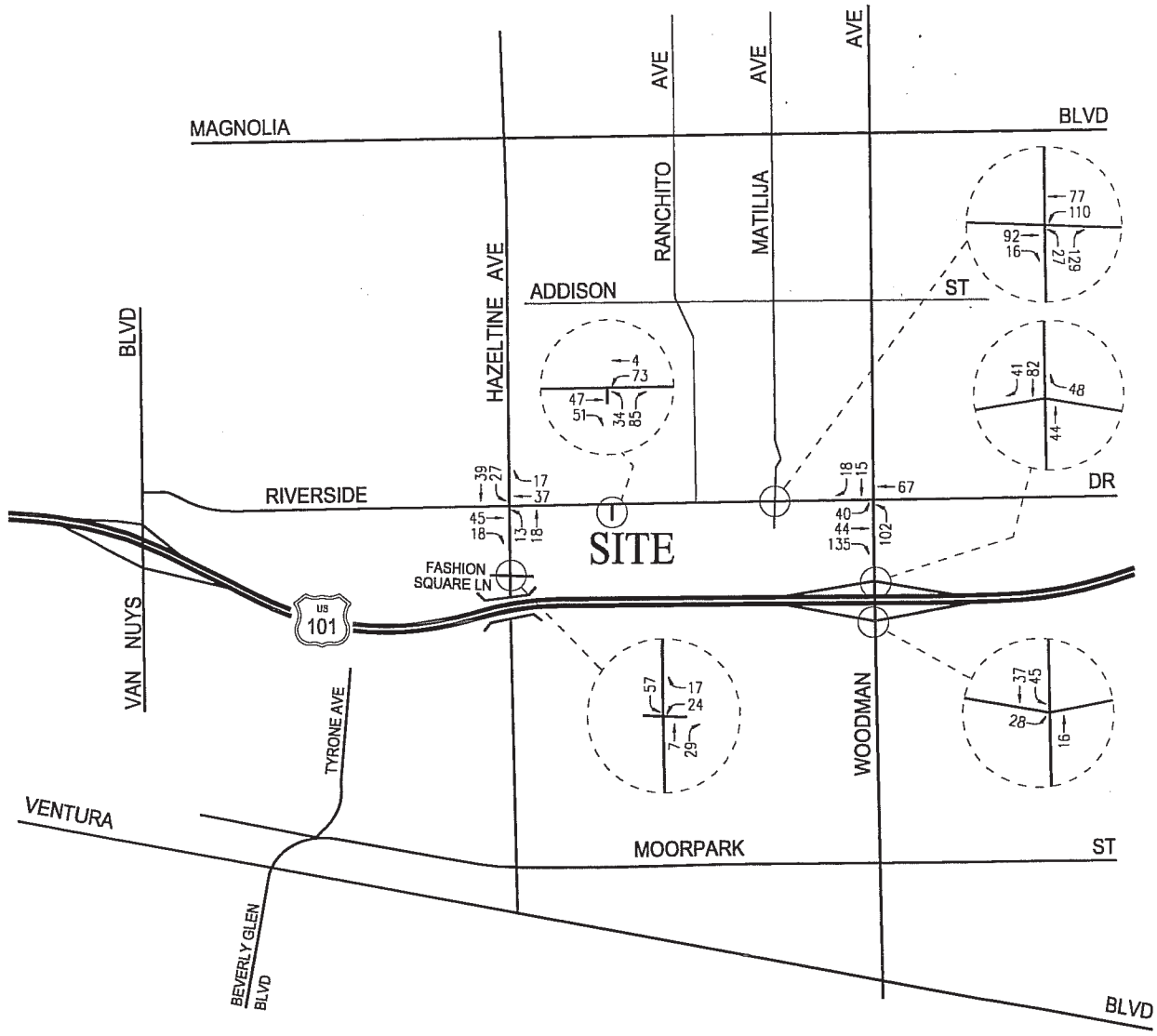


FIGURE 46
EXISTING TRAFFIC VOLUMES – SATURDAY MID-DAY PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH



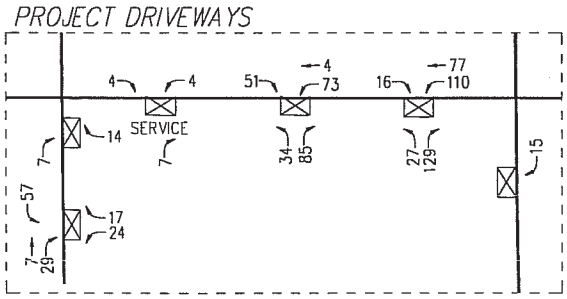


FIGURE 47
PROJECT TRAFFIC VOLUMES – SATURDAY MID-DAY PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

TABLE 39
EXISTING 2007 WEEKEND TRAFFIC VOLUMES [1]

NO.	INTERSECTION	DIR	SATURDAY MIDDAY	
			BEGAN	VOLUME
7	Hazeltine Ave/Riverside Dr	NB	1:45	1,070
		SB		960
		EB		728
		WB		692
8	Hazeltine Ave/ Fashion Square Lane	NB	1:45	868
		SB		1,066
		EB		11
		WB		234
12	Woodman Ave/Riverside Dr	NB	1:45	1,367
		SB		1,141
		EB		1,339
		WB		959
13	Woodman Ave/ US 101 Freeway WB Ramps	NB	1:00	1,407
		SB		1,555
		EB		0
		WB		596
14	Woodman Ave/ US 101 Freeway EB Ramps	NB	1:00	1,047
		SB		1,360
		EB		758
		WB		0
17	Matilija Ave/Fashion Square Lane/Riverside Dr	NB	2:00	0
		SB		20
		EB		1,116
		WB		1,023
18	New Project Driveway/Riverside Dr	NB	2:00	0
		SB		0
		EB		1,116
		WB		1030

[1] Counts conducted in March 2007 by City Traffic Counters.

The 18 study intersections were evaluated using the Critical Movement Analysis (CMA) method of analysis which determines the Volume-to-Capacity (V/C) ratio on a critical lane basis. The V/C ratio is a measure of an intersection's traffic (existing or projected) as compared to the theoretical (design) capacity of the intersection. The overall intersection V/C ratio is subsequently assigned an LOS value to describe intersection operations. LOS is a qualitative indicator of an intersection's operating conditions which is used to represent various degrees of congestion and delay. Level of service varies from LOS A (free flow with little or no delay) to LOS F (jammed condition resulting from extreme congestion). A more detailed description of the CMA method and corresponding Level of Service is provided in Appendix D of Appendix I: Traffic Study. However, the relationship between CMA values and LOS are generally as follows:

CMA VALUE	LOS
0 to 0.60	A
>0.60 to 0.70	B
>0.70 to 0.80	C
>0.80 to 0.90	D
>0.90 to l.00	E
Not applicable	F

The complete overview of V/C ratios and corresponding LOS for each of the 18 study intersections is provided later in this section along with an analysis of the project's traffic-related impacts. In summary, 16 of the 18 study intersections are presently operating at LOS D or better during the weekday A.M. and P.M. peak hours under existing conditions. The following study intersections are currently operating at LOS E during the weekday peak hours shown below:

- Int. No. 3: Van Nuys Boulevard/US 101 EB Ramps P.M. Peak Hour: V/C=0.955, LOS E
- Int. No. 12: Woodman Avenue/Riverside Drive A.M. Peak Hour: V/C=0.959, LOS E

During the weekend mid-day peak hours, all six of the adjacent study intersections are currently operating at LOS D or better.

b. Regulatory and Policy Setting

(1) Congestion Management Program

The Congestion Management Program (CMP) is a state-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990. The program is intended to address the impact of local growth on the regional transportation system. The County of Los Angeles Metropolitan Transportation Authority (MTA) developed the 2004 Congestion Management Program for Los Angeles County (July, 2004), which establishes procedures for assessing and determining the potential impacts on designated monitoring locations (both intersections and roadway segments) on the CMP highway system.

The following CMP intersection monitoring locations in the project vicinity have been identified:

- CMP Station / Intersection
  - Int. No. 74 — Ventura Boulevard/Laurel Canyon Boulevard
  - Int. No. 76 — Ventura Boulevard/Sepulveda Boulevard
  - Int. No. 78 — Ventura Boulevard/Woodman Avenue (Study Int. No. 16)

The following CMP freeway monitoring location in the project vicinity has been identified:

- CMP Station / Segment
  - Seg. No. 1038 — US 101 Freeway at Coldwater Canyon Avenue

(2) General Plan Circulation Element and Community Plan

The Van Nuys-North Sherman Oaks Community Plan includes goals, objectives and policies pertaining to transportation issues, which focus predominantly on public transit, alternative transportation modes, transportation systems and congestion management, and parking.

The Community Plan notes that some of the major public transportation opportunities within the Community Plan area relate to the Metro rail transit lines and bus transit service. The Community Plan recognizes that the operation of a safe, convenient, and efficient mass transit line would also lessen regional dependence on the private automobile and the need for additional traffic capacity.

With regard to transportation demand management (TDM), it is the City's objective that the traffic level of service (LOS) on the street system not exceed LOS D. TDM is a program designed to encourage people to change their mode of travel from single occupancy automotive vehicles to more efficient transportation modes. People are given incentives to utilize TDM measures such as public transit, ridesharing, modified work schedules, van pools, telecommuting, and non-motorized transportation modes such as the bicycle. The City actively enforces TDM requirements through a City-wide TDM Ordinance, participation in regional transportation management programs, and formation of localized transportation management associations.

The Community Plan also addresses transportation system management (TSM), which covers motorized vehicle routes (i.e., freeways, highways and streets), non-motorized transportation elements, and parking. TSM is the manipulation of transportation systems in order to improve the flow of traffic. TSM incorporates features such as computer based traffic signal timing facilities, intersection improvements, preferential parking areas for high occupancy vehicles, park and ride facilities, anti-gridlock measures, and parking management programs. TSM is further addressed through a community-wide Transportation Improvement and Mitigation Program (TIMP), which recommends specific measures and recommendations tailored to address impacts on transportation based on the buildout of the Community Plan land uses to the intended density levels. The TIMP provides an implementation program for the circulation needs of the Plan area: roadway improvements, roadway redesignations, bus service improvements, Metrolink service improvements and the creation of a community transit center.

Additional transportation improvement recommendations are rail transit improvements, paratransit or shuttle bus service, and transportation system management improvements such as the Automated Traffic Surveillance and Control (ATSAC) system. Other proposals include peak hour parking restrictions, the creation of neighborhood traffic control plans, and a transportation demand management program which includes creating bikeways, forming transportation management associations, a trip reduction ordinance, and continued participation by the City in regional transportation management programs.

The Community Plan provides for various modes of non-motorized transportation/circulation such as walking and bicycle riding. The City-wide Bicycle Plan identifies a backbone bicycle route and support routes through Van Nuys-North Sherman Oaks. The Community Plan establishes policies and standards to facilitate the development of a bicycle route system which is intended to compliment other transportation modes.

The Community Plan also encourages provisions for (off-street) parking facilities in Van Nuys-North Sherman Oaks so that an adequate supply of parking can be provided to meet the demand.

Specific transportation-related policies that are applicable to the project area are listed in later in this section under the Consistency with Adopted Plans and Policies discussion. For an analysis of the project's consistency with other policies of the Community Plan, please refer to Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this DEIR.

(3) LADOT ATSAC/ATCS

The City of Los Angeles has announced it will receive $150 million in State of California transportation bond funds for upgrading traffic signals in the City. In November 2006, California voters approved Proposition 1B, which committed $20 billion to statewide and regional transportation projects. Designed to enhance mobility, expand public transit, reduce air pollution, improve port security and repair local roads, this bond measure included $250 million for traffic signal improvements across the state. The City has stated it will use its share of the funds to synchronize every traffic signal in Los Angeles.

Subsequent to the City's announcement, LADOT has stated effective November 20, 2007, Automated Traffic Surveillance and Control (ATSAC)/Adaptive Traffic Control System (ATCS) is no longer available as mitigation for private projects unless LADOT has already assigned a specific intersection to a specific project as part of a traffic study approval or the project has already paid for installation of ATSAC/ATCS due to the full funding of the ATSAC/ATCS program for the entire City. Additionally, all future traffic studies should assume the ATSAC/ATCS credit in the future baseline analysis conditions (e.g., future pre-project, future with project, etc.). Prior to November 20, 2007 the project applicant paid for the upgrading of seven intersections. These intersections are identified in the mitigation section of this document.

ATSAC provides computer control of traffic signals allowing automatic adjustment of signal timing plans to reflect changing traffic conditions, identification of unusual traffic conditions caused by accidents, the ability to centrally implement special purpose short-term traffic timing

changes in response to incidents, and the ability to quickly identify signal equipment malfunctions. ATCS provides real time control of traffic signals and includes additional loop detectors, closed-circuit television, an upgrade in the communications links, and a new generation of traffic control software.

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section and used to determine the proposed project's environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006).

Intersection, Street Segment and Freeway Capacity

Intersection Capacity – The project would have a significant impact on intersection capacity if the project traffic causes an increase in the V/C ratio on the intersection operating condition after the addition of project traffic of one of the following:

V/C ratio increase ≥0.040 if final LOS[2] is C
V/C ratio increase ≥0.020 if final LOS is D
V/C ratio increase ≥0.010 if final LOS is E or F

These criteria are also consistent with criteria set forth in the LADOT's *Traffic Study Policies and Procedures*, and represent a Sliding Scale Method for calculating the level of impact. The City's Sliding Scale Method requires mitigation of project traffic impacts whenever traffic generated by the proposed development causes an increase of the analyzed intersection V/C ratio by an amount equal to or greater than the values shown above.

Street Segment Capacity – The project would have a significant street segment capacity impact if project traffic causes an increase in the V/C ratio on the street segment operating condition after the addition of project traffic equal to or greater than the following:

V/C ratio increase >0.080 if final LOS is C
V/C ratio increase >0.040 if final LOS is D
V/C ratio increase >0.020 if final LOS is E or F

Freeway Capacity – The project would have a significant freeway capacity impact if project traffic causes an increase in the demand to capacity (D/C) ratio on a freeway segment or freeway on- or off-ramp of 2 percent or more capacity (D/C increase >0.02), which causes or worsens LOS F conditions (D/C >1.00).

[2]"Final LOS" is defined as projected future conditions including project, ambient, and related project growth but without project traffic mitigation.

Project Access and Neighborhood Protection

Project Access

Project Access (operational) – The project would have a significant project access impact if the intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the A.M. or P.M. peak hour, under cumulative plus project conditions.

Bicycle, Pedestrian and Vehicular Safety - The determination of significance shall be on a case-by-case basis, considering the following factors:

- The amount of pedestrian activity at project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facility the project driveway(s) crosses and the level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/ bicycle or vehicle/vehicle impacts.

Neighborhood Intrusion

The project would have a significant neighborhood intrusion impact if project traffic increases the average daily traffic (ADT) volume on a local residential street in an amount equal to or greater than the following:

ADT increase ≥ 16% if final ADT[3] <1,000
ADT increase >12% if final ADT >1,000 and <2,000
ADT increase >10% if final ADT >2,000 and <3,000
ADT increase >8% if final ADT >3,000

The significance of neighborhood intrusion impacts related to vehicle delay shall be determined on a case-by-case basis.

Transit System

The determination of significance shall be made on a case-by-case basis, considering the projected number of additional transit passengers expected with implementation of the Proposed Project and available transit capacity.

Parking

The project would have a significant impact on parking if the project provides less parking than needed as determined through an analysis of demand from the project.

[3]"Final ADT" is defined as total projected future daily volume including project, ambient, and related project growth.

In-Street Construction

The determination of significance shall be made on a case-by-case basis, considering the following factors:

Temporary Traffic Impacts:

- The length of time of temporary street closures or closures of two or more traffic lanes;
- The classification of the street (major arterial, state highway) affected;
- The existing traffic levels and level of service (LOS) on the affected street segments and intersections;
- Whether the affected street directly leads to a freeway on- or off-ramp or other state highway;
- Potential safety issues involved with street or lane closures; and
- The presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street.

Temporary Loss of Access:

- The length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;
- The availability of alternative vehicular or pedestrian access within ¼ mile of the lost access; and
- The type of land uses affected, and related safety, convenience, and/or economic issues.

Temporary Loss of Bus Stops or Rerouting of Bus Lines:

- The length of time that an existing bus stop would be unavailable or that existing service would be interrupted;
- The availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated;
- The existence of other bus stops or routes with similar routes/destinations within a ¼ mile radius of the affected stops or routes; and
- Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).

Temporary Loss of On-Street Parking:

- The current utilization of existing on-street parking;
- The availability of alternative parking locations or public transit options (e.g. bus, train) within ¼ mile of the project site; and
- The length of time that existing parking spaces would be unavailable.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

Proposed Physical Site Access and Circulation Improvements

Under the Proposed Project, access to the site and the internal vehicle circulation pattern within the site would be modified to create a more efficient design that is intended to enhance safety and minimize traffic concerns along adjacent roadways and within surrounding neighborhoods. The revised accesses of the Proposed Project are shown on *Figure 13: Site Access and Driveways – Proposed Internal Circulation*, *Figure 14: Site Access and Driveways – Proposed Hazeltine Access* and *Figure 15: Site Access and Driveways – Proposed Riverside Access*, in Section II: Project Description: F-Project Characteristics, of this EIR, and are more specifically described as follows:

Westerly Access – Hazeltine Avenue Driveways

Hazeltine Avenue North Project Driveway: The Hazeltine Avenue north project driveway is located on the east side of Hazeltine Avenue, south of Riverside Drive and immediately south of the Bloomingdale's department store. Under the Proposed Project, the Hazeltine Avenue north project driveway will continue to provide access to the existing parking structure located south of the shopping center but will function as a secondary access. The Hazeltine Avenue north project driveway will continue to accommodate right-turn ingress and egress movements only through the existing travel lanes.

Hazeltine Avenue South Project Driveway: The Hazeltine Avenue south project driveway is located on the east side of Hazeltine Avenue at Fashion Square Lane (along the southerly site boundary). The intersection of Hazeltine Avenue and Fashion Square Lane is currently controlled by traffic signals and consists of one ingress lane and two egress lanes (one dedicated left-turn and one dedicated right-turn). The Hazeltine Avenue south project driveway will continue to provide access to the existing parking structure located south of the shopping center, as well as provide access to the proposed parking structure to be located south of the existing Macy's department store via a new dedicated internal roadway. Although no roadway configuration changes along Hazeltine Avenue are proposed, the driveway configuration with the project site boundary (i.e., Fashion Square Lane) will be modified to accommodate two inbound lanes and two outbound lanes. Under the proposed site plan, existing parking spaces along the ingress lane would be removed so that the new entrance configuration can accommodate two ingress lanes, thereby creating an improved unimpeded and more efficient traffic flow into the project site via Fashion Square Lane. This reconfiguration will allow for this entrance to better function as a primary site entrance because of the additional internal lane, the elimination of conflicts between parked cars and cars entering this site, and its connection to an internal road that will extend to the east-end in a less circuitous fashion than what currently exits. The Hazeltine Avenue south project driveway will continue to accommodate left-turn and right-turn ingress and egress movements.

Northerly Access – Riverside Drive Driveways

As part of the expansion project, it is proposed that the two existing Fashion Square driveways on Riverside Drive be closed and two new driveways be provided on Riverside Drive. A new westerly driveway will be provided approximately 540 feet east of Hazeltine Avenue. A new easterly project driveway will be provided approximately 100 feet west of the existing westerly driveway to align with Matilija Avenue to the north, and this driveway will form the south leg of the existing Matilija Avenue/Riverside Drive intersection.

Riverside Drive and New Westerly Fashion Square Driveway: The new westerly driveway access is proposed to be approximately 40 feet in width and accommodate one inbound lane and two outbound lanes. At the Riverside Drive intersection, the driveway exit would provide one left-turn lane and one right-turn lane. The new westerly driveway access currently serves as an existing service driveway and historically served as a customer driveway. The new westerly driveway would provide access to a new subterranean parking level to be constructed at the south side of the shopping center.

Riverside Drive and New Easterly Fashion Square Driveway: The new easterly driveway access is proposed to be approximately 60 feet in width and accommodate two inbound lanes and three outbound lanes. The new easterly driveway would be constructed opposite Matilija Avenue so as to provide a traditional four-leg intersection on Riverside Drive. At the Riverside Drive intersection, the driveway exit would provide one left-turn lane and two right-turn lanes (i.e., no through movements would be permitted onto Matilija Avenue north of Riverside Drive). The new easterly driveway would provide access to the existing two-level Macy's parking garage, as well as to the new six-level parking structure proposed south of Macy's. Through access to Matilija Avenue controlled by the installation of a traffic barrier on the north side of Riverside Drive. A rendering of this barrier is provided on *Figure 16: Matilija Avenue Traffic Barrier* in Section II: Project Description: F-Project Characteristics, of this EIR. This barrier will limit traffic flow at this intersection to a right-turn in/out movement (relative to Riverside Drive) only.

This new Riverside Drive project driveway would also serve as a replacement westerly access to the adjacent 3.0-acre NAP parcel (i.e., Riverside Woodman Plaza). Currently, the Riverside Woodman Shopping Plaza property has a westerly access directly off Riverside Drive, which leads to a subterranean parking area. The Riverside Woodman Plaza's driveway would be consolidated and combined with the new Riverside Drive/Fashion Square Lane driveway and would intersect the new internal driveway west of the Riverside Woodman Plaza. The existing Riverside Woodman Plaza's Riverside Drive driveways would remain open, but turn movements would be restricted to right-turn in/out only.[4] This proposed driveway reconfiguration reflects input from the Riverside Woodman Plaza property owner and tenants, and would be fully coordinated in cooperation with such.

To accommodate the Proposed Project's Riverside Drive driveway improvements, two new traffic signals would be installed and the travel approaches along Riverside Drive would be

[4] It is noted that the owners of the Riverside Shopping Center may not permit an internal roadway connection between the Fashion Square and its center. In this scenario, the Riverside Shopping Center will continue to have vehicular access from its existing driveways along Riverside Drive and Woodman Avenue, albeit with restricted left-turn ingress from Riverside Drive (which is common at many commercial centers in Los Angeles located immediately adjacent to intersections of major roadways due to traffic operational safety issues).

improved. Specific physical roadway improvements along Riverside Drive needed to implement the Proposed Project include:

- Widen the south side of Riverside Drive beginning at a point approximately 290 feet west of the Matilija Avenue centerline by 10 feet. The widening would also require a concurrent dedication of up to 10 feet (thus resulting in a 50-foot wide half roadway and a 60-foot wide half right-of-way).
- Widen the south side of Riverside Drive beginning at a point approximately 600 feet east of the Matilija Avenue centerline by 3 feet. The widening would also require a concurrent dedication of 2 feet along the shopping center frontage (no dedication required by the adjacent Riverside Woodman Plaza). Thus, the resulting cross-section would be a 40-foot wide half roadway and a 52-foot wide half right-of-way (remaining a 50-foot half right-of-way adjacent to the Riverside Woodman Plaza).
- Restripe the eastbound Riverside Drive approach to the intersection with the new easterly Fashion Square Lane driveway to provide two through lanes and one right-turn lane, plus retention of the existing eastbound bike lane. No left-turns to Matilija Avenue north of Riverside Drive would be permitted.
- Restripe the westbound Riverside Drive approach to the intersection with the new easterly Fashion Square Lane driveway to provide two left-turn lanes, one through lane, and one optional through/right-turn lane, plus retention of the existing westbound bike lane.
- Restripe the eastbound Riverside Drive approach to the intersection with the new westerly (tunnel) driveway to provide two through lanes and one right-turn lane.
- Restripe the westbound Riverside Drive approach to the intersection with the new westerly (tunnel) driveway to provide one left-turn lane, and two through lanes, plus retention of the existing westbound bike lane.

East End – Woodman Avenue Driveways

Woodman Avenue Project Driveway: The Woodman Avenue project driveway is located on the east side of the project site, south of Riverside Drive and immediately south of the adjacent 3.0-acre NAP Riverside Woodman shopping center. The Woodman Avenue project driveway will provide access to the new four-level parking structure and remainder surface parking area located on the easterly portion of project site. This access will also tie into the main Fashion Square Lane internal circulation driveway. The Woodman Avenue project driveway will continue to accommodate right-turn ingress; however, egress movements would be prohibited through the use of signage and directional arrows.

These circulation modifications will improve access to the site by increasing the number of inbound lanes from the public streets; increasing the left-turn queuing capacity on Riverside Drive by 25%; allowing for safe legal left turns from the Riverside Drive driveway; and reducing pedestrian and parked car conflicts with inbound cars.

Proposed Parking Improvements

Prior development approvals at the shopping center (under ZA-95-0899-CUZ and CPC-94-0287-ZC) established a parking requirement for the entire site at 4.5 parking spaces per 1,000 square feet of GLSF for all retail, restaurant, and office uses. The shopping center has surveyed parking demand on peak shopping days (i.e., weekends during both holiday and non-holiday seasons) for the 2005 and 2006 calendar years. These site-specific surveys show a demand of 4.03 parking spaces per 1,000 square feet GLA. The Proposed Project includes a request for Shared Parking that would establish a parking ratio requirement of up to 4.5 parking spaces per 1,000 GLSF. Under the Proposed Project proposal to construct an additional 280,000 GLSF of commercial uses, up to 5,148 parking spaces would be provided across the entire site, representing a minimum increase of approximately 973 spaces above the approximate 3,902 parking spaces currently provided on-site.

In addition to increasing the total number of parking spaces, the Proposed Project would reconfigure the location and access to parking to create a more efficient arrangement of parking relative to the shopping center uses. Parking for the Proposed Project will be provided through a combination of old and new parking structures, and through remainder surface parking lots. The Proposed Project will include the following physical improvements to parking facilities:

- The existing southern, three-level parking structure located immediately south of, and serving, the existing shopping center will be demolished and replaced with the retail expansion building, which will include one level of subterranean parking and one level of rooftop parking. This new component will also extend to replace a surface parking lot area immediately east of the demolished parking structure.

- A new six-level (also referred to as the "main") parking structure will be constructed adjacent and easterly to the new retail building and immediately south of the existing two-level Macy's parking structure. The new six-level parking structure, which will be integrated into the new retail component through the subterranean and roof-top levels, will replace an existing surface parking lot.

- A new four-level (also referred to as the "employee" or "east") parking structure, anticipated to accommodate up to approximately 700 parking spaces, will replace existing surface parking along the eastern portion of the project site.

- Other miscellaneous physical improvements to the parking areas include: (1) minor modifications to two existing parking structures (i.e., the Macy's and Bloomingdale's parking structures) to facilitate improved internal access and linkages to new construction; (2) removal of surface parking near the southwest corner of the project site to facilitate traffic flow and safety improvements; and (3) reconfiguration of the remainder surface parking lot areas to integrate with revised circulation plan.

The removal, temporary displacement and establishment of new parking facilities and spaces will be coordinated throughout the Proposed Project construction activities (see discussion

below) to ensure that adequate on-site parking is available to serve all functional shopping center uses (including patrons and employees) and temporary construction workers.

In addition, during schools days (7 a.m. to 4 p.m.), the shopping center currently makes available 100 parking spaces in the east surface parking lot for Buckley High School and 60 parking spaces at the same location for Notre Dame High School. These parking spaces are on a month-to-month agreement and are not made available to students on the weekends or during peak holiday periods. This arrangement would continue on an as-needed basis as determined by the individual schools and would be accommodated through adequate surplus parking available during non-peak operational periods.

In addition to a finding that Shared Parking at a ratio of up to 4.5 parking spaces per 1,000 GLSF is appropriate, a CUP is requested to deviate from the restriction on tandem parking in association with the Commercial Corner designation (see discussion under entitlements above). The tandem parking spaces would be provided in association with a valet drop off and pick up system for convenience of patrons.

Operational Characteristics

The Proposed Project proposes expansion of the existing shopping center by 280,000 GLSF of floor area to provide a total of approximately 1,147,000 GLSF of floor area. The new floor area would consist of retail and restaurant uses. The summary of existing and proposed floor area, broken down by retail and restaurant use, is provided in *Table 40: Summary of Project Floor Area*.

TABLE 40
SUMMARY OF PROJECT FLOOR AREA [1] [2]

USE	EXISTING FLOOR AREA		NET NEW FLOOR AREA		TOTAL FLOOR AREA	
	LAMC	LEASABLE	LAMC	LEASABLE	LAMC	LEASABLE
Retail	956,422	842,045	355,227	233,178	1,311,649	1,075,223
Restaurant	31,694	24,955	71,329	46,822	103,023	71,777
TOTAL	**988,116**	**867,000**	**426,556**	**280,000**	**1,414,672**	**1,147,000**

[1] Floor area is expressed in terms of the Los Angeles Municipal Code (LAMC) definition, as well as in gross leasable (GLSF) floor area, which is the common floor area calculation used for enclosed shopping malls such as Fashion Square.
[2] The floor areas provided in this table are precise numbers that vary slightly from the floor area data provided in the project description, for which floor area was rounded to an approximate value. For the purpose of traffic and parking analysis in this section, the numbers presented in this table were used.

Based on an analysis of potential traffic impacts presented in the Traffic Study, transportation improvement measures have been identified, several of which have been incorporated directly into the project design and hence function a project design features (PDFs). PDFs are specific design elements proposed by the project applicant that have been incorporated into the project to prevent the occurrence, or to reduce the significance, of potential environmental effects. For example, the location of the new proposed consolidated driveway on Riverside drive functions as both a PDF (because it is part of the project design), as well as a mitigation measure because it represents an configuration which will reduce transportation impacts. Specific PDFs, as well as recommended mitigation measures are identified later in this section.

Although not required to mitigate adverse project impacts, the project applicant, in consultation with LADOT, has volunteered to implement three additional transportation improvements so as to improve local traffic operations:

- Fund the development and implementation of a Neighborhood Traffic Management Plan (NTMP) to address potential existing and future regional "cut-through" traffic on residential streets north of the project site.

- Design and install protected/permissive left-turn traffic signal phasing for Hazeltine Avenue and Riverside Drive at the Hazeltine Avenue/Riverside Drive intersection to improve current safety and traffic flow at this intersection (i.e., all approaches to the intersection). The southbound left-turn phasing on Hazeltine Avenue is currently under construction by LADOT. The Project Applicant will volunteer to implement the installation of the protected/permissive left-turn phasing at the remaining approaches to the intersection (i.e., northbound approach on Hazeltine Avenue and eastbound and westbound approaches on Riverside Drive).

- Design and install upgraded traffic delineators along Hazeltine Avenue between Riverside Drive and Fashion Square Lane using "quik-kurb" or similar installation approved by LADOT.

Construction Activity

Construction is planned for completion in the year 2012, while full occupation of the development may not stabilize until the year 2013. The Proposed Project would be completed as a single-event project staged through four phases over an approximate 36 to 48-month period (see discussion below). Construction activities will generally occur between the hours of 7:00 a.m. and 9:00 p.m. during weekdays. Construction phasing is described in detail in Section II: Project Description: F-Project Characteristics.

Construction activities would be coordinated and staged to balance space limitations on site, phasing of construction to retain operation of the existing shopping center and appropriate parking during construction, and general construction phasing techniques. To maintain the required parking during the construction stage, the Proposed Project will implement a number of strategies to temporarily increase parking on the project site. These strategies are anticipated to include strategic planning of construction states, the use of on-site valet parking, stacked parking, shuttles, and a dedicated pedestrian walkway, and if necessary contingency off-site parking during construction at the adjacent Sunkist site on Hazeltine Avenue. During construction, workers will be required to park in designated areas to prevent impacts to the nearby residential areas. Construction activities will be staged and coordinated so that at no time during the construction activities, will available parking fall below 2,800 parking spaces during any peak holiday period within the construction timeframe. Retention of these parking levels will ensure that the availability of parking spaces coincides with the level of on-going shopping center uses.

Construction debris from demolition of existing parking areas, and earth from excavation will require that dirt and materials be removed from the site. A haul route from the project site will be required. The Applicant also requests a zone variance during the construction phase to accommodate a temporary reduction from the code-required parking levels during the first phase of construction (i.e., until completion of the new "east" parking structure).

Other Traffic Related Assumptions

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- While not required to mitigate a significant traffic impact, the Project Applicant will seek LADOT approval to install traffic signals at the new Riverside Drive/ Fashion Square Lane access at Matilija Avenue as well as at the new westerly driveway along Riverside Drive to facilitate vehicular movements to and from the project site.

- Pedestrian crossings at Riverside Drive/Matilija Avenue and at the new westerly driveway/Riverside Drive intersection.

- In addition to the TDM measures described above that satisfy the requirements of Section 12.26 J, the Proposed Project will voluntarily implement the following demand management services related to the Orange Line Shuttle to further reduce vehicle trips and parking demand at the site. The Proposed Project will provide a shuttle service connecting the site to a nearby Orange Line station (e.g., Van Nuys Boulevard). This service could be provided by either the provision of a private shuttle or the funding of extended hours for the existing LADOT DASH line. The Orange Line shuttle would complement existing transit services (i.e., the LADOT DASH service) such that the shuttle would operate during hours when other public transit services connecting the site to the Orange Line are not available (e.g., evenings during the work week and certain weekend hours). The shuttle would operate during regular shopping center hours corresponding with periods of peak parking demand at the site (i.e., everyday during the holiday shopping period between November 15 and January 1, and every Saturday/Sunday throughout the year).

- Although not required to mitigate adverse project impacts, the project applicant, in consultation with LADOT, has volunteered to fund the development and implementation of a Neighborhood Traffic Management Plan (NTMP) to address potential existing and future regional "cut-through" traffic on residential streets north of the project site, which may encompass the area generally bounded by Magnolia Boulevard to the north, Riverside Drive to the south, Hazeltine venue to the west and Woodman Avenue to the east. The following is a discussion of the sequential steps typically followed by LADOT in implementing the NTMP.

    - Deposit Funds. Prior to issuance of a Building Permit for the Proposed Project, the project applicant will be required to deposit funds in a separate account maintained by LADOT designated for use in funding the NTMP. The exact

amount will be determined by LADOT and will reasonably cover the likely costs of the measures.

- Stakeholders Meeting. Following establishment of the NTMP account, a group consisting of representatives from LADOT, the Council Office, and the residential community north of the project site will meet to discuss the goals, opportunities and constraints of the NTMP. As needed, follow-up meetings may be conducted with other City departments (Public Works, Fire Department, Police Department, etc.).

- Data Collection and Initial Plan Formulation. Based on the input received at the stakeholders meeting, LADOT will commence with conducting appropriate studies (traffic observations, traffic counts, vehicle speed surveys, accident research, commercial parking intrusion, etc.) to assess existing traffic conditions on the residential streets north of the project site. The studies will be based on studies conducted for the EIR as well as other studies deemed necessary by LADOT. Following collection of the data and based on their professional experience, LADOT will prepare for the stakeholders an initial NTMP for implementation prior to completion of the Proposed Project.

- Neighborhood Concurrence. As some of the measures that may be recommended within the initial NTMP (e.g., installation of speed humps, implementation of permit parking districts) may, by LADOT policy, require majority or super-majority consent of affected property owners (at least two-thirds), LADOT will work with the stakeholders to survey the appropriate residents to determine if there is support to implement the specific measures.

- Implementation and Follow-Up Studies. LADOT will implement the initial NTMP (including those measures authorized by the affected residents) prior to the completion of the Proposed Project. Following a reasonable period of time after opening of the Proposed Project, LADOT will meet with the stakeholders to review traffic experiences since the implementation of the NTMP and opening of the Proposed Project. As needed, additional review and studies may be conducted by LADOT based on the effectiveness of the initial NTMP and/or traffic and parking issues related to the shopping center.

- Updated NTMP. Based on the follow-up studies, LADOT will present to the stakeholders their recommendations for an updated NTMP. Following review by the stakeholders, and with consent of the affected residents (if required), the updated NTMP will be implemented.

- To further alleviate potential inconvenience existing in the area which lead to non-project related cut-through traffic the Proposed Project has volunteered to design and install protected/permissive left-turn traffic signal phasing for Hazeltine Avenue at its intersection with Riverside Drive to improve current safety and traffic flow at this intersection.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- In accordance with LAMC Section 91.70067, hauling of construction materials shall be restricted to a haul route approved by the City. The City of Los Angeles will approve specific haul routes for the transport of materials to and from the site during demolition and construction. This process includes a public hearing and opportunities for the public to comment on the proposed route.

- The Proposed Project will comply with Section 12.26 J of the Los Angeles Municipal Code for purposes of implementing a Transportation Demand Management (TDM) plan. The following outlines the minimum measures that the project will undertake in compliance with the Code section.

    - Employee Transportation Center and Transportation Coordinator. The project shall designate an area within the building to be the Transportation Center. The Employee Transportation Center shall be maintained by the center's Transportation Coordinator, who will be employed by Westfield. The Transportation Coordinator will assist employees in seeking out and arranging for commute alternatives. This includes carpool and vanpool formation, assisting employees with planning trips to work via bus, and locating bike or walking routes to work. The Employee Transportation Center shall provide a bulletin board, display case, or kiosk displaying transportation information where the greatest numbers of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

        - Current routes and schedules for public transit serving the site;
        - Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;
        - Ridesharing promotion material supplied by commuter-oriented organizations;
        - Regional/local bicycle route and facility information; and
        - A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

    - Preferential Parking Spaces. The project will provide designated parking areas for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit.

    - Bicycle Parking Spaces. Bicycle parking shall be provided in conformance with Section 12.21.A.16 of the Los Angeles Municipal Code. The project will provide

safe and convenient access from the external circulation system to bicycle parking facilities on-site.

- Carpool/Vanpool Loading Area. The project shall provide a safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area.

- Pedestrian Access. The project shall provide sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to the center.

- Transit Stop Enhancements. In coordination with LADOT and the Department of City Planning, the project will consult with local bus service providers in determining appropriate improvements to transit stops, such as installation of benches, shelters, and schedule information.

b. Project Impacts

Based on the IS, potential impacts for a number of environmental issues were determined to be less than significant. The scope of the following analysis focuses only on those impacts that were determined through the NOP and IS process to have a potential significant environmental effect. Issues related to Traffic, Circulation and Access that were determined to be less than significant, and not addressed further, include air traffic. An explanation supporting this conclusion is provided in Section VI: Other Environmental Considerations: A-Effects Not Found To Be Significant of this DEIR.

(1) Construction Activity

During the construction phase, traffic would be generated by activities including construction equipment, crew vehicles, haul trucks and trucks delivering building materials. Hauling of debris would be restricted to a haul route approved by the City. The City will approve specific haul routes for the transport of materials to and from the site during demolition and construction. Currently, the Proposed Project's haul route is not approved and thus remains subject to the City's approval process. This process includes a public hearing and opportunities for the public to comment on the proposed route.

Subject to approval, the general haul routes currently envisioned are as follows:

Inbound: Trucks entering the jobsite will take the following route, entering the site at the Woodman Avenue entrance on the south side of the property.

- Exit US 101 Freeway at Van Nuys Blvd going north
- Take right onto Riverside Drive, heading east

- Take right onto Woodman Avenue, heading south
- Take right onto property at Woodman Avenue entrance

The route will be modified slightly during the period in which the Riverside entry is closed to the public by allowing the trucks to enter at the Riverside Entry in lieu of the Woodman Avenue Entry.

Outbound: Trucks exiting the jobsite will take the following route, exiting the site at the Woodman Avenue entrance on the south side of the property.

- Exit Woodman Avenue entrance on the south side of property
- Right onto Woodman Avenue, heading south
- Right onto 101 Freeway, heading west

A goal of the Proposed Project is to reuse and or recycle as much of the existing mall and parking structure materials as possible. Materials that would be recycled include concrete and steel. Concrete and steel removed from the site would be hauled via the same routs outlined above to one of the existing recycling sites located in Los Angeles County. The recycling component of the Project is a major design feature. It is anticipated that about 50 percent of all materials (by weight) would be recycled. Removal of these materials will occur during two demolition phases. The first will be associated with the area to construct the new east parking structure. This demolition is anticipated to take approximately 1 month. The second demolition phase would occur with the removal of the existing 3 level parking structure south of the mall. This demolition is anticipated to take up to 4 months and is anticipated to require approximately 41 roundtrip truckloads (or 82 daily trips, counting the arrival and departure separately). Work hours are anticipated to be from 7:00 a.m. to 9:00 p.m. Monday through Friday and 10:00 a.m. to 6:00 p.m. on Saturday.

During the construction phase, local traffic may experience a temporary increase as additional construction-related trips (comprised of commuting construction personnel and haul trucks) would be added to the area in addition to traffic generated by the existing retail uses. However, the Proposed Project would be subject to the City's haul route approval process. Ingress and egress from the site would be designed pursuant to City code requirements. Nevertheless, it will be necessary to develop and implement a construction traffic control plan, including the designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction. The construction traffic control plan would also address interim traffic staging and parking for shopping center patrons that would continue to shop at Fashion Square during the construction phase.

It is assumed that demolition and grading would occur on the Project site during the first year of construction. It is also assumed that after completion of the initial phase of construction demolition and grading, final grading and structure construction would begin on the site and extends over a two-year period. It is estimated that the demolition/excavation would require the removal of approximately 147,016 cubic yards of material from the site. It is assumed that the equipment staging area during the initial phases of construction grading, as well as after the start of construction, would occur on the Project site. Construction worker parking would occur in a

combination of on-site parking and off-site parking (with workers transported to the site in shuttles if required).

It is assumed that heavy construction equipment would be located on-site during grading activities and would not travel to and from the Project site on a daily basis. However, truck trips would be generated during the demolition, grading, and export period, so as to remove material (from demolition) from the Project site. Trucks are expected to carry the export material to a receptor site located within 20 miles of the Project site. The Project applicant anticipates that trucks with a capacity to carry at least 14 cubic yards of material per truck would be used during the export period. The export period is assumed to require approximately 130 workdays per month for three months. During the peak demolition, grading and export activities, up to 80 truck trips per day (i.e., 40 inbound trips and 40 outbound trips) are anticipated. Of the 80 daily truck trips, it is estimated that approximately ten trucks trips (five inbound trips and five outbound trips) would occur during each of the weekday A.M. peak hour, the weekday P.M. peak hour, and the Saturday mid-day peak hour.

Activities related to the final grading/structure construction period would generate a higher number of vehicle trips as compared to the grading and material export period. Thus, the greatest potential for impact on the adjacent street system would occur during the final grading/structure construction period.

During the final grading and structure construction period, it is assumed that a trip generation rate of 0.32 worker vehicle trips per 1,000 square feet of commercial development per day is used. Construction workers are expected to typically arrive at the Project site before 7:00 a.m. and most will depart before 3:00 p.m. Thus, these construction work trips would occur outside of the peak hour of traffic on the local street system. For example, as shown in the Traffic Study, the peak hour of traffic at the study intersections adjacent to the Project site begins between 7:30 and 7:45 a.m. during the morning commuter period, and begins at 5:00 p.m. during the afternoon commuter period.

It is anticipated that construction workers would remain on-site throughout the day. It is estimated that a peak of approximately 900 vehicle trips per day (i.e., 450 trips inbound and 450 trips outbound) would be generated by the construction workers during the peak construction phases at the Project site. Of the peak daily trip generation of 900 daily trips, it is estimated that approximately 90 construction worker vehicle trips (ten percent of the daily construction worker inbound or outbound trips) would occur during each of the weekday A.M. peak hour, the weekday P.M. peak hour, and the Saturday mid-day peak hour.

In addition to construction worker vehicles, additional trips may be generated by miscellaneous trucks traveling to and from the Project site. These trucks may consist of larger vehicles delivering equipment and/or construction materials to the Project site, or smaller pick-up trucks or four-wheel drive vehicles used by construction supervisors and/or City inspectors. During peak construction phases, it is estimated that approximately 40 trips per day would be made by miscellaneous trucks. To conservatively estimate the equivalent number of vehicles associated with the trucks, a passenger car equivalency factor of 2.0 was utilized based on standard traffic engineering practice. Conservatively assuming 40 daily truck trips, it is estimated that the trucks

would generate approximately 80 passenger car equivalent (PCE) vehicles trips (i.e., 40 trips inbound and 40 trips outbound) on a daily basis. It is estimated that approximately 12 PCE vehicle trips (six inbound trips and six outbound trips) would occur during each of the weekday A.M. peak hour, the weekday P.M. peak hour, and the Saturday mid-day peak hour.

Taken together, the construction worker vehicles and miscellaneous trucks are forecast to generate 960 PCE vehicle trips per day (i.e., 480 inbound and 480 outbound) during peak final construction and structure construction phases at the site. During the weekday A.M. peak hour, the weekday P.M. peak hour, and the Saturday mid-day peak hour, it is estimated that approximately 96 PCE vehicle trips would be generated during each of these peak hours.

Based on the relatively low number of generated construction related trips as compared to the project, traffic impacts due to construction activities are forecast to be less than significant at the 18 study intersections during the weekday A.M. and P.M. peak hours or during the Saturday mid-day peak hour.

Further, because a construction traffic and interim traffic control plan will be in force, and because the temporary increase and disruption to the local traffic area due to construction activity would be short-term and not permanent, the resulting impact to traffic would be less than significant with implementation of the traffic control plans and City's approval of the haul routes.

(2) Long-Term Operation

In order to analyze the potential long-term operational traffic-related impacts associated with the Proposed Project, the following background, assumptions and methodology were used.

Traffic Counts

Manual counts of vehicular turning movements were conducted at each of the 18 study intersections during weekday A.M. and P.M. commuter periods, and during a week-end (Saturday) mid-day period, to determine the peak hour traffic volumes. "Typical" weekday commuter periods for Los Angeles include 7:00 A.M. to 10:00 A.M. and 3:00 P.M. to 6:00 P.M. Results of the manual counts which represent base line conditions for the project vicinity are presented above under Existing Conditions.

Project Trip Generation

Traffic generation for a particular project/use is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Traffic volumes expected to be generated by the Proposed Project during the A.M. and P.M. peak hours, as well as on a daily basis, were estimated using rates published in the Institute of Transportation Engineers' (ITE) *Trip Generation* manual[5]. Traffic volumes expected to be generated by the Proposed Project were based upon per thousand GLSF. ITE Land Use Code 820 (Shopping

[5]Institute of Transportation Engineers. 2003. *Trip Generation, 7th Edition.* Washington D.C.: Author. 12 June 2008 <http://www.ite.org/emodules/scriptcontent/Orders/ProductDetail.cfm?pc=GP-001B>.

Center) trip generation equation rates were used to forecast the traffic volumes expected to be generated by the Proposed Project.

In addition to the trip generation forecast for the Proposed Project (which is essentially an estimate of vehicles that could be expected to enter and exit the site access points), a forecast was made of the likely pass-by trips that could be anticipated at the site. Pass-by trips are made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from traffic passing the site on an adjacent street or roadway that offers direct access to the generator. The pass-by traffic forecast has been estimated based on existing traffic volumes at the study intersections, recommended practice in Chapter 5 of the ITE *Trip Generation Handbook*[6], and LADOT's policy on pass-by trips as stated in the City's *Traffic Study Policies and Procedures*. A 10 percent (10%) pass-by adjustment has been applied to the project A.M. and P.M. peak hour traffic volume forecasts, as well as to the daily traffic volume forecast for the existing shopping center and the Proposed Project.

Weekday Trip Generation

The trip generation forecast for the Proposed Project is summarized in *Table 41: Weekday Project Trip Generation*. The trip generation forecast for the project was submitted for review and approval by LADOT staff. As presented in *Table 42: Weekday Project Trip Generation*, the project is expected to generate a net increase of 95 vehicle trips (58 inbound trips and 37 outbound trips) during the A.M. Peak Hour; a net increase of 476 vehicle trips (229 inbound trips and 247 outbound trips) during the P.M. Peak Hour; and a net increase of 4,964 daily trip ends (2,482 inbound trips and 2,482 outbound trips) during a typical weekday.

TABLE 41
WEEKDAY PROJECT TRIP GENERATION [1]

LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
			IN	OUT	TOTAL	IN	OUT	TOTAL
PROPOSED								
Shopping Center	1,147,000 GLSF	33,162	413	264	677	1,504	1,629	3,133
Less 10% Pass-by [3][4]		(3,316)	(41)	(26)	(67)	(150)	(163)	(313)
Subtotal		29,846	372	238	610	1,354	1,466	2,820
EXISTING								
Shopping Center	867,000 GLSF	27,647	349	223	572	1,250	1,354	2,604
Less 10% Pass-by [3][4]		(2,765)	(35)	(22)	(57)	(125)	(135)	(260)
Subtotal		24,882	314	201	515	1,125	1,219	2,344

[6]Institute of Transportation Engineers. 2004. *Trip Generation Handbook, 2nd Edition*. Washington D.C.: Author. 12 June 2008 <http://www.ite.org/emodules/scriptcontent/Orders/ProductDetail.cfm?pc=RP-028B>.

TABLE 41
WEEKDAY PROJECT TRIP GENERATION [1]

LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
			IN	OUT	TOTAL	IN	OUT	TOTAL
NET CHANGE	**280,000 GLSF**	**4,964**	**58**	**37**	**95**	**229**	**247**	**476**

[1] Source: ITE "Trip Generation", 7th Edition, 2003.
[2] Trips are one-way traffic movements, entering or leaving.
[3] ITE Land Use Code 820 (Shopping Center) trip generation equation rates.
[4] Pass-by trips include traffic passing the site on an adjacent street with direct access to the land use. Pass-by reductions were based on the City of Los Angeles Department of Transportation policy on pass-by trips.

TABLE 42
WEEKEND PROJECT TRIP GENERATION [1]

LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	SATURDAY PEAK HOUR VOLUMES [2]		
			IN	OUT	TOTAL
PROPOSED					
Shopping Center	1,147,000 GLSF	42,972	2,198	2,029	4,227
Less 10% Pass-by [3][4]		(4,297)	(220)	(203)	(423)
Subtotal		38,675	1,978	1,826	3,804
EXISTING					
Shopping Center	867,000 GLSF	36,026	1,832	1,692	3,524
Less 10% Pass-by [3][4]		(3,603)	(183)	(169)	(352)
Subtotal		32,423	1,649	1,523	3,172
NET CHANGE	**280,000 GLSF**	**6,252**	**329**	**303**	**632**

[1] Source: ITE "Trip Generation", 7th Edition, 2003.
[2] Trips are one-way traffic movements, entering or leaving.
[3] ITE Land Use Code 820 (Shopping Center) trip generation equation rates.
[4] Pass-by trips include traffic passing the site on an adjacent street with direct access to the land use. Pass-by reductions were based on the City of Los Angeles Department of Transportation policy on pass-by trips.

It should be noted that the traffic study prepared for the project noted that the trip generation likely overstates the actual amount of vehicular traffic that would be generated by the Proposed Project. By example, traffic counts were conducted at the existing shopping center driveways during the weekday morning and afternoon commuter peak periods. The existing shopping center currently generates 418 A.M. peak hour trips (327 inbound trips and 91 outbound trips) and 1,850 P.M. peak hour trips (836 inbound trips and 1,014 outbound trips). The actual peak hour traffic count data is approximately 25% less than the estimates based on the ITE trip rates for shopping centers of similar size. This trip generation characteristic is likely due to the shopping center providing "high end" tenants which require relatively fewer patrons to achieve revenue goals. However, to provide a conservative, "worst-case" analysis, the traffic study prepared for the project included a trip generation forecast based on the ITE trip rates.

Weekend Trip Generation

Traffic volumes expected to be generated by the Proposed Project during the Saturday mid-day peak hour, as well as on a daily basis, were estimated using rates published in the ITE Trip Generation manual. The Saturday trip generation forecast for the Proposed Project is summarized in *Table 42: Weekend Project Trip Generation*. As presented in *Table 42: Weekend Project Trip Generation*, the Proposed Project is expected to generate a net increase of 632 vehicle trips (329 inbound trips and 303 outbound trips) during the Saturday mid-day peak hour. Over a 24-hour period, the Proposed Project is forecast to generate a net increase of 6,252 daily trip ends during a typical Saturday (3,126 inbound trips and 3,126 outbound trips).

It should be noted that the trip generation forecast provided herein likely overstates the actual amount of vehicular traffic that would be generated by the proposed expansion. By example, traffic counts were conducted at the existing shopping center driveways during the Saturday mid-day peak period. The shopping center currently generates 2,854 Saturday mid-day peak hour trips (1,627 inbound trips and 1,227 outbound trips). The actual peak hour traffic count data is approximately 25% less than the estimates based on the ITE trip rates for shopping centers of similar size. This trip generation characteristic is likely due to the shopping center providing "high end" tenants which require relatively fewer patrons to achieve revenue goals. However, to provide a conservative, "worst-case" traffic analysis, the trip generation forecast based on the ITE trip rates have been utilized in the review of potential impacts associated with the project.

Project Trip Distribution

The traffic distribution pattern was based on the proposed land uses, the existing and proposed access schemes, existing traffic patterns, characteristics of the surrounding roadway system, and nearby population and employment centers. Project generated traffic was assigned to the local roadway system based on a trip distribution pattern developed in consultation with City staff, and was submitted to staff for their review and approval.

The regional distribution patterns of project-related trips utilized in the traffic analysis were determined to be consistent with the procedures outlined in the Congestion Management Program (CMP) manual published by the Metropolitan Transportation Authority. The CMP manual provides generalized trip distribution factors based on regional modeling efforts. The trip distribution factors show Regional Statistical Areas (RSAs)-level trip making origins and destinations for work and non-work trip purposes. The regional distribution pattern for the Proposed Project provides general origin and destination trip distributions from the project study area RSA throughout the Los Angeles Basin.

The distribution pattern was reviewed and approved by LADOT prior to inclusion into the traffic analysis. The project-related traffic volume distribution percentages during A.M. and P.M. peak hours at the 18 study intersections for the A.M. and P.M. peak hours are displayed in *Figure 48: Project Trip Distribution*, *Figure 49: Project Traffic Volumes – Weekday AM Peak Hour* and *Figure 50: Project Traffic Volumes – Weekday PM Peak Hour*.

Similar to the weekday analysis, for the weekend trip distribution patterns the project generated traffic was assigned to the local roadway system based on a trip distribution pattern developed in consultation with City staff. The forecast project traffic volumes at the study intersections for the Saturday mid-day peak hour are displayed in *Figure 47: Project Traffic Volumes – Saturday Mid-Day Peak Hour*.

Related Projects and Ambient Growth

A forecast of on-street traffic conditions prior to occupancy of the Proposed Project was prepared by incorporating the potential trips associated with other known development projects (related projects as identified in Section III: General Description of the Environmental Setting: B-Related Projects of this DEIR) in the area. The potential impact of the Proposed Project can be evaluated within the context of the cumulative impact of all ongoing development. Related project research was based on information on file at the City of Los Angeles Departments of Planning and Transportation. The list of related projects in the project area used for this analysis is provided in *Table 3: List of Related Projects* in Section III: General Description of the Environmental Setting: B-Related Projects of this DEIR. The locations of related projects are shown in *Figure 21: Location of Related Projects*, also found in Section III: General Description of the Environmental Setting: B-Related Projects of this DEIR.

Traffic volumes expected to be generated by related projects were calculated using rates provided in the ITE Trip Generation manual. Related projects' traffic generation for the A.M. and P.M. peak hours, as well as on a daily basis for a typical weekday, is summarized in *Table 43: Related Projects Weekday Trip Generation*. The anticipated distribution of related projects traffic volumes to the study intersections during A.M. and P.M. peak hours is displayed in *Figure 51: Related Projects Traffic Volumes – Weekday AM Peak Hour* and *Figure 52: Related Projects Traffic Volumes – Weekday PM Peak Hour*.

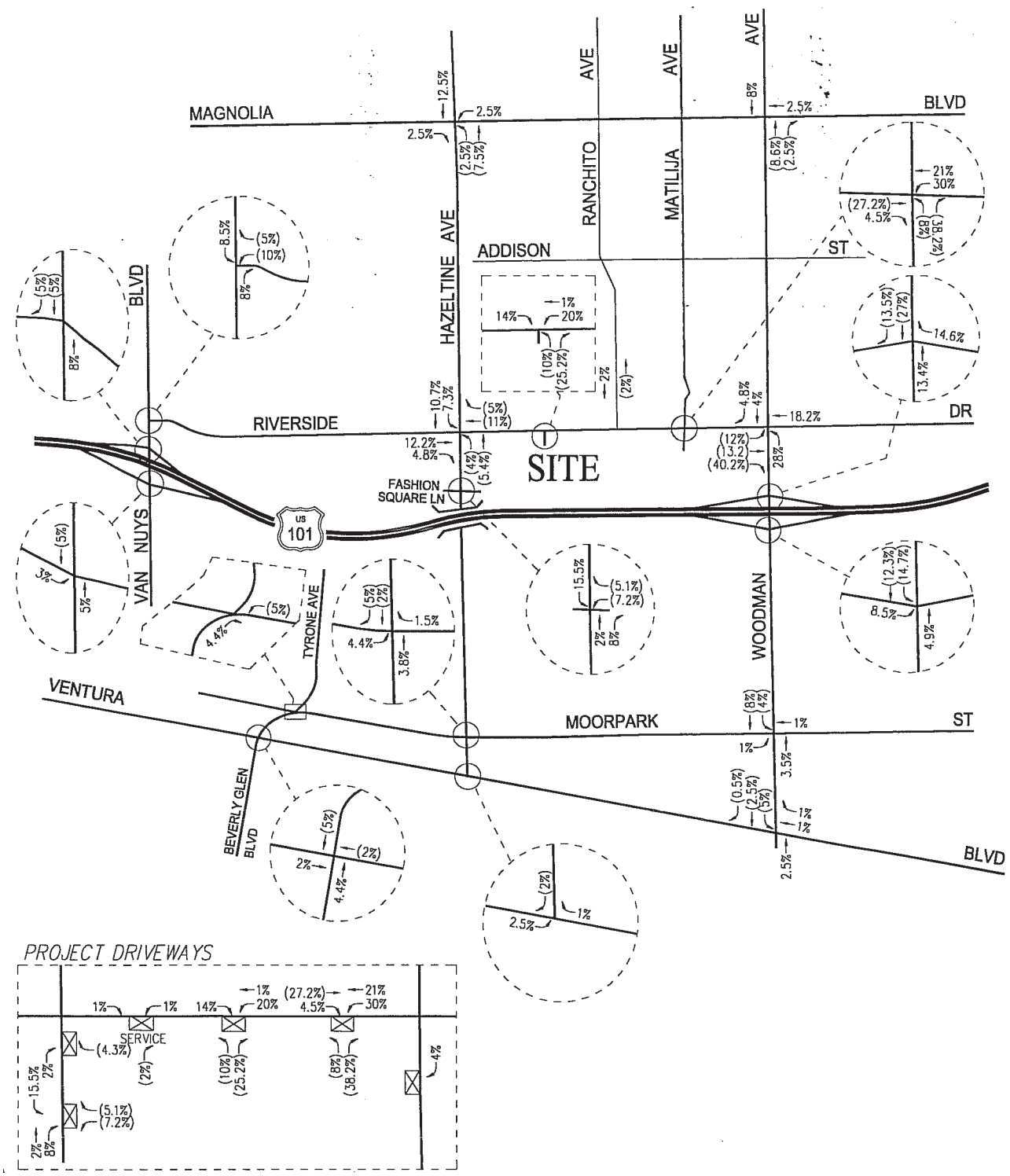


FIGURE 48
PROJECT TRIP DISTRIBUTION

MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

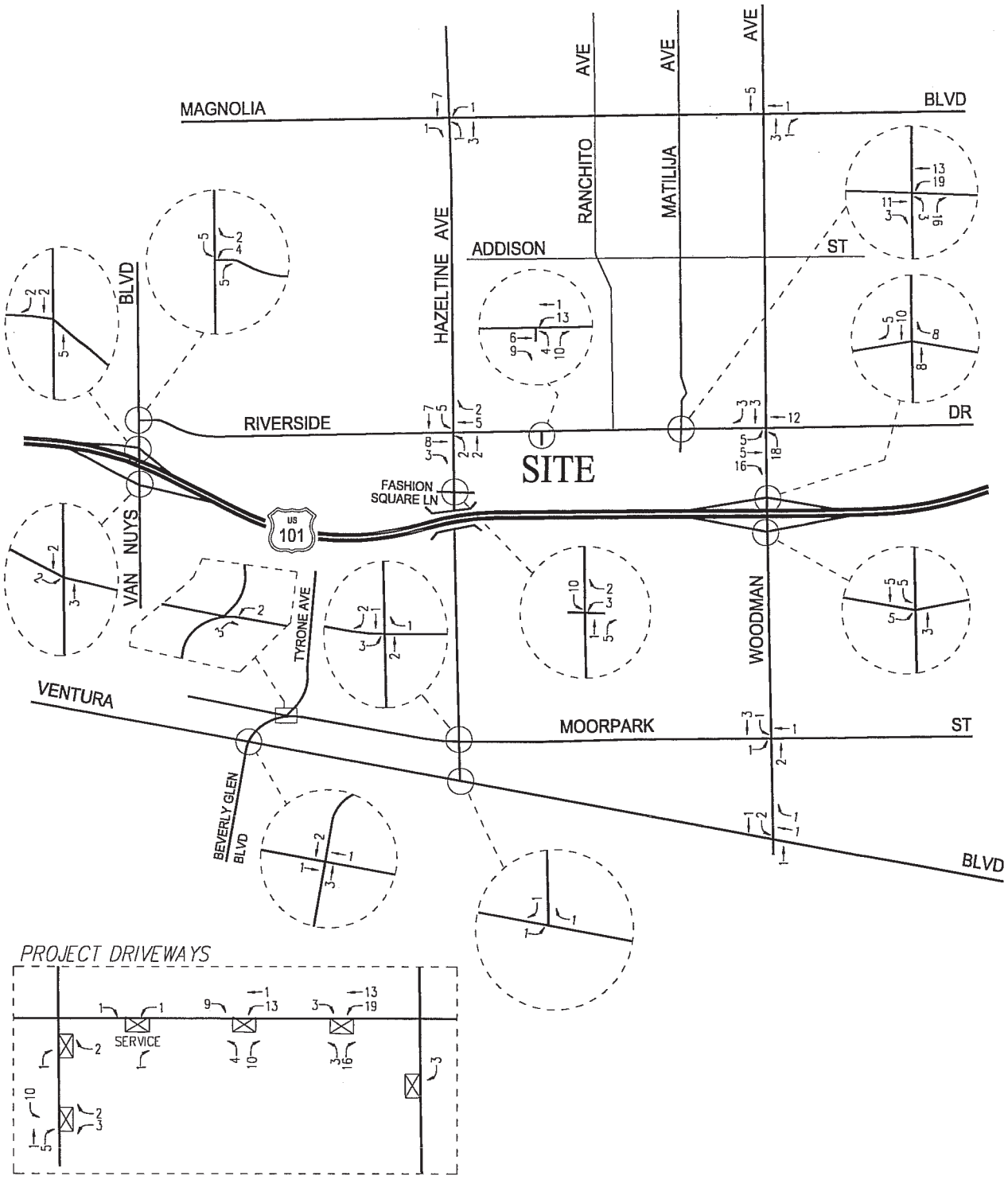


FIGURE 49
PROJECT TRAFFIC VOLUMES – WEEKDAY AM PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

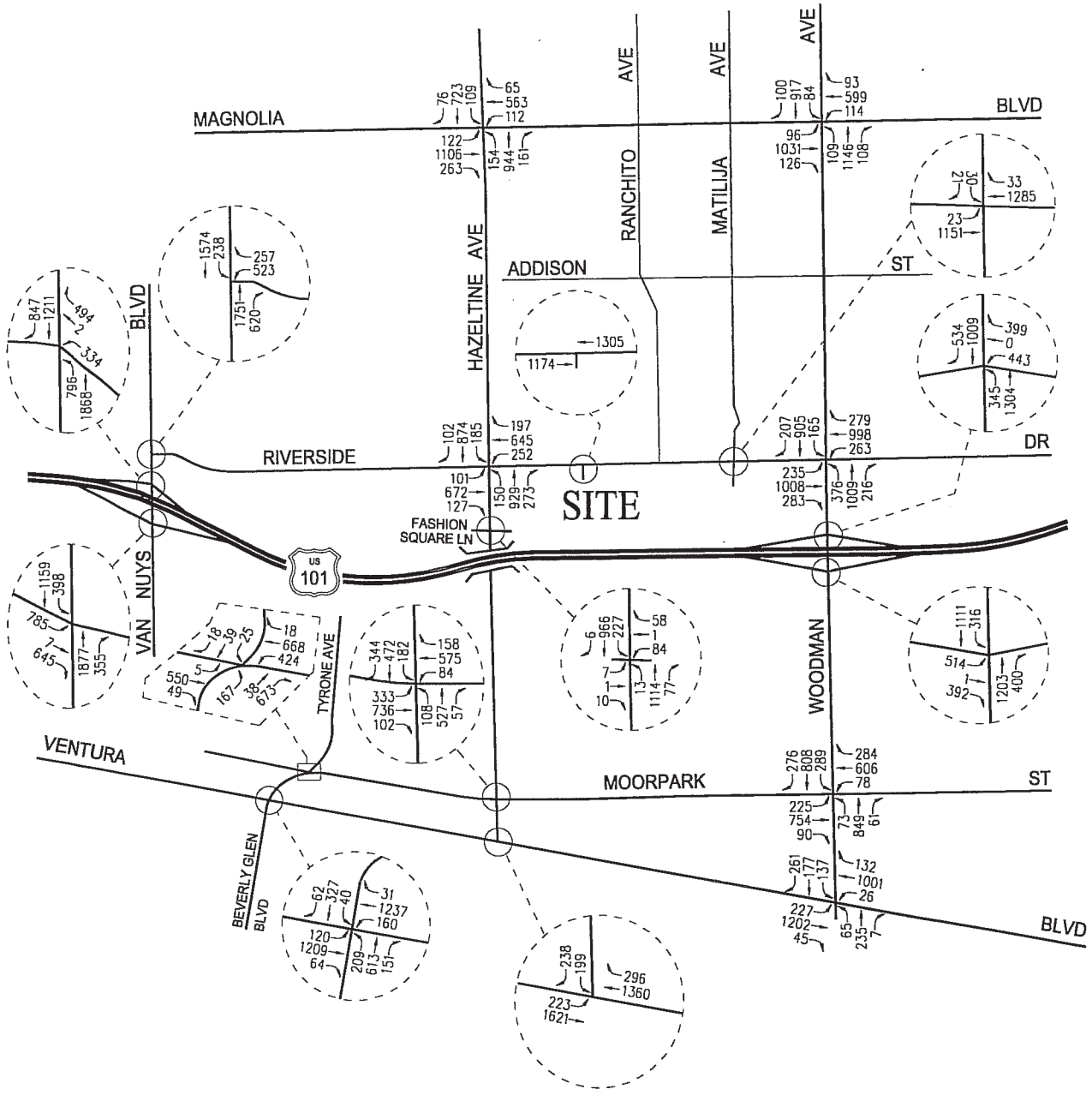


FIGURE 50
PROJECT TRAFFIC VOLUMES – WEEKDAY PM PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

TABLE 43
RELATED PROJECTS WEEKDAY TRIP GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
1	Apartment [3]	142 DU	724	13	29	42	32	23	55
2	Mixed-Use Development [4] Condominium Retail Quality Restaurant Fast Food without Drive-thru	146,463 SF 88 DU 6,000 GLSF 7,000 GLSF 3,500 GSF	1,310	58	73	131	64	49	113
3	Office [5]	29,475 GSF	325	40	6	46	7	37	44
4	Drugstore [6]	11,244 GSF	1,013	21	15	36	48	47	95
5	Private School [7]	80 Students	198	50	41	91	29	32	61
6	Retail [8]	60,000 GSF	2,576	5	2	7	30	42	72
7	Apartment [9]	98 DU	659	10	40	50	40	21	61
8	Gas Station [10]	392 SF	520	21	21	42	26	26	52
9	Community College [11]	2,300 Students	5,380	441	97	538	212	120	332
10	Mixed-Use [12] Condominiums Specialty Retail	10,551 SF 52 DU 7,460 SF	470	9	23	32	27	20	47
11	Apartment [13] Supermarket Retail	500 DU 45,000 GSF 10,000 GLSF	5,500	96	225	321	323	227	550
12	Self-Storage [14]	60,250 GSF	(729)	(31)	(43)	(74)	(37)	(35)	(72)
13	New Car Sales [15]	85,038 GSF	1,787	78	27	105	52	81	133
14	Condominium [16]	26 DU	152	2	9	11	9	5	14

TABLE 43
RELATED PROJECTS WEEKDAY TRIP GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	AM PEAK HOUR VOLUMES [2]			PM PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL	IN	OUT	TOTAL
15	Condominium [16]	23 DU	135	2	8	10	8	4	12
16	Private School [7]	300 Students	744	165	78	243	(38)	(34)	(72)
17	Condominiums [16]	247 DU	1,447	18	88	106	84	42	126
TOTAL			**22,211**	**998**	**739**	**1,737**	**916**	**707**	**1,623**

[1] Source: ITE "Trip Generation", 7th Edition, 2003.
[2] Trips are one-way traffic movements, entering or leaving.
[3] Source: "Traffic Impact Analysis, Chase Knolls Project," prepared by Linscott, Law & Greenspan, Engineers, 2005.
[4] LADOT trip generation forecast. The A.M. peak hour traffic volumes represent ten percent of the daily trip generation forecast.
[5] ITE Land Use Code 710 (General Office Building) trip generation average rates.
[6] ITE Land Use Code 881 (Pharmacy/Drugstore without Drive-thru Window) trip generation average rates.
[7] LADOT trip generation forecast. Daily trip generation rate and directional distribution for Private School (K-12) obtained from ITE "Trip Generation," 7th Edition, 2003.
[8] LADOT trip generation forecast. Daily trip generation rate for shopping center obtained from ITE "Trip Generation," 7th Edition, 2003.
[9] ITE Land Use Code 220 (Apartment) trip generation average rates.
[10] LADOT trip generation forecast. The P.M. peak hour traffic volumes represent ten percent of the daily trip generation forecast.
[11] LADOT trip generation forecast. Daily trip generation rate and directional distribution for Junior/Community College obtained from ITE "Trip Generation," 7th Edition, 2003.
[12] LADOT trip generation forecast. The P.M. peak hour traffic volumes represent ten percent of the daily trip generation forecast.
[13] LADOT trip generation forecast. The P.M. peak hour traffic volumes represent ten percent of the daily trip generation forecast.
[14] LADOT tip generation forecast. Directional distribution for Health Club obtained from ITE "Trip Generation," 7th Edition, 2003. Existing Health Club at 14,624 square feet will be demolished as part of the project.
[15] LADOT trip generation forecast. Directional distribution for New Car Sales obtained from ITE "Trip Generation," 7th Edition, 2003.
[16] ITE Land Use Code 230 (Residential Condominium/Townhome) trip generation average rates.

In order to account for unknown related projects not included in the traffic study, the existing traffic volumes were increased at an annual rate of two percent (2.0%) to the year 2012 (i.e., the anticipated year of project build-out). Application of this ambient growth factor allows for a conservative forecast of future traffic volumes in the project study area. The ambient growth factor, determined in consultation with LADOT staff, was based on general traffic growth factors provided in the *2004 Congestion Management Program for Los Angeles County* (the "CMP manual"). The CMP's traffic growth rate is intended to anticipate future traffic generated by development projects in the project vicinity. It is also noted that based on review of empirical data and the general traffic growth factors provided in the CMP manual for the San Fernando Valley area, it is anticipated that the existing traffic volumes are actually expected to increase at an annual rate of less than 1.0% per year between the years 2005 and 2012. Thus, the inclusion in this traffic analysis of both a forecast of traffic generated by known related projects plus the use of an ambient growth traffic factor based on CMP traffic model data likely overstates future pre-project conditions and future traffic volumes at the study intersections.

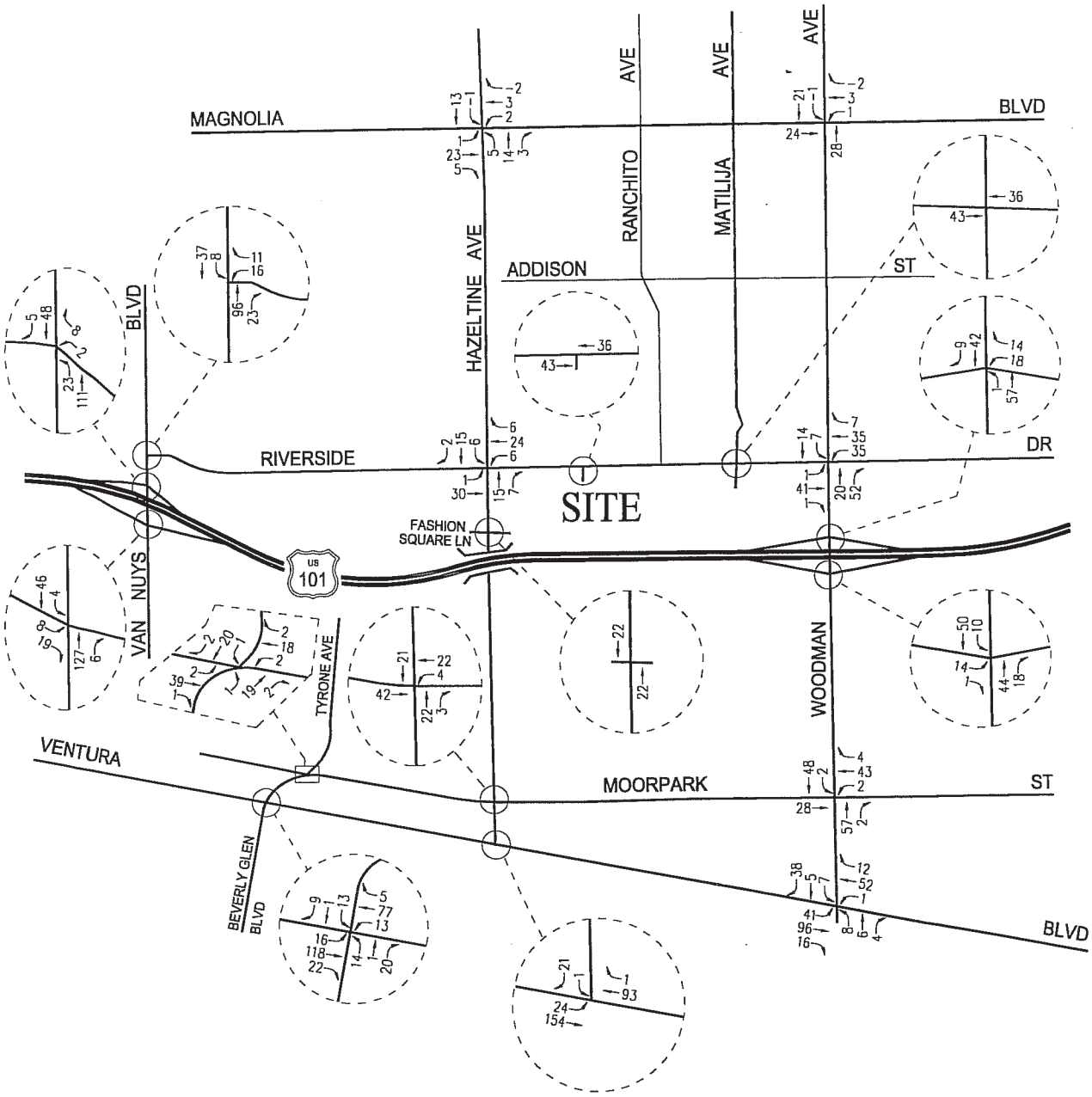


FIGURE 51
RELATED PROJECTS TRAFFIC VOLUMES – WEEKDAY AM PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

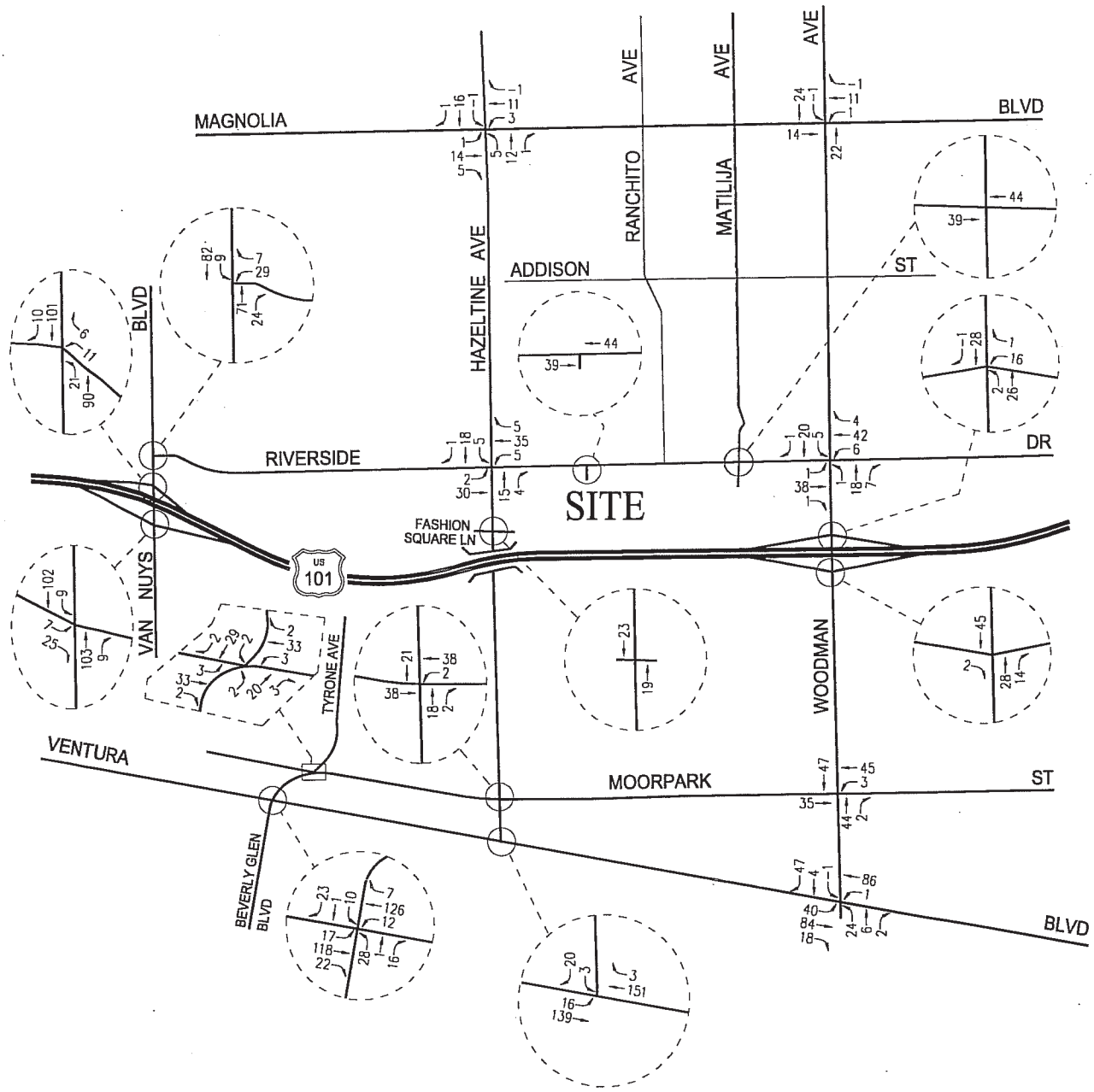


FIGURE 52
RELATED PROJECTS TRAFFIC VOLUMES – WEEKDAY PM PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

The related projects' respective traffic generation for the Saturday mid-day peak hour, as well as on a daily basis for a typical Saturday, is summarized in summarized in *Table 44: Related Projects Weekend Trip Generation*. The anticipated distribution of the related projects traffic volumes to the study intersections during the Saturday mid-day peak hour is displayed in *Figure 53: Related Projects Traffic Volumes – Saturday Mid-Day Peak Hour*. Similar to the weekday analysis, the existing Saturday traffic volumes were increased at an annual rate of two percent (2.0%) to the year 2012 (i.e., the anticipated year of project build-out).

TABLE 44
RELATED PROJECTS WEEKEND TRIP GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	SATURDAY PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL
1	Apartment [3]	142 DU	859	15	62	77
2	Camino Real Mixed-Use Development					
	Condominium [4]	88 DU	516	31	15	46
	Retail [5]	6,000 GLSF	300	16	14	30
	Quality Restaurant [6]	7,000 GLSF	661	45	31	76
	Fast Food with Drive-Through [7]	3,500 GSF	2,527	106	101	207
3	Office [8]	29,475 GSF	82	8	6	14
4	Drugstore [9]	11,244 GSF	880	44	44	88
5	Private School [10]	80 Students	NOM.	NOM.	NOM.	NOM.
6	Retail [5]	60,000 GSF	2,998	155	143	298
7	Apartment [3]	98 DU	513	12	47	59
8	Gas Station [11]	392 SF	380	19	19	38
9	Community College [12]	2,300 Students	966	66	49	115
10	Condominiums [4]	52 DU	305	18	9	27
	Retail [5]	7,460 SF	373	19	18	37
11	II Villaggio Toscano Project					
	Apartment [3]	500 DU	3,669	45	179	224
	Retail [5]	10,000 GSF	500	26	24	50
	Supermarket [13]	45,000 GSF	7,992	247	237	484
	Existing Apartments [14]	24 DU	(153)	(6)	(6)	(12)
	Existing Single Family Detached Housing [15]	11 DU	(111)	(5)	(5)	(10)
	Existing Office [8]	52,452 GSF	(131)	(12)	(10)	(22)
12	Self-Storage [16]	60,250 GSF	74	4	3	7
	Existing Health/Fitness Club [17]	14,624 GSF	305	19	19	38
13	New Car Sales [18]	85,038 GSF	1,788	129	124	253

TABLE 44 (CONTINUED)
RELATED PROJECTS WEEKEND TRIP GENERATION [1]

NO.	LAND USE	SIZE	DAILY TRIP ENDS VOLUMES [2]	SATURDAY PEAK HOUR VOLUMES [2]		
				IN	OUT	TOTAL
14	Condominium [4]	26 DU	152	9	5	14
15	Condominium [4]	23 DU	135	8	4	12
16	Private School [9]	300 Students	NOM.	NOM.	NOM.	NOM.
17	Condominiums [4]	247 DU	1,447	86	42	128
TOTAL			**27,027**	**1,104**	**1,174**	**2,278**

[1] Source: ITE "Trip Generation", 7th Edition, 2003.
[2] Trips are one-way traffic movements, entering or leaving.
[3] ITE Land Use Code 220 (Apartment) dip generation equation rates for Saturday daily and-peak hour of generator.
[4] ITE Land Use Code 230 (Townhome/Condominium) nip generation average rates for Saturday daily and peak hour of generator.
[5] ITE Land Use Code 820 (Shopping Center) trip generation average rates for Saturday daily and peak hour of generator.
[6] ITE Land Use Code 931 (Quality Restaurant) trip generation average rates for Saturday daily and peak hour of generator.
[7] ITE Land Use Code 933 (Fast-Food Restaurant without Drive-Through) trip generation average rates for Saturday daily and peak hour of generator.
[8] ITE Land Use Code 710 (General Office Building) trip generation equation rates for Saturday daily and peak hour of generator.
[9] ITE Land Use Code 881 (Pharmacy/Drugstore without Drive-Through Window) trip generation average rates for Saturday peak hour of generator. The peak hour traffic volumes represent ten percent of the daily trip generation forecast
[10] Please note that the weekend daily and peak hour traffic volumes for Private School are assumed to be nominal.
[11] As the ITE Trip Generation Manual does not provide weekend trip generation rates for this land use, ITE Land Use Code 945 (Gasoline Station with Convenience Market) weekday trip generation overage rates were utilized.
[12] ITE Land Use Code 540 (Junior/Community College) trip generation average rates for Saturday daily and peak hour of generator.
[13] ITE Land Use Code 850 (Supermarket) trip generation average rates for Saturday daily and peak hour of generator.
[14] ITE Land Use Code 220 (Apartment) trip generation average rates for Saturday daily and peak hour of generator.
[15] ITE Land Use Code 210 (Single Family Housing) trip generation average rates for Saturday daily and peak hour of generator.
[16] ITE Land Use Code 841 (New Car Sales) trip generation average rates for Saturday daily and peak hour of generator.
[17] ITE Land Use Code 492 (Health/Fitness Club) trip generation average rates for Saturday daily and peak hour of generator.
[18] ITE Land Use Code 841 (New Car Sales) trip generation average rates for Saturday daily and peak hour of generator.

Traffic Impact Analysis Methodology

The 18 study intersections were evaluated using the Critical Movement Analysis (CMA) method of analysis which determines Volume-to-Capacity (V/C) ratios on a critical lane basis. The overall intersection V/C ratio is subsequently assigned a Level of Service (LOS) value to describe intersection operations. Level of Service varies from LOS A (free flow) to LOS F (jammed condition). A description of the CMA method and corresponding Level of Service is provided in Appendix D of the Appendix I: Traffic Study.

The relative impact of the added project traffic volumes to be generated by the Proposed Project during the A.M. and P.M. peak hours was evaluated based on analysis of future operating conditions at the 18 study intersections, without and with the Proposed Project. The previously discussed capacity analysis procedures were utilized to evaluate the future V/C relationships and service level characteristics at each study intersection.

The significance of the potential impacts of project generated traffic at each study intersection was identified using criteria set forth in the LADOT's Traffic Study Policies and Procedures

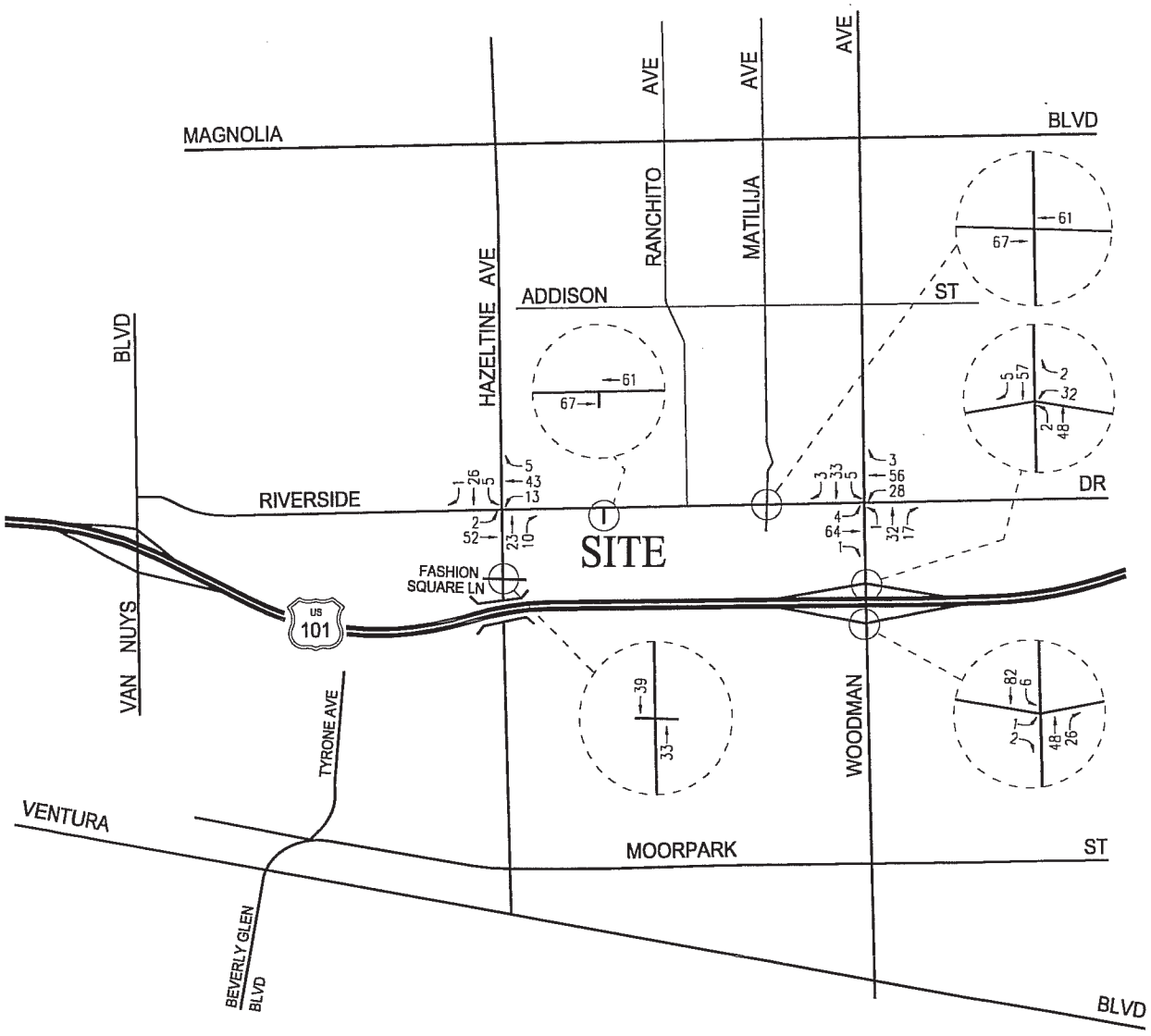


FIGURE 53
RELATED PROJECTS TRAFFIC VOLUMES – SATURDAY MID-DAY PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

(March, 2002), and are identified above under the Thresholds of Significance section. According to the City's Sliding Scale Method for calculating the level of impact due to traffic generated by the Proposed Project, a significant transportation impact is determined based on the sliding scale based on the pre-project LOS. The City's Sliding Scale Method requires mitigation of project traffic impacts whenever traffic generated by the proposed development causes an increase of the analyzed intersection V/C ratio by an amount equal to or greater than the sliding scale values.

An annual two percent (2.0%) ambient growth rate was assumed so as to account for unknown related projects in the vicinity of the Proposed Project.[7] Additionally, it was assumed that the Proposed Project will be completed and occupied in the year 2012.

The City's Automated Traffic Surveillance and Control (ATSAC) System provides computer control of traffic signals allowing automatic adjustment of signal timing plans to reflect changing traffic conditions, identification of unusual traffic conditions caused by accidents, the ability to centrally implement special purpose short-term traffic timing changes in response to incidents, and the ability to quickly identify signal equipment malfunctions. An upgrade to the ATSAC, called Adaptive Traffic Control System (ATCS), provides real time control of traffic signals and the funding provided by the ATCS project includes additional loop detectors, closed-circuit television, an upgrade in the communications link, and a new generation of traffic control software. LADOT estimates that the ATSAC system reduces the critical V/C ratios by seven percent (0.07).

Additionally, due to LADOT's recent policy change (as discussed above under Regulatory and Policy Setting), all future traffic studies should assume the ATSAC/ATCS credit in the future baseline analysis conditions (e.g., future pre-project, future with project, etc.). LADOT estimates that the ATSAC system reduces critical *v/*c ratios by seven percent (0.07). The ATCS upgrade further reduces the critical *v/c* ratios by three percent (0.03). Therefore, a reduction of 0.10 was assumed in the calculation of the *v/c* ratios for the signalized study intersections in the existing and future baseline analysis conditions. A reduction of 0.07 was assumed in the calculation of the *v/c* ratios for seven signalized study intersections for which the Project Applicant had previously funded in the existing and future baseline analysis conditions based on the current ATSAC operation (not ATCS). Further, the Proposed Project may utilize ATCS for purposes of further mitigating potential traffic impacts.

[7] For assessment purposes intersection volumes from 2005 were increased at a rate of two percent (2.0%) per year to reflect year 2007 conditions. Additional manual traffic counts were conducted in November 2007 at 17 of the study intersections to verify that the 2005 traffic count extrapolations remain representative of current (and projected) conditions. Following this comparison, it was determined that the 2007 traffic counts (as aggregated) were approximately 6.6 percent and 0.5 percent lower during A.M. peak and P.M. peak hours, respectively. These differences are within the normal expected variation range. Hence, the 2005 adjusted traffic counts presented in the Traffic Study, and referenced throughout this analysis, are reasonably consistent with the 2007 counts. Further, the 2005 adjusted traffic counts are more conservative (i.e., "worst-case") and provide a reasonable representation of traffic volumes in the study area. Source: Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Traffic Count Comparison* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

Traffic Impact Analysis Scenarios

Traffic impacts at the study intersections were analyzed for the following conditions:

(a) Existing conditions
(b) Condition (a) plus two percent (2.0%) ambient traffic growth through year 2012
(c) Condition (b) with completion and occupancy of the related projects (including 2007 update)
(d) Condition (c) with completion and occupancy of the Proposed Project
(e) Condition (d) with implementation of project mitigation measures where necessary

The traffic volumes for each new conditions were added to the volumes in the prior condition to determine the change in capacity utilization at the 18 study intersections.

(a) Intersections

Weekday Traffic Analysis

Summaries of the V/C ratios and LOS values for the study intersections during the A.M. and P.M. peak hours are shown in *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*.

As indicated in Column [1] of *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*, 16 of the 18 study intersection are presently operating at LOS D or better during the A.M. and P.M. peak hours under existing conditions. The two study intersections currently operating at LOS E during the peak hours are: (1) Intersection No. 3 (Van Nuys Blvd / US 101 EB Ramps) with a P.M. peak hour V/C of 0.955 (LOS E); and (2) Intersection No. 12 (Woodman Ave / Riverside Dr.) with an A.M. peak hour V/C of 0.959 (LOS E).

Growth in traffic due to the combined effects of continuing development, intensification of existing developments, and other factors was assumed to be two percent per year through 2012. This ambient growth incrementally increases the V/C ratios at all of the study intersections. As shown in Column [2] of *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*, 13 of the 18 study intersections are expected to continue to operate at LOS D or better during the A.M. and P.M. peak hours with the addition of ambient growth traffic through 2012. The following five study intersections are expected to operate at LOS E during the peak hours with the addition of ambient growth traffic:

Int No. 3: Van Nuys Blvd / US 101 EB Ramps	P.M. Peak Hour: V/C = 1.027, LOS F
Int No. 4: Tyrone Ave / Moorpark St	P.M. Peak Hour: V/C = 0.955, LOS E
Int No. 11: Woodman Ave / Magnolia Blvd	A.M. Peak Hour: V/C =0.919, LOS E
Int No. 12: Woodman Ave / Riverside Dr	A.M. Peak Hour: V/C = 1.061, LOS F P.M. Peak Hour: V/C = 0.975, LOS E

TABLE 45

SUMMARY OF VOLUME TO CAPACITY RATIOS AND LEVEL OF SERVICE WEEKDAY AM AND PM PEAK HOURS

NO	INTERSECTION	PEAK HOUR	[1] YEAR 2007 EXISTING		[2] YEAR 2012 W/ AMBIENT GROWTH		[3] YEAR 2012 W/ RELATED PROJECTS		[4]				[5]			
									YEAR 2012 W/ PROPOSED PROJECT		CHANGE ([4] - [3])	SIGNIF. IMPACT	YEAR 2012 W/ PROJECT MITIGATION		CHANGE ([5] - [3])	MITI-GATED
			V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			V/C	LOS		
1	Van Nuys Blvd/ Riverside Dr	AM	0.687	B	0.762	C	0.802	D	0.808	D	0.006	NO	0.778	C	-0.024	—
		PM	0.770	C	0.854	D	0.893	D	0.920	E	0.027	YES	0.890	D	-0.003	YES
2	Van Nuys Blvd/US 101 Freeway Westbound Ramps	AM	0.655	B	0.698	B	0.721	C	0.722	C	0.001	NO	0.722	C	0.001	—
		PM	0.787	C	0.843	D	0.881	D	0.885	D	0.004	NO	0.885	D	0.004	—
3	Van Nuys Blvd/US 101 Freeway Eastbound Ramps	AM	0.793	C	0.850	D	0.877	D	0.878	D	0.001	NO	0.878	D	0.001	—
		PM	0.955	E	1.027	F	1.063	F	1.068	F	0.005	NO	1.068	F	0.005	—
4	Tyrone Ave/Moorpark St	AM	0.539	A	0.600	A	0.622	B	0.622	B	0.000	NO	0.592	A	-0.030	—
		PM	0.862	D	0.955	E	0.983	E	0.994	E	0.011	YES	0.964	E	-0.019	YES
5	Tyrone Ave - Beverly Glen Blvd/Ventura Blvd	AM	0.613	B	0.651	B	0.717	C	0.718	C	0.001	NO	0.718	C	0.001	—
		PM	0.738	C	0.789	C	0.863	D	0.873	D	0.010	NO	0.873	D	0.010	--
6	Hazeltine Ave/ Magnolia Blvd	AM	0.701	C	0.748	C	0.766	C	0.770	C	0.004	NO	0.770	C	0.004	—
		PM	0.814	D	0.872	D	0.884	D	0.900	D	0.016	NO	0.900	D	0.016	--
7	Hazeltine Ave/Riverside Dr	AM	0.778	C	0.863	D	0.882	D	0.890	D	0.008	NO	0.860	D	-0.022	—
		PM	0.718	C	0.797	C	0.819	D	0.849	D	0.030	YES	0.819	D	0.000	YES
8	Hazeltine Ave/ Fashion Square Lane	AM	0.361	A	0.404	A	0.412	A	0.414	A	0.002	NO	0.384	A	-0.028	—
		PM	0.515	A	0.573	A	0.580	A	0.630	B	0.050	NO	0.600	A	0.20	—
9	Hazeltine Ave/Moorpark St	AM	0.709	C	0.757	C	0.779	C	0.780	C	0.001	NO	0.780	C	0.001	—
		PM	0.739	C	0.790	C	0.824	D	0.829	D	0.005	NO	0.829	D	0.005	—
10	Hazeltine Ave/Ventura Blvd	AM	0.797	C	0.853	D	0.907	E	0.908	E	0.001	NO	0.908	E	0.001	—
		PM	0.644	B	0.685	B	0.755	C	0.761	C	0.006	NO	0.761	C	0.006	—
11	Woodman Ave/ Magnolia Blvd	AM	0.857	D	0.919	E	0.927	E	0.929	E	0.002	NO	0.929	E	0.002	—
		PM	0.780	C	0.835	D	0.847	D	0.849	D	0.002	NO	0.849	D	0.002	—
12	Woodman Ave/Riverside Dr	AM	0.959	E	1.061	F	1.107	F	1.117	F	0.010	YES	1.016	F	-0.091	YES
		PM	0.880	D	0.975	E	1.003	F	1.038	F	0.035	YES	0.986	E	-0.017	YES
13	Woodman Ave/US 101 Freeway Westbound Ramps	AM	0.743	C	0.824	D	0.841	D	0.847	D	0.006	NO	0.817	D	-0.024	—
		PM	0.733	C	0.813	D	0.819	D	0.853	D	0.034	YES	0.823	D	0.004	YES
14	Woodman Ave/ US 101 Freeway Eastbound Ramps	AM	0.654	B	0.696	B	0.720	C	0.725	C	0.005	NO	0.725	C	0.005	—
		PM	0.648	B	0.690	B	0.700	B	0.731	C	0.031	NO	0.731	C	0.031	—
15	Woodman Ave/Moorpark St	AM	0.850	D	0.942	E	0.991	E	0.993	E	0.002	NO	0.963	E	-0.028	—
		PM	0.867	D	0.960	E	1.005	F	1.017	F	0.012	YES	0.987	E	-0.018	YES
16	Woodman Ave/Ventura Blvd	AM	0.717	C	0.766	C	0.826	D	0.829	D	0.003	NO	0.829	D	0.003	—
		PM	0.640	B	0.681	B	0.741	C	0.754	C	0.013	NO	0.754	C	0.013	—

TABLE 45 (CONTINUED)
SUMMARY OF VOLUME TO CAPACITY RATIOS AND LEVEL OF SERVICE WEEKDAY AM AND PM PEAK HOURS

NO	INTERSECTION	PEAK HOUR	[1] YEAR 2007 EXISTING		[2] YEAR 2012 W/ AMBIENT GROWTH		[3] YEAR 2012 W/ RELATED PROJECTS		[4]				[5]			
									YEAR 2012 W/ PROPOSED PROJECT		CHANGE ([4] - [3])	SIGNIF. IMPACT	YEAR 2012 W/ PROJECT MITIGATION		CHANGE ([5] - [3])	MITI-GATED
			V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			V/C	LOS		
17	Project Driveway-Matilija Avenue/Riverside Drive [a]	AM	0.518	A	0.570	A	0.585	A	0.412	A	-0.173	NO	0.412	A	-0.173	—
		PM	0.555	A	0.610	B	0628	B	0.565	A	-0.063	NO	0.565	A	-0.063	—
18	New Project Driveway (Tunnel Access)/Riverside Drive [b]	AM	0.00	A	0.000	A	0.000	A	0.378	A	0.378	NO	0.378	A	0.378	—
		PM	0.000	A	0.000	A	0.000	A	0.649	B	0.649	NO	0.649	B	0.649	—

[a] Intersection proposed to be signalized as part of the Proposed Project. V/C ratio includes a 0.10 reduction rate due to installation of ATSAC/ATCS as part of the Victory System No. 6.
[b] Intersection currently does not exist. Intersection proposed to be signalized as part of the Proposed Project. V/C ratio includes a 0.10 reduction due to installation of ATSAC/ATCS as part of the Victory System No. 6

Int No. 15: Woodman Ave / Moorpark St	A.M. Peak Hour: V/C = 0.942, LOS E P.M. Peak Hour: V/C = 0.960, LOS E

The existing with ambient growth traffic volumes at the study intersections during the A.M. and P.M. Peak hours are shown in *Figure 54: Existing with Ambient Growth Traffic Volumes – Weekday AM Peak Hour* and *Figure 55: Existing with Ambient Growth Traffic Volumes – Weekday PM Peak Hour*.

The V/C ratios at all 18 study intersections are incrementally increased with the addition of traffic generated by the related projects list in *Table 43: Related Projects Weekday Trip Generation*. As presented in Column [3] of *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*, 12 of the 18 study intersections are expected to continue operating at LOS D or better during the A.M. and P.M. peak hours with the addition of growth in ambient traffic and the traffic due to related projects. The following six study intersections are expected to operate at LOS E during peak hours with the addition of ambient traffic and traffic due to related projects:

Int No. 3: Van Nuys Blvd / US 101 EB Ramps	P.M. Peak Hour: V/C =1.063, LOS F
Int No. 4: Tyrone Ave / Moorpark Street	P.M. Peak Hour: V/C = 0.983, LOS E
Int. No. 10: Hazeltine Ave / Ventura Boulevard	A.M. Peak Hour: V/C =0.907, LOS E
Int No. 11: Woodman Ave / Magnolia Boulevard	A.M. Peak Hour: V/C =0.927, LOS E
Int No. 12: Woodman Ave / Riverside Drive	A.M. Peak Hour: V/C = 1.107, LOS F P.M. Peak Hour: V/C = 1.003, LOS F
Int No. 15: Woodman Ave / Moorpark Street	A.M. Peak Hour: V/C = 0.991, LOS E P.M. Peak Hour: V/C = 1.005, LOS F

The future pre-project (existing, ambient growth, and related project) traffic volumes at the study intersections during the A.M. and P.M. peak hours are presented in *Figure 56: Future Pre-Project Traffic Volumes – Weekday AM Peak Hour* and *Figure 57: Future Pre-Project Traffic Volumes – Weekday PM Peak Hour*.

As shown in Column [4] of *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the Proposed Project is expected to create significant impacts at six of the 18 study intersections. The Proposed Project is anticipated to create significant impacts at the following locations during the identified peak hour, as shown below, with the addition of ambient growth, related project traffic, and project-related traffic:

Int No. 1 - Van Nuys Blvd / Riverside Dr	P.M. Peak Hour V/C ratio increase of 0.027 [to 0.920 (LOS E) from 0.893 (LOS D)]

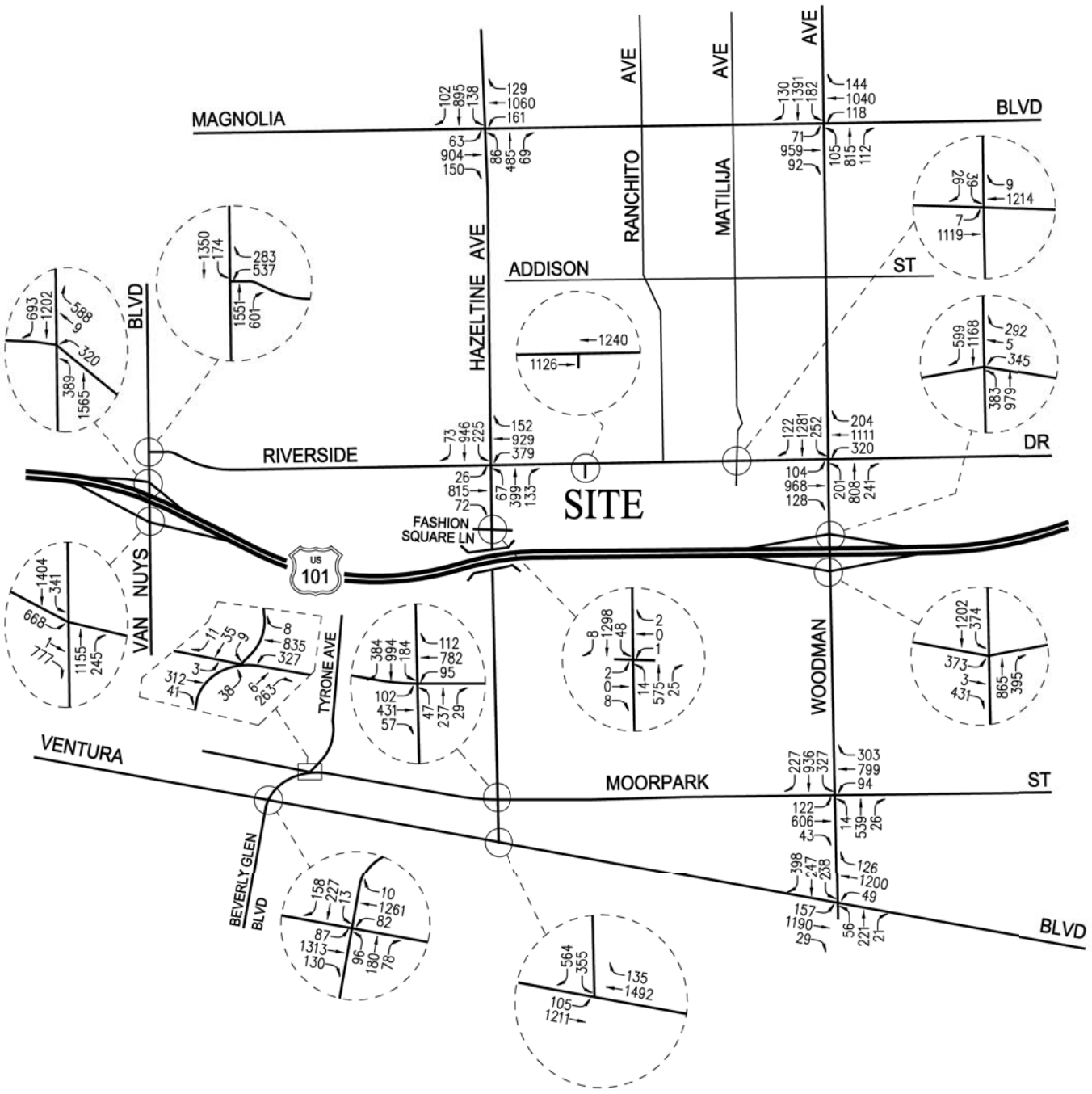


FIGURE 54
EXISTING WITH AMBIENT GROWTH TRAFFIC VOLUMES
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS **WEEKDAY AM PEAK HOUR**

NORTH

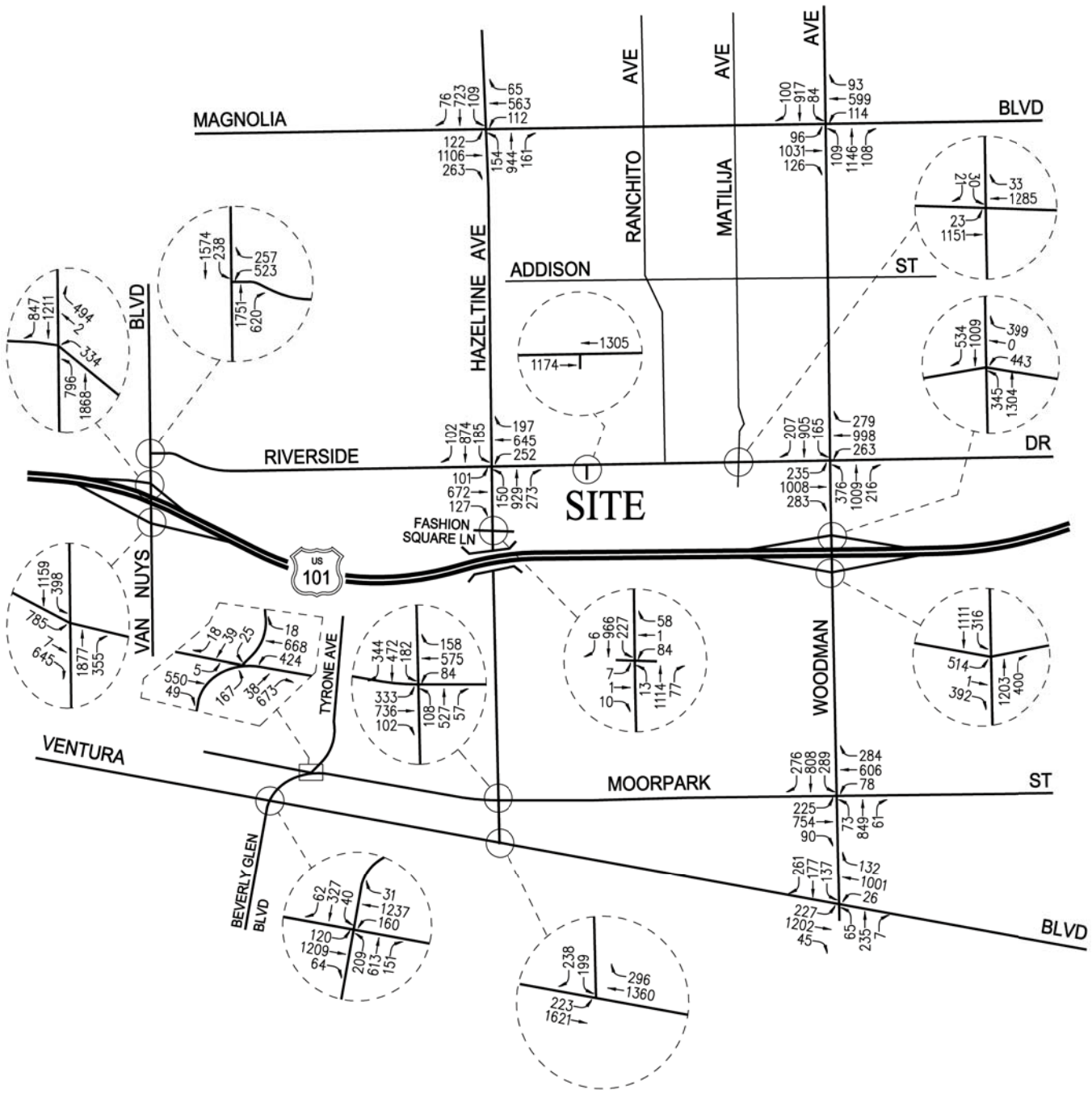


FIGURE 55
EXISTING WITH AMBIENT GROWTH TRAFFIC VOLUMES
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS **WEEKDAY PM PEAK HOUR**

NORTH

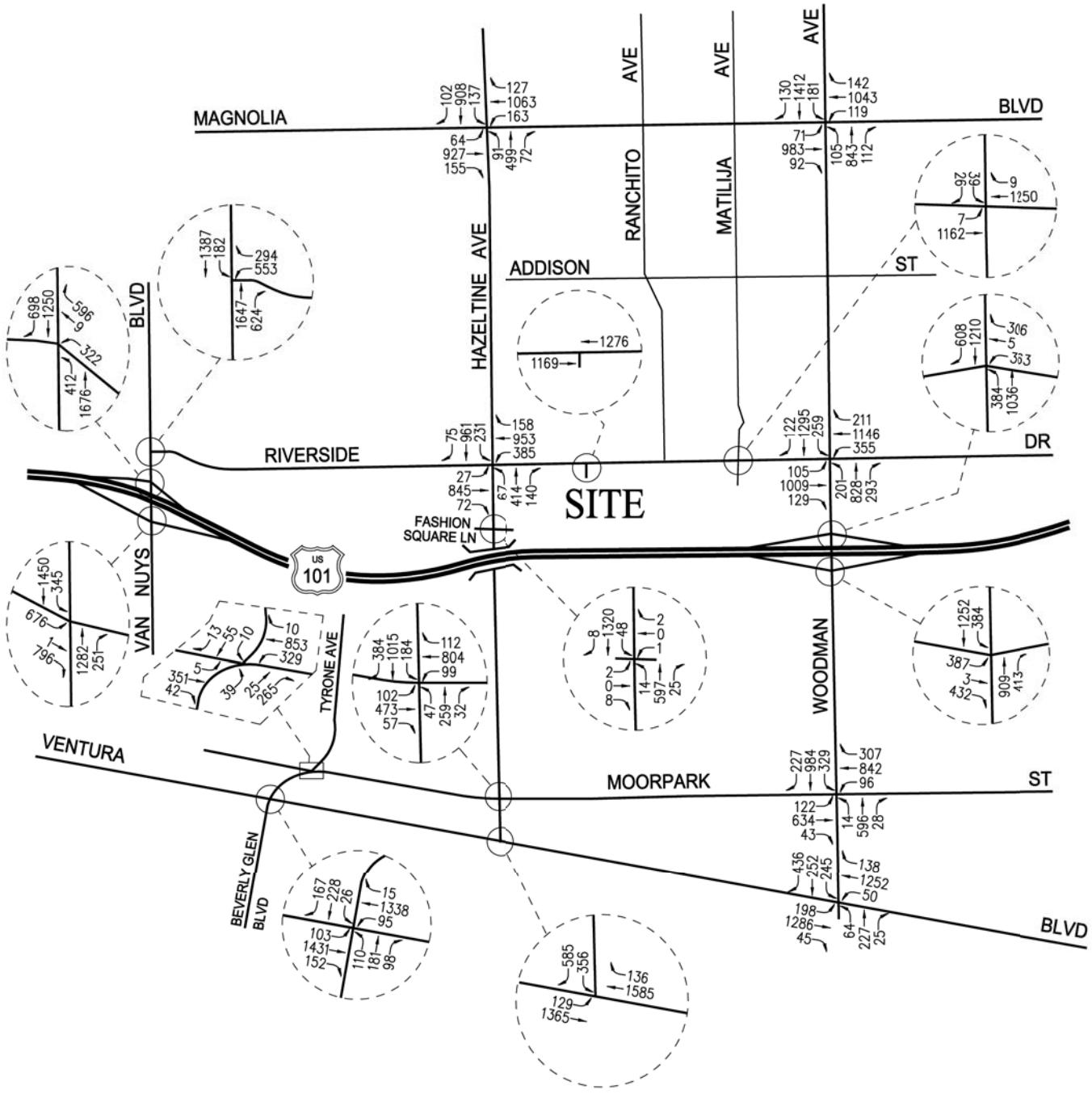


FIGURE 56
FUTURE PRE-PROJECT TRAFFIC VOLUMES – WEEKDAY AM PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

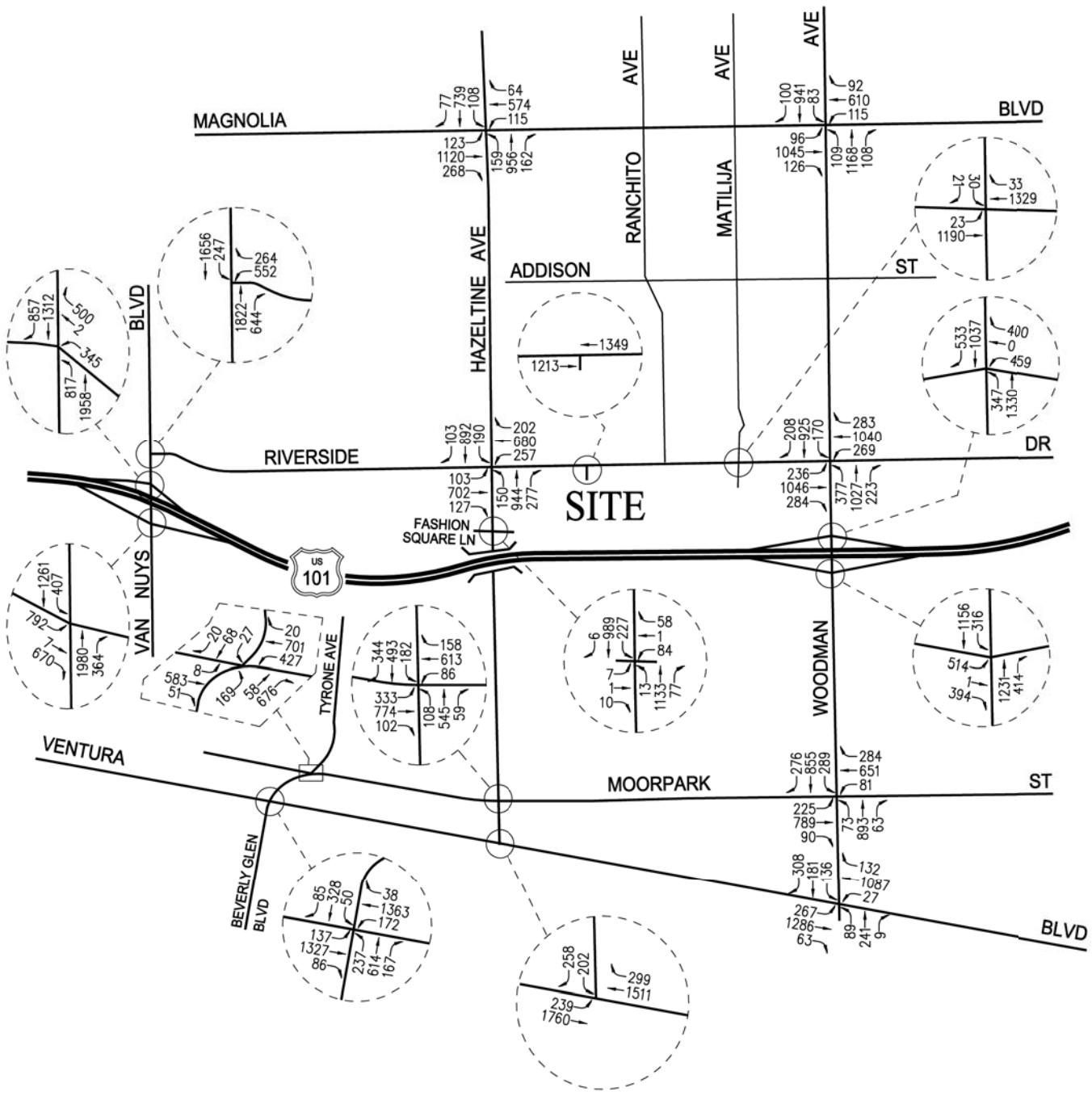


FIGURE 57
FUTURE PRE-PROJECT TRAFFIC VOLUMES – WEEKDAY PM PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

Int No. 4 - Tyrone Ave / Moorpark St	P.M. Peak Hour V/C ratio increase of 0.011 [to 0.994 (LOS E) from 0.983 (LOS E)]
Int No. 7 - Hazeltine Ave/Riverside Dr	P.M. Peak Hour V/C ratio increase of 0.030 [to 0.849 (LOS D) from 0.819 (LOS D)]
Int No. 12 - Woodman Ave / Riverside Dr	A.M. Peak Hour V/C ratio increase of 0.010 [to 1.117 (LOS F) from 1.107 (LOS F)]
	P.M. Peak Hour V/C ratio increase of 0.035 [to 1.038 (LOS F) from 1.003 (LOS F)]
Int No. 13 - Woodman Ave / US 101 WB Ramps	P.M. Peak Hour V/C ratio increase of 0.034 [to 0.853 (LOS D) from 0.819 (LOS D)]
Int No. 15 - Woodman Ave / Moorpark St	P.M. Peak Hour V/C ratio increase of 0.012 [to 1.017 (LOS F) from 1.005 (LOS F)]

Incremental but not significant impacts are anticipated at the remaining 12 study intersections. The future with project (existing, ambient growth, related projects, and project) traffic volumes during the A.M. and P.M. peak hours are shown in *Figure 58: Future with Project Traffic Volumes – Weekday AM Peak Hour* and *Figure 59: Project Traffic Volumes – Weekday PM Peak Hour*.

Weekend Traffic Analysis

While not specifically required by LADOT staff, additional analysis was prepared to evaluate the potential traffic impacts of the proposed Expansion Project to the local street system during the Saturday mid-day peak hour. Specifically, the focus of this analysis is to determine the potential traffic impacts at the following seven study intersections located immediately adjacent to the project site:

Int. No. 7: Hazeltine Avenue/Riverside Drive

Int. No. 8: Hazeltine Avenue/Fashion Square Lane

Int. No. 12: Woodman Avenue/Riverside Drive

Int. No. 13: Woodman Avenue/US 101 Westbound Ramps

Int. No. 14: Woodman Avenue/US 101 Eastbound Ramps

Int. No. 17: Matilija Avenue-New Project Driveway/Riverside Drive

Int. No. 18: New Westerly Project Driveway/Riverside Drive

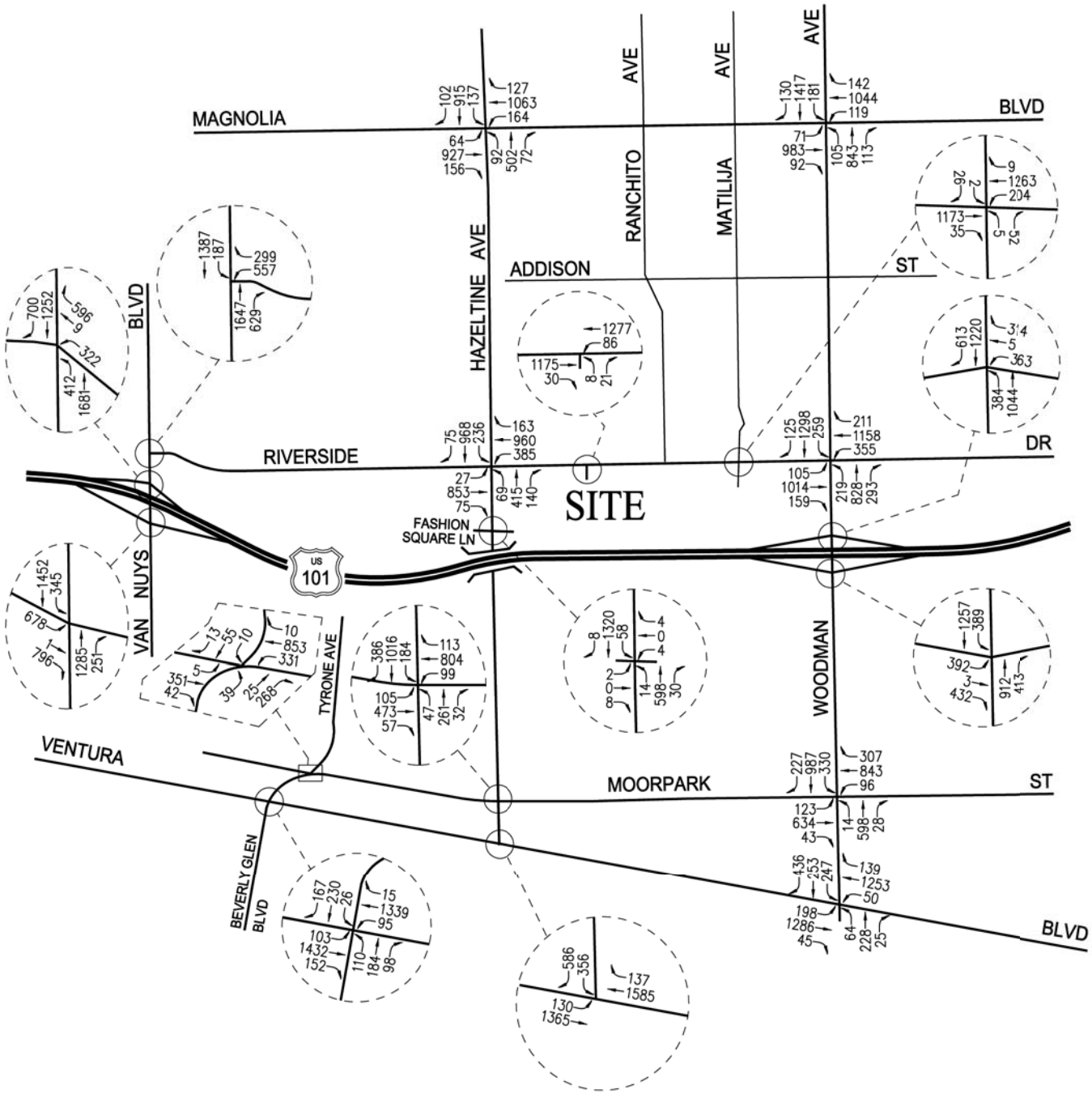


FIGURE 58

FUTURE WITH PROJECT TRAFFIC VOLUMES – WEEKDAY AM PEAK HOUR

MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

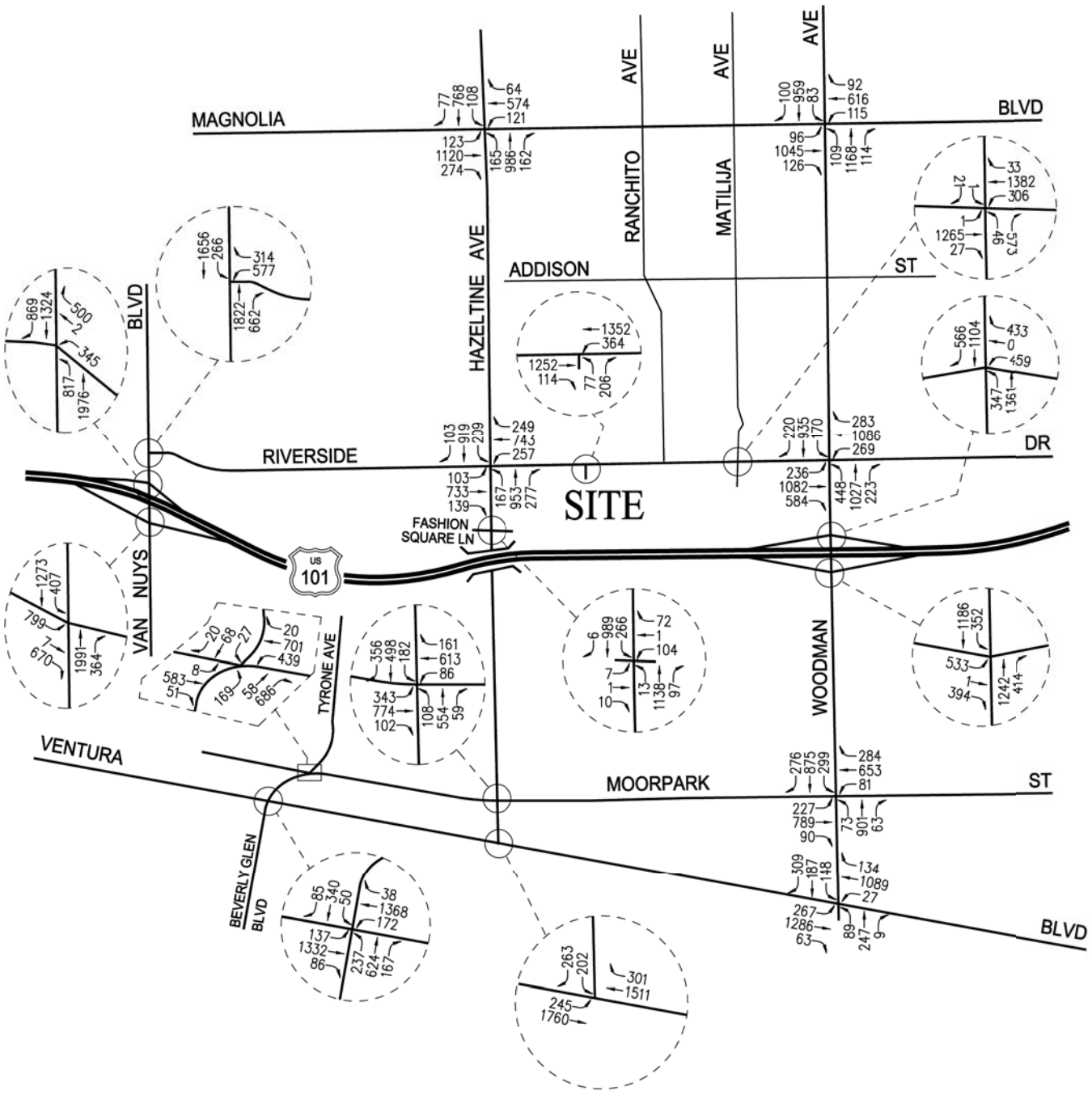


FIGURE 59

FUTURE WITH PROJECT TRAFFIC VOLUMES – WEEKDAY PM PEAK HOUR

MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

Summaries of the V/C ratios and LOS values for the seven adjacent study intersections during the Saturday mid-day peak hour are shown in *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*. The CMA data worksheets for the analyzed intersections are contained in Appendix D of Appendix I: Traffic Study to this DEIR.

As indicated in column [1] of *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*, all of the seven adjacent study intersections are presently operating at LOS D or better during the Saturday mid-day peak hour under existing conditions. As previously mentioned, the existing traffic volumes at the study intersections during Saturday mid-day peak hour are displayed in *Figure 47: Project Traffic Volumes – Saturday Mid-Day Peak Hour*.

As shown in column [2] of *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*, six of the seven adjacent study intersections are expected to continue operating at LOS D or better during the Saturday mid-day peak hour with the addition of ambient growth traffic through the year 2012. The existing with ambient growth traffic volumes at all seven of the study intersections are presently operating at LOS D or better during the Saturday mid-day peak hour are shown in *Figure 60: Existing with Ambient Growth Traffic Volumes – Saturday Mid-Day Peak Hour*. The following study intersection is expected to operate at LOS E during the during Saturday mid-day peak hour with the addition of ambient growth traffic:

Int. No. 12: Woodman Avenue/Riverside Drive Mid-day Peak Hour: V/C = 0.968, LOS E

The existing with ambient growth traffic volumes at the study intersections during all of the seven adjacent study intersections are presently operating at LOS D or better during the Saturday mid-day peak hour.

As presented in column [3] of *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*, five of seven adjacent study intersections are expected to continue operating at LOS D or better during the Saturday mid-day peak hour with the addition of growth in ambient traffic and the traffic due to the related projects. The following study intersection is expected to operate at LOS E during the Saturday mid-day peak hour with the addition of ambient traffic and the traffic due to the related projects:

Int. No. 12: Woodman Avenue/Riverside Drive Mid-day Peak Hour: V/C=1.024, LOS F

The future pre-project (existing, ambient growth and related projects) traffic volumes at the study intersections during the Saturday mid-day peak hour are presented in *Figure 61: Future Pre-Project Traffic Volumes – Saturday Mid-Day Peak Hour*.

As shown in column [4] of *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the Proposed Project is expected to create significant impacts at

TABLE 46
SUMMARY OF VOLUME TO CAPACITY RATIOS AND LEVELS OF SERVICE WEEKEND PEAK HOURS

NO	INTERSECTION	PEAK HOUR	[1] YEAR 2007 EXISTING		[2] YEAR 2012 W/ AMBIENT GROWTH		[3] YEAR 2012 W/ RELATED PROJECTS		[4]				[5]			
									YEAR 2012 W/ PROPOSED PROJECT		CHANGE V/C ([4] - [3])	SIGNIF. IMPACT	YEAR 2012 W/ PROJECT MITIGATION		CHANGE V/C ([5] - [3])	MITI-GATED
			V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			V/C	LOS		
7	Hazeltine Ave/Riverside Dr	Saturday Mid-day	0.684	B	0.760	C	0.795	C	0.842	D	0.047	YES	0.812	D	0.017	YES
8	Hazeltine Ave/ Fashion Square Lane	Saturday Mid-day	0.636	B	0.707	C	0.719	C	0.764	C	0.045	YES	0.734	C	0.015	YES
12	Woodman Ave/Riverside Dr	Saturday Mid-day	0.874	D	0.968	E	1.024	F	1.086	F	0.062	YES	0.997	E	-0.027	YES
13	Woodman Ave/US 101 Freeway Westbound Ramps	Saturday Mid-day	0.757	C	0.840	D	0.856	D	0.900	D	0.044	YES	0.870	D	0.014	YES
14	Woodman Ave/ US 101 Freeway Eastbound Ramps	Saturday Mid-day	0.590	A	0.626	B	0.644	B	0.688	B	0.044	NO	0.688	B	0.044	--
17	Project Driveway-Matilija Avenue/Riverside Drive [a]	Saturday Mid-day	0.472	A	0.519	A	0.547	A	0.606	B	0.059	NO	0.606	B	0.059	—
18	New Project Driveway (Tunnel Access)/Riverside Drive [b]	Saturday Mid-day	0.000	A	0.000	A	0.000	A	0.755	C	0.755	NO	0.755	C	0.755	—

[a] Intersection proposed to be signalized as part of the Proposed Project. V/C ratio includes a 0.10 reduction rate due to installation of ATSAC/ATCS as pat of the Victory System No. 6.
[b] Intersection currently does not exist. Intersection proposed to be signalized as part of the Proposed Project. V/C ratio includes a 0.10 reduction due to installation of ATSAC/ATCS as part of the Victory System No. 6

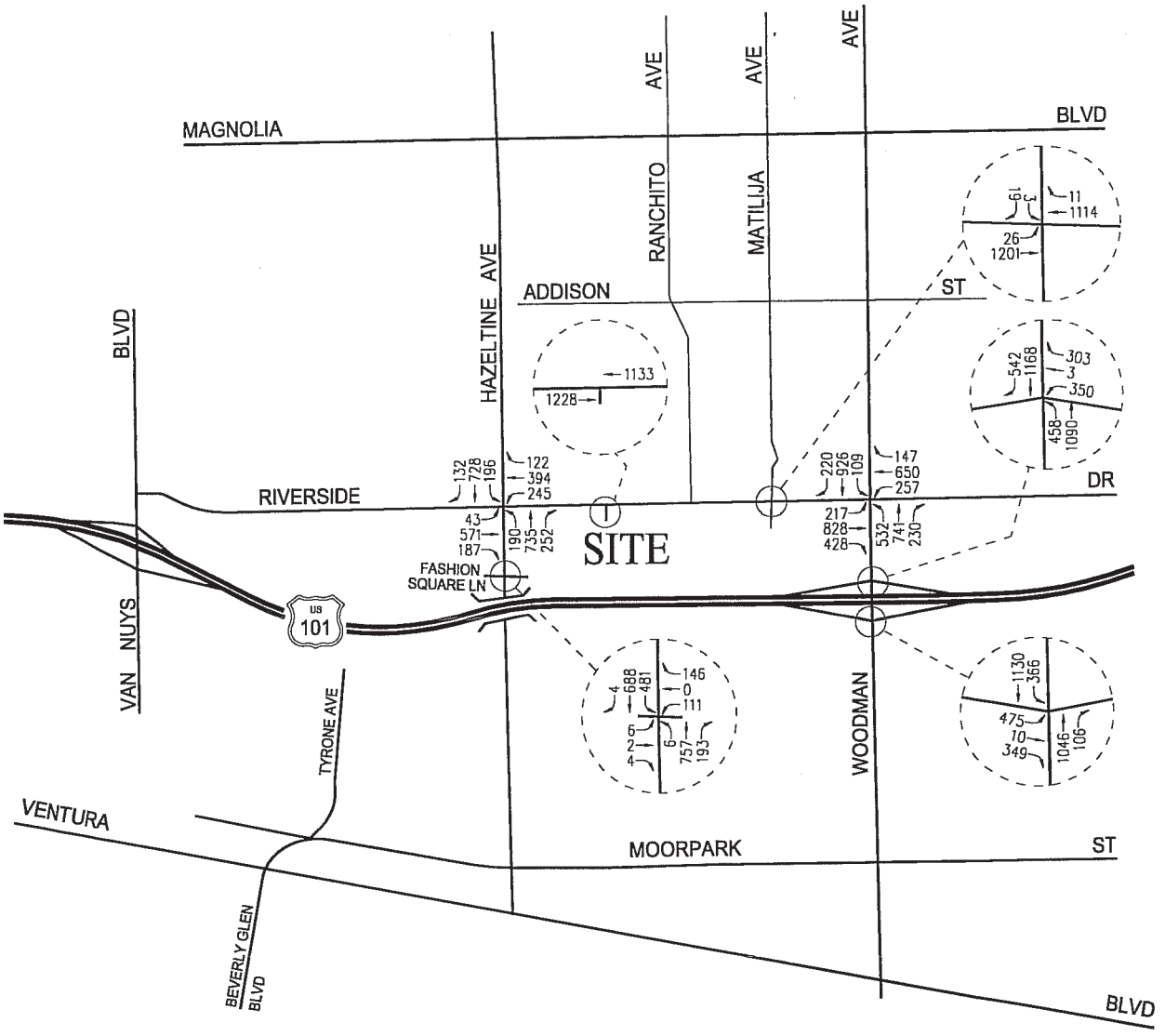


FIGURE 60
EXISTING WITH AMBIENT GROWTH TRAFFIC VOLUMES
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS **SATURDAY MID-DAY PEAK HOUR**

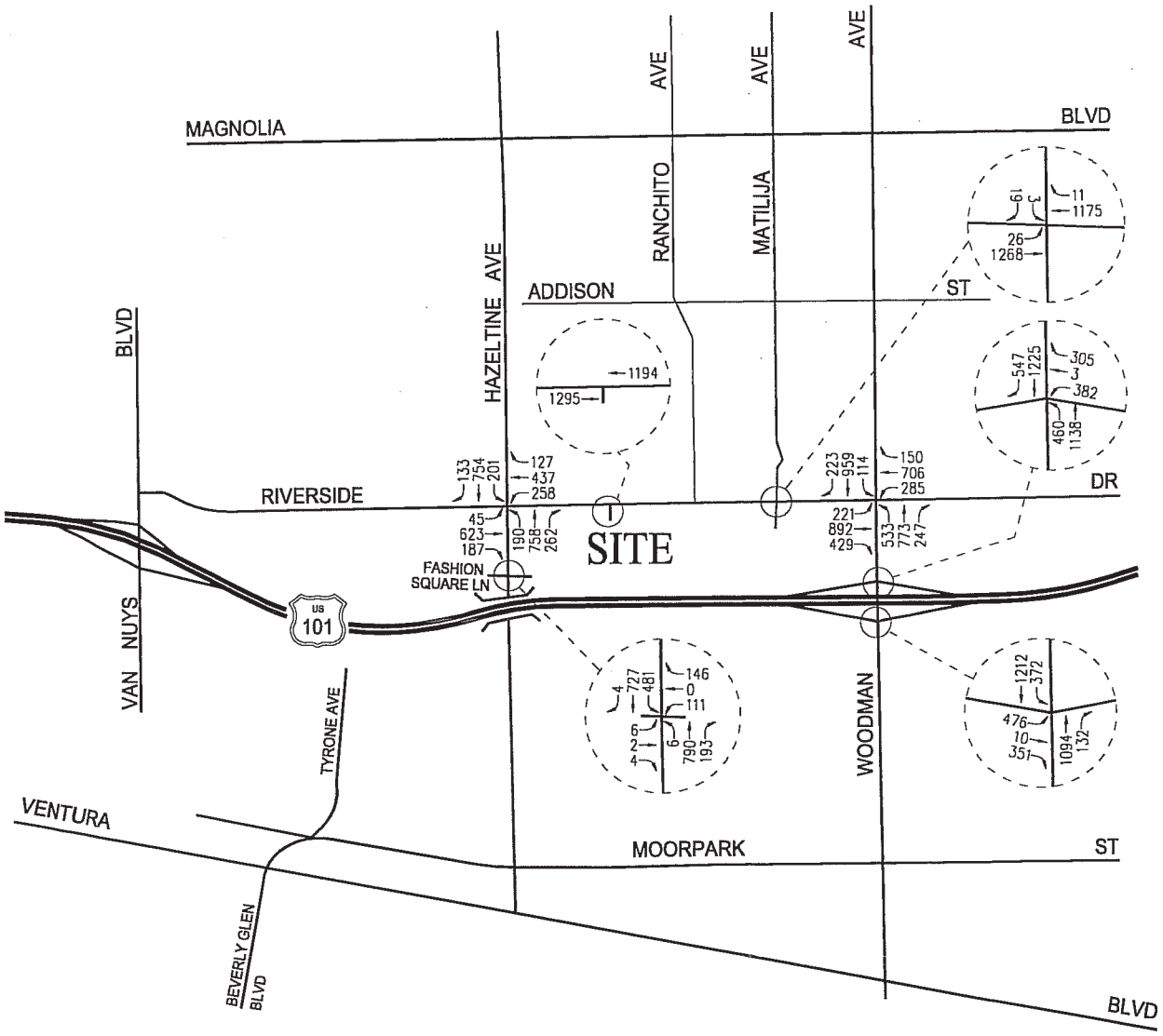


FIGURE 61
FUTURE PRE-PROJECT TRAFFIC VOLUMES – SATURDAY MID-DAY PEAK HOUR
MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

NORTH

four of the seven adjacent study intersections. The following locations would experience significant impacts during the Saturday mid-day peak hour with the addition of ambient growth, related projects traffic, and project-related traffic:

Int. No. 7: Hazeltine Avenue/Riverside Drive — Mid-Day peak hour V/C ratio increase of 0.047 [to 0.842 (LOS D) from 0.795 (LOS C)]

Int. No. 8: Hazeltine Ave/Fashion Square Lane — Mid-Day peak hour V/C ratio increase of 0.045 [to 0.764 (LOS C) from 0.719 (LOS C)]

Int. No. 12: Woodman Avenue/Riverside Drive — Mid-Day peak hour V/C ratio increase of 0.062 [to 1.086 (LOS F) from 1.024 (LOS F)]

Int. No. 13: Woodman Ave/US 101 Westbound Ramps
Mid-Day peak hour V/C ratio increase of 0.044 [to 0.900 (LOS D) from 0.856 (LOS D)]

Incremental but not significant impacts are noted at the remaining three adjacent study intersections as presented in *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*. The future with project (existing, ambient growth, related projects and project) traffic volumes at the study intersections during the Saturday mid-day peak hour are illustrated in *Figure 62: Future with Project Traffic Volumes – Saturday Mid-Day Peak Hour*.

Summary Of Weekday And Weekend Project Impact And Mitigation

As summarized in the column four of *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours* and in *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the Proposed Project is anticipated to create significant impacts at the following seven study intersections:

Int. No. 1: Van Nuys Boulevard/Riverside Drive
Int. No. 4: Tyrone Avenue/Moorpark Street
Int. No. 7: Hazeltine Avenue/Riverside Drive
Int. No. 8: Hazeltine Avenue/Fashion Square Lane
Int. No. 12: Woodman Avenue/Riverside Drive
Int. No. 13: Woodman Avenue/US 101 Westbound Ramps
Int. No. 15: Woodman Avenue/Moorpark Street

Environmental impacts to traffic in the project area could occur as a result of the Proposed Project. However, potential impacts would be reduced to a less than significant level with the incorporation of the recommended mitigation measures. One key factor for reduction of potential impacts is the City's installation of LADOT's ATCS at a number of the study intersections. As discussed above, the City has stated it will use its share of State funds to synchronize every traffic signal in Los Angeles. Technically, per LADOT's November 2007

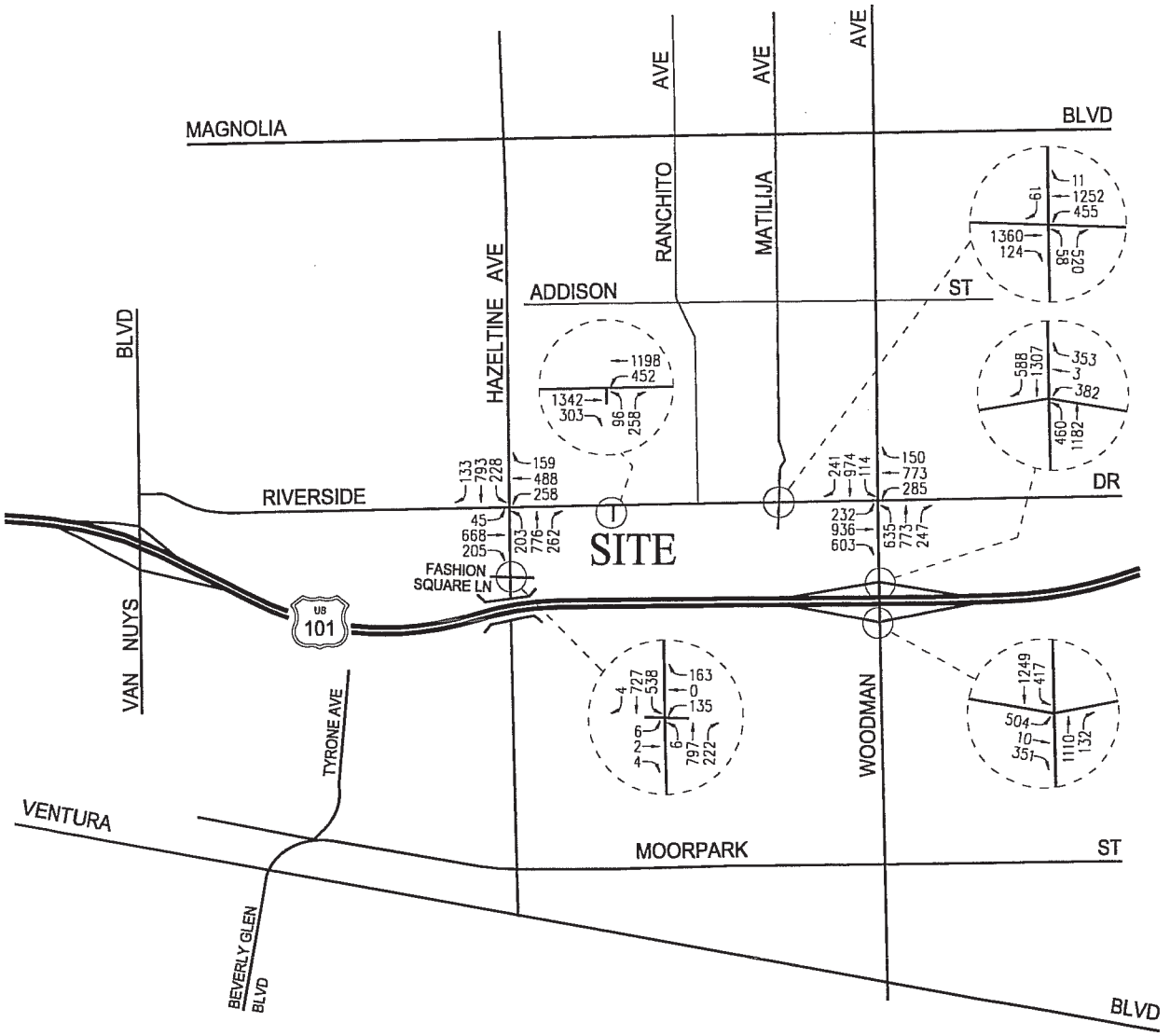


FIGURE 62

FUTURE WITH PROJECT TRAFFIC VOLUMES – SATURDAY MID-DAY PEAK HOUR

NORTH

MAP SOURCE: LINSCOTT, LAW & GREENSPAN, ENGINEERS

directive, ATSAC/ATCS is no longer available as a mitigation option due to the full funding of the ATSAC/ATCS program for the entire City. Prior to November 2007 directive, the project applicant paid for the upgrading of the seven intersections identified above. Mitigation measures at significantly impacted intersections are recommended, and the resultant residual impact is indicated, as follows:

Intersection No. 1 - Van Nuys Boulevard / Riverside Drive

The Applicant has provided funding for the installation of LADOT's ATCS at this intersection, which is planned as part of the Victory ATSAC system. As shown in *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*, the proposed mitigation is expected to improve the V/C ratios to 0.890 (LOS D) from 0.920 (LOS E) during the P.M. peak hour. Thus, the significant impact at this intersection during the P.M. peak hours would be reduced to a less than significant level.

Intersection No. 4 - Tyrone Avenue / Moorpark Street

The Applicant has provided funding for the installation of LADOT's ATCS at this intersection, which is planned as part of the Victory ATSAC system. As shown in *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*, the proposed mitigation is expected to improve the V/C ratios to 0.964 (LOS E) from 0.994 (LOS E) during the P.M. peak hour. Thus, the significant impact at this intersection during the P.M. peak hours would be reduced to a less than significant level.

Intersection No. 7 - Hazeltine Avenue / Riverside Drive

The Applicant has provided funding for the installation of LADOT's ATCS at this intersection, which is planned as part of the Victory ATSAC system. As shown in *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*, the proposed mitigation is expected to improve the V/C ratios to 0.819 (LOS D) from 0.849 (LOS D) during the P.M. peak hour. As shown in *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*, the proposed mitigation is expected to improve the V/C ratio to 0.812 (LOS D) from 0.842 (LOS D) during the Saturday mid-day peak hour. Thus, the significant impact at this intersection during the weekday P.M. peak hours and the Saturday mid-day peak hour would be reduced to less than significant levels.

Intersection No. 8 - Hazeltine Avenue/Fashion Square Lane

The Applicant has provided funding for the installation of LADOT's ATCS at this intersection, which is planned as part of the Victory ATSAC system. As shown in *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*, the proposed mitigation is expected to improve the V/C ratio to 0.734 (LOS C) from 0.764 (LOS C) during the Saturday mid-day peak hour. Thus, the significant impact at this intersection during the Saturday mid-day peak hour would be reduced to less than significant levels.

Intersection No. 12 - Woodman Avenue / Riverside Drive

The Applicant has provided funding for the installation of LADOT's ATCS at this intersection, which is planned as part of the Victory ATSAC system. As shown in *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*, the proposed mitigation is expected to improve the V/C ratios to 1.016 (LOS F) from 1.117 (LOS F) during the A.M. peak hour and ratio to 0.986 (LOS E) from 1.038 (LOS F) during the P.M. peak hour.

In addition, redesignate the curb lane on the southbound approach on Woodman Avenue to an optional through/right-turn lane. The resultant lane configurations at the southbound approach will be one left-turn lane, two through lanes and one optional through/right-turn lane. If required by LADOT, the existing four-foot wide median island on the south leg of the intersection could be replaced by striping and/or lane delineators (e.g., two feet wide or less) so that additional width could be provided to the existing three southbound Woodman Avenue through lanes on the departure side of the intersection[8]. As shown in *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*, the proposed additional mitigation is expected to improve the V/C ratio to 0.997 (LOS E) from 1.086 (LOS F) during the Saturday mid-day peak hour.

With these mitigations, the significant impact at this intersection during the weekday A.M. and P.M. peak hours and the Saturday mid-day peak hour would be reduced to less than significant levels.

Intersection No. 13 - Woodman Avenue / US 101 Westbound Ramps

The Applicant has provided funding for the installation of LADOT's ATCS at this intersection, which is planned as part of the Victory ATSAC system. As shown in *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*, the proposed mitigation is expected to improve the V/C ratios to 0.823 (LOS D) from 0.853 (LOS D) during the PM peak hour. As shown in *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hours*, the proposed mitigation is expected to improve the V/C ratio to 0.870 (LOS D) from 0.900 (LOS D) during the Saturday mid-day peak hour. Thus, the significant impact at this intersection during the weekday P.M. peak and Saturday mid-day peak hour would be reduced to less than significant levels.

Intersection No. 15 - Woodman Avenue / Moorpark Street

The Applicant has provided funding for the installation of LADOT's ATCS at this intersection, which is planned as part of the Victory ATSAC system. As shown in *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*, the proposed mitigation is expected to improve the V/C ratios to 0.987 (LOS E) from 1.017 (LOS F) during the P.M. peak hour. Thus, the significant impact at this intersection during the P.M. peak hour would be reduced to a less than significant level.

[8] In addition, LADOT recommends that left-turns from northbound Woodman Avenue to La Maida Street be restricted during the weekday PM peak period. LADOT will review the Woodman Avenue/La Maida Street intersection if additional turn restrictions are required.

Non-Required Project Mitigation

While not required for traffic mitigation purposes, the traffic study (attached Appendix I: Traffic Study) and traffic signal warrants analysis prepared for the Proposed Project recommended that consideration be given to installation of traffic signals at the two new Proposed Project driveways on Riverside Drive. Based on discussions with LADOT staff, traffic signal warrant analyses have been prepared for the Matilija Avenue-New Fashion Square Easterly Driveway/Riverside Drive intersection and the New Fashion Square Westerly Driveway/Riverside Drive intersection (Tunnel Access), associated with the Proposed Project. These new traffic signals would facilitate vehicular movements to and from the shopping center site, particularly with consideration to the new driveway configurations and parking distribution.

(b) Street and Freeway Capacity

Neighborhood Street Segment Analysis

To address the issue of non-residential traffic using local streets in the neighborhoods adjacent to the shopping center, the traffic study included analysis of two local residential street segments located near the project site. The street segments included (1) Ranchito Avenue north of Riverside Drive and (2) Matilija Avenue north of Riverside Drive.

The significance of potential project-related impacts at the studied street segments was identified using criteria set forth in the LADOT's *Traffic Study Policies and Procedures*, March, 2002. According to the City's published traffic study guidelines, a traffic impact on a local residential street shall be deemed significant based on an increase in the project Average Daily Traffic (ADT) volumes as shown in *Table 47: Local Residential Street Segment Impact Threshold Criteria*.

TABLE 47
LOCAL RESIDENTIAL STREET SEGMENT IMPACT THRESHOLD CRITERIA

PROJECTED AVERAGE DAILY TRAFFIC WITH PROJECT (FINAL ADT)	PROJECT-RELATED INCREASE IN ADT
0 to 999	16% or more of Final ADT
1,000 or more	12% or more of Final ADT
2,000 or more	10% or more of Final ADT
3,000 or more	8% or more of Final ADT

The forecast traffic conditions at the analyzed street segment for existing, future pre-project, and future with-project scenarios are summarized in *Table 48: Neighborhood Street Segment Analysis Summary*. The actual 24-hour count data was utilized to evaluate the existing conditions[9]. As shown in Column [2] of *Table 48: Neighborhood Street Segment Analysis Summary*, for purposes of estimating future pre-project traffic volume, a two percent (2.0%) annual growth rate through the year 2012 was conservatively added to the existing ADT volume to account for traffic generated by the related projects, as well as increases in general ambient traffic.

[9] The traffic count data was increased at a rate of two percent (2.0%) per year to reflect year 2007 conditions.

TABLE 48
NEIGHBORHOOD STREET SEGMENT ANALYSIS SUMMARY

NO	STREET SEGMENT	YEAR 2007 EXISTING 24-HOUR VOLUME [1]	YEAR 2012 FUTURE PRE-PROJECT VOLUME [2]	PROPOSED PROJECT DISTRIBUTION [3]		DAILY PROJECT BUILD-OUT TRIP ENDS [4]	YEAR 2012 FUTURE WITH PROJECT [(2) + (4)] [5]	PERCENT ADT INCREASE WITH PROJECT [6]	SEGMENT IMPACT [7]
				IN	OUT				
1	Ranchito Ave north of Riverside Dr	1,568	1,725	2.0%	2.0%	99	1,824	5.4%	NO
2	Matilija Ave north of Riverside Dr	802	882	0.0%	0.0%	0	882	0.0%	NO

[1] The existing average daily traffic (ADT) volume was determined based on a count conducted by City Traffic Counters. An ambient growth rate of two percent (2.0%) per year was assumed to derive the year 2007 existing conditions. A copy of the ADT summary data worksheet is provided in the traffic study.
[2] An ambient growth rate of two percent (2.0%) per year was assumed to derive the year 2012 future pre-project volume.
[3] Distribution of inbound and outbound daily project traffic at the analyzed street segment.
[4] Project build-out daily trip ends include inbound and outbound trips based on a net increase of 4,964 daily trips.
[5] Total of columns [2] and [4].
[6] The ADT percentage increase due to project traffic was calculated by dividing [4] by [5].
[7] According to LADOT's "Traffic Study Policies & Procedures," March, 2002, Page 10:"A local residential street shall be deemed significantly impacted based on an increase in the projected average daily traffic (ADT) volumes." See Table 47: Local Residential Street Segment Impact Threshold Criteria.

As presented in Column [5] of *Table 48: Neighborhood Street Segment Analysis Summary*, the Proposed Project daily trips will incrementally affect traffic volumes on the analyzed street segments. As shown in *Table 48: Neighborhood Street Segment Analysis Summary*, application of LADOT's threshold criteria for local residential street segment analysis indicates that the Proposed Project is not anticipated to significantly impact the analyzed street segment.

Congestion Management Program Traffic Impact Assessment

As required by the 2004 Congestion Management Program for Los Angeles County, a Traffic Impact Assessment (TIA) has been prepared to determine the potential impacts on designated monitoring locations on the CMP highway system. The analysis has been prepared in accordance with procedures outlined in the *2004 Congestions Management Program for Los Angeles County*, County of Los Angeles Metropolitan Transportation Authority, July, 2004.

According to Section B.9.1 (Appendix B, Page B-6) of the 2004 CMP manual, the criteria for determining a significant impact are as follows:

"A significant transportation impact occurs when the Proposed Project increases traffic demand by 2% of capacity (V/C≥0.02), causing or worsening LOS F (V/C≥1.00)."

The CMP impact criteria apply for analysis of both intersection and freeway monitoring locations.

The following CMP intersection monitoring locations have been identified in the project vicinity:

CMP Stations	Intersection
No. 74	Ventura Boulevard/Laurel Canyon Boulevard
No. 76	Ventura Boulevard/Sepulveda Boulevard
No. 78	Ventura Boulevard/Woodman Avenue (Study Int No. 16)

The CMP TIA guidelines require that intersection monitoring locations must be examined if the Proposed Project will add 50 or more trips during either the A.M. or P.M. weekday peak hours. The Proposed Project will not add 50 or more trips during the A.M. or P.M. Peak hours at any of the AMP monitoring intersections which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. No further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

The Woodman Avenue/Ventura Boulevard intersection was analyzed as part of the traffic study and was evaluated using the CMA method of analysis which determines Volume-to-Capacity (V/C) ratios on a critical lane basis. The overall intersection V/C ratio is subsequently assigned a Level of Service (LOS) value to describe intersection operations. A summary of the V/C ratios and LOS values for this intersection during the A.M. and P.M. peak hours is shown in *Table 45: Summary of Volume to Capacity Ratios and Level of Service Weekday AM and PM Peak Hours*. The project is not expected to create a significant impact at the Woodman Avenue/Ventura Boulevard intersection based on the CMP significant impact criteria. No further review of potential impacts to intersection monitoring locations that are part of the CMP system is required.

The following CMP freeway monitoring location has been identified in the project area:

CMP Station	Segment
Segment No. 1038	US 101 Freeway at Coldwater Canyon Avenue

The CMP TIA guidelines require that freeway monitoring locations must be examined if the Proposed Project will add 150 or more trips (in either direction) during either the A.M. or P.M. weekday peak periods. The Proposed Project will not add 150 or more trips (in either direction) during either the A.M. or P.M. weekday peak hours to the CMP freeway monitoring location which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. The project is forecast to add four (4) eastbound trips and seven (7) westbound trips to the freeway monitoring location during the A.M. peak hour. During the P.M. peak hour, an additional 30 eastbound trips and 27 westbound trips are forecast at the monitoring location due to the project. These forecast additional trips are substantially less than the CMP threshold for additional analysis. No further review of potential impacts to freeway monitoring locations which are part of the CMP highway system is required.

(c) Project Access and Neighborhood Intrusion

The Proposed Project proposes a revised access scheme that would enhance access at the Hazeltine Avenue south project driveway and consolidate and restructure the Riverside Drive

project driveway. The portions of the site access that are being upgraded or altered under the project are shown in *Figure 13: Site Access and Driveways – Proposed Internal Circulation*, *Figure 14: Site Access and Driveways – Proposed Hazeltine Access*, and *Figure 15: Site Access and Driveways – Proposed Riverside Access* (see Section II: Project Description). The Hazeltine Avenue south driveway ingress would be expanded to two lanes and parking spaces along the ingress/egress removed thereby providing a more efficient and safer access at this location.

The Proposed Project includes an improved Riverside Drive entrance which will provide for better circulation along Riverside Drive and within the shopping center, including direct access to the parking structures. This improvement includes installation of a new traffic signal and safer pedestrian crossing at the main shopping center entrances. The new Riverside Drive project driveway would be located on the eastern side of the site, between the locations of the two existing driveways that would be replaced by the new consolidated driveway. The Proposed Project would result in a less than significant impact due to the substantial increase in hazards due to design features or incompatible uses.

The Proposed Project includes expansion of the shopping center at the project site and will not exceed the existing project site boundaries. The project will not alter existing public roadways and will not introduce new roadways into the project area. All buildings and access points/roadways would be designed to provide daily emergency access. Buildings on, and access to the project site, will comply with all Building Code and Municipal Code regulations. All emergency access roadways will remain open and functional during construction and operation of the shopping center.

The Proposed Project is designed to meet the access requirements of the City Fire and Police Departments. Current project design does not include gates, tunnels, or public street closures. The Proposed Project includes an improved Riverside Drive entrance which will provide for better circulation along Riverside Drive and within the shopping center. This improvement includes installation of a new traffic signal at the main shopping center entrance on Riverside Drive which will enhance emergency access at the site. The Proposed Project will result in a less than significant impact to emergency access.

Although adequate access from public streets will be provided with the Proposed Project, surrounding residents have expressed concern that Fashion Square patrons may nonetheless use adjacent residential streets as a "short cut" to access shopping center. It is anticipated that the access, circulation and parking enhancements will provide sufficient incentive for patrons to access the shopping center from local arterial roadways. Further, several measures to address pass-through traffic, neighborhood protection and traffic calming (such as restricted access to Matilija Avenue from Riverside Drive) are proposed to address project traffic. Neighborhood intrusion from pass-through traffic is anticipated to be less than significant with the proposed modifications to the Riverside Drive project driveway and the restricted access to Matilija Avenue. Although there is no anticipated significant increase in neighborhood intrusion from the project, the applicant is proposing to fund a Neighborhood Protection Plan. The plan will include funding for the study and implementation of measures such as speed humps, stop signs, and traffic collars to provide additional disincentive from driving through or parking in adjacent neighborhood north of the center.

(d) Transit System

As required by the 2004 Congestion Management Program for Los Angeles County, a review has been made of the CMP transit service. Transit service is currently provided in the project vicinity. The project trip generation was adjusted by values set forth in the CMP to estimate transit trip generation. Pursuant to the CMP guidelines, the Proposed Project is forecast to generate demand for 5 net new transit trips (3 inbound trips and 2 outbound trips) during the weekday A.M. peak hour and 23 net new trips (11 inbound trips and 12 outbound trips) in the weekday P.M. peak hour. Over a 24-hour period, the Proposed Project is forecast to generate a demand for 243 daily transit trips[10]. It is anticipated that the existing transit service will adequately accommodate the project generated transit trips. As a result, the project will result in a less than significant impact on existing or future transit services in the project area.

(e) Parking

The Proposed Project includes a request for shared parking across the entire shopping center site. As part of this request, a shared parking analysis was completed by Linscott, Law & Greenspan, Traffic Engineers (see Appendix I: Traffic Study), per Section 12.21.A.4 of the LAMC. The analysis, discussed in further detail below, indicates that the Proposed Project will result in a less than significant parking impact.

The purpose of a shared parking analysis is to evaluate whether a combination of compatible land uses in a single development would support an anticipated parking demand that would be less than that required for separate free-standing land uses of similar types. The Proposed Project requests the Zoning Administrator to issue a finding that Shared Parking is applicable to the project under the provisions of Section 12.24.X.20 of the LAMC.

Prior development approvals at the shopping center (under ZA-95-0899-CUZ and CPC-94-0287-ZC) established a parking requirement for the entire site at 4.5 parking spaces per 1,000 square feet of gross leasable square footage (GLSF) which is applicable, but not limited to, retail, restaurant, and office uses. Existing development at the shopping center totals approximately 867,000 GLSF of floor area, yielding a current parking requirement of approximately 3,902 parking spaces on-site which are currently provided on-site in parking structures and surface parking.

Existing Parking Utilization

To determine the adequacy of the existing parking requirement (4.5 parking spaces per 1,000 GLSF), observations of parking demand were conducted at the shopping center during the 2005 holiday shopping period and 2006 holiday shopping period on three days of typically high patronage: the day after Thanksgiving, the last full Saturday shopping day before Christmas, and the day after Christmas. Peak parking demand observed at the shopping center during each of the three days is as follows:

[10]AM Peak Hour Trips = 95 * 1.14 * .0.35 = 5 transit trips; PM Peak Hour Trips = 476 * 1.4 * 0.035 = 23 transit trips; Daily Trips = 4,964 * 1.4 * 0.035 = 243 transit trips

- 2005 Friday after Thanksgiving: 3,424 spaces (observed at 2:00 P.M.)
- 2006 Friday after Thanksgiving: 3,309 spaces (observed at 2:00 P.M.)
- 2005 Saturday before Christmas: 3,370 spaces (observed at 4:00 P.M.)
- 2006 Saturday before Christmas: 3,354 spaces (observed at 4:00 P.M.)
- 2005 Day after Christmas: 3,594 spaces (observed at 2:00 P.M.)
- 2006 Day after Christmas: 3,402 spaces (observed at 2:00 P.M.)

Based on the existing 867,000 GLSF, the average peak parking demand at the shopping center during the 2005 and 2006 holiday season (3,498 parking spaces on December 26th) was equivalent to approximately 4.03 spaces per 1,000 GLSF. The observed peak parking rate is less than the current requirement to provide 4.5 parking spaces per 1,000 square feet of GLSF. It is noted that during the 2005 and 2006 holiday seasons that shopping center employees were parked on-site (primarily in the existing surface parking area near the Woodman Avenue driveway).

Code Parking Calculation for Proposed Project

The Proposed Project will provide 355,227 square feet of new retail space and 71,329 square feet of new restaurant space per LAMC[11]. This new development will be in addition to the existing 988,116 square feet of commercial floor area. Per the LAMC parking requirements, the Proposed Project would be required to provide 1 parking space per 250 SF of retail floor area and 1 parking space per 100 SF of restaurant floor area. Based on the parking rates provided in the LAMC, the calculated parking for the project is as follows:

- New Retail (1 space/250 SF for 355,227 SF): 1,421 parking spaces
- New Restaurants (1 space/100 SF for 71,329 SF): 713 parking spaces
- Existing shopping center (by permit): 3,902 parking spaces
- Total calculated project parking by Code: 6,036 parking spaces

Based on these calculations, the Proposed Project would require provision of approximately new additional 2,134 parking spaces. Combined with the 3,902 parking spaces required for the existing development, a total of 6,036 parking spaces would be required site-wide based on LAMC requirements without Shared Parking. Based on the existing parking requirement of 4.5 parking spaces per 1,000 GLSF, approximately 5,162 spaces would be required site-wide under the Proposed Project.

The Proposed Project proposes to provide parking that is less than the number of parking spaces that would otherwise be required under Section 12.21.A.4 of the LAMC. Specifically, the Proposed Project would to provide parking at a rate of up to 4.5 parking spaces per 1,000 square feet of gross leasable floor area (i.e., 5,148 spaces based on a total center of 1,147,000 gross leasable square feet) with the potential to provide parking at a maximum rate of 4.5 parking

[11]All floor areas in this section as defined by the Los Angeles Municipal Code.

spaces per 1,000 square feet of gross leasable floor area (i.e., 5,162 spaces based on a total center of 1,147,000 gross leasable square feet). Thus, the project will request the Planning Department to issue a finding that Shared Parking is applicable to the project under the provisions of Section 12.24.X.20 of the LAMC.

Shared Parking Demand Analysis

The basis for reduced parking under the Shared Parking provisions in the LAMC is demonstrated by the shared parking analysis which has been prepared based on data published in the second edition of the Shared Parking manual published by the Urban Land Institute (ULI)[12], and supplemented by the observations of existing parking demand at the site which together demonstrate the adequacy of the proposed on-site parking supply for the project.

The analysis is consistent with methodology used by the City of Los Angeles in the review and approval of share parking applications for other major retail centers. The Shared Parking manual provides recommendations with respect to the following characteristics of parking demand at shopping centers:

Hourly Parking Indices: The *Shared Parking* manual provides hourly parking indices for various land uses. For the shopping center, the hourly parking indices for retail, and restaurants (sit-down and fast-food type restaurants) were utilized. The indices show, for example, that the hourly parking demand for retail (which generates peak parking demand during the early afternoon period) is different than the parking demand seen at sit-down type restaurants (which generates peak parking demand in evening hours).

Day of Week Parking Variations: The *Shared Parking* manual provides recommendations for day of week parking factors. For example, retail and restaurants uses generate their peak parking demand during weekends.

Monthly Parking Variations: The *Shared Parking* manual considers that some uses have substantial parking variations based on the month of the year. Retails uses, for example typically generates its highest parking demand in December while restaurants have a generally consistent parking demand throughout the year.

Internal Capture: Parking demand at mixed-use centers can be reduced through internal capture characteristics. For example, a person working in a retail establishment within a mall may walk to the restaurants in the center to eat during lunch. The Shared Parking manual indicates that parking demand may be reduced by at least 10% at a mixed-use center based on these internal capture characteristics.

Shared Parking Demand Analysis for Existing Conditions

A shared parking demand analysis has been prepared for existing conditions at shopping center to demonstrate the validity of the parking indices provided in the ULI Shared Parking manual.

[12]Smith, Mary S., et al. 2005. *Shared Parking, Second Edition*. Washington D.C.: Urban Land Institute (ULI). 12 June 2008 <http://www.uli.org/AM/Template.cfm?Section=Bookstore&Template=Ecommerce/ProductDisplay.cfm&Productid=1495>.

Land uses utilized the shared parking analysis included approximately 842,045 GLSF of retail and approximately 24,955 GLSF of restaurant uses (i.e., 20,275 GLSF of "fast food" restaurant and 4,680 GLSF of "family" restaurant).

Observations of existing parking utilization were conducted at the shopping center during the 2005 and 2006 holiday seasons (see above). Accordingly, the shared parking analysis was prepared for a December weekday and weekend condition for the existing floor area. As shown in *Table 49: Weekday Shared Parking Demand Analysis Existing Conditions (December)*, a peak parking demand for 3,193 parking spaces (at 1:00 P.M.) is forecast for a weekday while *Table 50: Weekend Shared Parking Demand Analysis Existing Conditions (December)*, shows a peak parking demand for 3,476 parking spaces (at 2:00 P.M.). By comparison, during the most recent 2005 and 2006 holiday seasons, an average peak parking demand of 3,367 spaces as observed on the Friday after Thanksgiving, an average peak parking demand for 3,362 spaces as observed on the Saturday before Christmas and an average peak parking demand for 3,498 spaces as observed on the day after Christmas. Thus, the parking demand model developed for the shopping center using the ULI methodology is highly correlated to the observed parking demand during the 2005 and 2006 holiday seasons. It is concluded that the shared parking methodology provides a reasonable model for purposes for forecasting future parking demand at build-out of the Proposed Project.

TABLE 49
WEEKDAY SHARED PARKING DEMAND ANALYSIS EXISTING CONDITIONS (DECEMBER) [1]

LAND USE	RETAIL	FAMILY RESTAURANT	FAST-FOOD RESTAURANT	SHARED PARKING DEMAND	COMPARISON W/PARKING SUPPLY OF 3,902 SPACES
Size	842.0 KSF	4.7 KSF	20.3 KSF		
Peak Pkg Rate [2]	4.0 /KSF	15.0 /KSF	15.0 /KSF		
Weekday Pkg Rate [3]	3.6 /KSF	10.5 /KSF	15.0 /KSF		
Gross Spaces	3,031	49	304		
Adjusted Gross Spaces [4]	2,879	44	274		
TIME OF DAY	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**		**SURPLUS (DEFICIENCY)**
6:00 A.M.	79	13	18	110	3,792
7:00 A.M.	200	24	31	255	3,647
8:00 A.M.	572	28	59	659	3,243
9:00 A.M.	1,232	34	86	1,352	2,550
10:00 A.M.	1,983	38	159	2,180	1,722
11:00 A.M.	2,503	40	239	2,782	1,120
12:00 P.M.	2,763	44	274	3,081	821
1:00 P.M.	2,879	40	274	3,193	709
2:00 P.M.	2,763	25	249	3,037	865
3:00 P.M.	2,647	22	169	2,838	1,064
4:00 P.M.	2,647	22	153	2,822	1,080
5:00 P.M.	2,735	35	169	2,939	963
6:00 P.M.	2,735	36	235	3,006	896
7:00 P.M.	2,735	36	223	2,994	908

TABLE 49 (CONTINUED)
WEEKDAY SHARED PARKING DEMAND ANALYSIS EXISTING CONDITIONS (DECEMBER) [1]

LAND USE	RETAIL	FAMILY RESTAURANT	FAST-FOOD RESTAURANT		COMPARISON W/PARKING SUPPLY OF 3,902 SPACES
Size Peak Pkg Rate [2]	842.0 KSF 4.0 /KSF	4.7 KSF 15.0 /KSF	20.3 KSF 15.0 /KSF		
Weekday Pkg Rate [3]	3.6 /KSF	10.5 /KSF	15.0 /KSF		
Gross Spaces	3,031	49	304		
Adjusted Gross Spaces [4]	2,879	44	274		
TIME OF DAY	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**SHARED PARKING DEMAND**	**SURPLUS (DEFICIENCY)**
8:00 P.M.	2,359	36	142	2,537	1,365
9:00 P.M.	1,580	28	86	1,694	2,208
10:00 P.M.	920	25	59	1,004	2,898
11:00 P.M.	316	23	31	370	3,532
12:00 A.M.	0	12	20	32	3,870

[1] Source: ULI - Urban Land Institute "Shared Parking," Second Edition, 2005.
[2] Peak parking rates for all land uses based on the recommended base parking ratios as contained in Table 2-2 of the "Shared Parking" manual.
[3] Weekday parking rates based on the weekday parking demand ratios, as summarized in Table 2-2 of the "Shared Parking" manual.
[4] Gross spaces adjusted to reflect parking demand reduction due to captive market, internal capture, transit, and/or walk-in reduction.

TABLE 50
WEEKEND SHARED PARKING DEMAND ANALYSIS EXISTING CONDITIONS (DECEMBER) [1]

LAND USE	RETAIL	FAMILY RESTAURANT	FAST-FOOD RESTAURANT		COMPARISON W/PARKING SUPPLY OF 3,902 SPACES
Size Peak Pkg Rate [2]	842.0 KSF 4.0 /KSF	4.7 KSF 15.0 /KSF	20.3 KSF 15.0 /KSF		
Weekend Pkg Rate [3]	4.0 /KSF	15.0 /KSF	14.0 /KSF		
Gross Spaces	3,368	70	284		
Adjusted Gross Spaces [4]	3,200	63	256		
TIME OF DAY	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**SHARED PARKING DEMAND**	**SURPLUS (DEFICIENCY)**
6:00 A.M.	90	10	17	117	3,785
7:00 A.M.	224	21	29	274	3,628
8:00 A.M.	512	32	55	599	3,303
9:00 A.M.	1,248	46	81	1,375	2,527
10:00 A.M.	1,824	58	148	2,030	1,872
11:00 A.M.	2,272	58	223	2,553	1,349
12:00 P.M.	2,688	63	256	3,007	895
1:00 P.M.	2,944	55	256	3,255	647
2:00 P.M.	3,200	44	232	3,476	426
3:00 P.M.	3,200	29	157	3,386	516
4:00 P.M.	3,072	31	142	3,245	657
5:00 P.M.	2,912	41	157	3,110	792
6:00 P.M.	2,592	47	219	2,858	1,044
7:00 P.M.	2,432	47	208	2,687	1,215

TABLE 50 (CONTINUED)
WEEKEND SHARED PARKING DEMAND ANALYSIS EXISTING CONDITIONS (DECEMBER) [1]

LAND USE	RETAIL	FAMILY RESTAURANT	FAST-FOOD RESTAURANT		COMPARISON W/PARKING SUPPLY OF 3,902 SPACES
Size Peak Pkg Rate [2]	842.0 KSF 4.0 /KSF	4.7 KSF 15.0 /KSF	20.3 KSF 15.0 /KSF		
Weekend Pkg Rate [3]	4.0 /KSF	15.0 /KSF	14.0 /KSF		
Gross Spaces	3,368	70	284		
Adjusted Gross Spaces [4]	3,200	63	256		
TIME OF DAY	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**SHARED PARKING DEMAND**	**SURPLUS (DEFICIENCY)**
8:00 P.M.	2,144	44	132	2,320	1,582
9:00 P.M.	1,696	23	81	1,800	2,102
10:00 P.M.	1,184	20	55	1,259	2,643
11:00 P.M.	480	14	29	523	3,379
12:00 A.M.	0	8	18	26	3,876

[1] Source: ULI - Urban Land Institute "Shared Parking," Second Edition, 2005.
[2] Peak parking rates for all land uses based on the recommended base parking ratios as contained in Table 2-2 of the "Shared Parking" manual.
[3] Weekday parking rates based on the weekday parking demand ratios, as summarized in Table 2-2 of the "Shared Parking" manual.
[4] Gross spaces adjusted to reflect parking demand reduction due to captive market, internal capture, transit, and/or walk-in reduction

Shared Parking Demand Analysis for Future Conditions

A shared parking demand analysis has been prepared for future conditions at the shopping center following build-out of the Proposed Project. Land uses utilized the shared parking analysis for future conditions included approximately 1,075,223 GLSF of retail and approximately 71,777 GLSF of restaurant uses (i.e., 39,097 GLSF of "fast food" restaurant, 4,680 GLSF of "family" restaurant, and 28,000 GLSF of "fine/casual dining" restaurant). The forecast parking demand based on the shared parking analysis has been compared to a proposed parking supply of 5,148 parking spaces, which is equivalent to a ratio of up to 4.5 parking spaces per 1,000 gross leasable square feet.

The shared parking analysis has been prepared for weekday and weekend conditions. Further, evaluations have been prepared for both non-holiday month conditions (e.g., July), as well as holiday conditions. Hourly parking forecasts have been prepared from 6:00 a.m. to 12:00 a.m. for each of the analysis days to evaluate parking demand during operating hours of the center during typical (non-holiday) and non-typical (holiday) conditions. The analysis is deemed to be in compliance with the requirements of Section 12.24.X.20 of the LAMC whereby a review of parking demand for "24 hours per day, for seven consecutive days" is required. It is noted that the parking demand forecasts account for parking generated by both shopping center employees and patrons.

Table 51: Weekday Shared Parking Demand Analysis Future Conditions (July) and *Table 52: Weekend Shared Parking Demand Analysis Future Conditions (July)* provide the weekday and weekend, respectively, shared parking analysis for the shopping center for a non-holiday month (i.e., July). For a weekday condition in July, *Table 51: Weekday Shared Parking Demand Analysis Future Conditions (July)* indicates a peak demand for approximately 3,371 parking spaces at 1:00 P.M. which can be accommodated by the proposed supply of 5,148 spaces. *Table*

52: Weekend Shared Parking Demand Analysis Future Conditions (July) shows a peak demand for 3,474 parking spaces at 2:00 P.M. for a weekend condition during the non-holiday season which can be accommodated by the proposed supply of 5,148 spaces. This includes parking of all employees on site. Even with a the requested parking ratio reduction, the Proposed Project would result in a substantial surplus in parking at the site during non-holiday periods (i.e., a minimum surplus of over 1,500 parking spaces during weekdays and over 1,400 parking spaces during weekends).

TABLE 51
WEEKDAY SHARED PARKING DEMAND ANALYSIS FUTURE CONDITIONS (JULY) [1]

LAND USE	RETAIL	FINE/CASUAL DINING	FAMILY RESTAURANT	FAST-FOOD RESTAURANT	SHARED PARKING DEMAND	COMPARISON W/PARKING SUPPLY OF 5,148 SPACES
Size	1,075.2 KSF	28.0 KSF	4.7 KSF	39.1 KSF		
Peak Pkg Rate [2]	4.0 /KSF	20.0 /KSF	15.0 /KSF	15.0 /KSF		
Weekend Pkg Rate [3]	3.6 / KSF	18.0 /KSF	10.5 /KSF	15.0 /KSF		
Gross Spaces	3,871	504	49	586		
Adjusted Gross Spaces [4]	3,677	454	44	527		
TIME OF DAY	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**		**SURPLUS (DEFICIENCY)**
6:00 A.M.	76	0	12	34	122	5026
7:00 A.M.	181	14	24	60	279	4869
8:00 A.M.	513	35	27	112	687	4461
9:00 A.M.	1,092	52	33	164	1,341	3807
10:00 A.M.	1,718	119	38	300	2,175	2973
11:00 A.M.	2,154	213	40	452	2,859	2289
12:00 P.M.	2,373	345	43	518	3,279	1869
1:00 P.M.	2,468	345	40	518	3,371	1777
2:00 P.M.	2,373	307	25	470	3,175	1973
3:00 P.M.	2,278	203	22	318	2,821	2327
4:00 P.M.	2,278	241	22	288	2,829	2319
5:00 P.M.	2,344	352	34	318	3,048	2100
6:00 P.M.	2,344	427	36	444	3,251	1897
7:00 P.M.	2,344	446	36	422	3,248	1900
8:00 P.M.	2,032	446	36	267	2,781	2367
9:00 P.M.	1,377	446	27	164	2,014	3134
10:00 P.M.	798	427	24	112	1,361	3787
11:00 P.M.	276	342	23	60	701	4447
12:00 A.M.	0	118	11	38	167	4981

[1] Source: ULI - Urban Land Institute "Shared Parking," Second Edition, 2005.
[2] Peak parking rates for all land uses based on the recommended base parking ratios as contained in Table 2-2 of the "Shared Parking" manual.
[3] Weekday parking rates based on the weekday parking demand ratios, as summarized in Table 2-2 of the "Shared Parking" manual.
[4] Gross spaces adjusted to reflect parking demand reduction due to captive market, internal capture, transit, and/or walk-in reduction.

Table 53: Weekday Shared Parking Demand Analysis Future Conditions (December) and *Table 54: Weekend Shared Parking Demand Analysis Future Conditions (December)* provide the December shared parking analysis for weekday and weekend conditions, respectively. For a weekday condition in December, *Table 53: Weekday Shared Parking Demand Analysis Future Conditions (December)* indicates a peak demand for approximately 4,595 parking spaces at 1:00 P.M. which can be accommodated by the proposed supply of 5,148 spaces. *Table 54: Weekend Shared Parking Demand Analysis Future Conditions (December)* shows a peak demand for 4,827 parking spaces at 2:00 P.M. for a weekend condition during the holiday season which can be accommodated by the proposed supply of 5,148 spaces. This includes parking of all employees on site.

TABLE 52
WEEKEND SHARED PARKING DEMAND ANALYSIS FUTURE CONDITIONS (JULY) [1]

LAND USE	RETAIL	FINE/CASUAL DINING	FAMILY RESTAURANT	FAST-FOOD RESTAURANT	SHARED PARKING DEMAND	COMPARISON W/PARKING SUPPLY OF 5,148 SPACES
Size Peak Pkg Rate [2]	1,075.2 KSF 4.0 /KSF	28.0 KSF 20.0 /KSF	4.7 KSF 15.0 /KSF	39.1 KSF 15.0 /KSF		
Weekend Pkg Rate [3]	4.0 /KSF	20.0 /KSF	15.0 /KSF	14.0 /KSF		
Gross Spaces	4,301	560	70	547		
Adjusted Gross Spaces [4]	4,086	504	63	492		
TIME OF DAY	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**		**SURPLUS (DEFICIENCY)**
6:00 A.M.	86	0	10	32	128	5020
7:00 A.M.	203	15	20	55	293	4855
8:00 A.M.	470	23	32	104	629	4519
9:00 A.M.	1,118	46	45	152	1,361	3787
10:00 A.M.	1,602	57	57	280	1,996	3152
11:00 A.M.	1,981	120	57	422	2,580	2568
12:00 P.M.	2,328	267	62	484	3,141	2007
1:00 P.M.	2,537	288	54	484	3,363	1785
2:00 P.M.	2,746	246	43	439	3,474	1674
3:00 P.M.	2,746	246	28	297	3,317	1831
4:00 P.M.	2,642	246	31	269	3,188	1960
5:00 P.M.	2,504	328	41	297	3,170	1978
6:00 P.M.	2,230	453	46	415	3,144	2004
7:00 P.M.	2,092	474	46	394	3,006	2142
8:00 P.M.	1,850	495	43	249	2,637	2511
9:00 P.M.	1,471	453	23	152	2,099	3049
10:00 P.M.	1,026	453	19	104	1,602	3546
11:00 P.M.	412	442	14	55	923	4225
12:00 A.M.	0	248	8	35	291	4857

[1] Source: ULI - Urban Land Institute "Shared Parking," Second Edition, 2005.
[2] Peak parking rates for all land uses based on the recommended base parking ratios as contained in Table 2-2 of the "Shared Parking" manual.
[3] Weekday parking rates based on the weekday parking demand ratios, as summarized in Table 2-2 of the "Shared Parking" manual.
[4] Gross spaces adjusted to reflect parking demand reduction due to captive market, internal capture, transit, and/or walk-in reduction.

TABLE 53
WEEKDAY SHARED PARKING DEMAND ANALYSIS FUTURE CONDITIONS (DECEMBER) [1]

LAND USE	RETAIL	FINE/CASUAL DINING	FAMILY RESTAURANT	FAST-FOOD RESTAURANT	SHARED PARKING DEMAND	COMPARISON W/PARKING SUPPLY OF 5,148 SPACES
Size	1,075.2 KSF	28.0 KSF	4.7 KSF	39.1 KSF		
Peak Pkg Rate [2]	4.0 /KSF	20.0 /KSF	15.0 /KSF	15.0 /KSF		
Weekend Pkg Rate [3]	3.6 /KSF	18.0 /KSF	10.5 /KSF	15.0 /KSF		
Gross Spaces	3,871	504	49	586		
Adjusted Gross Spaces [4]	3,677	454	44	527		
TIME OF DAY	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**		**SURPLUS (DEFICIENCY)**
6:00 A.M.	102	0	13	34	149	4999
7:00 A.M.	255	14	24	61	354	4794
8:00 A.M.	730	35	28	114	907	4241
9:00 A.M.	1,573	52	34	166	1,825	3323
10:00 A.M.	2,533	120	38	305	2,996	2152
11:00 A.M.	3,197	216	40	460	3,913	1235
12:00 P.M.	3,529	351	44	527	4,451	697
1:00 P.M.	3,677	351	40	527	4,595	553
2:00 P.M.	3,529	312	25	478	4,344	804
3:00 P.M.	3,381	206	22	324	3,933	1215
4:00 P.M.	3,381	245	22	293	3,941	1207
5:00 P.M.	3,493	358	35	324	4,210	938
6:00 P.M.	3,493	435	36	452	4,416	732
7:00 P.M.	3,493	454	36	429	4,412	736
8:00 P.M.	3,014	454	36	271	3,775	1373
9:00 P.M.	2,017	454	28	166	2,665	2483
10:00 P.M.	1,175	435	25	114	1,749	3399
11:00 P.M.	403	348	23	61	835	4313
12:00 A.M.	0	120	12	38	170	4978

[1] Source: ULI - Urban Land Institute "Shared Parking," Second Edition, 2005.
[2] Peak parking rates for all land uses based on the recommended base parking ratios as contained in Table 2-2 of the "Shared Parking" manual.
[3] Weekday parking rates based on the weekday parking demand ratios, as summarized in Table 2-2 of the "Shared Parking" manual.
[4] Gross spaces adjusted to reflect parking demand reduction due to captive market, internal capture, transit, and/or walk-in reduction.

TABLE 54
WEEKEND SHARED PARKING DEMAND ANALYSIS FUTURE CONDITIONS (DECEMBER) [1]

LAND USE	RETAIL	FINE/CASUAL DINING	FAMILY RESTAURANT	FAST-FOOD RESTAURANT	SHARED PARKING DEMAND	COMPARISON W/PARKING SUPPLY OF 5,148 SPACES
Size	1,075.2 KSF	28.0 KSF	4.7 KSF	39.1 KSF		
Peak Pkg Rate [2]	4.0 /KSF	20.0 /KSF	15.0 /KSF	15.0 /KSF		
Weekend Pkg Rate [3]	4.0 /KSF	20.0 /KSF	15.0 /KSF	14.0 /KSF		
Gross Spaces	4,301	560	70	547		
Adjusted Gross Spaces [4]	4,086	504	63	492		
TIME OF DAY	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**	**NUMBER OF SPACES**		**SURPLUS (DEFICIENCY)**
6:00 A.M.	115	0	10	32	157	4991
7:00 A.M.	286	15	21	56	378	4770
8:00 A.M.	654	23	32	105	814	4334
9:00 A.M.	1,594	46	46	155	1,841	3307
10:00 A.M.	2,329	57	58	285	2,729	2419
11:00 A.M.	2,901	121	58	429	3,509	1639
12:00 P.M.	3,432	271	63	492	4,258	890
1:00 P.M.	3,759	292	55	492	4,598	550
2:00 P.M.	4,086	250	44	447	4,827	321
3:00 P.M.	4,086	250	29	302	4,667	481
4:00 P.M.	3,923	250	31	274	4,478	670
5:00 P.M.	3,718	333	41	302	4,394	754
6:00 P.M.	3,309	461	47	422	4,239	909
7:00 P.M.	3,106	483	47	401	4,037	1111
8:00 P.M.	2,738	504	44	253	3,539	1609
9:00 P.M.	2,166	461	23	155	2,805	2343
10:00 P.M.	1,512	461	20	105	2,098	3050
11:00 P.M.	613	450	14	56	1,133	4015
12:00 A.M.	0	252	8	35	295	4853

[1] Source: ULI - Urban Land Institute "Shared Parking," Second Edition, 2005.
[2] Peak parking rates for all land uses based on the recommended base parking ratios as contained in Table 2-2 of the "Shared Parking" manual.
[3] Weekday parking rates based on the weekday parking demand ratios, as summarized in Table 2-2 of the "Shared Parking" manual.
[4] Gross spaces adjusted to reflect parking demand reduction due to captive market, internal capture, transit, and/or walk-in reduction.

As demonstrated by the shared parking analysis, adequate parking will be provided with the Proposed Project and the impacts related to parking demand are less than significant and mitigation is not required.

Although sufficient parking will be provided with the Proposed Project, surrounding residents have expressed concern that shopping center patrons may nonetheless park along adjacent off-site streets, including within residential neighborhoods to the north, for convenience. A key goal of the Proposed Project is to provide a more convenient and efficient access and internal circulation system within the project site, and to provide convenient parking options. It is anticipated that the access, circulation and parking enhancements will provide sufficient incentive for patrons to park on-site at the shopping center. Further, several measures to address pass-through traffic, neighborhood protection and traffic calming (such as restricted access to

Matilija Avenue from Riverside Drive) are proposed to address project traffic. The neighborhood protection plan will provide additional disincentive to park in adjacent neighborhoods to the north of the project site. As a result, parking impacts to surrounding areas are anticipated to be less than significant.

(3) Pedestrian Environment

Buildings on, and access to, the project site will comply with all Building Code and Municipal Code regulations. The Proposed Project includes improved Riverside Drive vehicle entrances that will provide for better circulation along Riverside Drive and within the shopping center and thereby also enhancing pedestrian circulation and safety. This improvement includes installation of a new traffic signal and an improved (safer) pedestrian crossing at the new consolidated shopping center driveway entrances.

Pedestrian access to the Proposed Project would be available from the parking areas on the south side of the project and at one location along Riverside Drive through Bloomingdale's department store. Pedestrian access will also be facilitated from Riverside Drive by improved pedestrian walkways between parking areas internal to the project site.

In addition, enhanced landscaping along Riverside Drive and Hazeltine Avenue would create a more inviting pedestrian environment. In essence, the new landscaping treatment along the project site perimeter will create a pedestrian-friendly corridor that be an amenity for the community as well as function as pedestrian access to the project site. The proposed landscape concept is described in Sections II: Project Description and IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources of this DEIR.

Overall, the inclusion of PDFs that provide improved pedestrian crosswalks across Riverside Drive and a more pleasant landscaped backdrop along Riverside Drive and Hazeltine Avenue will have a beneficial effect on the local pedestrian environment. No mitigation is required as the Proposed Project impacts are already less than significant, and in fact improved to a beneficial level.

(4) Consistency with Applicable Plans and Polices

The Proposed Project does not propose any change to adopted plans or policies, nor reclassification of applicable designations. The applicable transportation-related goals, objectives and policies of the General Plan Community Plan are provided in *Table 55: Consistency with Community Plan Transportation Related Goals, Objectives and Policies*, along with a discussion of the project consistency with each applicable component. In summary, the Proposed Project is consistent with the transportation-related goals, objectives and policies because the project will either directly contribute toward the furtherance of those policies (e.g., as with the funding for implementation of the ATCS system at local intersections) or indirectly supports those policies through not creating obstacles for their realization (e.g., such as enhanced pedestrian and public transit orientation). The Proposed Project will result in a less than significant impact to transportation in the project area since it does not create conflicts with

policies and programs supporting public transit, alternative transportation modes, transportation systems and congestion management, and parking.

TABLE 55
CONSISTENCY WITH COMMUNITY PLAN TRANSPORTATION RELATED GOALS, OBJECTIVES AND POLICIES

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
VAN NUYS-NORTH SHERMAN OAKS COMMUNITY PLAN			
G 11	Develop a public transit system that improves mobility with convenient alternatives to automobile travel.	The implementation of the programs to achieve this goal is dependent on coordination between the City and the Transit Districts that serve the Sherman Oaks area. The Proposed Project includes the provision of a weekend and holiday shuttle services to the immediate area and a ride-share coordinator to give employees an alternative to single occupant vehicle commuting.	Not applicable to a development of private property
O 11-1	To encourage improved local and express bus service through the Van Nuys-North Sherman Oaks community, encourage park-and-ride facilities to interface with freeways, high occupancy vehicle (HOV) facilities, and rail facilities.	The implementation of the programs to achieve this objective requires actions by the City and the Transit Districts that serve the Sherman Oaks area.	Not applicable to a development of private property
P 11-1.1	Coordinate with the Metropolitan Transit Authority (MTA) to improve local bus service to and within the Van Nuys-North Sherman Oaks area. Program: Transit Improvements [TIMP] 1. Recommended bus transit improvement [TIMP]: - Increase bus service along high-demand routes as warranted; and - Extend Metrolink shuttle route south to serve the proposed Red Line Van Nuys Station; and - Implement transit-priority treatments along Van Nuys Boulevard. The implementation of the programs to achieve this objective requires actions by the City and the Transit Districts that serve the Sherman Oaks area	The implementation of the programs to achieve this objective requires actions by the City and the Transit Districts that serve the Sherman Oaks area.	Not applicable to a development of private property
P 11-1.2	Encourage the provision of safe, attractive and clearly identifiable transit stops with user friendly design amenities.	Program: The Community Plan includes an Urban Design chapter that outlines design guidelines for transit stops. These improvements can be implemented through the City's Capital Improvement Program or as part of street improvements associated with a new development. The Proposed Project is required to make 2 feet of street dedications and to repair broken	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		sidewalk. The Proposed Project proposes the provision of a right turn only lane on Riverside Drive at the new Mall Driveway. This street improvement is anticipated to include a reconstruction/relocation of an existing transit stop. This reconstruction/relocation shall include the installation of appropriate transit user-friendly amenities.	
P 11-1.3	Encourage the expansion, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled persons, and the transit-dependent population.	Program: Implementation of the "Restructuring Public Transit Service" (RPTS) study proposals to create limited stop service and replace existing services with new local buses. The implementation of the programs to achieve this policy is dependent on coordination between the City and the Transit Districts that serve the Sherman Oaks area. The Proposed Project includes the provision of a ride-share coordinator and the provision of weekend and holiday shuttle services to the immediate area.	Consistent
O 11-2	To increase the work trips and non-work trips made on public transit.	The Proposed Project includes the provision of a weekend and holiday shuttle services for residents in the immediate area and a ride-share coordinator to give employees an alternative to single occupant vehicle commuting. The Proposed Project also includes a reconstruction/relocation of an existing transit stop. This reconstruction/relocation shall include the installation of a new transit stop with appropriate transit user-friendly amenities.	Consistent
P 11-2.1	Develop an intermodal mass transportation plan to implement linkages to future rail service. Program: Rail transit improvements [TIMP]. -Extend rail transit line west from Metro Red Line terminus in North Hollywood through the Van Nuys-North Sherman Oaks Community Plan area; -Locate station stop at Fulton Avenue/Valley College, Van Nuys Boulevard and Sepulveda Boulevard; -Expand Van Nuys Amtrak/Metrolink Station; -Increase Metrolink service levels.	The implementation of the programs to achieve this objective requires actions by the City and the Transit Districts that serve the Sherman Oaks area.	Not applicable to a development of private property

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
	The implementation of the programs to achieve this goal is dependent on coordination between the City and the Transit Districts that serve the Sherman Oaks area.		
G 12	Encourage alternative modes of transportation to reduce the use of single occupant vehicles (sov) in order to reduce overall vehicular trip volumes.	The Proposed Project includes the provision of a weekend and holiday shuttle services to the immediate area and a ride-share coordinator to give employees an alternative to single occupant vehicle commuting.	Consistent
O 12-1	To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.	The Proposed Project includes the provision of a weekend and holiday shuttle services to the immediate area and a ride-share coordinator to give employees an alternative to single occupant vehicle commuting.	Consistent
P 12-1.1	Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex-time, bicycles, and walking, etc).	Program: The TDM City-wide Ordinance and trip reduction measures will continue to be implemented in the Van Nuys-North Sherman Oaks area and monitored by LADOT. This Ordinance calls for several measures to be taken by non-residential developments to achieve necessary trip reduction targets. Program: TDM Ordinance [TIMP]. The Proposed Project includes the provision of a ride-share coordinator to give employees an alternative to single occupant vehicle commuting. The project will also provide preferential parking for carpoolers. In addition the project will provide showers, changing rooms and bike storage for employees choosing to bike to work. Also the street improvement associated with the project involves a reconstruction/ relocation of an existing transit stop. This reconstruction/ relocation shall include the installation of appropriate transit user-friendly amenities.	Consistent
P 12-1.2	Encourage the use of multiple-occupancy vehicle programs such as carpool, vanpools and/or shuttle for shopping and other activities to reduce midday traffic.	Program: The City-wide Ordinance on TDM and trip reduction measures will continue to be implemented and monitored by LADOT. The Proposed Project includes the provision of a ride-share coordinator to give employees an alternative to single occupant vehicle commuting. The project will also provide preferential	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		parking for carpoolers. In addition the project will provide showers, changing rooms and bike storage for employees choosing to bike to work. Also the street improvement associated with the project involves a reconstruction/ relocation of an existing transit stop. This reconstruction/relocation shall include the installation of appropriate transit user-friendly amenities.	
P 12-1.3	Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.	Program: The decision-maker shall include this as a condition in approving such projects. The Proposed Project includes the provision of a ride-share coordinator to give employees an alternative to single occupant vehicle commuting. The Proposed Project includes the provision of a weekend and peak holiday shuttle from the site to the Orange Line Bus Station.	Consistent
G 13	A well maintained, safe, efficient freeway, highway, and street network.	The Proposed Project will make the required dedications to the adjacent streets to bring them up to the standards of the Street and Highways element of the General Plan. However, the maintenance and design of the freeway, highway and street network in not in the control of the private property owner.	Not applicable to a development of private property
O 13-1	That Van Nuys-North Sherman Oaks' signalized intersections are integrated with the City's ATSAC system by the year 2010	The Proposed Project supports the City's programs of providing the most current ATCS system in the area through the payment of impact fees for the installation of computerized equipment at 10 local intersections.	Consistent
P13-1.1	Install ATSAC equipment at an accelerated rate with expanded funding.	Program: Accelerated installation of ATCS equipment when funding becomes available. Program: Transportation Systems Management (TSM) Strategies [TIMP]. Automated Traffic Surveillance and Control (ATSAC), a computerized system that directs traffic control operations based on the data collected at each signalized intersection, is recommended to be installed by the 2010 at the major and secondary intersections. The Proposed Project supports the City's programs of providing the most current ATCS system in the area	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
		through the payment of impact fees for the installation of computerized equipment at 7 local intersections.	
P 13-1.2	Support the existing Department of Transportation program to provide separate right and/or left turn lanes on all arterial streets where feasible. Program: The Plan supports the City Department of Transportation's programs providing for separate right turn and/or left turn lanes on all arterials.	The Proposed Project will support the City's program of separate right and/or left turn lanes with the implementation of left turn phasing at Hazeltine Avenue and Riverside Drive.	Consistent
P 13-1.3	Accelerate controller replacement to upgrade and improve signal efficiency. Program: Implement as funding becomes available.	The Proposed Project supports the City's programs of providing the most current ATCS system in the area through the payment of impact fees for the installation of computerized equipment at 10 local intersections.	Consistent
G 14	A system of highways, freeways, and streets that provides a circulation system which supports existing, approved, and planned land uses while maintaining a desired level of service at all intersections.	The Proposed Project will make the required dedications to the adjacent streets to bring them up to the standards of the Street and Highways element of the General Plan. However, the maintenance and design of the freeway, highway and street network in not in the control of the private property owner. Further the Proposed Project includes a series of mitigation measures, which will eliminate any significant impacts to traffic caused by the project.	Consistent
O 14-1	To comply with Citywide performance standards for acceptable levels of service (LOS) and ensure that necessary road access and street improvements are provided to accommodate traffic generated by all new development.	The Proposed Project includes a series of mitigation measures, which will eliminate any significant impacts to traffic caused by the project.	Consistent
P 14-1.1	Maintain a satisfactory LOS for streets and highways that should not exceed LOS "D" for Major Highways, Secondary Highways and Collector Streets. If existing levels of service are LOS "E" or LOS "F" on a portion of a highway or collector street, then the level of service for future growth should be maintained at LOS "E". Program: Improve, to their designated standard specifications, substandard segments of those major and secondary highways which are expected to experience heavy traffic congestion by the year 2010. Program: The Plan supports the use of Residential Neighborhood	The Proposed Project includes a series of mitigation measures, which will eliminate any significant impacts to traffic caused by the project.	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
	Protection Plans to relieve congestion on collector streets that are expected to experience traffic congestion by the year 2010. Program: Capital Improvements [TIMP] 1. Proposed street widenings [TIMP]: - Burbank Boulevard from Sepulveda Boulevard to Coldwater Canyon Avenue (widen and implement peak parking restrictions in both directions to provide 6 peak lanes); - Hazeltine Avenue from Victory Boulevard to Burbank Boulevard (widen to 4 lanes); - Van Nuys Boulevard from Chandler Boulevard to Addison Street (implement peak parking restrictions to provide 6 peak lanes); - Provide a fourth northbound lane on Sepulveda Boulevard during P.M. peak period from the Ventura Freeway (US 101) to Rinaldi Street; - I-405/Burbank Boulevard interchange: conduct a study to identify feasible improvements to the I-405/Burbank Boulevard interchange; - I-405/Sepulveda Boulevard ramps: construct a new I-405 northbound off-ramp to Sepulveda Boulevard opposite the existing Ventura Freeway (US 101) eastbound on-ramp; construct a new I-405 northbound on-ramp from Sepulveda Boulevard opposite the Ventura Freeway (US 101) westbound off-ramp; and - Support implementation of regional high-occupancy vehicle (HOV) projects: I-5/I-405 direct HOV connector between north 1-5 and south 1-405 legs. 2. Proposed roadway extensions [TIMP]: - Connect Cedros Avenue across MTA right-of-way (between Bessemer Street and Aetna Street); - Extend Hazeltine Avenue north from current terminus to proposed Saticoy Street extension; also improve to four lanes north of Sherman Way; - Connect Tyrone Avenue across MTA right-of-way (between Bessemer Street and Aetna Street); and - Construct new overpass and connect Saticoy Street across Southern Pacific railroad and classify this segment of Saticoy as a secondary highway, improving it to four lanes between		

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
	Woodman Avenue and Van Nuys Boulevard. 3. Roadway redesignation; Program: Encourage the completion of the following street improvements in the City's Capital Improvement Program (Five Year Program- Pictorial Guide FY 1996-97 to 2000-2001).		
P 14-1.2	Highways and street dedications shall be developed in accordance with standards and criteria contained in the Highways and Freeways Element of the General Plan and the City's Standard Street Dimensions, except where environmental issues and planning practices warrant alternate standards consistent with capacity requirements.	The Proposed Project will make the required dedications to the adjacent streets to bring them up to the standards of the Highways and Freeways element of the General Plan.	Consistent
P 14-1.3	Discourage non-residential traffic flow on streets designed to serve residential areas only by the use of traffic control measures. Program: The use of Residential Neighborhood Protection Plans to relieve congestion on collector streets that are expected to experience traffic congestion by the year 2010.	The Proposed Project has volunteered to fund a neighborhood. Protection to develop measures to discourage not-residential traffic on street designed to serve residential area consistent with this policy of the Community Plan.	Consistent
P 14-1.4	New development projects should be designed to minimize disturbance to existing flow with proper ingress and egress to parking. Program: Require that new development projects incorporate adequate driveway access to prevent vehicular queuing that extends onto arterial streets.	The Proposed Project will consolidate ingress and egress points on Riverside Drive consistent with this policy of the Community Plan.	Consistent
O 14-2	To ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure utilizing the City's streets and highways standards.	The Proposed Project includes a series of mitigation measures, which will eliminate any significant impacts to traffic caused by the project.	Consistent
P 14-2.1	No increase in density and intensity shall be effectuated by zone change, variance, conditional use, parcel map or subdivision unless it is determined that the transportation system can accommodate the increased traffic generated by the project. Program: The decision-maker shall adopt a finding which addresses this factor as part of any decision. Program: Require that new development projects incorporate TSM and/or TDM programs and/or transit improvements consistent with City-wide	The Proposed Project includes a series of mitigation measures, which will eliminate any significant impacts to traffic caused by the project.	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
	Land Use-Transportation policy.		
P 14-2.2	Driveway access points onto major and secondary highways, should be restricted or limited in number and located to ensure the smooth and safe flow of vehicles and bicycles. Program: Require that new development projects incorporate such considerations.	The Proposed Project will consolidate ingress and egress points on Riverside Drive and provide access to and from the site at signalized intersections to improve the safe flow of vehicles consistent with this policy of the Community Plan	Consistent
G 15	A system of safe, efficient and attractive bicycle and pedestrian routes.	The implementation of the programs to achieve this goal is dependent the City. The design of bicycle routes on the street network in not in the control of the private property owner. The Proposed Project will make the required dedications to the adjacent streets to bring them up to the standards of the Highways and Freeways element of the General Plan. As such will allow the City to provide bicycle routes as part of the street system	Consistent
O 15-1	To promote an adequate system of safe bikeways for commuter, school and recreational use.	The implementation of the programs to achieve this policy is dependent the City. The design of bicycle routes on the street network in not in the control of the private property owner. The Proposed Project will make the required dedications to the adjacent streets to bring them up to the standards of the Highways and Freeways element of the General Plan. As such will allow the City to provide bicycle routes as part of the street system	Consistent
P 15-1.1	Plan for and encourage funding and construction of bicycle routes connecting residential neighborhoods to schools, open space areas and employment centers.	Program: The Plan map identifies existing and proposed bicycle routes. The City-wide Bicycle Plan addresses concerns regarding bicycle use issues. The implementation of the programs to achieve this policy is dependent the City the design of bicycle routes on the street network in not in the control of the private property owner. The Proposed Project will make the required dedications to the adjacent streets to bring them up to the standards of the Highways and Freeways element of the General Plan. As such will allow the City to provide bicycle routes as part of the street system	Consistent
P 15-1.2	Identify bicycle routes along major and secondary arterials in the community. Program: Bikeways - The City should	The implementation of the programs to achieve this policy is dependent the City the design of bicycle routes on the	Consistent

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
	implement the proposed Bikeway Plan in the Bikeway Five Year Program and the 20-year Plan for the Van Nuys-North Sherman Oaks area, which includes the following proposed bikeways [TIMP]: Class I bike paths along Southern Pacific/Metrolink tracks, Southern Pacific Burbank/Chandler Branch right-of-way, Los Angeles River, and Tujunga Wash; and Class II bike lanes along Riverside Drive, Victory Boulevard (east of I-405), Woodley Avenue, and Woodman Avenue.	street network in not in the control of the private property owner. The Proposed Project will make the required dedications On Riverside Drive to bring this street up to the standards of the Highways and Freeways element of the General Plan. As such will allow the City to provide bicycle routes as part of the street system	
P 15-1.3	Assure that local bicycle routes are linked with the routes of neighboring areas of the City. Program: The Plan map identifies bicycle routes which link with the bicycle routes of adjacent communities.	The implementation of the programs to achieve this policy is dependent the City the design of bicycle routes on the street network in not in the control of the private property owner. The Proposed Project will make the required dedications to the adjacent streets to bring them up to the standards of the Highways and Freeways element of the General Plan. As such will allow the City to provide bicycle routes as part of the street system	Consistent
P 15-1.4	Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places. Program: Through the inclusion of this policy in the Plan text, the Plan supports the provision of bicycle storage facilities. The Plan recommends that this policy be considered by decision makers when reviewing projects requiring discretionary action.	The Proposed Project includes the provision showers, changing rooms and bike storage for employees choosing to bike to work.	Consistent
O 15-2	To promote pedestrian-oriented mobility and the utilization of the bicycle for commuter, school, recreational use, economic activity, and access to transit facilities.	The implementation of the programs to achieve this policy is dependent the City the design of bicycle routes on the street network in not in the control of the private property owner. The Proposed Project will make the required dedications to the adjacent streets to bring them up to the standards of the Highways and Freeways element of the General Plan. As such will allow the City to provide bicycle routes as part of the street system	Consistent
P 15-2.1	Encourage the safe utilization of easements and/or right-of-way along flood control channels, public utilities, railroad right-of-way and streets wherever feasible for the use of bicycles and/or pedestrians.	The implementation of the programs to achieve this policy is dependent the City the design of bicycle routes on the street network in not in the control of the private property owner. The	Not applicable to a development of private property

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
	Program: The City-wide Bicycle Plan addresses bicycle use issues. Program: Implementation of the City-wide Land Use/Transportation Policy and the City's discretionary project approval process.	Proposed Project will make the required dedications to the adjacent streets to bring them up to the standards of the Highways and Freeways element of the General Plan. As such will allow the City to provide bicycle routes as part of the street system	
P 15-2.2	Require the installation of sidewalks with all new roadway construction and significant reconstruction of existing roadways. Program: The City's Capital Improvement Program, public works construction projects, and the City's discretionary project approval process.	The project site has sidewalks on all street frontages. The Proposed Project will make 2 feet of street dedications and to repair broken sidewalk.	Not applicable to a development of private property
G 16	A sufficient system of well-designed and convenient on-street parking and off-street parking facilities throughout the plan area.	The Proposed Project includes a significant reconfiguration of parking areas at the site consistent with this objective of the Community Plan. The reconfigured parking will provide better circulation through the site thus making parking more convenient.	Consistent
O 16-1	To provide parking in appropriate locations in accordance with Citywide standards and community needs.	The Proposed Project includes a significant reconfiguration of parking areas at the site consistent with this objective of the Community Plan. The parking is also being provided at a ratio of up to 4.5 spaces per 1,000 of gross leasable space. This ratio exceeds the standard 4.0 spaces for retail space but was proposed based on a site-specific parking demand analysis.	Consistent
P 16-1.1	Consolidate parking, where appropriate, to eliminate the number of ingress and egress points onto arterials. Program: The Plan contains an Urban Design chapter which outlines guidelines for parking facilities.	The Proposed Project will consolidate ingress and egress points on Riverside Drive consistent with this policy of the Community Plan	Consistent
P 16-1.2	New parking lots and garages shall be developed in accordance with design standards. Program: The Plan contains an Urban Design Chapter which outlines guidelines for parking facilities.	The new parking garage will be designed in accordance with design standards consistent with this policy of the Community Plan.	Consistent

(5) Cumulative Impacts

As discussed above under the traffic analysis for the Proposed Project, project impacts were evaluated based on a scenario where all other related projects (through year 2012) were assumed to be in place (i.e., future conditions). Please refer to the Project Impact discussion above for an assessment of cumulative impacts.

4. MITIGATION PROGRAM

Construction

MM TRF-1: In accordance with LAMC Section 91.70067, hauling of construction materials shall be restricted to a haul route approved by the City. The City of Los Angeles will approve specific haul routes for the transport of materials to and from the site during demolition and construction. This process includes a public hearing and opportunities for the public to comment on the proposed route.

MM TRF-2: Prior to obtaining a demolition and/or grading permit, the Project Applicant shall prepare a Construction Traffic Control Plan (Construction TCP) for review and approval by the LADOT. The Construction TCP shall include the designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction. The Construction TCP will identify a designated off-site parking lot at which construction workers will be required to park.

Long-Term Operational

MM TRF-3: The Proposed Project shall comply with Section 12.26 J of the Los Angeles Municipal Code for purposes of implementing a Transportation Demand Management (TDM) plan. The following outlines the minimum measures that the project will undertake in compliance with the Code section.

- Employee Transportation Center and Transportation Coordinator. The project shall designate an area within the building to be the Transportation Center. The Employee Transportation Center shall be maintained by the center's Transportation Coordinator, who will be employed by Westfield. The Transportation Coordinator will assist employees in seeking out and arranging for commute alternatives. This includes carpool and vanpool formation, assisting employees with planning trips to work via bus, and locating bike or walking routes to work. The Employee Transportation Center shall provide a bulletin board, display case, or kiosk displaying transportation information where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

- Current routes and schedules for public transit serving the site;
- Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;
- Ridesharing promotion material supplied by commuter-oriented organizations;
- Regional/local bicycle route and facility information; and
- A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

- Preferential Parking Spaces. The project will provide designated parking areas for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit.

- Bicycle Parking Spaces. Bicycle parking shall be provided in conformance with Section 12.21 A 16 of the Los Angeles Municipal Code. The project will provide safe and convenient access from the external circulation system to bicycle parking facilities on-site.

- Carpool/Vanpool Loading Area. The project shall provide a safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area.

- Pedestrian Access. The project shall provide sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to the center.

- Transit Stop Enhancements. In coordination with LADOT and the Department of City Planning, the project will consult with local bus service providers in determining appropriate improvements to transit stops, such as installation of benches, shelters, and schedule information.

MM TRF-4: The Project Applicant shall seek LADOT approval to install two new traffic signals at the two new Riverside Drive driveways to facilitate vehicular movements to and from the project site.

MM TRF-5: The Project Applicant shall install a pedestrian crossing at the Riverside Drive/Matilija Avenue intersection.

MM TRF-6: In addition to the TDM measures described above that satisfy the requirements of Section 12.26 J, the Proposed Project shall voluntarily implement the following

demand management services to further reduce vehicle trips and parking demand at the site:

- Orange Line Shuttle. The project shall provide a shuttle service connecting the site to a nearby Orange Line station (e.g., Van Nuys Boulevard). This service could be provided by either the provision of a private shuttle or the funding of extended hours for the existing LADOT DASH line. The Orange Line shuttle would complement existing transit services (i.e., the LADOT DASH service) such that the shuttle would operate during hours when other public transit services connecting the site to the Orange Line are not available (e.g., evenings during the work week and certain weekend hours). The shuttle would operate during regular shopping center hours corresponding with periods of peak parking demand at the site (i.e., everyday during the holiday shopping period between November 15 and January 1, and every Saturday/Sunday throughout the year).

MM TRF-7: The Proposed Project applicant, in consultation with LADOT, shall fund the development and implementation of a Neighborhood Traffic Management Plan (NTMP) to address potential existing and future regional "cut-through" traffic on residential streets north of the project site, which may encompass the area generally bounded by Magnolia Boulevard to the north, Riverside Drive to the south, Hazeltine venue to the west and Woodman Avenue to the east. The following is a discussion of the sequential steps typically followed by LADOT in implementing the NTMP.

- Deposit Funds. Prior to issuance of a Building Permit for the Proposed Project, the project applicant will be required to deposit funds in a separate account maintained by LADOT designated for use in funding the NTMP. The exact amount will be determined by LADOT and will reasonably cover the likely costs of the measures.

- Stakeholders Meeting. Following establishment of the NTMP account, a group consisting of representatives from LADOT, the Council Office, and the residential community north of the project site will meet to discuss the goals, opportunities and constraints of the NTMP. As needed, follow-up meetings may be conducted with other City departments (Public Works, Fire Department, Police Department, etc.).

- Data Collection and Initial Plan Formulation. Based on the input received at the stakeholders meeting, LADOT will commence with conducting appropriate studies (traffic observations, traffic counts, vehicle speed surveys, accident research, commercial parking intrusion, etc.) to assess existing traffic conditions on the residential streets north of the project site. The studies will be based on studies conducted for the EIR as well as other studies deemed necessary by LADOT. Following collection of the data and based on their

professional experience, LADOT will prepare for the stakeholders an initial NTMP for implementation prior to completion of the Proposed Project.

- Neighborhood Concurrence. As some of the measures that may be recommended within the initial NTMP (e.g., installation of speed humps, implementation of permit parking districts) may, by LADOT policy, require majority or super-majority consent of affected property owners (at least two-thirds), LADOT will work with the stakeholders to survey the appropriate residents to determine if there is support to implement the specific measures.

- Implementation and Follow-Up Studies. LADOT will implement the initial NTMP (including those measures authorized by the affected residents) prior to the completion of the Proposed Project. Following a reasonable period of time after opening of the Proposed Project, LADOT will meet with the stakeholders to review traffic experiences since the implementation of the NTMP and opening of the Proposed Project. As needed, additional review and studies may be conducted by LADOT based on the effectiveness of the initial NTMP and/or traffic and parking issues related to the shopping center.

- Updated NTMP. Based on the follow-up studies, LADOT will present to the stakeholders their recommendations for an updated NTMP. Following review by the stakeholders, and with consent of the affected residents (if required), the updated NTMP will be implemented.

MM TRF-8: To further alleviate potential inconvenience existing in the area which lead to non-project related cut-through traffic the Proposed Project shall install protected/permissive left-turn traffic signal phasing for Hazeltine Avenue at its intersection with Riverside Drive to improve current safety and traffic flow at this intersection.

MM TRF-9: The Project Applicant will prepare and implement an Interim Traffic Control Plan (TCP) during construction. The Interim TCP shall address interim traffic staging and parking for shopping center patrons that would continue to shop at the shopping center during the construction phase. To maintain the required parking and adequate access during the construction stage, the Proposed Project will include a plan to implement a number of strategies to temporarily address parking on the site and ensure safe and functional access. These strategies are anticipated to include the use of valet parking, stacked parking, shuttles from the eastern most parking lot, and if necessary off-site parking for employees.

MM TRF-10: Prior to issuance of building permit, the Project Applicant shall contribute prorated funding for the installation of LADOT's Victory ATSAC system at the following seven intersections: (1) Van Nuys Boulevard/Riverside Drive; (2) Tyrone Avenue/Moorpark Street; (3) Hazeltine Avenue/Riverside Drive; (4) Hazeltine Avenue/Fashion Square Lane: (5) Woodman Avenue/Riverside Drive;

(6) Woodman Avenue/US 101 Westbound Ramps; and (7) Woodman Avenue/Moorpark Street.

MM TRF-11: Prior to project occupancy, the LADOT shall redesignate the curb lane on the southbound approach on Woodman Avenue to an optional through/right-turn lane so that the resultant lane configurations at the southbound approach will be one left-turn lane, two through lanes and one optional through/right-turn lane. If required by LADOT, the existing four-foot wide median island on the south leg of the intersection would be replaced by striping and/or lane delineators (e.g., two feet wide or less) so that additional width could be provided to the existing three southbound Woodman Avenue through lanes on the departure side of the intersection. The Project Applicant shall pay all expenses for these improvements.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

The traffic analysis evaluated potential project-related impacts at 18 intersections and two street segments. Application of the City's threshold criteria to the "With Proposed Project" scenario indicates that six of the 18 study intersections are anticipated to be significantly impacted by the Proposed Project during the weekday conditions. Incremental but not significant impacts are noted at the remaining 12 study intersections, as well as at the two local residential street segments evaluated in the analysis. During the Saturday mid-day peak hour at six study intersections located immediately adjacent to the project site, four of the seven study intersections are anticipated to be significantly impacted by the Proposed Project during the weekend conditions. Incremental but not significant impacts are noted at the remaining three study intersections. For both weekday and weekend conditions, it is recommended that the significant transportation impacts be mitigated through a contribution by the project to the City of Los Angeles' Adaptive Traffic Control System (ATCS) installation. In addition, at the Woodman Avenue/Riverside Drive intersection, it is recommended that the southbound Woodman Avenue approach to the Riverside Drive intersection be reconfigured to provide one left-turn lane, two through lanes and one optional through/right-turn lane. These recommended mitigation measures are anticipated to reduce the forecast project-related significant impacts to less than significant levels.

While not specifically required for traffic mitigation purposes, it is also recommended that, as part of the Proposed Project, two new traffics signal would be installed at the two new driveway intersections of Riverside Drive to enhance traffic safety and reduce wait times.

Parking utilization observations conducted at the site during the 2005 and 2006 holiday shopping periods revealed that the demand for parking peaked at a ratio equivalent to 4.03 parking spaces per 1,000 GLSF (observed at 4:00 P.M. on December 26). Parking provided at a reduced shared parking rate of up to 4.5 parking spaces per 1,000 GLSF is expected to be adequate to accommodate peak parking demands during the December holiday season, as well as throughout the year for the Proposed Project.

V. ALTERNATIVES

Regulatory Requirements for Identifying and Analyzing Project Alternatives

The identification and analysis of alternatives is a fundamental concept of the environmental review process under CEQA. CEQA Guidelines Section 15126.6 addresses the required discussion of alternatives to proposed projects in an EIR and the intended use of such information. Section 15126.6(a) states the following:

> "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible."

The CEQA Guidelines further clarify in Section 15126.6(b):

> "Because the EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impeded to some degree the attainment of the project objectives, or would be more costly."

Thus, an EIR for any project subject to CEQA review must consider a reasonable range of alternatives to the project which: (1) substantially lessen the project's significant environmental impacts; and (2) that are feasible and may substantially accomplish the proposed project goals.

The CEQA Guidelines Section 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These factors include:

> "…site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site."

The range of alternatives required within an EIR is governed by the "rule of reason". Specifically, CEQA Guidelines Section 15126.6(c) provides that:

> "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead

> agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts."

The CEQA Guidelines also require the analysis of a "no project" alternative in addition to any other feasible alternatives identified. The No Project Alternative shall discuss the existing conditions at the time the notice of preparation is published as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved (CEQA Guidelines Section 15126.6(e)(2)).

The impact analysis, as detailed in Section IV: Environmental Impact Analysis of this DEIR, concluded that the Proposed Project generated no impacts that would remain significant after implementation of the project design features, standard conditions and recommended mitigation measures, except for potentially significant (but temporary) air quality impacts during the construction phase. Hence, the selection of alternatives focused on reducing construction impacts (air quality in particular) overall, as well as, those areas where a significant impact is anticipated prior to mitigation (i.e., traffic and noise). Consideration of the General Plan, Community Plan and zoning designations applicable to the project site were also a key consideration, and thus established limitations on reasonable alternative land uses.

The underlying purpose of the Proposed Project is to update, modernize and revitalize the shopping center to ensure its long-term economic viability. The underlying purpose is exemplified in the project objectives provided below. Several of the project objectives embrace many of the relevant goals, objectives and policies set forth in the Van Nuys-North Sherman Oaks Community Plan. The objectives of the project are stated as follows:

- To establish and enhance the long-term sustainability of the shopping center through a higher utilization of the commercial center site and modernization of facilities.

- To improve site access and circulation through an updated site circulation plan that reflects modern development practices.

- To enhance on-site pedestrian safety through improved internal vehicle circulation configuration.

- To develop a project consistent with the City' Urban Form Guidelines with special emphasis on creating and encouraging a greater pedestrian environment, especially along Riverside Drive and Hazeltine Avenue.

- To enhance traffic flow and safety concerns along adjacent roadways through improved site access.

- To incorporate a community-friendly design that integrates visually with adjacent uses yet simultaneously affords appropriate neighborhood protection from traffic activity.

- To provide a greater range of stores to enhance the neighborhood shopping opportunities for the Sherman Oaks area.

- To provide greater variety and improved quality of restaurants in the shopping center.

- To conform to the goals, objectives and policies of the Van Nuys-North Sherman Oaks Community Plan.

- To develop a commercial project that is able to be LEED certifiable and enhance sustainability.

Potential Project Alternatives Considered but Rejected

Alternate Site(s). The CEQA Guidelines (Section 15126.6(a)) suggest that the range of reasonable alternatives to the project evaluated in an EIR consider alternate locations of the project, when feasible. However, no feasible alternative site has been identified that could reasonably fulfill the basic objectives of the Proposed Project (i.e., to revitalize the existing shopping center), and which could reasonably be acquired or controlled by the Applicant, as the site is.

One of the Proposed Project objectives is to "establish and enhance the long-term sustainability of the shopping center through a higher utilization of the commercial center site and modernization of facilities". Consequently, any alternative that analyzes development of the Proposed Project at an alternate location would be inconsistent with this stated objective. Further, as the project involves an expansion of established uses, to effectively address an alternate site location would essentially mean moving the location of the existing shopping center. Moving Fashion Square would be in substantial conflict with the Van Nuys-North Sherman Oaks Community Plan, which designates the project site as community commercial and specifically recognizes the shopping center as an identifiable and desirable anchor of the community.

Further, the feasibility to establish a consolidated parcel large enough to accommodate approximately thirty acres of shopping center/community commercial uses elsewhere in the Sherman Oaks community is remote and the potential for such a project speculative. Therefore, consideration of an alternative site location project is considered infeasible and not analyzed further in this EIR.

Alternative Land Use(s). The project site is currently developed with community commercial (i.e., retail and restaurant) uses comprised of the shopping center. As an alternative to the Proposed Project, a development concept could consider the inclusion of a mix of land uses other than or in addition to commercial retail. The subject property is designated Community Commercial by the Community Plan, which permits a range of commercial (CR, C2 and C4) and

mixed-use zones (RAS3 and RAS4). The project site is currently zoned predominantly C2, along with PB (for parking buildings).

Given the development already existing on-site, an alternative land use could include the addition of residential and/or commercial office uses, in order to create a higher intensity mixed-use project. Although mixed-use development is encouraged in areas within the community that are supported by proximate transit services, the introduction of a project of greater intensity and diversity in land uses is anticipated to result in additional adverse impacts beyond those identified for the Proposed Project. For example, an increase in the building footprint and/or height would be anticipated to accommodate the additional uses thereby exacerbating the level of adverse impacts for air quality during the construction phase, and likely increasing the degree of aesthetic and traffic impacts. Hence, a mixed-use project at this location would not meet the goal of reducing impacts beyond those anticipated with the Proposed Project.

Further, a mixed-use development project, especially one incorporating a residential component is not consistent with the Proposed Project objectives. For the reasons noted above, consideration of an alternative land use project is considered infeasible and not analyzed further in this EIR.

Project Alternatives Selected for Evaluation

Considering the factors above, seven alternatives (including the "No Project Alternative"), are evaluated in this EIR. Because alternatives that would consider an alternate site location or a mixed-use development were rejected, the alternatives considered for evaluation focus instead on a range of retail development densities and/or different site plan configurations. Alternatives selected for evaluation include the following:

- Alternative A: No Project
- Alternative B: Existing Entitlement (108,000 GLSF)
- Alternative C: Reduced Project 1 – (235,000 GLSF/Reduced Height of Parking)
- Alternative D: Reduced Project 2 – (235,000 GLSF/Maintain Macy's Parking Structure/Full Closure of Matilija Avenue)
- Alternative E: Alternate Site Plan 1 – (280,000 GLSF Proposed Project/No Tunnel/No Subterranean Parking)
- Alternative F: Alternate Site Plan 2 – (280,000 GLSF Proposed Project/Pedestrian Activation on Riverside Drive)
- Alternative G: Promenade – (190,000 GLSF Reduced Project/Pedestrian Promenade)

These seven alternatives are described in detail below and summarized in *Table 56: Summary of Alternatives*. The following sections also provide an analysis of each alternative, including an assessment of the anticipated development impacts, a comparison of the alternative's impacts relative to the Proposed Project, and a determination of the alternative's ability to meet the Project objectives. It should be noted that for the alternatives analysis, it is assumed that the same or equivalent level of mitigation measures (MM) and/or project design features (PDF) that apply to the Proposed Project would be carried forward with each potential alternative to the

extent feasible, except for those that would otherwise be in conflict with the description for that alternative. For example, MM/PDFs for the Proposed Project that relate to the tunnel access would not apply to alternatives that do not incorporate the tunnel access as part of their description.

TABLE 56
SUMMARY OF ALTERNATIVES

PROJECT/ ALTERNATIVES	COMMERCIAL USE			PARKING		ACCESS/PROJECT DRIVEWAYS
	NEW CONSTRUCTION (GLSF)	TOTAL CUMULATIVE CONSTRUCTION (GLSF)	BUILDING ENVELOP FOR NEW CONSTRUCTION	PARKING RATIO (PER 1,000 GLSF)	PARKING CONFIGURATION	
Proposed Project	280,000	1,147,000	Two levels of retail building over one level of subterranean parking and one level of rooftop parking, located south of existing main mall.	4.25	Demo of three-level parking structure south of main mall. Construction of two new multi-level parking structures, including a new "main" six-level (one level at grade plus five levels above grade) structure south of the existing Macy's parking structure, and a new "east" four-level (one level at grade plus three levels above grade) structure adjacent to Woodman Avenue. Additional structured parking incorporated into retail building, to include one level subterranean and one level of roof-top parking. Remainder surface parking lot east of Fashion Square Lane. Existing two-level Macy's and five-level Bloomingdale's parking structures to remain with modifications to accommodate circulation.	Riverside Drive: Consolidate 2 existing driveways and create one new consolidated "east" driveway with signalized intersection at Matilija Avenue and one new "west" driveway with signal at activated tunnel entrance. Hazeltine Avenue: Restripe south driveway to include one additional ingress lane and eliminate parking along driveway Fashion Square Lane. Woodman Avenue: Restricted to right-turn ingress only. Matilija Avenue: Restricted access to/from Matilija Avenue from Riverside Drive (right-turn movement only and median barrier). Fashion Square Lane: Improve internal circulation with realignment and widening of Fashion Square Lane to establish loop road along southern edge and directly connecting to both Riverside and Woodman access drives.
Alternative A No Project	0	867,000	No change to existing.	4.5	No change to existing.	No change to existing access/circulation condition.

TABLE 56 (CONTINUED)
SUMMARY OF ALTERNATIVES

PROJECT/ ALTERNATIVES	COMMERCIAL USE			PARKING		ACCESS/PROJECT DRIVEWAYS
	NEW CONSTRUCTION (GLSF)	TOTAL CUMULATIVE CONSTRUCTION (GLSF)	BUILDING ENVELOP FOR NEW CONSTRUCTION	PARKING RATIO (PER 1,000 GLSF)	PARKING CONFIGURATION	
Alternative B Existing Entitlement (108K)	108,000	975,000	Two levels of retail building (without integrated parking), located as extension at south end of existing mall just easterly of Bloomingdale's.	4.5	Remove portion and add two levels (for a total of five) to existing three-level (one level at grade plus two levels above grade) southern parking structure; construct new four-level (one level at grade plus three levels above grade) parking structure extension to the east; no alterations to Macy's parking structure.	No change to existing access/circulation condition.
Alternative C Reduced Project 1 (235K/Reduced Height of Parking)	235,000	1,102,000	Two levels of retail building (without integrated parking), located as extension at south end of existing mall with footprint slightly less than Proposed Project.	4.25	Demo two level Macy's structure and construct new six-level (one level at grade plus five levels above grade) structure with footprint similar to that compared to the Proposed Project and slightly increased footprint compared to Alt D, however no subterranean parking would be developed.	Only four (rather than five) project driveways to be provided: same as Proposed Project, but without additional new "west" Riverside Drive project access (or tunnel conversion) east of Bloomingdale's. Fashion Square Lane alignment and improvements similar to Proposed Project. Off-site roadway improvements to Riverside Drive, Matilija Avenue and Woodman Avenue would be the similar to Proposed Project (except without tunnel).
Alternative D Reduced Project 2 (235K/Retain Macy's Parking/ Matilija Avenue Closure)	235,000	1,102,000	Two levels of retail building (without integrated parking), located as extension at south end of existing mall with footprint slightly less than Proposed Project (same as Alt C).	4.25	Retain two level Macy's structure (with alterations) and construct new six-level (one level at grade plus five levels above grade); new six-level structure to have reduced footprint to the east as compared to the Proposed Project; slightly reduced footprint compared to Alt C, however no subterranean parking would be developed	Same as Alternative C with the exception of the configuration of Matilija Avenue across from Riverside Drive, for which access to/from Riverside would be fully closed off.

TABLE 56 (CONTINUED)
SUMMARY OF ALTERNATIVES

PROJECT/ ALTERNATIVES	COMMERCIAL USE			PARKING		ACCESS/PROJECT DRIVEWAYS
	NEW CONSTRUCTION (GLSF)	TOTAL CUMULATIVE CONSTRUCTION (GLSF)	BUILDING ENVELOP FOR NEW CONSTRUCTION	PARKING RATIO (PER 1,000 GLSF)	PARKING CONFIGURATION	
Alternative E Alternate Site Plan 1 (280K/No Tunnel/ No Subterranean Parking)	280,000	1,147,000	Same as Proposed Project, including roof top parking over new retail, but without subterranean level parking.	4.25	To facilitate required parking in the absence of the subterranean level, the existing two-level Macy's parking structure would be demolished and replaced with a new consolidated six-level "main" parking structured designed to "step back" from the Riverside Drive frontage in a terraced fashion. Rooftop parking would tie into rooftop level of retail building. The "east" parking structure along Woodman Avenue would be built, however no subterranean parking would be developed.	Only four (rather than five) project driveways to be provided: same as Proposed Project, but without additional new "west" Riverside Drive project access (or tunnel conversion) east of Bloomingdale's. Fashion Square Lane internal circulation and off-site roadway improvements similar to Proposed Project (except without tunnel).
Alternative F Alternate Site Plan 2 (280K/ Pedestrian Activation)	280,000	1,147,000	Same as Proposed Project but with new public/pedestrian mall entrance at Riverside Drive (just west of Macy's), along with additional landscape/ plaza improvements to enhance pedestrian activation at new entry.	4.25	Same as Proposed Project.	Same as Proposed Project for vehicular driveway accesses. New pedestrian access to mall just west of Macy's department store, in addition to other mall , access and circulation improvements similar to Proposed Project.

TABLE 56 (CONTINUED)
SUMMARY OF ALTERNATIVES

PROJECT/ ALTERNATIVES	COMMERCIAL USE			PARKING		ACCESS/PROJECT DRIVEWAYS
	NEW CONSTRUCTION (GLSF)	TOTAL CUMULATIVE CONSTRUCTION (GLSF)	BUILDING ENVELOP FOR NEW CONSTRUCTION	PARKING RATIO (PER 1,000 GLSF)	PARKING CONFIGURATION	
Alternative G Promenade (190K/ Promenade)	190,000	1,057,000	One level of retail oriented along new internal roadway (promenade street) along south edge of existing mall, incorporated as addition to existing mall on north side of promenade and integrated into ground level of southerly parking structures (two existing and one new) along south side of promenade.	4.25 (at build out) 4.1 (tempor-arily during con-struction phase)	Existing three parking structures (including the two-level Macy's, five-level Bloomingdale's and four-level south parking structures) to remain with modifications. Macy's structure to be modified to accommodate access/ circulation similar to Proposed Project. Bloomingdale's and adjacent "south" structure to be accommodate one level of ground-floor retail along promenade and redirect/ reorient traffic circulation. Construction of one new multi-level parking structure, including a new "main" six-level (one level at grade plus five levels above grade) structure south of the existing Macy's parking structure and stepping down to three levels (grade plus two levels) at its east extension toward Woodman Avenue. Remainder surface parking lot east of Fashion Square Lane.	Vehicular driveway access similar to Proposed Project, but without tunnel access on Riverside Drive and with alternate internal loop road (Fashion Square Lane) configuration. Hazeltine Avenue: South driveway reconfigured to incorporate ramps to second level parking, with no access to ground level parking from this driveway. Modify north driveway to function as secondary access leading to promenade and restricted ground-level parking in Bloomingdale's parking structure. Fashion Square Lane: Alternate internal loop circulation established along south portion of site and contained within parking structure (level two), and would be continually functional as primary internal access. Second, ground-level east-west segment of Fashion Square Lane to function as promenade. Promenade to serve as open-air pedestrian mall during peak mall hours and would be closed to vehicle traffic during those times. Off-site roadway improvements to Riverside Drive, Matilija Avenue and Woodman Avenue would be the similar to Proposed Project (except without tunnel).

GLSF = Gross leasable square feet

Alternative Analysis Format and Methodology

The CEQA Guidelines (Section 15126.6(d)) provide that the degree of analysis required for each alternative need not be exhaustive, but rather should be at a level of detail that is reasonably feasible and shall include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." Under the standards for adequacy, the EIR must contain "a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." Hence, the analysis of environmental effects of project alternatives need not be as thorough or detailed as the analysis of the project itself.

The level of analysis in the following sections of the alternatives analysis has been completed to a sufficient level of detail to determine whether the overall environmental impacts would be less, similar or greater than the corresponding impacts of the Proposed Project. In addition, each alternative is evaluated to determine whether the project objectives, identified above and in Section II: Project Description would be substantially attained by the alternative.

The evaluation of each alternative considers the anticipated net environmental impacts of the alternative after implementation of reasonable mitigation measures (similar, or equivalent, to the level of mitigation defined for the Proposed Project). Net impacts for each environmental issue area are then classified as either having no impact, a less than significant impact or a significant adverse impact. Net impacts are then compared to those of the Proposed Project for each environmental issue area. To facilitate the comparison, the analysis identifies whether the net impact would clearly be less, similar, or greater than that identified for the Proposed Project. Finally, the evaluation provides a comparative analysis of the alternative and its ability to attain the basic project objectives.

V. ALTERNATIVES

A. ALTERNATIVE A: NO PROJECT

ALTERNATIVE DESCRIPTION

The No Project Alternative assumes no new construction and evaluates continuation of the existing conditions at the time the Notice of Preparation was published in July 2007. This Alternative assumes that no changes to the site or existing structures would occur. The existing structures and project site landscaping would remain in their current condition and the site would remain fully occupied. The physical and operational conditions of the shopping center would remain as they are today with no change to the existing commercial square footage totals and no modification to the on-site access, circulation and parking. This alternative satisfies a direct requirement in CEQA for a No Project Alternative comparison.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

1. Aesthetics and Visual Resources

Under the No Project Alternative scenario, there would be no visual changes to the project site; therefore the impacts to aesthetic character, viewsheds, light/glare, and shading would be less than significant and less than those identified for the Proposed Project.

Visual Character. Without the Proposed Project, the proposed site would remain in its current condition. The project site is currently developed with two and three-story mall buildings and parking structures that were built in the early 1960's and renovated in the mid 1990's. While not visually distinctive, these structures have been a visual component of the surrounding area as they have been commercial development icon of the community for more than 40 years.

Because there would be no construction activity under the No Project scenario, aesthetic construction related impacts would be avoided. None of the existing mature trees on-site would be removed.

The No Project Alternative would arguably have a less beneficial impact than the Proposed Project. With the Proposed Project, an updated and more visually distinctive building façade, and intensified landscaped site interior and frontages would be provided. Although the development of the Proposed Project would result in the removal of 48 mature trees (that would be fully replaced), the new construction, building façade updates, and landscaping would enhance the aesthetic quality of the site. Overall, the No Project Alternative would have a lesser beneficial impact.

Alteration of Views. The No Project Alternative would not result in any change of views over current conditions. The Proposed Project visual analysis, included in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, indicates that because of the increased height and location of the proposed new parking structure, views from some of the homes along

Matilija Avenue would be altered. While both the Proposed Project impact and the No Project Alternative impact would be less than significant, overall the impact of the Proposed Project would be worse due to the change in views.

Lighting. In the No Project Alternative, lighting conditions would remain unchanged over existing conditions. Existing on-site sources of night lighting are the spill over of security lighting from open parking areas and at the five docking/loading areas along Riverside Drive. Vehicle lights exiting the project site at the two driveways along Riverside Drive (in the vicinity of Matilija Avenue) sweep out onto adjacent sidewalks, streets and residences to the north. In the long run, illumination impacts from the No Project Alternative would be reasonably comparable to the mitigated impacts from the Proposed Project. Both the Proposed Project impact and the No Project Alternative impact would be less than significant.

2. Air Quality

No grading or construction would be required under the No Project scenario, and no new vehicle trips would be generated due to expansion of uses at the project site. However, traffic generated by existing uses generates pollutant emissions. Gas and electricity usage for commercial operations at the shopping center also generate pollutants in the region. Operational emissions generated by the No Project Alternative would be less than those of the Proposed Project, and would remain less than significant. There would be no construction emissions from the No Project Alternative. During construction, the Proposed Project would result in a significant impact for NO_X, PM2.5 and PM10 emissions. The No Project Alternative would avoid these significant impacts. There would be no new green house gases emitted from the No Project Alternative.

3. Geology and Soils

As discussed in Section IV: Environmental Impact Analysis: C-Geology and Soils, the risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence at the project site is low. However, much of the region is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the No Project Alternative is the same as with the Proposed Project. The No Project Alternative would have a lower on-site population during the day; therefore, the number of people that would be affected in a seismic event would be slightly less. However, any new construction with the Proposed Project would be constructed to meet current seismic standards and not anticipated to create a significant impact. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

The existing condition of the site is generally insignificant with regard to hazardous materials. The potential impacts with regard to asbestos containing materials (ACMs) and lead-based paints are a concern due to demolition and construction of the Proposed Project, however, the main portion of the mall structures would be avoided during construction. Construction activities associated with the Proposed Project introduce a slightly higher risk of hazards due to materials and equipment to be used on-site during the construction activity. With no construction

proposed under the No Project scenario, these potential risks would be avoided. While both the Proposed Project impact and the No Project Alternative impact concerning hazardous materials would be less than significant, overall the impact of the No Project concerning hazardous materials would be less.

5. Water Resources

The water resources impacts from the subject property were analyzed. Runoff from the site is conveyed and adequately handled by the City's storm drain system. Under current conditions, the project site is largely paved and/or covered by structures and impermeable surfaces. New construction of the Proposed Project would require that drainage and water quality conditions at the project site be improved to meet current Standard Urban Stormwater Mitigation Plan (SUSMP) requirements and therefore result in a net improvement to water resources. The No Project Alternative would arguably have a less beneficial impact than the Proposed Project since no treatment of site runoff would occur. As a result, the No Project Alternative would have a lesser beneficial impact than the Proposed Project.

The No Project Alternative's water consumption would be 59,795 gallons per day less than the Proposed Project. The No Project Alternative would create no new water supply impact (as the water usage currently exists) and, therefore, would have less impact than the Proposed Project.

6. Land Use, Planning and Urban Decay

Existing land uses are compatible with surrounding land use patterns. The No Project Alternative would be as compatible with adjacent land uses. Existing uses are consistent with zoning and planning designations and policies for the site. However, the on-site commercial uses are underutilized in their current condition. The community would benefit from the revitalizing effect of the Proposed Project, and hence, this would aid in fostering the goals of the policies of the related City plans. Both the Proposed Project and the No Project Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. It should be noted however, that the Proposed Project affords an opportunity for compliance and implementation of the River Improvement Overlay (RIO), and regional plans and policies, which the No Project Alternative would not.

7. Noise

Noise from the operation of existing uses is generated primarily by traffic coming to and from the project site. Existing uses currently generate traffic and noise that would continue under the No Project. No perceivable change in non-traffic related operational impacts is anticipated between the No Project (existing conditions) and the Proposed Project because the new commercial uses would be contained within an enclosed structure and much of the mall activity would be located on the south side of the project site, shielded from noise-sensitive land uses to the north.

With the No Project Alternative, construction impacts of the Proposed Project would not occur. The No Project Alternative impacts would be less than significant and would avoid the construction noise impacts otherwise associated with the Proposed Project.

8. Fire Services

The No Project Alternative would not result in an increase in fire protection demands and, therefore, would create no impact. This represents a reduction of the Proposed Project's less than significant impact in the area of fire protection.

9. Police Services

The No Project Alternative would not result in an increase in police protection demands. This represents a reduction of the Proposed Project's less than significant impact after mitigation in the area of police protection.

10. Solid Waste

No demolition or construction would be required under the No Project scenario. During construction, the Proposed Project would involve demolition of two parking structures and portions of the mall structure and surface parking lots; however because construction debris will be recycled to the extent feasible (including construction debris from both demolition and waste materials from new construction), the Proposed Project impact for solid waste would be less than significant. Even though Proposed Project construction phase impacts to solid waste are less than significant, the No Project Alternative would avoid these impacts.

The No Project Alternative would generate 1,921 pounds per day less of solid waste than the Proposed Project. As a result, the No Project Alternative would reduce the less than significant impact on solid waste generation as compared to the Proposed Project.

11. Traffic, Circulation and Access

The No Project Alternative involves no additional increase in uses at the project site and the existing Shopping center would continue to operate and generate traffic as is currently experienced. The vehicular access associated with the No Project Alternative would be consistent with the access currently provided at the project site. The parking configuration, although unchanged under the No Project Alternative, would continue to provide parking at the current approved ratio of 4.5 parking spaces per 1,000 GLSF. Improvements and enhancements to internal site circulation, driveway consolidations, pedestrian safety and access enhancements, and off-site traffic mitigations would not occur. Although the overall increase in project site related trips would not occur under the No Project scenario, other beneficial impacts to access, vehicular and pedestrian safety, and internal circulation would also not occur. The No Project Alternative's traffic and circulation impacts would be less than those impacts under the Proposed Project due primarily to an overall lower trip generation rate; however the beneficial impacts of the Proposed Project (i.e., enhanced traffic flow and safety improvements and additional parking areas) would not be realized.

12. Growth Inducing

The No Project Alternative would not result in an increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the No Project Alternative scenario would be less than significant. Because there would be no change in the current condition, the comparative growth inducing impacts of the No Project Alternative are anticipated to be less than those of the Proposed Project.

13. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. However, as the No Project Alternative would not contribute any change to the cumulative conditions, this alternative would have no significant cumulative impacts.

14. Relationship of Alternative to Project Objectives

The No Project Alternative would avoid most of the environmental impacts associated with the Proposed Project (including those that would be less than significant and those that would be beneficial). However, the No Project Alternative would not satisfy any of the project objectives. Specifically, the No Project Alternative would not invigorate economic activity at the project site, would not provide circulation and access improvements that promote enhanced vehicular and pedestrian safety, would not enhance on-site aesthetics treatments that could facilitate improved community linkages, and would not expand the range of services available to the community at this location.

In summary, the No Project Alternative would not attain any of the objectives established for the Proposed Project. For this reason, and although project impacts would be avoided or minimized, the No Project Alternative is not considered a feasible alternative to the Proposed Project.

15. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) only to air quality during the short-term construction phase. For those issues addressed, the No Project scenario would not result in significant environmental impacts and would avoid any new impacts beyond the existing condition.

Implementation of the No Project Alternative would not result in new environmental impacts. Overall, the No Project Alternative would result in a reduced level of impact when compared to the Proposed Project. All of the significant and unavoidable impacts (i.e., short-term construction-related air quality) associated with the Proposed Project would be avoided under the

No Project Alternative. However, all the potential benefits of the Proposed Project (i.e., enhanced traffic flow and safety, and improved on-site access and pedestrian safety) would not be implemented either.

V. ALTERNATIVES

B. ALTERNATIVE B: EXISTING ENTITLEMENT (108,000 GLSF)

ALTERNATIVE DESCRIPTION

The Existing Entitlement (108K) Alternative would consist of build out in accordance with the existing entitlements (as approved in 1994) resulting in the construction of an additional 108,000 GLSF of new retail/restaurant commercial space in a two-story structure south of the existing mall and just southeast of the Bloomingdale's department store and west of the existing food court. A proposed site plan for this alternative is shown in *Figure 63: Existing Entitlement (108,000 GLSF) Alternative – Level 1* and *Figure 64: Existing Entitlement (108,000 GLSF) Alternative – Level 2*. All three of the existing parking structures would remain. A portion of the existing three-level (one-level at grade plus two levels above grade) parking structure would be removed to permit construction of the new two-story mall extension. A third above grade level would be added to the remaining existing three-level parking structure south of the existing mall. A new four-level parking structure (grade plus three levels) would be added to the east end of the existing three-level parking structure, just south of Macy's department store and would add approximately 490 parking spaces to the site. Surface parking would remain south of the Macy's parking structure. Because of the interim loss of on-site parking due to the demolition of the south parking structure, a request for a parking variance to temporarily allow a reduction in on-site parking during the construction phase would be requested. Until this alternative is built out, some project parking would have to be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site).

Improvements to the internal circulation (i.e., realignment and widening of Fashion Square Lane) would not occur and project site driveways at Hazeltine Avenue, Riverside Drive, and Woodman Avenue would remain unchanged. As a result, physical site improvements that would enhance emergency access would not be implemented. Some landscape improvements along the street frontages would be anticipated, but the overall enhancements to the Riverside Drive and Hazeltine Avenue elevations would not be anticipated as all development would be limited to the "back" of the mall. The Existing Entitlement Alternative would not be designed to achieve LEED certification to the extent that the Proposed Project has been designed to do so.

This Alternative was selected because it provides for what has already been entitled, and because it accomplishes some of the project objectives by increasing the commercial intensity at the project site, but would not require new discretionary approvals. While additional restaurant area could be provided with this alternative, the total area of new restaurant uses would be reduced and the incorporation of higher-end, full-service restaurant facilities would most likely not be realized. Under this alternative, requests for Conditional Use Permit(s) for Alcoholic Beverages (CUBs) may still be requested under a separate action. Additionally, the Existing Entitlement Alternative is a "reduced project" alternative representing approximately 40% of the square footage proposed under the Proposed Project.

FIGURE 63
EXISTING ENTITLEMENT (108,000 GLSF) ALTERNATIVE – LEVEL 1

MAP SOURCE: WESTFIELD

NORTH

FIGURE 64
EXISTING ENTITLEMENT (108,000 GLSF) ALTERNATIVE – LEVEL 2

MAP SOURCE: WESTFIELD

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

1. Aesthetics and Visual Resources

Under the Existing Entitlement Alternative scenario, the visual changes to the project site would be less extensive (due to reduced building height of the parking structure) but otherwise similar to those identified for the Proposed Project. Therefore the impacts to aesthetic character and light/glare would be less than significant and similar to those identified for the Proposed Project, while those related to viewsheds would be somewhat less and also less than significant.

Aesthetic Character. With the Existing Entitlement Alternative, all new construction would be sited immediately south of the existing main mall buildings and modifications to the driveways at Hazeltine Avenue and Riverside Drive would not be implemented. Therefore, most of the construction related impacts on visual character, as viewed from Hazeltine Avenue and Riverside Drive, would be minimized. Construction activity would be most visible from Woodman Avenue as the surface lot in this area will be used for construction staging and views from the street toward the project site are relatively unobstructed, hence construction-related visual character impacts from Woodman Avenue would be similar to those identified for the Proposed Project. To accommodate construction of new buildings and implementation of enhanced landscaping, approximately twenty mature trees would be removed, compared to approximately 48 trees under the Proposed Project.

Overall, and due primarily to the reduced construction phase aesthetic impacts, the Existing Entitlement Alternative would have a less than significant impact on visual character that would be slightly less impactive than the Proposed Project.

Alteration of Views. The Proposed Project visual analysis, included in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, indicates that because of the increased height and location of the proposed new parking structure, views from some of the homes along Matilija Avenue would be altered (and partially obstructed). Under the Existing Entitlement Alternative, the new construction (including the new parking structure) would be limited to a location that would not extend as far east as that with the Proposed Project, and the existing Macy's parking structure would not be modified, see *Figure 63: Existing Entitlement (108,000 GLSF) Alternative – Level 1* and *Figure 64: Existing Entitlement (108,000 GLSF) Alternative – Level 2*. For this reason, newly constructed structures would generally not be visible from the Matilija Avenue residences and thus any obstruction of viewsheds would be avoided. While both the Proposed Project impact and the Existing Entitlement Alternative impact would be less than significant, overall the impact of the Proposed Project would be greater than this alternative.

Lighting. Under the Existing Entitlement Alternative, lighting conditions would remain similar to existing conditions and lighting associated with the parking structure will be shielded from light-sensitive uses to the north by intervening structures that would obstruct the view. Existing on-site sources of night lighting are the spill over of security lighting from open parking areas and at the five docking/loading areas along Riverside Drive. Vehicle lights exiting the project site at the two driveways along Riverside Drive (in the vicinity of Matilija Avenue) sweep out

onto adjacent sidewalks, streets and residences to the north. Because the building configuration along the Riverside Drive and Hazeltine Avenue street frontages would not change, and the project site driveways along those frontages would not be altered, the illumination impacts would be similar to those described for the No Project Alternative, and would be reasonably comparable to the mitigated impacts from the Proposed Project. Both the Proposed Project impact and the Existing Entitlement Alternative impact would be less than significant. But without the introduction of night lighting of a six level parking structure south of the Macy's parking structure, this alternative would slightly reduce a less than significant impact of lighting when compared to the Proposed Project.

2. Air Quality

The Existing Entitlement Alternative would require less construction activity than assumed for the Proposed Project. In addition, the Existing Entitlement Alternative would export approximately 20,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. As such, pollutant emissions during the entire Existing Entitlement Alternative construction period would be less than the amount of pollutants emitted during the entire Proposed Project construction period (e.g., NO_X emissions associated with haul trucks). However, the daily construction intensity (e.g., construction equipment hours) for the Existing Entitlement Alternative, would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Existing Entitlement Alternative daily regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$, and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Existing Entitlement Alternative would disturb a maximum of 4.25 acres per day. This would result in 16 pounds per day (ppd) of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceeds the SCAQMD localized significance thresholds. Therefore, the Existing Entitlement Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact, although the duration of that impact would be less than the Proposed Project due to a shorter overall construction period.

The 108,000 GLSF associated with the Existing Entitlement Alternative would generate less mobile and area source emissions than the Proposed Project. Weekday emissions would be approximately 12 pounds per day (ppd) for VOC, 16 ppd for NO_X, 109 ppd for CO, less than one ppd for SO_X, 17 ppd for $PM_{2.5}$, and 3 ppd for PM_{10}. Weekend emissions would be approximately 15 ppd for VOC, 19 ppd for NO_X, 136 ppd for CO, less than one ppd for SO_X, 21 ppd for $PM_{2.5}$, and 4 ppd for PM_{10}. As with the Proposed Project, regional operational emissions for the Existing Entitlement Alternative would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}, and regional operational emissions for the Existing Entitlement Alternative would result in a less than significant impact.

Mobile source emissions associated with the Existing Entitlement Alternative would potentially be less than localized CO emissions for the Proposed Project. Maximum project-related weekday and weekend one- and eight-hour CO concentrations are estimated to be 5 and 3.7 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0

and 20 ppm, respectively. Reduced traffic associated with the Existing Entitlement Alternative would result in slightly reduced levels, but would not substantially change the CO concentrations estimated for the Proposed Project. The Existing Entitlement Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Existing Entitlement Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Existing Entitlement Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Existing Entitlement Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Existing Entitlement Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. However, the Existing Entitlement Alternative is not designed to achieve LEED certification and may not be consistent with objectives under the Climate Action Team Plan and the City's Green LA Action Plan.

3. Geology and Soils

As discussed in Section IV: Environmental Impact Analysis: C-Geology and Soils, the risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence at the project site is low. However, much of the region is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the Existing Entitlement Alternative is the same as with the Proposed Project. However, due to the reduced GLSF area, the Existing Entitlement Alternative would have a lower on-site population during the day; therefore, the number of people that would be affected in a seismic event would be slightly less. However, any new construction under either scenario would be constructed to meet current seismic standards and would ensure that potential impacts are less than significant. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

The existing condition of the site is generally insignificant with regard to hazardous materials. Construction activities associated with the Proposed Project would introduce a slightly higher risk of hazards due to materials and equipment to be used on-site during the construction activity for a longer duration than would be required with the Existing Entitlement scenario. With construction proposed under the Existing Entitlement Alternative, although overall reduced in building intensity, the nature of activities and construction style and materials would make the impact related to hazardous materials similar to that identified for the Proposed Project. While both the Proposed Project impact and the Existing Entitlement Alternative impact concerning hazardous materials would less than significant, overall the impact of the Existing Entitlement scenario would be slightly less due to a slightly reduced duration of construction activity. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

The operations of the Existing Entitlement Alternative, although on a slightly smaller scale would be of a similar nature of activities and impacts related to hazardous materials as those

identified for the Proposed Project. While both the Proposed Project impact and the Existing Entitlement Alternative impact concerning hazardous materials from operations would be less than significant, overall the impact of the Existing Entitlement scenario would be slightly less due to the reduced building and parking area and volume of materials consumed. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

5. Water Resources

Runoff from the site is conveyed and would be adequately handled by the City's storm drain system. Under current conditions, the project site is largely paved and/or covered by structures and impermeable surfaces. New construction under the Existing Entitlement Alternative would not result in any substantial net change in permeable surface area, except that new construction would be designed to comply with current SUSMP requirements and therefore result in a net improvement to water resources over existing conditions. The area of improvement to drainage and water quality under this scenario could be less than the area of improvements under the Proposed Project. Specifically, the Proposed Project will be required to bring runoff to all three streets up to current SUSMP standards, but depending on the design of the storm-water drainage system for the parking structure under the Existing Entitlement project SUSMP standards may only be required for drainage to Hazeltine Avenue. However, it is possible that the Existing Entitlement Alternative could result in a slightly reduced impact compared to the Proposed Project because: (1) there would be less vehicle-related contaminants at the site due to an overall reduced commercial square footage; and (2) there would be more "undeveloped" area/opportunity available on-site to implement best management practices that are based on "green" strategies. Overall, the Existing Entitlement Alternative would have a similar and still less than significant impact on water quality when compared to the Proposed Project.

The Existing Entitlement Alternative's water consumption of approximately 25,800 gallons per day would be 28,061 gallons per day less than the Proposed Project and therefore would have less of an impact than the Proposed Project. However, the impact for both the Existing Entitlement Alternative and the Proposed Project scenarios would be less than significant.

6. Land Use, Planning and Urban Decay

Existing land uses are compatible with surrounding land use patterns. The Existing Entitlement Alternative would be a continuation, albeit intensification, of the existing community commercial use and would be similarly compatible with adjacent land uses. The Existing Entitlement Alternative is based on the permitted uses, height, development criteria and building intensity provisions of the existing entitlements approved in 1994. Since there has been no substantial change in land use patterns in the area since 1994, the Existing Entitlement Alternative would still be considered to be compatible with surrounding uses and not to have a significant impact on compatibility. As a result, this alternative would have a similar less than significant impacts on compatibility as the Proposed Project.

Existing uses, and proposed uses under this scenario, are consistent with zoning and planning designations and policies for the site. However, the on-site commercial uses are underutilized in

their current condition. The community could benefit from the revitalizing effect of an expansion of uses proposed under the Existing Entitlement Alternative, and hence, this would aid in fostering the goals of the policies of the related City plans. Both the Proposed Project and the Existing Entitlement Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. Both scenarios would also afford an opportunity for compliance and implementation of the RIO. As with the Proposed Project, this alternative would be consistent with regional planning programs (i.e., SCAG's RCP and the AQMP). The Existing Entitlement Alternative would have similar less than significant impacts with regard to land use compatibility as the Proposed Project.

7. Noise

Noise from the operation of existing uses is generated primarily by traffic coming to and from the project site. Existing uses currently generate traffic and noise that would continue and increase slightly under the Existing Entitlement Alternative. Because traffic levels would be greater with the Proposed Project, traffic-related noise levels would be proportionately less under the Existing Entitlement scenario. However, no perceivable change in non-traffic related operational impacts is anticipated between the Existing Entitlement Alternative and the Proposed Project because the new commercial uses would be contained within an enclosed structure and much of the mall activity would be located on the south side of the project site, shielded from noise-sensitive land uses to the north.

With the Existing Entitlement Alternative, construction impacts would be less notable at noise-sensitive uses to the north because the construction activity would be obstructed primarily by existing structures. The Existing Entitlement Alternative impacts would be less than significant and would result in reduced construction noise impacts than would otherwise be associated with the Proposed Project.

8. Fire Services

The Existing Entitlement Alternative would not result in a measurable increase in fire protection demands and, therefore, would create a less than significant impact. However, this alternative would not involve any of the on-site circulation improvements associated with the Proposed Project. As a result, overall the Existing Entitlement Alternative is anticipated to result in a similar level of impact for that anticipated with the Proposed Project.

9. Police Services

The Existing Entitlement Alternative would not result in a significant increase in police protection demands and the overall impact would be similar to that anticipated with the Proposed Project, and therefore less than significant.

10. Solid Waste

During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste

materials from new construction through an aggressive recycling program. Under the Existing Entitlement Alternative, only a small portion of the existing three-level parking structure would be demolished and the volume of construction waste would be less than that for the Proposed Project. Although the level of demolition or construction required under the Existing Entitlement scenario would be less, this alternative would not fully avoid impacts related to construction-generated solid waste. However with the implementation of a similar aggressive recycling program the impact is anticipated to be less than significant.

The Existing Entitlement Alternative would generate 305 pounds per day of solid waste, which would generate less of an impact on landfills than the 1921 pounds per day generated by the Proposed Project. Operational volumes of solid waste generated by the Existing Entitlement Alternative would be less than those of the Proposed Project, and the impact would remain less than significant.

11. Traffic, Circulation and Access

The Existing Entitlement Alternative involves an increase of approximately 108,000 GLSF of commercial retail uses at the project site. Under this scenario, a net increase of 37 vehicle trips during the weekday A.M. peak hour and 189 vehicle trips during the weekday P.M. peak hour are anticipated.[1] During the weekend peak hours, an additional 250 vehicle trips are anticipated. During both the weekday and weekend conditions, these trip increases due to implementation of the Existing Entitlement Alternative would result in a reduced level of traffic impact compared to the Proposed Project, and would have a net impact that would be less than significant with the implementation of comparable mitigation measures. The parking configuration would be somewhat enhanced with the addition of more centrally located parking, and this alternative would provide parking at the current approved ratio of 4.5 parking spaces per 1,000 GLSF. The vehicular access associated with the Existing Entitlement Alternative would be consistent with the access currently provided at the project site. Improvements and enhancements to internal site circulation, driveway consolidations, and pedestrian safety and access enhancements would not occur. Although the overall increase in project site related trips would not occur to the same level as the Proposed Project under the Existing Entitlement scenario, other beneficial impacts to access, vehicular and pedestrian safety, and internal circulation would also not occur. However, the Existing Entitlement Alternative's traffic impacts would be less than the Proposed Project's impacts overall due to the reduced number of vehicle trips. As a result, with the implementation of similar traffic mitigation as the Proposed Project, the Existing Entitlement Alternative would be anticipated to reduce traffic impacts to a less than significant level.

12. Growth Inducing

The Existing Entitlement Alternative would not result in a measurable increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the Existing Entitlement scenario would be less than significant and may be slightly less than any potential associated with the Proposed Project.

[1] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

13. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Existing Entitlement Alternative would result a contribution to cumulative impacts that is similar to, but slightly less than that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project (and pro-rated accordingly), the Alternative's contribution toward cumulative impacts would be less than significant.

14. Relationship of Alternative to Project Objectives

The Existing Entitlement Alternative would result in reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). However, the Existing Entitlement Alternative would not satisfy most of the project objectives to the extent possible with the Proposed Project. Specifically, the Existing Entitlement Alternative would not invigorate economic activity at the project site to the full extent of the Proposed Project, would not provide circulation and access improvements that promote enhanced vehicular and pedestrian safety, would not enhance on-site improvements that could facilitate improved community linkages, and would not expand to the fullest extent the range of services (e.g., restaurants higher end retail uses) available to the community at this location. Also, the Existing Entitlement Alternative would not be designed to achieve LEED certification to the same extent as the Proposed Project. In summary, the Existing Entitlement Alternative would not attain most of the objectives established for the Proposed Project.

15. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Existing Entitlement scenario would reduce but not avoid this significant air quality impact, however this alternative would reduce the level of all other impacts addressed herein beyond those anticipated with the Proposed Project.

Implementation of the Existing Entitlement Alternative would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. While some of the impacts under this alternative may have somewhat less impacts relative to the Proposed Project, none of the impacts are totally avoided. Overall, the Existing Entitlement Alternative would result in a reduced level of impact when compared to the Proposed Project.

V. ALTERNATIVES

C. ALTERNATIVE C: REDUCED PROJECT 1 – (235,000 GLSF/REDUCED HEIGHT OF PARKING)

ALTERNATIVE DESCRIPTION

In addition to the Existing Entitlement Alternative, two additional "reduced project" alternatives were evaluated. At an approximate 60% reduction, the Existing Entitlement Alternative offered a scenario where a substantial reduction in project scale was evaluated. Two other "reduced project" alternatives were considered that essentially address the same level of reduction (i.e., 16%), but with varied site plan configurations. A net reduction of approximately 16% was selected as it represents the next logical scaled-back project size given internal shopping circulation considerations for integration with the existing shopping center development. The Reduced Project 1 Alternative is one of two alternatives that represent an approximate 16% reduction in proposed commercial square footage. The location and configuration of the new commercial development would be similar under both of the Reduced Project Alternatives, however, the approach to parking accommodations would be addressed differently under each Alternative.

The Reduced Project 1 (235K/Reduced Height of Parking) Alternative consists of up to 235,000 GLSF of new retail/restaurant commercial space in a two-level structure (with rooftop parking) that would be constructed south of the existing mall between the Bloomingdale's and Macy's department stores. A proposed site plan for this alternative is shown in *Figure 65: Reduced Project 1 (235,000 GLSF/Reduced Height of Parking) Alternative – Level 1*, *Figure 66: Reduced Project 1 (235,000 GLSF/Reduced Height of Parking) Alternative – Level 2*, and *Figure 67: Reduced Project 1 (235,000 GLSF/Reduced Height of Parking) Alternative – Level 3*. A cross section of the east parking structure for this alternative is shown on *Figure 68: Reduced Project 1 (235,000 GLSF/Reduced Height of Parking) Alternative Cross Section*. The existing three-level "south" parking structure would be demolished to accommodate new construction and facilitate internal circulation improvements. Additional and replacement parking would be accommodated in a new five-level (one-level at grade plus four levels above grade) parking structure that would extend easterly from the new commercial segment. Similar to the Proposed Project, minor modifications to the Bloomingdale's parking structure would be required to tie in new structures and implement circulation improvements. Unlike with the Proposed Project, the existing two-level Macy's parking structures would not be retained, and instead would be completely demolished and replaced with a new consolidated terraced five-level (one-level at grade plus four-levels above grade) parking structure located east and southeast of Macy's department store. Because of the interim loss of on-site parking due to the demolition of the south and Macy's parking structure, a request for a parking variance to temporarily allow a reduction in on-site parking during the construction phase would be requested. Until this alternative is buildout, some project parking would have to be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site). Unlike the Proposed Project, this alternative would not provide a parking structure on the eastern most portion of the project site. As a result it would only provide parking at a ratio of 4.25 spaces per 1,000 GLSF. It is anticipated that construction of this alternative would be completed by year 2012.

FIGURE 65
REDUCED PROJECT 1 (235,000 GLSF) ALTERNATIVE – LEVEL 1

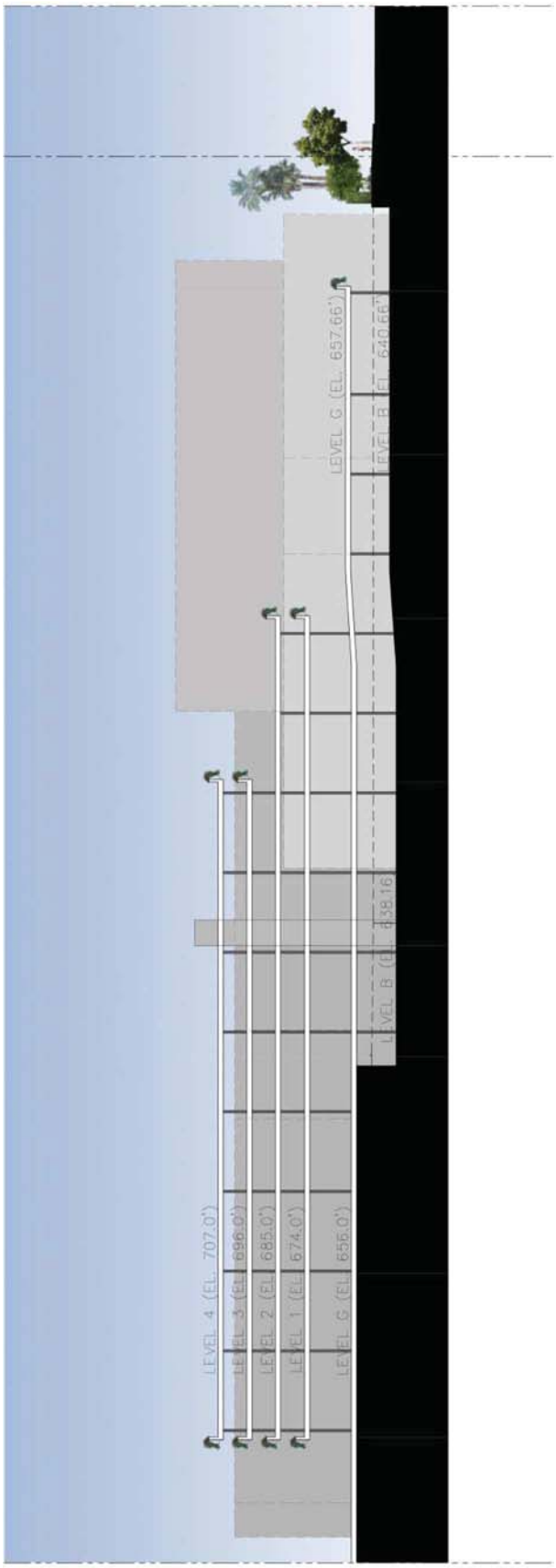
MAP SOURCE: WESTFIELD

FIGURE 66
REDUCED PROJECT 1 (235,000 GLSF) ALTERNATIVE – LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE 67
REDUCED PROJECT 1 (235,000 GLSF) ALTERNATIVE – LEVEL 3

MAP SOURCE: WESTFIELD



NORTH

FIGURE 68
REDUCED PROJECT 1 (235,000 GLSF) ALTERNATIVE – CROSS SECTION

MAP SOURCE: WESTFIELD

Under the Reduced Project 1 Alternative, landscape and building facade enhancements, similar to those described for the Proposed Project, along the Riverside Drive and Hazeltine Avenue frontages would be provided. Full improvements to internal circulation and site access driveways, including realignment of the driveway at the Matilija Avenue intersection, would be implemented, including circulation improvements that would facilitate better emergency access within the project site. This Reduced Project 1 Alternative represents an approximate 16% reduction in new commercial square footage compared to the Proposed Project.

The Reduced Project 1 Alternative would require the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 235,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

- Site Plan Review for the modification of two existing parking structures, reconfiguration of site driveways and internal circulation, construction of 235,000 GLSF retail space within a new two-level structure, and construction of a new five-level parking structure.

- Conditional Use Permit for Commercial Corner[2] development and deviation from:

    - a 45-foot height limit to provide a building and parking structure with maximum height no greater than the existing Macy's building;

    - allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight;

    - a requirement to provide a five foot landscaped area immediately adjacent to all street frontages;

    - the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass along the Riverside Drive frontage; and

    - the restriction on tandem parking by providing tandem parking spaces.

[2] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Expansion Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site and the unified nature of the center that for a worst case analysis of potential impacts that for at least this Environmental document that it will be assumed that the project is subject to the Commercial Corner restrictions.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction

- Haul Route approval from the Building and Safety Commission for construction phase operations

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Reduced Project 1 Alternative.

The Reduced Project 1 Alternative would be designed to address LEED compliance to the extent feasible with the reduced scale of development proposed with this alternative, but may not achieve full LEED certification. This Reduced Project 1 Alternative was selected to provide a comparison to the Proposed Project that would potentially reduce impacts to traffic, air quality, public services and utilities.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

1. Aesthetics and Visual Resources

Under the Reduced Project 1 Alternative scenario, the visual changes to the project site from Riverside Drive would be similar to those identified for the Proposed Project, but building massing of the new east parking structure would be slightly reduced as it be limited to five-levels (one-level at grade plus four-levels above grade) compared to the six levels (1 at grade and 5 above grade) proposed with the Proposed Project. Nonetheless, visibility of the sixth level under the Proposed Project would be very limited due to an approximate 210 feet setback of the proposed parking structure from Riverside Drive. As a result, the individual levels of the parking structure are not readily discernable but rather perceived as just part of a building mass, and the sixth level of the Proposed Project is not distinguishable. Hence, elimination of the upper parking level under the Reduced Project 1 Alternative would not substantially alter (i.e., improve) the views of this portion of the project. Therefore the impacts to aesthetic character and light/glare from Riverside Drive would be similar to those identified for the Proposed Project, including those related to viewsheds, and would be less than significant. Under this alternative, there would not be a new parking structure on the Woodman Avenue frontage. As a result, the alterations to the visual changes from Woodman Avenue caused by the five-level parking structure would appear as part of the background because of the large setback from

Woodman Avenue. Therefore, the impacts to aesthetics character and lights/glare would be reduced as compared to those identified for the Proposed Project., including those related to viewsheds and would be less than significant.

Aesthetic Character. With the Reduced Project 1 Alternative, all new construction would be sited to the south of the existing mall buildings and the Macy's shopping center, and the driveways at Hazeltine Avenue and Riverside Drive would be consolidated and improved with a new signalized intersection. Construction related impacts on visual character, as viewed from Hazeltine Avenue and Riverside Drive would be similar to those identified for the Proposed Project. Under this alternative, there would not be a new parking structure on the Woodman Avenue frontage. As a result, the alterations to the visual changes from Woodman Avenue caused by the five-level parking structure would appeal as part of the background because of the large setback from Woodman Avenue.

To accommodate construction of new buildings and implementation of enhanced landscaping, as with the Proposed Project, approximately 48 mature trees would be removed. Overall, the Reduced Project 1 Alternative would have a similar net impact to visual character as that identified for the Proposed Project as both scenarios would provide an updated and more visually distinctive building façade, and intensified landscaping at the site interior and frontages. Both the Reduced Project 1 Alternative and the Proposed Project would have a less than significant impact and there would be no measurable difference between the two scenarios relative to visual character.

Alteration of Views. The Proposed Project visual analysis, included in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, indicates that because of the increased height and location of the proposed new parking structure, views from some of the homes along Matilija Avenue would be altered (and partially obstructed). Under the Reduced Project 1 Alternative, the new construction (including the new parking structure) would be similarly located except that the levels of the new parking structure would not extend beyond the southern edge of the Macy's parking structure. The increased building setback may result in a perception of reduced building massing, but would not result in a change in the overall viewshed from the Matilija Avenue area relative to the Proposed Project. Both the Proposed Project impact and the Reduced Project 1 Alternative impact would be less than significant and similar.

Lighting. Under the Reduced Project 1 Alternative, lighting conditions at build out would be similar to that of the Proposed Project. Both the Proposed Project impact and the Reduced Project 1 Alternative impact would be less than significant.

2. Air Quality

The Reduced Project 1 Alternative would require slightly less construction activity than assumed for the Proposed Project as approximately 235,000 GLSF would be constructed instead of 280,000 GLSF. In addition, the Reduced Project 1 Alternative would export approximately 35,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. As such, pollutant emissions during the entire Reduced Project 1 Alternative construction period would be less than the amount of pollutants emitted during the entire Proposed Project

construction period (e.g., NO_X emissions associated with haul trucks). The daily construction intensity (e.g., construction equipment hours) for the Reduced Project 1 Alternative, would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Reduced Project 1 Alternative daily regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$, and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact. However, with the reduced export of dirt, the amount of NO_X resulting from haul truck trips would be reduced to less than significant levels and this alternative would avoid this significant regional impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Reduced Project 1 Alternative would disturb a maximum of 4.25 acres per day. This would result in 16 ppd of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceeds the SCAQMD localized significance thresholds. Therefore, the Reduced Project 1 Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact, although the duration of that impact would be slightly less than the Proposed Project given the slightly shorter construction period of this alternative.

The 235,000 GLSF associated with the Reduced Project 1 Alternative would generate less mobile and area source emissions than the Proposed Project. Weekday emissions would be approximately 25 ppd for VOC, 33 ppd for NO_X, 229 ppd for CO, less than one ppd for SO_X, 7 ppd for $PM_{2.5}$, and 35 ppd for PM_{10}. Weekend emissions would be approximately 31 ppd for VOC, 41 ppd for NO_X, 288 ppd for CO, less than one ppd for SO_X, 9 ppd for $PM_{2.5}$, and 44 ppd for PM_{10}. Similar to the Proposed Project, regional operational emissions would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}. As such, regional operational emissions for the Reduced Project 1 Alternative would result in a less than significant impact.

Mobile source emissions associated with the Reduced Project 1 Alternative would potentially reduce the Proposed Project's localized CO emissions. Maximum project-related weekday and weekend one- and eight-hour CO concentrations are estimated to be 5 and 3.7 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. Reduced traffic associated with the Reduced Project 1 Alternative would not substantially change the CO concentrations estimated for the Proposed Project. As such, the Reduced Project 1 Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Reduced Project 1 Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Reduced Project 1 Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Reduced Project 1 Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Reduced Project 1 Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. The Reduced Project 1 Alternative would be designed to incorporate LEED certification element to the extent feasible to achieve many of the objectives in the Climate Action Team Plan and the City's Green LA Action Plan. Thus, similar to the Proposed Project, the Reduced Project 1 Alternative would result in a less than significant global warming impact.

3. Geology and Soils

The risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence at the project site is low. However, much of the region is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the Reduced Project 1 Alternative is the same as with the Proposed Project. However, due to the reduced GLSF area, the Reduced Project 1 Alternative would have a lower on-site population during the day; therefore, the number of people that would be affected in a seismic event would be slightly less. However, any new construction under either scenario would be constructed to meet current seismic standards and would ensure that potential impacts are less than significant. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

The existing condition of the site is generally insignificant with regard to hazardous materials. The potential impacts with regard to asbestos containing materials (ACMs) and lead-based paints are a concern due to demolition and construction of the Proposed Project, however, the main portion of the mall structures would be avoided during construction. Construction activities associated with the Reduced Project 1 Alternative and the Proposed Project would be similar with no measurable change in risk of hazards due to materials and equipment to be used on-site. Both the Proposed Project impact and the Reduced Project 1 Alternative impact would less than significant. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

5. Water Resources

Under current conditions, the project site is largely paved and/or covered by structures and impermeable surfaces. New construction under the Reduced Project 1 Alternative would not result in any substantial net change in permeable surface area, except that new construction would be designed to comply with current SUSMP requirements and therefore result in a net improvement to water resources over existing conditions. The level of improvement to drainage and water quality under this scenario would be similar to the net improvement under the Proposed Project. However, it is possible that the Reduced Project 1 Alternative could result in a slightly reduced impact compared to the Proposed Project because there would be less vehicle-related contaminants at the site due to an overall reduced commercial square footage. Overall, the Reduced Project 1 Alternative would have a beneficial impact and would be essentially the same impact as that identified for the Proposed Project.

The Reduced Project 1 Alternative's water consumption would be 32,400 gallons per day which would be 21,461 gallons per day less than the Proposed Project and therefore would have less of an impact than the Proposed Project. However, the impact for both the Reduced Project 1 Alternative and the Proposed Project scenarios would be less than significant.

6. Land Use, Planning and Urban Decay

The Reduced Project 1 Alternative would be a continuation of the existing community commercial use and would be similarly compatible with adjacent land uses. Existing uses, and proposed uses under this scenario, are consistent with zoning and planning designations and policies for the site and would require similar entitlement approvals as described for the Proposed Project. The community would benefit from the revitalizing effect of an expansion of uses proposed under the Reduced Project 1 Alternative, and hence, this would aid in fostering the goals of the policies of the related City plans. Both the Proposed Project and the Reduced Project 1 Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. Both scenarios would also afford an opportunity for compliance and implementation of the RIO. This Alternative would similarly consistent with regional plans and policies (including the RCP and the AQMP) as is the Proposed Project. The Reduced Project 1 Alternative would have similar less than significant impacts with regard to land use compatibility commensurate with the Proposed Project.

7. Noise

Noise from the operation of existing uses is generated primarily by traffic coming to and from the project site and these levels would increase with intensification of uses at the project site. Because traffic levels would be slightly greater with the Proposed Project, traffic-related noise levels would be proportionately less under the Reduced Project 1 scenario. However, no perceivable change in non-traffic related operational impacts is anticipated between the Reduced Project 1 Alternative and the Proposed Project because the new commercial uses would be contained within an enclosed structure and much of the mall activity would be located on the south side of the project site, shielded from noise-sensitive land uses to the north.

Although construction time may not be as long as the Proposed Project the intensity of any individual day's construction activities are anticipated to be similar to that of the Proposed Project. As a result, worst case construction-related noise impacts would be similar to those described for the Proposed Project. Although there would not be the construction related noise associated with the reopening of the Riverside Drive tunnel. Overall, the Reduced Project 1 Alternative impacts are not expected to be measurably different than construction noise impacts that would otherwise be associated with the Proposed Project, and would be less than significant.

8. Fire Services

The Reduced Project 1 Alternative would not result in a measurable increase in fire protection demands and, therefore, would create a less than significant impact. This represents a similar level of impact for that anticipated with the Proposed Project.

9. Police Services

The Reduced Project 1 Alternative would not result in a significant increase in police protection demands and the overall impact would be similar to that anticipated with the Proposed Project.

10. Solid Waste

The Reduced Project 1 Alternative would involve similar materials from new construction as that for the Proposed Project. The Reduced 1 Alternative would involve similar demolition and construction activities and therefore would result in similar potential impacts as the Proposed Project. During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste materials from new construction through an aggressive recycling program. The Reduced Project 1 Alternative could also avoid a significant impact from construction waste with the implementation of a similar aggressive recycling program. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

The Reduced Project 1 Alternative would generate 662 pounds per day of solid waste, which would be 1,259 pounds per day less of solid waste than the Proposed Project. Operational volumes of solid waste generated by the Reduced Project 1 Alternative would be less than those of the Proposed Project, and the impact would remain less than significant.

11. Traffic, Circulation and Access

The Reduced Project 1 Alternative involves an increase of approximately 235,000 GLSF of commercial retail uses at the project site. Under this scenario, a net increase of 79 vehicle trips during the weekday A.M. Peak hour and 402 vehicle trips during the weekday P.M. peak hour are anticipated.[3] During the weekend peak hours, an additional 534 vehicle trips are anticipated. During both the weekday and weekend conditions, these trip increases due to implementation of the Reduced Project 1 Alternative would result in a reduced level of traffic impact compared to the Proposed Project, and would have a net impact that would be less than significant with the implementation of comparable mitigation measures. Improvements and enhancements to internal site circulation, driveway consolidations, and pedestrian safety and access enhancements would be implemented in a manner consistent with those proposed under the Proposed Project. Overall, the Reduced Project 1 Alternative impacts would be less than the Proposed Project's impacts overall.

The Reduced Project 1 Alternative would not include the construction of the four-level structure on the eastern most portion of the project site. As a result, this alternative would only provide parking at a ratio of 4.25 spaces per 1,000 GLSF. This ratio meets the anticipated demand for the shopping center. This may result in some increased inconvenience to shoppers as compared to the Proposed Project. But it would not result in a significant impact to parking.

Although the Reduced Project 1 Alternative is anticipated to result in an overall decrease in traffic impacts when compared to the Proposed Project, contribution to the City's Adaptive Traffic Control System (ATCS) installation at seven study intersections, as well as redesignation of the Woodman Avenue/Riverside Drive intersection and southbound approach, would be implemented in a manner similar to the Proposed Project with this alternative.

[3] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

12. Growth Inducing

The Reduced Project 1 Alternative would not result in a measurable increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the Reduced Project 1 scenario would be less than significant and may be slightly less than any potential associated with the Proposed Project.

13. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Reduced Project 1 Alternative would result a contribution to cumulative impacts that is similar to, but slightly less than that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project (and pro-rated accordingly), the Alternative's contribution toward cumulative impacts would be less than significant.

14. Relationship of Alternative to Project Objectives

The Reduced Project 1 Alternative would result in slightly reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). However, the Reduced Project 1 Alternative may not satisfy some of the project objectives to the extent possible with the Proposed Project. Specifically, the Reduced Project 1 Alternative would not expand to the fullest extent the range of services and stores available to the community at this location.

15. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Reduced Project 1 scenario could still result in a significant air quality impact (although reduced in terms of duration), but for most other issues this alternative would reduce the level of impacts beyond those anticipated with the Proposed Project.

Implementation of the Reduced Project 1 Alternative (235K/Reduced Height of Parking) would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. However, with the reduction in parking to 4.25 spaces per 1,000 GLSF, some increased inconvenience will occur but a less than significant impact on parking is anticipated. The impacts under this alternative may have somewhat less impacts relative to the Proposed Project, however, none of the impacts are totally avoided. Additionally, the significant unavoidable

impacts from construction-related air quality, associated with the Proposed Project would still occur, because peak daily construction activity would not be substantially reduced under this alternative.

V. ALTERNATIVES

D. ALTERNATIVE D: REDUCED PROJECT 2 – (235,000 GLSF/MAINTAIN MACY'S PARKING STRUCTURE/FULL CLOSURE OF MATILIJA AVENUE)

ALTERNATIVE DESCRIPTION

The Reduced Project 2 (235K/Maintain Macy's Parking Structure/Full Closure of Matilija Avenue) Alternative represents another "reduced project" alternative offering an approximate 16% reduction in proposed commercial square footage than what is proposed with the Proposed Project. This Alternative differs from the Reduced Project 1 (235K/Reduced Height of Parking) Alternative by: (1) retaining most of the existing Macy's parking structure, (2) having all new construction occur south of this structure, (3) incorporating the full closure of Matilija Avenue at Riverside Drive, and (4) adding the new parking structure south of the retained Macy's structure which would contain six-levels (one-level at grade plus five-levels above grade) but would have a slightly reduced footprint as compared to the Reduced Project 1.

With the Reduced Project 2 Alternative, up to 235,000 GLSF of new retail/restaurant commercial space in a two-level structure (with rooftop parking) south of the existing mall between the Bloomingdale's and Macy's department stores would be constructed. A proposed site plan for this alternative is shown in *Figure 69: Reduced Project 2 (235,000 GLSF/Maintain Macy's Parking/Matilija Avenue Closure) Alternative – Level 1*, *Figure 70: Reduced Project 2 (235,000 GLSF/Maintain Macy's Parking/Matilija Avenue Closure) Alternative – Level 2*, and *Figure 71: Reduced Project 2 (235,000 GLSF/Maintain Macy's Parking/Matilija Avenue Closure) Alternative – Level 3*. A cross section of the east parking structure for this alternative is shown on *Figure 72: Reduced Project 2 (235,000 GLSF/Maintain Macy's Parking/Matilija Avenue Closure) Alternative Cross Section*. As with the Proposed Project (and the Reduced Project 1 Alternative), the existing three-level parking structure would be demolished to accommodate new construction and facilitate internal circulation improvements. Additional and replacement parking would be accommodated in a new six-level (one-level at grade plus five levels above grade) parking structure that would extend easterly from the new commercial segment. Similar to the Proposed Project, only minor modifications to the Macy's parking structure would be required to tie in new structures and implement the new signalized driveway across from Matilija Avenue. Because of the interim loss of on-site parking due to the demolition of the south parking structure, a request for a parking variance to temporarily allow a reduction in on-site parking during the construction phase would be requested. Until this alternative is buildout, some project parking would be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site). Unlike the Proposed Project, this alternative would not provide a parking structure on the eastern most portion of the project site. As a result it would only provide parking at a ratio of 4.25 spaces per 1,000 GLSF. It is anticipated that construction of this alternative would be completed by year 2012.

FIGURE 69
REDUCED PROJECT 2 (235,000 GLSF) ALTERNATIVE – LEVEL 1

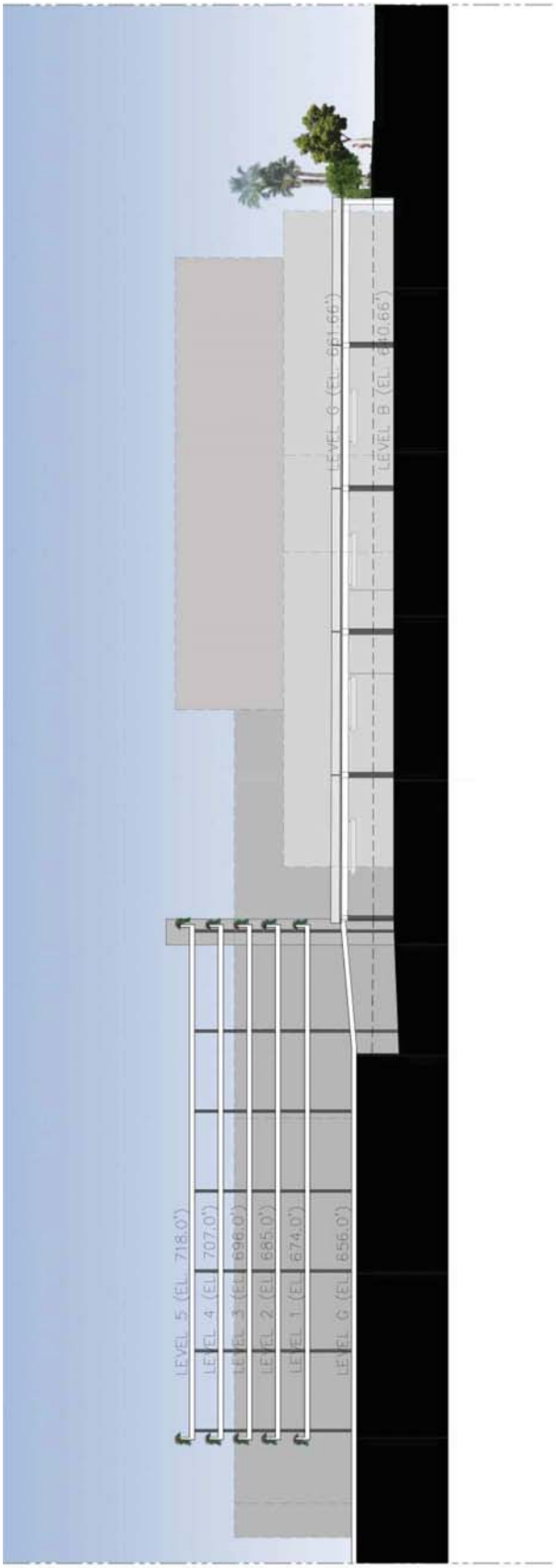
MAP SOURCE: WESTFIELD

FIGURE 70
REDUCED PROJECT 2 (235,000 GLSF) ALTERNATIVE – LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE 71
REDUCED PROJECT 2 (235,000 GLSF) ALTERNATIVE – LEVEL 3

MAP SOURCE: WESTFIELD



NORTH

FIGURE 72
REDUCED PROJECT 2 (235,000 GLSF) ALTERNATIVE CROSS SECTION

MAP SOURCE: WESTFIELD

Under the Reduced Project 2 Alternative, landscape and building facade enhancements, similar to those described for the Proposed Project, along the Riverside Drive and Hazeltine Avenue frontages would be provided. Full improvements to internal circulation and site access driveways, including realignment of the driveway at the Matilija Avenue intersection, would be implemented, and including circulation improvements that would facilitate better emergency access within the project site. However, under this alternative all vehicular access to Matilija Avenue from Riverside Drive would be eliminated. This Reduced Project 2 Alternative represents an approximate 16% reduction in new commercial square footage compared to the Proposed Project.

The Reduced Project 2 Alternative would require the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 235,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

- Site Plan Review for the modification of existing parking structures, reconfiguration of site driveways and internal circulation, construction of 235,000 GLSF retail space within a new two-level structure, and construction of a new six-level parking structure.

- Conditional Use Permit for Commercial Corner[4] development and deviation from:

    - a 45-foot height limit to provide a building and parking structure with maximum height no greater than the existing Macy's building;

    - allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight;

    - a requirement to provide a five foot landscaped area immediately adjacent to all street frontages;

    - the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass along the Riverside Drive frontage; and

    - the restriction on tandem parking by providing tandem parking spaces.

[4] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Expansion Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site and the unified nature of the center that for a worst case analysis of potential impacts that for at least this Environmental document that it will be assumed that the project is subject to the Commercial Corner restrictions.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.
- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction

- Haul Route approval from the Building and Safety Commission for construction phase operations

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Reduced Project 2 Alternative.

The Reduced Project 2 Alternative would be designed to address LEED compliance to the extent feasible with the reduced scale of development proposed with this alternative, but may not achieve full LEED certification. This alternative was selected to provide a comparison to the Proposed Project that would potentially reduce impacts to traffic, air quality, public services and utilities. Similar to the Reduced Project 1 Alternative, analysis of this alternative is useful in comparing traffic, land use, and aesthetic (i.e. height and building intensity) impacts resulting from additional intensification on the project site.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

1. Aesthetics and Visual Resources

Under the Reduced Project 2 Alternative scenario, the visual changes to the project site from Riverside Drive would be similar to those identified for the Proposed Project, but building massing of the new parking structure would be slightly reduced as it would be set back an additional 150 feet. Therefore the impacts to aesthetic character, light/glare, and shading would be less than significant and similar to those identified for the Proposed Project and the Reduced Project 1 Alternative, including those related to viewsheds. Under this alternative, there would not be a new parking structure on the Woodman Avenue frontage. As a result, the alterations to the visual changes from Woodman Avenue caused by the five-level parking structure would appeal as part of the background because of the large setback from Woodman Avenue. Therefore, the impacts to aesthetics character and lights/glare would be reduced as compared to those identified for the Proposed Project., including those related to viewsheds and would be less than significant.

Aesthetic Character. With the Reduced Project 2 Alternative, all new construction would be sited to the south of the existing mall buildings and the Macy's shopping center, and the driveways at Hazeltine Avenue and Riverside Drive would be consolidated and improved with a new signalized intersection. Construction related impacts on visual character, as viewed from Hazeltine Avenue and Riverside Drive would be similar to those identified for the Proposed Project. Under this alternative, there would not be a new parking structure on the Woodman Avenue frontage. As a result, the alterations to the visual changes from Woodman Avenue caused by the five-level parking structure would appeal as part of the background because of the large setback from Woodman Avenue.

To accommodate construction of new buildings and implementation of enhanced landscaping, as with the Proposed Project, approximately 48 mature trees would be removed. Overall, the Reduced Project 2 Alternative would have a similar net impact to visual character as that identified for the Proposed Project as both scenarios would provide an updated and more visually distinctive building façade, and intensified landscaping at the site interior and frontages. Both the Reduced Project 2 Alternative and the Proposed Project would have a less than significant impact and there would be no measurable difference between the two scenarios relative to visual character.

Alteration of Views. The Proposed Project visual analysis, included in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, indicates that because of the increased height and location of the proposed new parking structure, views from some of the homes along Matilija Avenue would be altered (and partially obstructed). Under the Reduced Project 2 Alternative, the new construction (including the new parking structure) would be similarly located except that the levels of the new parking structure would not extend beyond the southern edge of the Macy's parking structure. The increased in building setback may result in a perception of reduced building massing, but would not result in a change in the overall viewshed from the Matilija Avenue area relative to the Proposed Project. Both the Proposed Project impact and the Reduced Project 2 Alternative impact would be less than significant.

Lighting. Under the Reduced Project 2 Alternative, lighting conditions at build out would be similar to that of the Proposed Project. Both the Proposed Project impact and the Reduced Project 2 Alternative impact would be less than significant.

2. Air Quality

Demolition, excavation, grading and construction under the Reduced Project 2 Alternative would be required and would be similar to that described for the Proposed Project. Because the level of development under Reduced Project 2 Alternative involves a slightly reduced building footprint, the overall level construction-related air quality impacts would be proportionately reduced. The Reduced Project 2 Alternative would require less construction activity than assumed for the Proposed Project as approximately 235,000 GLSF would be constructed instead of 280,000 GLSF. In addition, the Reduced Project 2 Alternative would export approximately 35,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. As such, pollutant emissions during the entire Reduced Project 2 Alternative construction period would be less than the amount of pollutants emitted during the entire Proposed Project construction period.

The daily construction intensity (e.g., construction equipment hours) for the Reduced Project 2 Alternative, would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Reduced Project 2 Alternative daily regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$, and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact. However, with the reduced export of dirt, the amount of NO_X resulting from haul truck trips would be reduced to less than significant levels and this alternative would avoid this significant regional impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Reduced Project 2 Alternative would disturb a maximum of 4.25 acres per day. This would result in 16 ppd of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceeds the SCAQMD localized significance thresholds. Therefore, the Reduced Project 2 Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact, although the duration of that impact would be slightly less than the Proposed Project given the slightly shorter construction period of this alternative.

The 235,000 GLSF associated with the Reduced Project 2 Alternative would generate less mobile and area source emissions than the Proposed Project. Weekday emissions would be approximately 25 ppd for VOC, 33 ppd for NO_X, 229 ppd for CO, less than one ppd for SO_X, 7 ppd for $PM_{2.5}$, and 35 ppd for PM_{10}. Weekend emissions would be approximately 31 ppd for VOC, 41 ppd for NO_X, 288 ppd for CO, less than one ppd for SO_X, 9 ppd for $PM_{2.5}$, and 44 ppd for PM_{10}. Similar to the Proposed Project, regional operational emissions would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}. As such, regional operational emissions for the Reduced Project 2 Alternative would result in a less than significant impact.

Mobile source emissions associated with the Reduced Project 2 Alternative would potentially reduce the Proposed Project's localized CO emissions. Maximum project-related weekday and weekend one- and eight-hour CO concentrations are expected to be 5 and 3.7 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. Reduced traffic associated with the Reduced Project 2 Alternative would not substantially change the CO concentrations estimated for the Proposed Project. As such, the Reduced Project 2 Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Reduced Project 2 Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Reduced Project 2 Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Reduced Project 2 Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Reduced Project 2 Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. The Reduced Project 2 Alternative would be designed to incorporate LEED certification element to the extent feasible to achieve many of the objectives in the Climate Action Team Plan and the City's Green LA Action Plan. Thus, similar to the Proposed Project, the Reduced Project 2 Alternative would result in a less than significant global warming impact. As a result, this

alternative would reduce the less than significant Green House Gas emissions impact when compared to the Proposed Project.

3. Geology and Soils

The risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence at the project site is low. However, much of the region is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the Reduced Project 2 Alternative is the same as with the Proposed Project. However, due to the reduced GLSF area, the Reduced Project 2 Alternative would have a lower on-site population during the day; therefore, the number of people that would be affected in a seismic event would be slightly less. However, any new construction under either scenario would be constructed to meet current seismic standards and would ensure that potential impacts are less than significant. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

The existing condition of the site is generally insignificant with regard to hazardous materials. The potential impacts with regard to asbestos containing materials (ACMs) and lead-based paints are a concern due to demolition and construction of the Proposed Project, however, the main portion of the mall structures would be avoided during construction. Construction activities associated with the Reduced Project 2 Alternative and the Proposed Project would be similar with no measurable change in risk of hazards due to materials and equipment to be used on-site. Both the Proposed Project impact and the Reduced Project 2 Alternative impact would less than significant. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

5. Water Resources

Under current conditions, the project site is largely paved and/or covered by structures and impermeable surfaces. New construction under the Reduced Project 2 Alternative would not result in any substantial net change in permeable surface area, except that new construction would be designed to comply with current SUSMP requirements and therefore result in a net improvement to water resources over existing conditions. The level of improvement to drainage and water quality under this scenario would be similar to the net improvement under the Proposed Project. However, it is possible that the Reduced Project 2 Alternative could result in a slightly reduced impact compared to the Proposed Project because there would be less vehicle-related contaminants at the site due to an overall reduced commercial square footage. Overall, the Reduced Project 2 Alternative would have a beneficial impact and would be essentially the same impact as that identified for the Proposed Project.

The Reduced Project 2 Alternative's water consumption would be 32,400 gallons per day which would be 21,461 gallons per day less than the Proposed Project and therefore would have less of an impact than the Proposed Project. However, the impact for both the Reduced Project 2 Alternative and the Proposed Project scenarios would be less than significant.

6. Land Use, Planning and Urban Decay

The Reduced Project 2 Alternative would be a continuation of the existing community commercial use and would be similarly compatible with adjacent land uses. Existing uses, and proposed uses under this scenario, are consistent with zoning and planning designations and policies for the site and would require similar entitlement approvals as described for the Proposed Project. The community would benefit from the revitalizing effect of an expansion of uses proposed under the Reduced Project 2 Alternative, and hence, this would aid in fostering the goals of the policies of the related City plans. Both the Proposed Project and the Reduced Project 2 Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. Both scenarios would also afford an opportunity for compliance and implementation of the RIO. This Alternative would similarly consistent with regional plans and policies (including the RCP and the AQMP) as is the Proposed Project. The Reduced Project 2 Alternative would have similar less than significant impacts with regard to land use compatibility as the Proposed Project.

7. Noise

Noise from the operation of existing uses is generated primarily by traffic coming to and from the project site and these levels would increase with intensification of uses at the project site. Because traffic levels would be slightly greater with the Proposed Project, traffic-related noise levels would be proportionately less under the Reduced Project 2 scenario. However, no perceivable change in non-traffic related operational impacts is anticipated between the Reduced Project 2 Alternative and the Proposed Project because the new commercial uses would be contained within an enclosed structure and much of the mall activity would be located on the south side of the project site, shielded from noise-sensitive land uses to the north.

Although construction time may not be as long as the Proposed Project the intensity of any individual day's construction activities are anticipated to be similar to that of the Proposed Project. As a result, worst case construction-related noise impacts would be similar to those described for the Proposed Project. Although there would not be the construction related noise associated with the reopening of the Riverside Drive tunnel. Overall, the Reduced Project 2 Alternative impacts are not expected to be measurably different than construction noise impacts that would otherwise be associated with the Proposed Project, and would be less than significant.

8. Fire Services

The Reduced Project 2 Alternative would not result in a measurable increase in fire protection demands and, therefore, would create a less than significant impact. This represents a similar level of impact for that anticipated with the Proposed Project.

9. Police Services

The Reduced Project 2 Alternative would not result in a significant increase in police protection demands and the overall impact would be similar to that anticipated with the Proposed Project.

10. Solid Waste

The Reduced Project 2 Alternative would involve similar materials from new construction. The Reduced 2 Alternative would involve similar demolition and construction activities and therefore would result in similar potential impacts as the Proposed Project. During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste materials from new construction through an aggressive recycling program. The Reduced Project 2 Alternative could also avoid a significant impact from construction waste with the implementation of a similar aggressive recycling program. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

The Reduced Project 2 Alternative would generate 662 pounds per day of solid waste, which would be 1,259 pounds per day less of an impact than the Proposed Project. Operational volumes of solid waste generated by the Reduced Project 2 Alternative would be less than those of the Proposed Project, and the impact would remain less than significant.

11. Traffic, Circulation and Access

The Reduced Project 2 Alternative involves an increase of approximately 235,000 GLSF of commercial retail uses at the project site. Under this scenario, a net increase of 79 vehicle trips during the weekday A.M. Peak hour and 402 vehicle trips during the weekday P.M. peak hour are anticipated.[5] During the weekend peak hours, an additional 534 vehicle trips are anticipated. During both the weekday and weekend conditions, these trip increases due to implementation of the Reduced Project 2 Alternative would result in a reduced level of traffic impact compared to the Proposed Project, and would have a net impact that would be less than significant with the implementation of comparable mitigation measures. Improvements and enhancements to internal site circulation, driveway consolidations, and pedestrian safety and access enhancements would be implemented in a manner consistent with those proposed under the Proposed Project. Overall, the Reduced Project 2 Alternative impacts would be less than the Proposed Project's impacts overall.

Although the Reduced Project 2 Alternative is anticipated to result in an overall decrease in traffic impacts when compared to the Proposed Project, contribution to the City's ATCS installation at seven study intersections, as well as redesignation of the Woodman Avenue/Riverside Drive intersection and southbound approach, would be implemented in a manner similar to the Proposed Project with this alternative.

The Reduced Project 2 Alternative would not involve the construction of the four-level parking structure on the eastern most portion of the project site. As a result, this alternative would only provide parking at a ratio of 4.25 spaces per 1,000 GLSF. This ratio meets the anticipated demand for the shopping center. This may result in some increased inconvenience to shoppers as compared to the Proposed Project. But it would not result in a significant impact to parking.

[5] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

12. Growth Inducing

The Reduced Project 2 Alternative would not result in a measurable increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the Reduced Project 2 scenario would be less than significant and may be slightly less than any potential associated with the Proposed Project.

13. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Reduced Project 2 Alternative would result a contribution to cumulative impacts that is similar to, but slightly less than that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project (and pro-rated accordingly), the Alternative's contribution toward cumulative impacts would be less than significant.

14. Relationship of Alternative to Project Objectives

The Reduced Project 2 Alternative would result in slightly reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). However, the Reduced Project 2 Alternative would not satisfy some of the project objectives to the extent possible with the Proposed Project. Specifically, the Reduced Project 2 Alternative may not expand to the fullest extent the range of services available to the community at this location.

15. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Reduced Project 2 scenario could still result in significant air quality impacts (although reduced in terms of duration), but for most other issues this alternative would reduce the level of impacts beyond those anticipated with the Proposed Project.

Implementation of the Reduced Project 2 Alternative (235K/Maintain Macy's Parking Structure/Full Closure of Matilija Avenue) would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. However, with the reduction in parking to 4.25 spaces per 1,000 GLSF, some increased inconvenience will occur but a less than significant impact on parking is anticipated. The impacts under this alternative may have somewhat less impacts relative to the Proposed Project, none of the impacts are totally avoided.

Additionally, the significant unavoidable impacts from construction-related air quality, associated with the Proposed Project would still occur, because peak daily construction activity would not be substantially reduced under this alternative.

V. ALTERNATIVES

E. ALTERNATIVE E: ALTERNATE SITE PLAN 1 – (280,000 GLSF: PROPOSED PROJECT/NO TUNNEL/NO SUBTERRANEAN PARKING)

ALTERNATIVE DESCRIPTION

Two "alternative design" to the Proposed Project alternatives were evaluated in order to compare how a functional Alternate Site Plan would perform relative the Proposed Project. Both Alternate Site Plan options assume that the project would be approved to allow the 280,000 GLSF of retail/restaurant commercial space requested with the Proposed Project, however, site plan modifications could be included to address access, traffic safety, aesthetics and pedestrian orientation. The location and configuration of the new commercial development would be similar that described for the Proposed Project under both of the Alternate Site Plan Alternatives. However, site access, internal circulation, parking configuration, and pedestrian orientation would vary.

The Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative would assume that the project would be approved to allow the 280,000 GLSF of retail/restaurant commercial space requested with the Proposed Project within a similar two-level retail structure (with rooftop parking). However, site plan modifications would eliminate the additional driveway access from Riverside Drive that would tie into the overall internal circulation configuration and a new subterranean parking level that would extend under the new retail building. The existing 2-level Macy's parking structure would be demolished and rebuilt through a consolidated new "main" six-level (1 at grade and 5 above grade) parking structure that would be terraced to step back from the Riverside Drive frontage. A new four-level (one-level at grade plus three levels above grade) parking structure would be developed on the eastern most portion of the project site. No subterranean parking would be provided with this alternative. A proposed site plan for this alternative is shown in *Figure 73: Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative – Level 1*, *Figure 74: Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative – Level 2*, and *Figure 75: Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative – Level 3*. A cross section of the east parking structure for this alternative is shown on *Figure 76: Alternate Site Plan 1 (No Tunnel/No Subterranean Parking) Alternative Cross Section*. Because of the interim loss of on-site parking due to the demolition of the "south" and Macy's parking structures, a request for a parking variance to temporarily allow a reduction in on-site parking during the construction phase would be requested. Until this alternative is completed, some project parking would be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site). Proposed circulation improvements would facilitate better emergency access within the project site.

Benefits to this alternative include a reduction in the volume of required earth movement (including an overall reduction in cubic yards of earth materials to be exported off-site) and an overall reduction in the total length of time needed for project construction. The placement of parking on the area of the site at the existing Macy's parking structure would not change the use

FIGURE 73
ALTERNATE SITE PLAN 1 (PROSPOED PROJECT/NO TUNNEL/ NO SUBTERRANEAN PARKING ALTERNATIVE – LEVEL 1

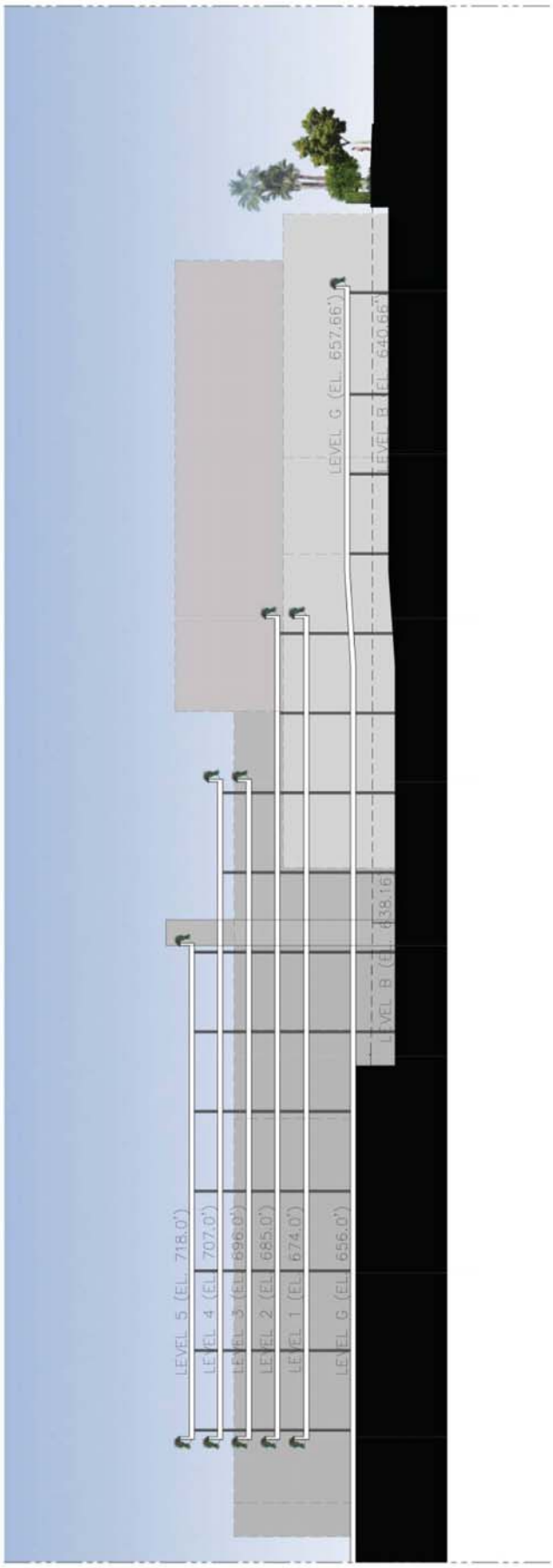
MAP SOURCE: WESTFIELD

FIGURE 74
ALTERNATE SITE PLAN 1 (PROSPOED PROJECT/NO TUNNEL/ NO SUBTERRANEAN PARKING ALTERNATIVE – LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE 75
ALTERNATE SITE PLAN 1 (PROPOSED PROJECT/NO TUNNEL/ NO SUBTERRANEAN PARKING ALTERNATIVE – LEVEL 3

MAP SOURCE: WESTFIELD



NORTH

FIGURE 76

ALTERNATE SITE PLAN 1 (PROPOSED PROJECT/NO TUNNEL/ NO SUBTERRANEAN PARKING ALTERNATIVE CROSS SECTION

MAP SOURCE: WESTFIELD

of land in this area from what currently exists, however, the perceived encroachment of new parking south and east of the Macy's parking structure would be further setback from Riverside Drive. This alternative was selected because it is useful in comparing traffic, access and aesthetic (i.e. height/building encroachment) impacts resulting from additional intensification on the project site. It is anticipated that construction of this alternative would be completed by year 2012.

The Alternate Site Plan 1 Alternative would require the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 280,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

- Site Plan Review for the modification of existing parking structures, reconfiguration of site driveways and internal circulation, construction of 280,000 GLSF retail space within a new two-level structure, and construction of a new six-level parking structure.

- Conditional Use Permit for Commercial Corner[6] development and deviation from:

    - a 45-foot height limit to provide a building and parking structure with maximum height no greater than the existing Macy's building;

    - allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight;

    - a requirement to provide a five foot landscaped area immediately adjacent to all street frontages;

    - the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass along the Riverside Drive frontage; and

    - the restriction on tandem parking by providing tandem parking spaces.

[6] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Expansion Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site and the unified nature of the center that for a worst case analysis of potential impacts that for at least this Environmental document that it will be assumed that the project is subject to the Commercial Corner restrictions.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction

- Haul Route approval from the Building and Safety Commission for construction phase operations

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Alternate Site Plan 1 project.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

Because the Alternate Site Plan 1 (Tunnel/Subterranean Parking) Alternative represents the same level of development, requested entitlements, and general design as the Proposed Project, the following evaluation of environmental impacts associated with this alternative will focus primarily on those issue areas for which an additional site driveway (off Riverside Drive easterly of Hazeltine Avenue) and one level of subterranean parking would pose a change in the net level of impact. Unless otherwise noted, the impacts associated with the Alternate Site Plan 1 Alternative would be the same as those identified for the Proposed Project.

1. Aesthetics and Visual Resources

Under the Alternate Site Plan 1 Alternative scenario, the visual changes to the project site would be identical to those identified for the Proposed Project, except that an additional project site driveway along Riverside Drive would be activated and improved as a new intersection. Therefore the impacts to aesthetic character and light/glare would be similar to those identified for the Proposed Project. The location of the new driveway would require a disruption of landscaping along this segment of Riverside Drive, however, as this location already functions as a loading dock, the area would not be fully landscaped anyway. The tunnel opening would introduce new lighting at this location; however, the area already is illuminated by security lighting at the loading docks. Because of the parking structure would be similar to the height and configuration of the parking structure under the Proposed Project, even with retention and incorporation of the existing Macy's parking structure, there would be no appreciable difference between the two scenarios relative to visual character, and both the Alternate Site Plan 1 Alternative and the Proposed Project would have a less than significant impact.

2. Air Quality

Air quality impacts associated with the Alternate Site Plan 1 Alternative during the construction phase would essentially be the same as for those identified for the Proposed Project, except that the reduction in construction activity that would otherwise have been necessary to improve the tunnel and excavate for subterranean parking, would reduce the duration of the construction phase and therefore result in slightly decreased air pollutant emissions proportional to the extended duration of construction activity; however the overall decrease is anticipated to be negligible. The Alternate Site Plan 1 Alternative would require slightly less construction activity than the Proposed Project due to the elimination of the subterranean parking and tunnel access and the associated export of additional earth material. The Alternate Site Plan 1 Alternative would export approximately 35,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. However, this alternative would require the hauling of construction debris due to demolition of the Macy's parking structure.

Pollutant emissions during the entire Alternate Site Plan 1 Alternative construction period would be similar to the amount of pollutants emitted during the entire Proposed Project construction period (e.g., NO_X emissions associated with haul trucks). The daily construction intensity (e.g., construction equipment hours) for the Alternate Site Plan 1 Alternative, would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Alternate Site Plan 1 Alternative daily regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$, and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact. However, with the reduced export of dirt, the amount of NO_X resulting from haul truck trips would be reduced to less than significant levels and this alternative would avoid this significant regional impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Alternate Site Plan 1 Alternative would disturb a maximum of 4.25 acres per day. Although the construction of the subterranean parking would generate more localized emissions over the entire construction period, localized $PM_{2.5}$ and PM_{10} daily emissions would be similar to the emissions calculated for the Proposed Project as the same amount of dirt would be disturbed per day. This would result in 16 ppd of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceed the SCAQMD localized significance thresholds. Therefore, the Alternate Site Plan 1 Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact.

The Alternate Site Plan 1 Alternative would develop with the same amount of floor area as the Proposed Project (i.e., 280,000 GLSF) and would generate the same number of weekday and weekend daily trips. As such, regional operational emissions would be similar to the Proposed Project. Weekday emissions would be approximately 29 ppd for VOC, 39 ppd for NO_X, 271 ppd for CO, less than one ppd for SO_X, 8 ppd for $PM_{2.5}$, and 42 ppd for PM_{10}. Weekend emissions would be approximately 37 ppd for VOC, 49 ppd for NO_X, 340 ppd for CO, less than one ppd for SO_X, 10 ppd for $PM_{2.5}$, and 52 ppd for PM_{10}. However, it is possible that increased localized traffic congestion due to the elimination of the "tunnel" westerly driveway along Riverside Drive could result in slightly increased air pollutant emissions (primarily carbon monoxide levels) at intersections surrounding the project site; however, this increase would be negligible and would

not exceed threshold standards. Similar to the Proposed Project, regional operational emissions would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}. As such, regional operational emissions for the Alternate Site Plan 1 Alternative would result in a less than significant impact.

As described above, the Alternate Site Plan 1 Alternative would generate the same number of weekday and weekend daily trips as the Proposed Project. The inclusion of subterranean parking and tunnel access would potentially redistribute vehicle trips on local roadways. Maximum project-related weekday and weekend one- and eight-hour CO concentrations are estimated to be 5 and 3.7 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. Redistributed vehicle trips associated with the Alternate Site Plan 1 Alternative would not substantially change the CO concentrations estimated for the Proposed Project. As such, the Alternate Site Plan 1 Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Alternate Site Plan 1 Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Alternate Site Plan 1 Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Alternate Site Plan 1 Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Alternate Site Plan 1 Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. The Alternate Site Plan 1 Alternative would be designed to achieve LEED certification and achieve many of the objectives in the Climate Action Team Plan and the City's Green LA Action Plan. Thus, similar to the Proposed Project, the Alternate Site Plan 1 Alternative would result in a less than significant global warming impact.

3. Geology and Soils

Overall, the impacts related to geology, soils and seismic risks would be essentially the same for the Alternate Site Plan 1 Alternative as those described for the Proposed Project. However, as the Proposed Project would include one level of subterranean parking, additional geotechnical and structural engineering considerations would be required for the Proposed Project to ensure that the subterranean parking (and the buildings supported over the parking level) are structurally and seismically sound. Because the subterranean parking would not be included with the Alternate Site Plan 1 Alternative, the need for these additional considerations, nor the need for dewatering measures, is potentially avoided. Impacts associated with the Alternate Site Plan 1 Alternative may be slightly decreased from those with the Proposed Project, and would still be less than significant.

4. Hazardous Materials and Man-Made Hazards

Impacts related to hazardous materials would be essentially the same for the Alternate Site Plan 1 Alternative as those described for the Proposed Project. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

5. Water Resources

The level of improvement to drainage and water quality under the Alternate Site Plan 1 Alternative would be similar to the net improvement under the Proposed Project. Overall, the Alternate Site Plan 1 Alternative would have a beneficial impact and would be essentially the same impact as that identified for the Proposed Project.
The Alternate Site Plan 1 Alternative's water consumption would be similar to that of the Proposed Project and therefore would have a similar less than significant impact.

6. Land Use, Planning and Urban Decay

Both the Proposed Project and the Alternate Site Plan 1 Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. Both scenarios would also afford an opportunity for compliance and implementation of the RIO. This Alternative would similarly consistent with regional plans and policies (including the RCP and the AQMP) as is the Proposed Project. The Alternate Site Plan 1 Alternative would have similar less than significant impacts with regard to land use compatibility as the Proposed Project.

7. Noise

Noise conditions (both during construction and long-term operation) with the Alternate Site Plan 1 Alternative would be similar those of the Proposed Project, except for additional noise associated with implementation of the new tunnel/driveway entrance off Riverside Drive. Although the tunnel currently exists, construction improvements would be required to fully activate this entrance. As a result, residents north of the project site along this portion of Riverside Drive would experience elevated noise levels during construction.

Under operation of the Proposed Project, some of the project related traffic would be diverted to this new driveway access. This portion of Riverside Drive already experiences elevated noise levels due to traffic along the roadway and the introduction of the driveway at this location is not necessarily anticipated to increase pass-by traffic; however, noise generated by vehicles driving through the tunnel may create increased noise as the level of vehicle activity at that point would increase.

Overall, the Alternate Site Plan 1 Alternative impacts are not expected to be measurably different, or only slightly greater, than construction or operational noise impacts that would otherwise be associated with the Proposed Project, but would still be less than significant.

8. Fire and Police Services

The Alternate Site Plan 1 Alternative would not result in a measurable increase in fire or police protection demands and, therefore, would create a less than significant impact. This represents a similar level of impact for that anticipated with the Proposed Project.

9. Solid Waste

The Alternate Site Plan 1 Alternative's solid waste generation (during operation) would be similar to that of the Proposed Project and therefore would have a similar less than significant impact. However, during the construction phase, the Alternate Site Plan 1 Alternative may result in a slight increase in construction waste due to additional construction activity/materials used to implement the new driveway/tunnel and subterranean parking area.
During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste materials from new construction through an aggressive recycling program. As the Alternate Site Plan 1 Alternative would involve similar demolition and construction activities, it would result in similar waste impacts, however with the implementation of a similar aggressive recycling program the impact is anticipated to be less than significant.

10. Traffic, Circulation and Access

The Alternate Site Plan 1 Alternative would generate traffic trips during weekday and weekends the same as the Proposed Project. Under this scenario, a net increase of 95 vehicle trips during the weekday A.M. Peak hour and 476 vehicle trips during the weekday P.M. peak hour are anticipated.[7] During the weekend peak hours, an additional 632 vehicle trips are anticipated. During both the weekday and weekend conditions, these trip increases would result in a reduced level of service impacts at the same study intersections as the Proposed Project. However, as with the Proposed Project, implementation of ATCS at these intersections, as well as redesignation of the Woodman Avenue/Riverside Drive intersection and southbound approach, can reduce impacts to less than significant levels.

A key difference between the Proposed Project and Alternate Site Plan 1 Alternative would be the exclusion of the new access driveway along Riverside Drive easterly of Hazeltine Avenue. Although there would be no net change in the number of vehicle trips with this alternative, the Alternate Site Plan 1 Alternative is anticipated to result in a net , albeit negligible, decrease to the operational levels of service at adjacent intersections, and in particular at the Matilija Avenue intersection, because a portion of the Proposed Project site-related traffic would not be shifted to the alternate "tunnel" westerly driveway along Riverside Drive. On-site access, and internal emergency access, would be similar to the Proposed Project, but slightly less efficient with the elimination of the fifth driveway location. Ultimately, parking impacts for the Alternate Site Plan 1 Alternative would be similar to those of the Proposed Project, as an overall parking ratio of up to 4.5 spaces per 1,000 GLSF would be achieved. Overall, the Alternate Site Plan 1 Alternative impacts would be similar but slightly greater than the Proposed Project's impacts.

11. Growth Inducing

The Alternate Site Plan 1 Alternative would not result in a measurable increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the Alternate Site

[7] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

Plan 1, the scenario would be less than significant and similar to any potential associated with the Proposed Project.

12. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Alternate Site Plan 1 Alternative would result a contribution to cumulative impacts that is similar to that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project, the Alternative's contribution toward cumulative impacts would be less than significant.

13. Relationship of Alternative to Project Objectives

The Alternate Site Plan 1 Alternative would result in similar impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant), but would also slightly exceed impacts in some areas and reduce others. The Alternate Site Plan 1 Alternative would not accomplish the same degree of "enhanced traffic flow and safety" as the Proposed Project due primarily to the added congestion at the other project site driveways with the elimination of the "tunnel" access along Riverside Drive. Further, without the additional fifth driveway/access, the internal site circulation would not be as efficient as that which would be accomplished by the Proposed Project.

14. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Alternate Site Plan 1 scenario would still result in significant air quality impacts during construction.

Implementation of the Alternate Site Plan 1 (Tunnel/Subterranean Parking) Alternative would result in similar environmental impacts for most issue areas compared to the Proposed Project. However, construction phase impacts related to air quality, geology/soils, noise, solid waste, and traffic may be slightly greater due to either the extended duration of construction and/or additional construction effort needed to implement the tunnel and subterranean parking level. Although these impacts could be slightly greater, the increase would be negligible and would be substantially comparable to the Proposed Project. During the operation of the project, traffic and air quality impacts would be slightly reduced and noise impacts slightly increased due to implementation of the new driveway. Geology/seismic risks may be slightly increased due to implementation of the subterranean parking. With the exception of air quality construction-related (daily) impacts, all impacts would remain less than significant.

V. ALTERNATIVES

F. ALTERNATIVE F: ALTERNATE SITE PLAN 2 – (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE)

ALTERNATIVE DESCRIPTION

Relative to the Proposed Project, the Alternate Site Plan 2 (Pedestrian Activation on Riverside Drive) Alternative emphasizes enhanced pedestrian activation along Riverside Drive through a new mall entrance just west of the Macy's department store. Under this alternative, the Alternate Site Plan 2 would present a similar layout and building construction plan as that described for the Proposed Project (i.e., 280,000 GLSF of retail/restaurant commercial in a two-level retail structure with one level each of rooftop and subterranean parking, a new "main" six-level parking structure through which the Macy's parking structure is retained, and a new "east" four-level parking structure adjacent to Woodman Avenue). This Alternative also includes the reopening of the existing driveway/loading dock east of Bloomingdale's as a vehicular tunnel to access the existing Bloomingdale's parking structure and new subterranean parking level. A proposed site plan for this alternative is shown in *Figure 77: Alternate Site Plan 2 (Pedestrian Activation) Alternative – Level 1*, *Figure 78: Alternate Site Plan 2 (Pedestrian Activation) Alternative – Subterranean Parking*, *Figure 79: Alternate Site Plan 2 (Pedestrian Activation) Alternative – Level 2*, and *Figure 80: Alternate Site Plan 2 (Pedestrian Activation) Alternative – Level 3*. A cross section of the east parking structure for this alternative is shown on *Figure 81: Alternate Site Plan 2 (Pedestrian Activation) Alternative Cross Section*. However, in order to improve the pedestrian environment and walkability along Riverside Drive, a new pedestrian mall entrance would be created just west of the Macy's department store. The new pedestrian access to the mall would also include construction of a small entrance patio. Currently, all entrances to the mall are through the two anchor department stores (Macy's and Bloomingdale's) or via the parking areas on the south side of the mall. Proposed circulation improvements would facilitate better emergency access within the project site. It is anticipated that construction of this alternative would be completed by year 2012.

This alternative was selected because it is useful in comparing land use and aesthetic impacts resulting from additional intensification on the project site. Additionally, an indirect reduction in traffic and air quality impacts may be realized due to increased pedestrian activity.

The Alternate Site Plan 2 Alternative would require the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 280,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

FIGURE 77
ALTERNATE SITE PLAN 2 (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE) ALTERNATIVE – LEVEL 1

MAP SOURCE: WESTFIELD

FIGURE 78
ALTERNATE SITE PLAN 2 (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE)
ALTERNATIVE – SUBTERRANEAN PARKING

MAP SOURCE: WESTFIELD

FIGURE 79
ALTERNATE SITE PLAN 2 (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE) ALTERNATIVE – LEVEL 2

MAP SOURCE: WESTFIELD

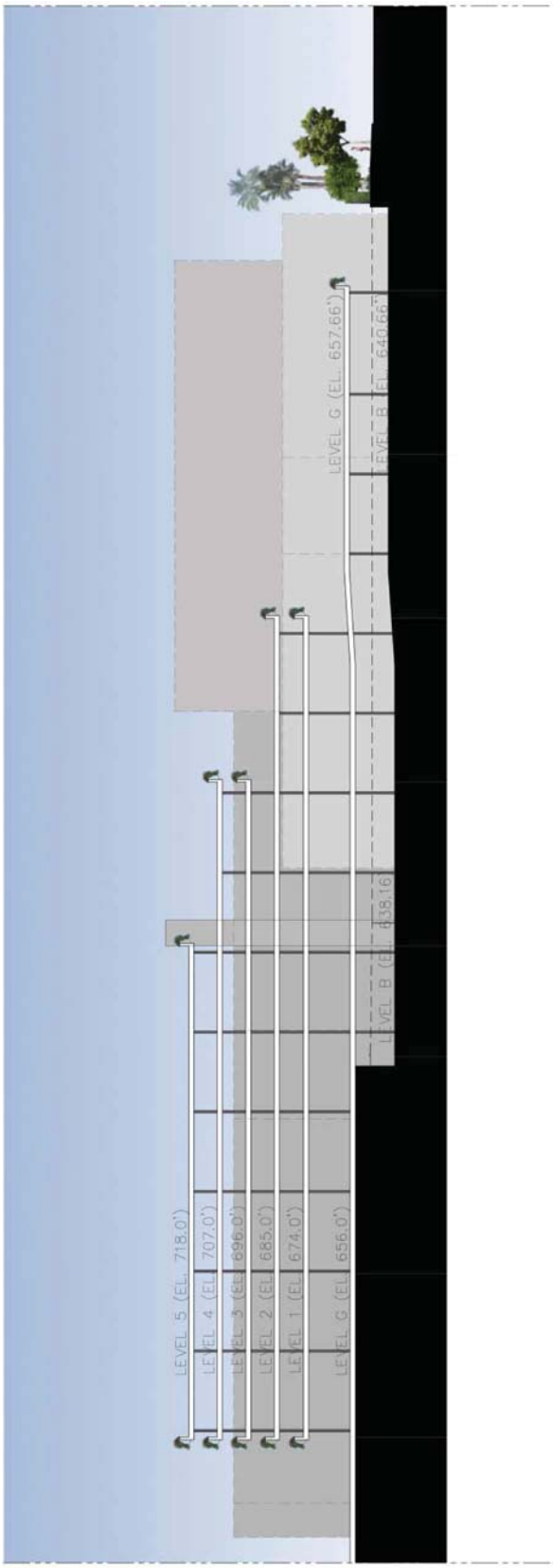
NORTH

FIGURE 80

ALTERNATE SITE PLAN 2 (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE)

ALTERNATIVE – LEVEL 3

MAP SOURCE: WESTFIELD



NORTH

FIGURE 81
ALTERNATE SITE PLAN 2 (PROPOSED PROJECT/PEDESTRIAN ACTIVATION ON RIVERSIDE DRIVE)
ALTERNATIVE CROSS SECTION

MAP SOURCE: WESTFIELD

- Site Plan Review for the modification of two existing parking structures, reconfiguration of site driveways and internal circulation, construction of 280,000 GLSF retail space within a new two-level structure, and construction of a new six-level and five-level parking structures.

- Conditional Use Permit for Commercial Corner[8] development and deviation from:

    - a 45-foot height limit to provide a building and parking structure with maximum height no greater than the existing Macy's building;

    - allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight;

    - a requirement to provide a five foot landscaped area immediately adjacent to all street frontages;

    - the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass along the Riverside Drive frontage; and

    - the restriction on tandem parking by providing tandem parking spaces.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction

- Haul Route approval from the Building and Safety Commission for construction phase operations

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits

[8] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Expansion Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site and the unified nature of the center that for a worst case analysis of potential impacts that for at least this Environmental document that it will be assumed that the project is subject to the Commercial Corner restrictions.

including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Alternate Site Plan 2 project.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

Because the Alternate Site Plan 2 (Pedestrian Activation/Tunnel Access) Alternative represents the same level of development, requested entitlements, and general design as the Proposed Project, the following evaluation of environmental impacts associated with this alternative will focus primarily on those issue areas for which a new mall pedestrian entrance (off Riverside Drive just west of the Macy's department store) would pose a change in the net level of impact. Unless otherwise noted, the impacts associated with the Alternate Site Plan 2 Alternative would be the same as those identified for the Proposed Project.

1. Aesthetics and Visual Resources

Under the Alternate Site Plan 2 Alternative scenario, the visual changes to the project site would be identical to those identified for the Proposed Project, except that an additional mall entrance oriented toward pedestrian users would be provided along Riverside Drive, just west of the Macy's department store. Such pedestrian activation along this frontage could enhance the pedestrian friendliness and community linkage to the area, both physically and visually. Under this alternative, a small outdoor patio area with seating and interaction opportunities would be provided. Overall, impacts to aesthetic character and light/glare would be similar to those identified for the Proposed Project. However, the mall entrance at this location may introduce new light sources at a location where none currently exists and could result in a perceived adverse impact to residences on the north side of Riverside Drive. However, with implementation of mitigation measures to direct lighting in the area away for residents and the installation of shielding on the light it is anticipated that the impacts to night lighting would be reduced to a less than significant level. With regard to visual interest and connectivity, the pedestrian activation with the Alternate Site Plan 2 Alternative would be a beneficial improvement from the Proposed Project (and therefore less of an impact), however, increased illumination would be a slightly greater impact. Nonetheless, both the Alternate Site Plan 2 Alternative and the Proposed Project would have a less than significant impact.

2. Air Quality

The Alternate Site Plan 2 Alternative would require similar construction activity as the Proposed Project along Riverside Drive due to construction of the pedestrian mall entrance and the tunnel access. But because of elimination of the subterranean parking export would be less than the Proposed Project. In addition, the Alternate Site Plan 2 Alternative would export approximately 35,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. As such, pollutant emissions during the entire Alternate Site Plan 2 Alternative construction period would be less than the amount of pollutants emitted during the entire Proposed Project construction period (e.g., NO_X emissions associated with haul trucks). The daily construction intensity (e.g., construction equipment hours) for the Alternate Site Plan 2 Alternative, would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Alternate Site Plan 2 Alternative daily regional construction emissions of VOC, CO, SO_X, $PM_{2.5}$,

and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact. However, with the reduced export of dirt, the amount of NO_X resulting from haul truck trips would be reduced to less than significant levels and this alternative would avoid this significant regional impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Alternate Site Plan 2 Alternative would disturb a maximum of 4.25 acres per day. This would result in 16 ppd of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceed the SCAQMD localized significance thresholds. Therefore, the Alternate Site Plan 2 Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact.

The Alternate Site Plan 2 Alternative would develop the same floor area as the Proposed Project (i.e., 280,000 GLSF) and would generate the same number of weekday and weekend daily trips. As such, regional operational emissions would be similar to the Proposed Project. Weekday emissions would be approximately 29 ppd for VOC, 39 ppd for NO_X, 271 ppd for CO, less than one ppd for SO_X, 8 ppd for $PM_{2.5}$, and 42 ppd for PM_{10}. Weekend emissions would be approximately 37 ppd for VOC, 49 ppd for NO_X, 340 ppd for CO, less than one ppd for SO_X, 10 ppd for $PM_{2.5}$, and 52 ppd for PM_{10}. Similar to the Proposed Project, regional operational emissions would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}. As such, regional operational emissions for the Alternate Site Plan 2 Alternative would result in a less than significant impact.

The Alternate Site Plan 2 Alternative would generate the same number of weekday and weekend daily trips as the Proposed Project. The inclusion of subterranean parking and tunnel access would potentially redistribute vehicle trips on local roadways but the maximum project-related weekday and weekend one- and eight-hour CO concentrations are estimated to be the same as the Proposed Project. Redistributed vehicle trips associated with the Alternate Site Plan 2 Alternative would not substantially change the CO concentrations estimated for the Proposed Project. As such, the Alternate Site Plan 2 Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Alternate Site Plan 2 Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Alternate Site Plan 2 Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Alternate Site Plan 2 Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Alternate Site Plan 2 Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. The Alternate Site Plan 2 Alternative would be designed to achieve LEED certification and achieve many of the objectives in the Climate Action Team Plan and the City's Green LA Action Plan. Thus, similar to the Proposed Project, the Alternate Site Plan 2 Alternative would result in a less than significant global warming impact.

3. Geology and Soils

Overall, the impacts related to geology, soils and seismic risks would be essentially the same for the Alternate Site Plan 2 Alternative as those described for the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

Impacts related to hazardous materials would be essentially the same for the Alternate Site Plan 2 Alternative as those described for the Proposed Project. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

5. Water Resources

The level of improvement to drainage and water quality under the Alternate Site Plan 2 Alternative would be similar to the net improvement under the Proposed Project. Overall, the Alternate Site Plan 2 Alternative would have a beneficial impact and would be essentially the same impact as that identified for the Proposed Project.

The Alternate Site Plan 2 Alternative's water consumption would be similar to that of the Proposed Project and therefore would have a similar less than significant impact.

6. Land Use, Planning and Urban Decay

Both the Proposed Project and the Alternate Site Plan 2 Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. However, because of the additional pedestrian orientation with the new mall entrance, the Alternate Site Plan 2 Alternative would be perceived to be more consistent with Community Plan policies that encourage pedestrian activity. Both scenarios would afford an opportunity for compliance and implementation of the RIO. This Alternative would similarly consistent with regional plans and policies (including the RCP and the AQMP) as is the Proposed Project. The Alternate Site Plan 2 Alternative would have similar less than significant impacts with regard to land use compatibility as the Proposed Project.

7. Noise

Noise conditions (both during construction and long-term operation) with the Alternate Site Plan 2 Alternative would be similar those of the Proposed Project, except for additional noise associated with implementation of the new mall entrance along Riverside Drive. Construction improvements at this location would be relatively minor, involving cutting a new entrance through the block wall and establishing a functional secured entrance.. As a result, residents north of the project site along this portion of Riverside Drive would experience slightly elevated noise levels while construction is underway at this location.

Noise impacts during the operation may also be slightly elevated as increased pedestrian activity at a new mall entrance would be a new noise source (voices of patrons using the outdoor areas)

at this location. However, it is anticipated that ambient noise levels from existing traffic would obscure the voices of pedestrians at this entrance. Overall, the Alternate Site Plan 2 Alternative impacts are not expected to be measurably different, or only slightly greater, than construction or operational noise impacts that would otherwise be associated with the Proposed Project, but would still be less than significant.

8. Fire and Police Services

The Alternate Site Plan 2 Alternative would not result in a measurable increase in fire or police protection demands and, therefore, would create a less than significant impact. This represents a similar level of impact for that anticipated with the Proposed Project.

9. Solid Waste

The Alternate Site Plan 2 Alternative's solid waste generation (during operation) would be similar to that of the Proposed Project and therefore would have a similar less than significant impact. However, during the construction phase, the Alternate Site Plan 2 Alternative may result in a slight increase in construction waste due to additional construction activity/materials used to establish the new Riverside Drive pedestrian entrance and reopened tunnel/driveway access.

During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste materials from new construction through an aggressive recycling program. As the Alternate Site Plan 2 Alternative would involve similar demolition and construction activities, it would result in similar waste impacts, however with the implementation of a similar aggressive recycling program the impact is anticipated to be less than significant.

10. Traffic, Circulation and Access

The Alternate Site Plan 2 Alternative would generate traffic trips similar to those identified for the Proposed Project and level of service impacts at the study intersections would be similar as well.[9] As with the Proposed Project, implementation of ATCS at these intersections, as well as redesignation of the Woodman Avenue/Riverside Drive intersection and southbound approach, would be implemented. Implementation of the new mall entrance along Riverside Drive is anticipated to induce greater pedestrian activity, possibly attracting more patrons from nearby residential and business uses due to the added convenience of a more proximate entrance. However, the addition of this feature is not anticipated to result in any notable trip reduction. Therefore, traffic related impacts associated with the Alternate Site Plan 2 Alternative would be similar to those of the Proposed Project, and less than significant.

11. Growth Inducing

The Alternate Site Plan 2 Alternative would not result in a measurable increased potential for new growth. As with the Proposed Project, the net growth-inducing effect of the Alternate Site

[9] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

Plan 2 scenario, would be less than significant and similar to any potential associated with the Proposed Project.

12. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Alternate Site Plan 2 Alternative would result a contribution to cumulative impacts that is similar to that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project, the Alternative's contribution toward cumulative impacts would be less than significant.

13. Relationship of Alternative to Project Objectives

The Alternate Site Plan 2 Alternative would result in similar impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant), but would also slightly exceed impacts in some areas and reduce others. The Alternate Site Plan 2 Alternative would satisfy all of the project objectives to a similar extent as with the Proposed Project.

14. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Alternate Site Plan 2 scenario would still result in significant air quality impacts during construction.

Implementation of the Alternate Site Plan 2 (Pedestrian Activation) Alternative would result in similar environmental impacts for most issue areas compared to the Proposed Project. However, construction phase impacts related to air quality, noise, solid waste, and traffic may be slightly greater due to either the extended duration of construction and/or additional construction effort needed to implement the tunnel and Riverside Drive pedestrian entrance. Although these impacts could be slightly greater, the increase would be negligible and would be substantially comparable to the Proposed Project. During the operation of the project, land use impacts would be slightly reduced and aesthetics and noise impacts slightly increased due to implementation of the new pedestrian mall entrance. With the exception of air quality construction-related (daily) impacts, all impacts would remain less than significant.

V. ALTERNATIVES

G. ALTERNATIVE G: PROMENADE (190,000 GLSF)

ALTERNATIVE DESCRIPTION

The Promenade (190K) Alternative would consist of up to 190,000 GLSF of new retail/restaurant commercial space in a series of single-story structures oriented along an open-air "promenade" to be located along the southern edge of the existing mall and integrated within the existing parking structures in that area. A proposed site plan for this alternative is shown in *Figure 82: Promenade (Reduced Project/Pedestrian Promenade) Alternative – Level 1, Figure 83: Promenade (Reduced Project/Pedestrian Promenade) Alternative – Level 2*, and *Figure 84: Promenade (Reduced Project/Pedestrian Promenade) Alternative – Level 5/6*. A cross-section of the easterly end of the mall for this alternative is shown on *Figure 85: Promenade (Reduced Project/Pedestrian Promenade) Alternative – Cross Section*. The Promenade Alternative accomplishes the goal of several of the other alternatives considered. At only 190,000 GLSF, the Promenade Alternative would represent an approximate net reduction of 32% (e.g. 90,000 GLSF) from the Proposed Project. Further, this alternative considers an alternate site plan that integrates a major pedestrian component that would simultaneously reorient the access to the mall.

The Promenade Alternative would include the construction of 190,000 square feet of commercial retail/restaurant space to be located at the southern portion of the site between the Bloomingdale's and Macy's buildings. One level of retail of retail would be oriented along both the north and south edges of a new internal roadway (promenade street) located along south edge of existing mall. This street is intended to provide emergency vehicle access and to provide a controlled level of patron traffic. During peak weekends and holidays this roadway would be closed for pedestrian safety reasons. A portion of the new commercial retail space will be constructed as an extension to the existing mall building and the remainder will be constructed on the bottom level of the existing southern parking structure. All three of the existing parking structures (the Macy's parking structure, the Bloomingdales parking structure, and the parking structure south of the mall) would remain, but would be altered to accommodate the new development under this alternative. One additional new parking structure would be constructed in the area located generally south of the existing Macy's department store and parking structure and would extend easterly on the south portion of the existing surface parking lot on the east portion of the development site. It is anticipated that construction of this alternative would be completed by year 2011.

For the Promenade Alternative, vehicular access to the project site will be provided via four project driveways: two existing driveways on Hazeltine Avenue, one existing driveway on Woodman Avenue, and one new driveway on Riverside Drive at Matilija Avenue (i.e., no tunnel access and subterranean parking). The tunnel access is not feasible with the Promenade Alternative because the placement of the new ground-level retail conflicts with the completion of the tunnel access. Further, the tunnel would provide direct access to only the grade level of the

FIGURE 82
PROMENADE (REDUCED PROJECT/PEDESTRIAN PROMENADE) – LEVEL 1

MAP SOURCE: WESTFIELD

FIGURE 83
PROMENADE (REDUCED PROJECT/PEDESTRIAN PROMENADE) – LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE 84
PROMENADE (REDUCED PROJECT/PEDESTRIAN PROMENADE) – LEVEL 5/6

MAP SOURCE: WESTFIELD

NORTH

FIGURE 85
PROMENADE (REDUCED PROJECT/PEDESTRIAN PROMENADE) – CROSS SECTION

MAP SOURCE: WESTFIELD

Bloomingdales parking structure and to the promenade street, thus increasing the traffic level on this street at all times and preventing the closure of the street during peak shopping periods for pedestrian safety.

A portion of the lower level of the Bloomingdale's parking structure, and the entire ground-floor footprint of the existing three-level south parking structure would be modified and converted to single-story retail space. A new six-level parking structure (grade plus five levels) would be added to the east end of the existing three-level parking structure, just south of Macy's department store. This new structure would extend easterly toward Woodman Avenue and replace the southern portion of the existing surface parking lot. That portion of the new parking structure east of the Fashion Square Lane road would step down to a three-level (grade plus two) structure. The western half of this new six-level structure would also incorporate ground level retail space along the promenade. Similar to changes associated with the Proposed Project, the Macy's parking structure would remain but would be modified as needed to accommodate the reconfiguration of the internal circulation, including the consolidation/realignment of the Riverside Drive entrance across from Matilija Avenue. Surface parking would remain on the east portion of the development site not developed with the new parking structure. All three of the southerly parking structures would be interconnected to allow for vehicular travel between the east and west end of the development site. The existing Macy's parking structure would remain separate, but its access would be integrated with the other parking areas through the ground-level internal circulation.

Because of the interim loss of on-site parking during the construction, a request for a parking variance (to a ratio of 4.1 parking spaces per 1,000 GLSF) to temporarily allow a reduction in on-site parking during the construction phase would be requested. Until this alternative is built out, some project parking would have to be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site).

Improvements to the internal circulation would include reconfiguration of Fashion Square Lane to create a "loop" road south of the existing mall. Under this alternative, the internal loop circulation established along the south portion of the development site would be contained within the parking structure (level two) and would function as the primary internal access. A secondary, ground-level east-west circulation route would separate the existing mall from the new retail created in the existing parking structure. This street segment would provide controlled limited patron access and emergency vehicle access to the center. This street segment would serve the dual function as a promenade. The promenade would serve as an open-air pedestrian mall during peak mall hours (i.e., during weekends and holiday seasons) and would be closed to vehicle traffic during those times.

Improvements to the other existing driveways would be incorporated to facilitate safer access and convenience. The south driveway along Hazeltine Avenue would be reconfigured to incorporate ramps directly accessing the second level of the parking structure. There would be no access to ground-level parking from this driveway. The north Hazeltine Avenue driveway would be modified to function as a secondary access and would link directly to the promenade and limited parking (i.e., approximately 80 spaces) in the ground level of the Bloomingdale's parking structure.

Under the Promenade Alternative, landscape and building facade enhancements, similar to those described for the Proposed Project, along the Riverside Drive and Hazeltine Avenue frontages would be provided. Full improvements to internal circulation and site access driveways, including realignment of the driveway at the Matilija Avenue intersection, would be implemented, including circulation improvements that would facilitate better emergency access within the project site. Off-site roadway improvements to Riverside Drive, Matilija Avenue and Woodman Avenue, similar to those for the Proposed Project (except without tunnel), would also be incorporated. Similar to the Proposed Project, the Promenade Alternative would achieve LEED certification and would be consistent with objectives under the Climate Action Team Plan and the City's Green LA Action Plan.

New discretionary approvals, similar to those for the Proposed Project, would be required. The Promenade Alternative would require the following entitlements:

- Zone Change from (Q)C2-1L, C2-1L, (T)(Q)PB-1L, (Q)PB-1L, and P-1L to (T)(Q)C2-1L

- Conditional Use Permit for construction of a "Major Development Project" (MDP) of approximately 190,000 square feet (GLSF) which exceeds the established threshold of 100,000 square feet for non-residential uses (MDP)

- Site Plan Review for the modification of three existing parking structures, reconfiguration of site driveways and internal circulation, construction of 190,000 GLSF retail space within a series of one-level structures, and construction of one new multi-level parking structure.

- Conditional Use Permit for Commercial Corner[10] development and deviation from:

    - a 45-foot height limit to provide a building and parking structure with maximum height no greater than the existing Macy's building;

    - allowable hours of operation (7:00 a.m. to 11:00 p.m.) to permit uses from 5:30 a.m. to 12 midnight;

    - a requirement to provide a five foot landscaped area immediately adjacent to all street frontages;

[10] Pursuant to section 12.03 of the Los Angeles Zoning Code a Commercial Corner development is, "[a]ny commercially used corner lot located in a C or M zoned in Height District Nos. 1, 1-l, 1-VL, or 1-XL, the lot line of which adjoins, is separated only by an alley adjacent to or is located across the street from, any portion of a lot zoned A or R, or improved with any residential use (except in an M zone)". The only corner lot at the center is the lot containing the Bloomingdale's departments store. This lot is not owned by the applicant and is not being affected by the Expansion Project. As such the project may not be subject to the Commercial Corner restrictions. However, in consultation with the Planning Department and the applicant it has been determined that because of the reciprocal access easements between the property owners on the site and the unified nature of the center that for a worst case analysis of potential impacts that for at least this Environmental document that it will be assumed that the project is subject to the Commercial Corner restrictions.

  - the requirement to provide a minimum of fifty percent transparent windows along the first floor retail by providing approximately no glass along the Riverside Drive frontage; and

  - the restriction on tandem parking by providing tandem parking spaces.

- Zone Variance request to deviate from the 45-foot height limit of the Commercial Corner regulations.

- Conditional Use Permit for the on-site sale and consumption of a full line of alcoholic beverages (CUB)

- Request for Shared Parking Review

- Zone Variance to reduce on-site parking below code requirements during construction

- Haul Route approval from the Building and Safety Commission for construction phase operations

- Other approval or permits necessary for the project including, but not limited to, grading and building permits and other minor permits from the Departments of Building and Safety and Public Works, and other ancillary approvals or permits including, but not limited to, lot line adjustments, public works permits or variances, conditional use permits necessary to fully implement the Promenade Alternative project.

It should be noted that for the alternatives analysis, it is assumed that the same or equivalent level of mitigation measures (MM) and/or project design features (PDF) that apply to the Proposed Project would be carried forward with each potential alternative to the extent feasible, except for those that would otherwise be in conflict with the description for that alternative. For example, MM/PDFs for the Proposed Project that relate to the tunnel access would not apply to alternatives that do not incorporate the tunnel access as part of their description.

This Alternative was selected because it accomplishes the project objectives by increasing the commercial intensity at the project site beyond current or entitled levels, although to a somewhat reduced extent than would the Proposed Project. While additional restaurant area would be provided with this alternative, the total area of new restaurant uses would be proportionately reduced. The Promenade Alternative is both a "reduced project" and an "alternate site plan" alternative that represents an approximate 32% reduction of square footage of the Proposed Project and incorporates a stronger pedestrian orientation through the promenade. Further, the Promenade Alternative was selected to provide a comparison to the Proposed Project that would potentially reduce impacts to traffic, air quality, public services and utilities and provide beneficial land use policy compliance attributes.

ENVIRONMENTAL IMPACTS OF ALTERNATIVE

1. Aesthetics and Visual Resources

Under the Promenade Alternative scenario, the visual changes to the project site would be similar, but somewhat reduced, to those identified for the Proposed Project. Therefore the impacts to aesthetic character and light/glare would be less than significant and similar to those identified for the Proposed Project, while those related to viewsheds would be somewhat less and also less than significant.

Under the Promenade Alternative scenario, the visual changes to the project site from Riverside Drive would be similar to those identified for the Proposed Project. As with the Proposed Project, visibility of the sixth level of the south parking structure under the Promenade Alternative would be very limited due to an approximate 210 feet setback of the proposed parking structure from Riverside Drive. As a result, the individual levels of the parking structure are not readily discernable but rather perceived as just part of a building mass. Impacts to aesthetic character and light/glare from Riverside Drive would be similar to those identified for the Proposed Project, including those related to viewsheds, and would be less than significant. Under this alternative, there would not be a new parking structure adjacent to the Woodman Avenue frontage. The easterly three-level portion of the new parking structure not be highly visible from Woodman Avenue due to its location along the south edge and because intervening landscaping would breakup the view to this segment of the structure. Therefore, the impacts to aesthetics character and lights/glare would be somewhat reduced as compared to those identified for the Proposed Project, including those related to viewsheds and would be less than significant.

Aesthetic Character. With the Promenade Alternative, all new construction would be sited immediately south of the existing main mall buildings; however, modifications to the driveways at Hazeltine Avenue and Riverside Drive would be implemented. Therefore, most of the construction related impacts on visual character, as viewed from Hazeltine Avenue and Riverside Drive, would be minimized, and similar to that for the Proposed Project. Construction activity would be most visible from Woodman Avenue as the surface lot in this area will be used for construction staging and views from the street toward the project site are relatively unobstructed, hence construction-related visual character impacts from Woodman Avenue would be similar to those identified for the Proposed Project. To accommodate construction of new buildings and implementation of enhanced landscaping, approximately 48 mature trees, similar to that under the Proposed Project, would be removed.

Overall, and due primarily to the reduced length of the construction phase, aesthetic impacts of the Promenade Alternative would have a less than significant impact on visual character that would be slightly less impactive than the Proposed Project.

Alteration of Views. The Proposed Project visual analysis, included in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources, indicates that because of the increased height and location of the proposed new parking structure, views from some of the homes along Matilija Avenue would be altered (and partially obstructed). Under the Promenade Alternative, the new construction (including the new parking structure) as viewed from Matilija

Avenue would be similar that with the Proposed Project. The newly constructed retail/restaurant structures would generally not be visible from the Matilija Avenue residences. With the Proposed Project, views while traveling along Woodman Avenue would be partially obstructed by the proposed five-level east parking structure. With the Promenade Alternative, the east parking structure would be reduced in scale to two levels above grade and set back farther from Woodman Avenue, thereby resulting negligible changes to the views from Woodman Avenue. In addition, the Promenade Alternative would retain an open view of the promenade corridor, offering a greater sense of "openness" to travelers along adjacent north-south streets (i.e., Woodman Avenue and Hazeltine Avenue) as they pass the project site. Both the Proposed Project impact and the Promenade Alternative impact would be less than significant; however, the overall the impact of the Promenade Alternative would be slightly less than with the Proposed Project.

Lighting. Under the Promenade Alternative, lighting conditions would be similar to those anticipated with the Proposed Project, and for the most part, similar to existing conditions. Although the Promenade Alternative establishes an open-air portion of the mall that would be lighted during the normal operational evening hours with street lighting and signage for new retail/restaurant buildings, the illumination generated by the open-air component by light-sensitive receptors to the north would be shielded by the existing mall building. Lighting associated with the parking structures will be shielded from light-sensitive uses to the north by intervening structures that would obstruct the illumination. Existing on-site sources of night lighting are the spill over of security lighting from open parking areas and at the five docking/loading areas along Riverside Drive. Vehicle lights exiting the project site at the two driveways along Riverside Drive (in the vicinity of Matilija Avenue) sweep out onto adjacent sidewalks, streets and residences to the north. Because the building configuration along the Riverside Drive and Hazeltine Avenue street frontages would not change, and the location of project site driveways along those frontages would not be altered, the illumination impacts would be similar to those described for the Proposed Project. Both the Proposed Project impact and the Promenade Alternative impact would be less than significant.

2. Air Quality

The Promenade Alternative would require less construction activity than assumed for the Proposed Project. In addition, the Promenade Alternative would export approximately 40,000 cubic yards of dirt as opposed to 147,016 cubic yards of dirt for the Proposed Project. As such, pollutant emissions during the entire Promenade Alternative construction period would be less than the amount of pollutants emitted during the entire Proposed Project construction period (e.g., NO_X emissions associated with haul trucks). However, the daily construction intensity (e.g., construction equipment hours) for the Promenade Alternative would be similar to the daily construction intensity assumed for the Proposed Project. Accordingly, the Promenade Alternative daily regional construction emissions of VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10} would be similar to the emissions presented for the Proposed Project and would result in a less than significant air quality impact.

Localized $PM_{2.5}$ and PM_{10} construction emissions were calculated based on the amount of acres to be disturbed per day. Similar to the Proposed Project, it was assumed that the Promenade

Alternative would disturb a maximum of 4.25 acres per day. This would result in 16 pounds per day (ppd) of $PM_{2.5}$ and 70 ppd of PM_{10}, which exceeds the SCAQMD localized significance thresholds. Therefore, the Promenade Alternative would result in a significant localized $PM_{2.5}$ and PM_{10} impact, although the duration of that impact would be less than the Proposed Project due to a shorter overall construction period.

The 190,000 GLSF associated with the Promenade Alternative would generate less mobile and area source emissions than the Proposed Project. Weekday emissions would be approximately 20 pounds per day (ppd) for VOC, 27 ppd for NO_X, 187 ppd for CO, less than one ppd for SO_X, 6 ppd for $PM_{2.5}$, and 29 ppd for PM_{10}. Weekend emissions would be approximately 25 ppd for VOC, 33 ppd for NO_X, 235 ppd for CO, less than one ppd for SO_X, 7 ppd for $PM_{2.5}$, and 36 ppd for PM_{10}. As with the Proposed Project, regional operational emissions for the Promenade Alternative would not exceed the SCAQMD significance thresholds for VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}, and regional operational emissions for the Promenade Alternative would result in a less than significant impact.

Mobile source emissions associated with the Promenade Alternative would potentially be less than localized CO emissions for the Proposed Project. Maximum project-related weekday and weekend one- and eight-hour CO concentrations are estimated to be 5 and 3.7 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. Reduced traffic associated with the Promenade Alternative would not be substantially changed from the CO concentrations estimated for the Proposed Project. The Promenade Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Promenade Alternative would be consistent with the land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Promenade Alternative would be compatible with the AQMP and would result in a less than significant cumulative air quality impact. The Promenade Alternative would generate less GHG emissions than estimated for the Proposed Project. In addition, the Promenade Alternative would not generate a disproportionate amount of vehicle miles of travel and would not have unique or disproportionately high fuel consumption characteristics. Similar to the Proposed Project, the Promenade Alternative would achieve LEED certification and would be consistent with objectives under the Climate Action Team Plan and the City's Green LA Action Plan. Introduction of the pedestrian promenade, which would parallel the Los Angeles River and connect two designated green street corridors, would better achieve compliance with the intent of the RIO than would the Proposed Project. Similar to the Proposed Project, the Promenade Alternative would result in a less than significant global warming impact.

Overall, the Promenade Alternative emissions would be less than the Proposed Project emissions but the air quality impact would be significant during the construction phase on a daily basis.

3. Geology and Soils

As discussed in Section IV: Environmental Impact Analysis: C-Geology and Soils, the risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence at the project site is low. However, much of the region is subject to seismic groundshaking activity. The potential for

a seismic occurrence on the site with the Promenade Alternative is the same as with the Proposed Project. However, due to the reduced GLSF area, the Promenade Alternative would have a lower on-site population during the day; therefore, the number of people that would be affected in a seismic event would be slightly less. However, any new construction under either scenario would be constructed to meet current seismic standards and would ensure that potential impacts are less than significant. As a result, this alternative would slightly reduce a less than significant impact when compared to the Proposed Project.

4. Hazardous Materials and Man-Made Hazards

The existing condition of the site is generally insignificant with regard to hazardous materials. Construction activities associated with the Proposed Project would introduce a slightly higher risk of hazards due to materials and equipment to be used on-site during the construction activity for a longer duration than would be required with the Promenade scenario. With construction proposed under the Promenade Alternative, although overall reduced in building intensity, the nature of activities and construction style and materials would make the impact related to hazardous materials similar to that identified for the Proposed Project. While both the Proposed Project impact and the Promenade Alternative impact concerning hazardous materials would less than significant, overall the impact of the Promenade scenario would be slightly less due to a slightly reduced duration of construction activity. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

The operations of the Promenade Alternative, although on a slightly smaller scale would be of a similar nature of activities and impacts related to hazardous materials as those identified for the Proposed Project. While both the Proposed Project impact and the Promenade Alternative impact concerning hazardous materials from operations would be less than significant, overall the impact of the Promenade scenario would be slightly less due to the reduced building and parking area and volume of materials consumed. Under either scenario, it is assumed that appropriate mandated measures would be implemented to ensure that all hazardous materials impacts would be reduced to less than significant levels.

5. Water Resources

Runoff from the project site is conveyed and would be adequately handled by the City's storm drain system. Under current conditions, the project site is largely paved and/or covered by structures and impermeable surfaces. New construction under the Promenade Alternative would not result in any substantial net change in permeable surface area. New construction would be designed to comply with current SUSMP requirements and therefore result in a net improvement to water resources over existing conditions. The area of improvement to drainage and water quality under this scenario could be less than the area of improvements under the Proposed Project. Specifically, the Proposed Project will be required to bring runoff to all three streets up to current SUSMP standards, but depending on the design of the storm-water drainage system for the parking structure under the Promenade Alternative project, SUSMP standards may only be required for drainage to Hazeltine Avenue. However, it is possible that the Promenade Alternative could result in a slightly reduced impact compared to the Proposed Project because:

(1) there would be less vehicle-related contaminants at the site due to an overall reduced commercial square footage; and (2) there would be more "undeveloped" area/opportunity available on-site to implement best management practices that are based on "green" strategies. Overall, the Promenade Alternative would have a similar and still less than significant impact on water quality when compared to the Proposed Project.

The Promenade Alternative's water consumption of approximately 36,625 gallons per day would be approximately 17,235 gallons per day less than the Proposed Project and therefore would have less of an impact than the Proposed Project. However, the impact for both the Promenade Alternative and the Proposed Project scenarios would be less than significant.

6. Land Use, Planning and Urban Decay

Existing land uses are compatible with surrounding land use patterns. The Promenade Alternative would be a continuation, albeit intensification, of the existing community commercial use and would be similarly compatible with adjacent land uses. The Promenade Alternative is based on the permitted uses, height, development criteria and building intensity provisions of the existing entitlements approved in 1994, plus an intensification of commercial uses and introduction of pedestrian orientation to reflect a higher and more efficient use of the property and address current land use policy to create stronger pedestrian linkages. Because the Promenade Alternative does not propose a substantial change in land use patterns in the area, this alternative would be considered to be compatible with surrounding uses and not to have a significant impact on compatibility. As a result, the Promenade Alternative would have a similar less than significant impacts on compatibility as the Proposed Project.

Existing uses, and proposed uses under this scenario, are consistent with zoning and planning designations and policies for the site. However, the on-site commercial uses are underutilized in their current condition. The community could benefit from the revitalizing effect of an expansion of uses proposed under the Promenade Alternative, and hence, this would aid in fostering the goals of the policies of the related City plans. Both the Proposed Project and the Promenade Alternative would be consistent with the policies of the Community Plan and would have a similar less than significant impact. Both scenarios would also afford an opportunity for compliance and implementation of the RIO. In fact, introduction of the pedestrian promenade, which would parallel the Los Angeles River and connect two designated green street corridors, would better achieve compliance with the intent of the RIO than would the Proposed Project. As with the Proposed Project, this alternative would be consistent with regional planning programs (i.e., SCAG's RCP and the AQMP). The Promenade Alternative would have similar less than significant impacts with regard to land use compatibility and consistency as the Proposed Project.

7. Noise

Construction activity associated with the Promenade Alternative would generally result in similar noise levels than as discussed for the Proposed Project. Daily noise levels would be similar to noise levels presented for the Proposed Project; however, construction-related noise exposure would be expected to be shorter in duration due to decreased development schedule.

Noise level increases from construction would occur in proximity to noise sensitive uses and mitigation measures, similar to those for the Proposed Project, would be recommended to reduce noise levels, and construction activity associated with this alternative would comply with the standards established in the Noise Ordinance. As such, construction noise impacts associated with Promenade Alternative would be similar to those presented for the Proposed Project and would result in a less than significant impact with mitigation.

Noise from the operation of existing uses is generated primarily by traffic coming to and from the project site. Existing uses currently generate traffic and noise that would continue and increase under the Promenade Alternative. However, the Promenade Alternative would result in less daily vehicle trips than the Proposed Project and, as such, would result in lower off-site mobile noise levels. Off-site mobile noise is not anticipated to be increased by more than 3 dBA CNEL thereby resulting in a less than significant impact on the ambient noise environment.

Perceivable changes in non-traffic related operational impacts may be anticipated due to the open-air style of the additional retail component. The Promenade Alternative would include retail uses along the promenade. The promenade would possibly have multiple outdoor uses, including a farmer's market, small-scale musical groups, and street performances. The promenade would be located on the southern portion of the project site and would be separated from sensitive receptors by multi-story retail buildings, which would serve as a noise barrier (because they would block the line-of-sight) of noise generated at the promenade to noise-sensitive receptors located north and south of the project site. Mobile noise from traffic along the promenade would be inaudible at these off-site noise-sensitive receptors. The nearest sensitive receptor with the potential to be impacted by on-site mobile noise would be located approximately 1,000 feet west of the project site. The ambient noise level at this sensitive receptor as a result of on-site mobile noise would increase by less than 0.1 dBA L_{eq}. Because the noise level increase would be less than the 5-dBA significance threshold, the noise impact would be less than significant.

Aside from noise associated with activity on the Promenade, the Promenade Alternative would include stationary noise sources (i.e., mechanical equipment) comparable to those discussed for the Proposed Project. Similar to the Proposed Project, the Promenade Alterative would result in a less than significant stationary source operational noise impact.

Noise sources associated with the parking structure include vehicle movement, slamming doors, and car alarms. Parking activity typically generates a noise level of 63 dBA L_{eq} at 50 feet, including rooftop noise. The Promenade Alternative would include multi-story parking structures on the southern portion of the project site. The nearest sensitive receptor with the potential to be impacted by parking on the project site is located approximately 850 feet to the west on Calhoun Avenue. Based on distance attenuation, the parking-related noise levels would be approximately 52.5 dBA L_{eq}. Mobile-source related noise levels are approximately 38.4 dBA L_{eq} along Calhoun Avenue. When added to this noise level, parking-related noise would increase the ambient noise level by less than 0.1 dBA. This level is less than the 5-dBA significance threshold, which would result in a less than significant impact.

Overall, the Promenade Alternative would result in similar construction noise levels, less stationary source operational noise, and less mobile source noise as the Proposed Project.

8. Fire Services

The Promenade Alternative would not result in a measurable increase in fire protection demands for same reasons attributable to the Project and, therefore, would create a less than significant impact. This represents a similar level of impact for that anticipated with the Proposed Project.

9. Police Services

The Promenade Alternative would not result in a significant increase in police protection demands for same reasons attributable to the Project, and the overall impact would be similar to that anticipated with the Proposed Project, and therefore less than significant.

10. Solid Waste

During construction, the Proposed Project avoids a potential significant impact for solid waste due to construction debris generated from demolition of the parking structures and waste materials from new construction through an aggressive recycling program. Under the Promenade Alternative, only a portion (the lower two levels) of the existing three-level parking structure, along with a portion of the lower levels of the Bloomingdale's parking structure, would be partially demolished, resulting in a volume of construction waste that would be less than that for the Proposed Project. Although the level of demolition or construction required under the Promenade scenario would be less, this alternative would not fully avoid impacts related to construction-generated solid waste. However with the implementation of a similar aggressive recycling program the impact is anticipated to be less than significant.

The Promenade Alternative would generate approximately 1,306 pounds per day of solid waste, which would generate less of an impact on landfills than the approximate 1,921 pounds per day generated by the Proposed Project. Operational volumes of solid waste generated by the Promenade Alternative would be less than those of the Proposed Project, and the impact would remain less than significant.

11. Traffic, Circulation and Access

The Promenade Alternative involves an increase of approximately 190,000 GLSF of commercial retail uses at the project site. Under this scenario, a net increase of 61 vehicle trips during the weekday A.M. peak hour and 311 vehicle trips during the weekday P.M. peak hour are anticipated.[11] During the weekend peak hours, an additional 413 vehicle trips are anticipated. During both the weekday and weekend conditions, these trip increases due to implementation of the Promenade Alternative would result in a reduced level of traffic impact compared to the Proposed Project, and would have a net impact that would be less than significant with the implementation of comparable mitigation measures. However, two of the 17 study intersections

[11] Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

are anticipated to be significantly impacted by the Promenade Alternative during the A.M. and P.M. peak hours. Incremental but not significant impacts are noted at the remaining 15 study intersections due to the Promenade Alternative. Under weekend peak hours, three of the six study intersections are anticipated to be significantly impacted by the Promenade Alternative. However, the Promenade Alternative is anticipated to contribute to the City of Los Angeles ACTC installation at these intersections, as well as provide for the redesignation of the southbound Woodman Avenue right-turn only lane to an operational through/right-turn lane at the intersection of Woodman Avenue/Riverside Drive, similar to the Proposed Project. As a result, the anticipated traffic impacts of the Promenade Alternative would be reduced to less than significant levels.

The parking configuration would be somewhat enhanced with the addition of more centrally located parking, which is more conveniently accessible by the promenade configuration, and this alternative would provide parking at the current Proposed Project ratio of 4.25 parking spaces per 1,000 GLSF. However, unlike the Proposed Project, on-site parking levels during the construction phase of the Promenade Alternative would be temporarily reduced to a ratio of 4.1 parking spaces per 1,000 GLSF for an approximate one-year period. During that time, a parking management plan would be implemented to ensure that adequate parking can be provided for the Promenade Alternative and minimize potential impacts to surrounding areas.

The vehicular access associated with the Promenade Alternative would enhance pedestrian access at the project site. Improvements and enhancements to internal site circulation, driveway consolidations, and pedestrian safety and access enhancements from off-site would be incorporated, although configured differently than the Proposed Project. These improvements and enhancements would reduce vehicle/pedestrian conflicts because it would locate the primary vehicular circulation away from the retail stores, thus eliminating the need for the majority of pedestrian movements having to cross an active vehicular circulation route. The Promenade Alternative's traffic impacts would be less than the Proposed Project's impacts overall due to the reduced number of vehicle trips. As a result, with the implementation of similar traffic mitigation as the Proposed Project, the Promenade Alternative would be anticipated to reduce traffic impacts to a less than significant level.

12. Growth Inducing

The Promenade Alternative would not result in a measurable increased potential for new growth for same reasons attributable to the Project. As with the Proposed Project, the net growth-inducing effect of the Promenade scenario would be less than significant and may be slightly less than any potential associated with the Proposed Project.

13. Cumulative Impacts

Other related projects, similar to those anticipated with the Proposed Project, would be expected to be developed and impacts corresponding to those developments are anticipated to occur. The Promenade Alternative would result a contribution to cumulative impacts that is similar to, but slightly less than that described for the Proposed Project. With the implementation of mitigation measures similar to those recommended for the Proposed Project (and pro-rated accordingly), the

Alternative's contribution toward cumulative impacts would be less than significant for same reasons attributable to the Project.

14. Relationship of Alternative to Project Objectives

The Promenade Alternative would satisfy most of the project objectives, but not to the extent possible with the Proposed Project. Specifically, the Promenade Alternative would invigorate economic activity at the project site, including the addition of a greater variety of retail and restaurant uses, but not to the full extent possible under the Proposed Project as total commercial area would be reduced by approximately 32%. However, the Promenade Alternative would provide circulation and access improvements that promote enhanced vehicular and pedestrian safety. Further, this alternative would enhance on-site improvements that could facilitate improved community linkages and achieve greater compliance with the intent of the RIO. Also, the Promenade Alternative would be designed to achieve LEED certification offering comparable "green" enhancements similar to the Proposed Project. In summary, the Promenade Alternative would generally satisfy the project objectives to a similar extent than the Proposed Project.

15. Comparison of Alternative's Reduction of Project Impacts

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. The Promenade Alternative would result in reduced impacts for most of the environmental impacts associated with the Proposed Project (including those that would already be less than significant). One exception would be a slightly greater parking/traffic impact for the Promenade Alternative for an approximate one-year period during the initial construction phase. Also, as illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) to air quality during the short-term construction phase. The Promenade scenario would reduce but not avoid this significant air quality impact, however this alternative would reduce the level of all other impacts addressed herein beyond those anticipated with the Proposed Project, with the exception of a temporary increase in traffic impacts during the construction phase due to a reduction in the available parking ratio to 4.1 parking spaces per 1,000 GLSF.

Implementation of the Promenade Alternative would result in similar or reduced environmental impacts for most issue areas compared to the Proposed Project. While some of the impacts under this alternative may have somewhat less impacts relative to the Proposed Project, none of the impacts are totally avoided. Overall, the Promenade Alternative would result in a reduced level of impact when compared to the Proposed Project.

V. ALTERNATIVES

H. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines requires that an EIR identify the environmentally superior alternative. If the "No Project" alternative is the environmentally superior alternative, then the EIR must identify an environmentally superior alternative among the remaining alternatives.

Based on the analysis of the DEIR, the Proposed Project is anticipated to result in significant unavoidable impacts related to:

- Air Quality – Construction Phase (due to exceedences of daily emission thresholds for $PM_{2.5}$ and PM_{10})

Table 58: Alternatives Comparison to the Proposed Project, provides a matrix that compares the impacts of each alternative relative to the level of impact anticipated with the Proposed Project. A more detailed description of each alternative and the potential impacts associated with each is provided above.

Of the Alternatives analyzed in the EIR, the No Project is considered the overall environmentally superior alternative as it would reduce and/or avoid the majority of the impacts (even those that would be less than significant) that would occur with implementation of the Proposed Project. However, as noted above, the No Project Alternative would not meet the project objectives as it would offer no enhancements to the project site that would attain economic vitalization, circulation improvements, and aesthetic upgrades.

In accordance with the CEQA Guidelines, a second alternative must be established as environmentally superior when the No Project Alternative is the primary environmentally superior alternative. The comparative evaluation indicates that the Existing Entitlement (with proposed buildout limited to 108,000 GLSF of retail/restaurant uses) would also be environmentally superior. The Existing Entitlement Alternative would result in the reduction of more project impacts than any of the other remaining alternatives. Further, the Existing Entitlement Alternative would reduce but not eliminate the only significant impact identified for the Proposed Project (i.e., construction phase air quality). Other impacts, though already less than significant with the Proposed Project, would be to a lesser extent. For example, visual impacts related to changes of the existing viewsheds as seen from residential properties along Matilija Avenue would be reduced as the new parking structure would be limited to only four levels, thereby reducing the degree to which views could be blocked.

The Existing Entitlement Alternative would not meet most of the project objectives primarily because this alternative would not accomplish the modernization and revitalization of the shopping center in a manner that achieves long-term economic viability to the extent anticipated through the Proposed Project. Further, under this alternative, internal and external site access improvements would not be implemented. Fashion Square Lane would not be realigned, thus

improved emergency access and a more efficient access for project site users would not be incorporated. Under this scenario, existing site access and circulation problems would remain.

Table 57: Summary of Alternatives Impacts, provides a summary of the net impacts by environmental issue for each of the proposed alternatives. Comparison to the impact of the project is presented in *Table 58: Alternatives Comparison to the Proposed Project*.

TABLE 57
SUMMARY OF ALTERNATIVE IMPACTS

PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
AESTHETICS AND VISUAL RESOURCES								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
AIR QUALITY								
Construction (Short-Term)	Significant	No impact	Significant	Significant	Significant	Significant	Significant	Significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
GEOLOGY AND SOILS								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
HAZARDOUS MATERIALS AND MAN-MADE HAZARDS								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
WATER RESOURCES – WATER QUALITY								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant

TABLE 57 (CONTINUED)
SUMMARY OF ALTERNATIVE IMPACTS

PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
WATER RESOURCES – WATER SUPPLY								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
LAND USE, PLANNING AND URBAN DECAY								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
NOISE								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
PUBLIC SERVICES – FIRE PROTECTION								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
PUBLIC SERVICES - POLICE								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
PUBLIC UTILITIES – SOLID WASTE								
Construction (Short-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant

TABLE 57 (CONTINUED)
SUMMARY OF ALTERNATIVE IMPACTS

PROJECT PHASE	PROPOSED EXPANSION PROJECT	ALTERNATIVE						
		A NO PROJECT	B 108 K/ EXISTING ENTITLE-MENT	C 235 K/ REDUCED HEIGHT	D 235 K/ MATILIJA CLOSURE	E NO TUNNEL/ NO SUB-PARKING	F PEDESTRIAN ACTIVATION	G PROMENADE
TRAFFIC, CIRCULATION AND ACCESS								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
GROWTH INDUCING								
Construction (Short-Term)	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
OTHER IMPACTS								
Construction (Short-Term)	Less than significant	No impact	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Operation (Long-Term)	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cumulative	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant

Table 57: Summary of Alternatives Impacts and *Table 58: Alternatives Comparison to the Proposed Project*, provide a summary of the net impacts by environmental issue for each of the proposed alternatives and comparison of the impacts of each alternative relative to the level of impact anticipated with the Proposed Project, respectively. As illustrated in these tables, the Proposed Project would result in significant impacts (after mitigation) only to air quality during the short-term construction phase. The No Project scenario would not result in any significant environmental impacts and would reduce and/or avoid any new impacts beyond the existing condition.

TABLE 58
ALTERNATIVES COMPARISON TO THE PROPOSED PROJECT

ALTERNATIVE ID	ALTERNATIVE TITLE	AESTHETICS/ VISUAL\RESOURCES	AIR QUALITY	GEOLOGY/SOILS	HAZARDOUS MATERIALS	WATER RESOURCES	LAND USE/PLANNING/ URBAN DECAY	NOISE	FIRE	POLICE	WATER SUPPLY	SOLID WASTE	TRAFFIC/ CIRCULATION/ACCESS	GROWTH INDUCING	OTHER IMPACTS
CONSTRUCTION PHASE (SHORT-TERM)															
A	No Project	—	—	—	—	—	—	—	—	—	—	—	—	N/A	—
B	Existing Entitlement (108 K)	—	—	¤	¤	¤	¤	—	¤	¤	¤	—	—	N/A	¤
C	Reduced Project 1 (235 K/Height)	¤	—	¤	¤	¤	¤	—	¤	¤	¤	—	¤	N/A	¤
D	Reduced Project 2 (235 K/Matilija)	¤	—	¤	¤	¤	¤	—	¤	¤	¤	—	¤	N/A	¤
E	Alternate Plan 1 (280 K/No Tunnel)	¤	—	—	¤	¤	¤	—	¤	¤	¤	—	¤	N/A	¤
F	Alternate Plan 2 (280 K/Pedestrian Activation)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	N/A	¤
G	Promenade (190 K/Promenade)	¤	—	¤	¤	¤	¤	—	¤	¤	¤	—	▲	N/A	¤
OPERATIONAL PHASE (LONG-TERM)															
A	No Project	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B	Existing Entitlement (108 K)	—	—	¤	¤	—	—	—	¤	¤	—	—	—	¤	¤
C	Reduced Project 1 (235 K/Height)	¤	—	¤	¤	¤	¤	¤	¤	¤	—	—	—	¤	¤
D	Reduced Project 2 (235 K/Matilija)	¤	—	¤	¤	¤	¤	¤	¤	¤	—	—	—	¤	¤
E	Alternate Plan 1 (280 K/No Tunnel)	¤	—	—	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
F	Alternate Plan 2 (280 K/Pedestrian Activation)	▲	¤	¤	¤	¤	¤	▲	¤	¤	¤	¤	¤	¤	¤
G	Promenade (190 K/Promenade)	—	—	¤	¤	¤	—	¤	¤	¤	—	—	¤	¤	¤

TABLE 58 (CONTINUED)
ALTERNATIVES COMPARISON TO THE PROPOSED PROJECT

ALTERNATIVE ID	ALTERNATIVE TITLE	AESTHETICS/ VISUAL\RESOURCES	AIR QUALITY	GEOLOGY/SOILS	HAZARDOUS MATERIALS	WATER RESOURCES	LAND USE/PLANNING/ URBAN DECAY	NOISE	FIRE	POLICE	WATER SUPPLY	SOLID WASTE	TRAFFIC/ CIRCULATION/ACCESS	GROWTH INDUCING	OTHER IMPACTS
CUMULATIVE (LONG-TERM/OPERATIONAL)															
A	No Project	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B	Existing Entitlement (108 K)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
C	Reduced Project 1 (235 K/Height)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
D	Reduced Project 2 (235 K/Matilija)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
E	Alternate Plan 1 (Tunnel/Subterranean Parking)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
F	Alternate Plan 2 (Pedestrian Activation/Tunnel)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤
G	Promenade (190 K/Promenade)	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤	¤

Key: ¤ = Net Alternative impact is generally equivalent to that identified for the Proposed Project
▲ = Net Alternative impact is considered to be greater than that identified for the Proposed Project
— = Net Alternative impact is considered to be less than that identified for the Proposed Project

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

A. EFFECTS NOT FOUND TO BE SIGNIFICANT

An Environmental Assessment Form (EAF) and Initial Study (IS) were prepared for the Proposed Project. Based on those documents, it was initially determined that the Proposed Project required a Mitigated Negative Declaration (MND). An MND is permitted when it can be demonstrated that all potential project-related impacts are "less than significant" or can be mitigated to less than significant through project design modifications and/or the implementation of recommended mitigation measures. An MND was prepared and circulated in April 2007. However, comments that were received through the public review of the MND requested the preparation of an Environmental Impact Report (EIR). Consequently, the City and the Applicant agreed that an EIR would be prepared. The scope of this EIR focuses only on those impacts that were determined through the IS, MND, public comments received during the circulation of the MND and Notice of Preparation of an EIR (NOP) and comments received during a Public Scoping Meeting to have a potential significant environmental effect.

Based on the Initial Study, preliminary MND and NOP process, it was determined that implementation of the Proposed Project may, either by itself and/or in conjunction with past, present and reasonably foreseeable future development in the project vicinity, have a significant environmental effect in the following areas: Aesthetics/Visual Resources, Air Quality, Geology/Soils, Hazardous Materials/Man-Made Hazards, Water Resources, Land Use/Planning/Urban Decay, Noise, Public Services (Fire and Police), Public Utilities (Solid Waste), and Traffic/Circulation/Access. This EIR includes analysis of the above environmental impacts and recommends mitigation measures to reduce potentially significant impacts.

In accordance with CEQA Guidelines Section 15128, other possible effects of the Proposed Project, which were not determined to be significant through the Initial Study review, are not discussed in detail in this EIR. Possible effects, which did not warrant detailed analysis, are identified below. The specific issues, as defined by initial study checklist questions or L.A. CEQA Threshold Guide screening criteria[1], are identified, followed by the impact analysis.

Aesthetics (Shade/Shadow)

The Proposed Project will not:

- Include light-blocking structures that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest or northeast.

Shade/Shadow. Existing shopping center structures are varied in height with some buildings (or portions thereof) reaching up to 73 feet in height; however, the majority of the existing development ranges in height between 45 and 60 feet. Off-site structures nearest the project site and vicinity of new construction is a two-story retail center (Riverside Woodman Shopping

[1] Los Angeles, City of. 2006 (May). *L.A. CEQA Thresholds Guide*. Los Angeles, CA: Author. 6 June 2008 <http://www.lacity.org/ead/EADWeb-AQD/thresholdsguide.htm>.

Center) at the corner of Riverside Drive and Woodman Avenue located on an adjacent abutting lot to the northeast. Other nearby buildings to the construction area of the site are a series of one- and two-story residential buildings and two office buildings on the north side of Riverside Drive. These buildings are located at a minimum of 100 feet from the project site. Because all new development associated with the Proposed Project will be located further away from existing surrounding properties (i.e., behind the existing shopping center buildings), and the height of all new proposed structures will not exceed the existing building heights (i.e., 75 feet and not taller than the existing Macy's building), future shade/shadow impacts would not be different than what is experienced in the area currently due to the existing development, and potential impacts would be less than significant. Shade/Shadow analysis for the Initial Study for the Proposed Project showed all shadows from new buildings associated with the Proposed Project would fall within the shadow limits already created by existing structures, or would create shadows that fall within the project site (as would be observed with easterly oriented shadows from the new parking structure that would shade the surface parking lot along Woodman Avenue).

The determination of potential significance of impacts related to visual character, views and lighting are subject to further evaluation and have been addressed in Section IV: Environmental Impact Analysis: A-Aesthetics and Visual Resources.

Agriculture

The Proposed Project will not:

- 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.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to non-agricultural use.

Agricultural Resources. The project site is currently developed with the shopping center, and the project area is commercial and residential in nature and does not contain agricultural uses. The site has undergone disturbance from prior development that began in the early 1960s with construction of the original shopping center and associated parking. Since at least the early 1960s, the site has continually operated as a shopping center. Currently, the entire site is either improved with structures related to the shopping center or pavement used primarily for surface parking. The project site is bordered on all sides by commercial development, residential development, or major highways. The Proposed Project will be constructed in an area that been developed and used for non-agricultural uses for many decades. The site is void of any farmland and there is no designated farmland in the project vicinity. The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Proposed Project will not require a change of the current land use designation of Community Commercial. As a result, the Proposed Project will not convert any such designated land from agricultural use, and will not result in a significant impact to agricultural resources.

The project site is designated as Community Commercial in the Van Nuys-North Sherman Oaks Community Plan. The project site has been developed with non-agricultural type uses for since the early 1960s. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use, in return for lower property tax assessments. Because the project site does not currently consist of agricultural uses or open space, the site does not meet the requirements to enter into a Williamson Act contract. The Proposed Project will not request or require a change of the current land use designation of Community Commercial and will not become eligible for the Williamson Act. The Proposed Project will not conflict with existing zoning for agricultural use or a Williamson Act contract and will result in a less than significant impact to agricultural lands.

The Proposed Project is not anticipated to result in impacts to agricultural resources and will not contribute to a potential cumulative impact to agricultural resources. Further, the related projects are located on sites that do not contain any recognized agricultural resources. Also, a separate, site-specific environmental analysis will be prepared for related projects to determine related project-specific potential impacts to agricultural resources.

Air Quality (Toxic Air Contaminants and Odor Impacts)

The Proposed Project will not:

- Store, or process carcinogenic or non-carcinogenic toxic air contaminants, which could result in airborne emissions during construction activity.
- Create objectionable odors affecting a substantial number of people.

Toxic Air Contaminant Impacts (Construction Activity) **-** The greatest potential for TAC emissions during construction would be diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the limited construction schedule of approximately 24 months, the Proposed Project would not result in a long-term (i.e., 70 years) source of TAC emissions. In addition, construction equipment emitting diesel particulate matter would only operate intermittently over the 48 month schedule. No residual emissions of diesel particulates by the Proposed Project are anticipated after construction. As such, project-related construction TAC emission would result in a less than significant impact and are not addressed further in this EIR.

Odor Impacts (Construction Activity and Operations) **-** Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the project site. The Proposed Project would utilize typical construction techniques that reduce odors, and any remaining odors would be typical of most construction sites and temporary. As such, Proposed Project construction would not cause an odor nuisance, construction odors would result in a less than significant impact, and this issue is not addressed further in this EIR.

According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The project site would be developed with retail space and not land uses that are typically associated with odor complaints. On-site trash receptacles would have the potential to create adverse odors. Trash receptacles would be located and maintained in a manner that promotes odor control and no adverse odor impacts are anticipated from these types of land uses. As such, proposed project operational activity would not cause an odor nuisance, operational odors would result in a less than significant impact, and this issue is not addressed further in this EIR.

The determination of potential significance of impacts related to other air quality issues are subject to further evaluation and have been addressed in Section IV: Environmental Impact Analysis: B-Air Quality.

Biological Resources

The Proposed Project will not:

- 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 Game or U.S. Fish and Wildlife Service.
- 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 Game or U.S. Fish and Wildlife Service.
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- 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.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The project site and surrounding area is characterized as an urban, developed commercial and residential area. The project site and all surrounding properties have undergone disturbance previously resulting from development of the existing shopping center, additional commercial uses at the adjacent intersections of Riverside Drive and both Hazeltine Avenue and Woodman Avenue, as well as the surrounding residential uses. The project site has been developed with the

established shopping mall and/or covered with pavement for the associated parking since the early 1960s.

Other than existing landscaping, the site is considered to be impervious. Vegetation on the site is limited to landscaping associated with existing development and a block of trees that currently buffer the site from the adjacent Ventura (US 101) Freeway to the south. Due to the length of time that the developed and impervious conditions have existed at the project site, the site is not considered to be conducive to important biological resources or their habitat. Hence candidate, sensitive, or special status species or habitat, nor migratory fish and wildlife and their associated habitat, are not thought or known to exist on the site.

According to the Los Angeles City-wide General Plan Framework, the project site is not located within a Biological Resources Area which is thought to meet habitat needs for plants and animals, nor promote wildlife migration or movement. Further, the Van Nuys-North Sherman Oaks Community Plan designates the project site for commercial uses which is not considered conducive to biological resources or their habitat. The likelihood of wildlife and associated habitat (including candidate, sensitive or special status species) on the project site is considered low. The project site is not located near or within a migratory corridor. The Proposed Project will not interfere substantially with the movement of resident or migratory fish or wildlife species or their migratory wildlife corridors.

The project site does not have any natural standing bodies of water. Hence, riparian habitat and other sensitive natural communities, and federally protected wetlands communities are not thought or known to exist on the site. The Proposed Project will not result in a substantial adverse impact to federally protected wetlands as defined by Section 404 of the Clean Water Act.

The United States Geological Survey (USGS) map, Van Nuys Quadrangle, identifies a blue line stream, commonly known as the Los Angeles River, on the south side of the Ventura (US 101) Freeway.[2] The River is completely encased in concrete, does not currently support riparian habitat and is not under the jurisdiction of the California Department of Fish and Game. Furthermore, the River is separated from the project site by the 10-lane Ventura Freeway; however the River does cross to the north side of the freeway just west of Hazeltine Avenue. The Proposed Project will not encroach into the River channel and will not adversely affect it. The Proposed Project will not result in an adverse impact to riparian habitat or other sensitive natural communities identified by local or regional plans or the California Department of Fish and Game.

The City of Los Angeles Protected Tree Ordinance is the only local ordinance that protects biological resources. This Ordinance considers protection of all native California Oak species, Black Walnut, California Bay, and California Sycamore trees. The project site has been developed and covered with either structures or pavement since the early 1960s. Vegetation on the site is limited to landscaping associated with the existing shopping center development and trees that currently buffer the site from the adjacent Ventura (US 101) Freeway to the south.

[2] U.S. Geologic Survey (USGS). 1966. USGS Map, Van Nuys Quadrangle. 12 June 2008 <http://store.usgs.gov/b2c_usgs/catalog/setCurrentItem/(isQuery=yes&layout=6_1_61_62_2&uiarea=2&itemPageSize=5&page=8&ctype=catalogQuery&next=seeItem&carea=%24ROOT&citem=00000004730000000011)/.do>.

According to a tree survey, attached as Appendix B: Tree Report, prepared for the Proposed Project, no trees covered under the Protected Tree Ordinance exist on site. The Proposed Project will not conflict with local policies or ordinances that protect biological resources, including trees. The Proposed Project will result in a less than significant impact to biological resources, including protected trees.

The project site is not located within a Significant Ecological Area, as defined by the County of Los Angeles Department of Regional Planning. The Proposed Project will not result in a significant impact to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Impacts to biological resources are typically considered to be site specific but can, at certain times, result from indirect growth inducing impacts on regional areas. The Proposed Project will result in a less than significant impact to biological resources. The Proposed Project is being constructed on the existing shopping center site which is considered to be fully developed with either buildings or surface parking and impervious. The Proposed Project will not exceed existing project boundaries and does not include grading of any open space or native lands. The Proposed Project is consistent with development goals of the Van Nuys-North Sherman Oaks Community Plan as a commercial center and will not indirectly disturb biological resources off-site. As such, the Proposed Project is not expected to contribute to a cumulative impact on biological resources. Further, the related projects are located at sites that are not listed in the Community Plan as containing recognized biological resources.

Cultural Resources

The Proposed Project will not:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

Historical Resources. A "historical resource" is a resource listed in, or determined to be eligible for listing in the California Register, a local register, or determined by a lead agency to be a historic resource as defined in Public Resources Code Section 5020.1 (j) or 5024.1. A record search of National Register for Historical Preservation found no historical or cultural resources located on or adjacent to the project site.[3]

[3]U.S. Department of the Interior (DOI), National Park Service (NPS). 2006 (as updated). *National Register of Historical Places*. 12 June 2008 <http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome>.

The City of Los Angeles City-wide General Plan Framework EIR does not designate the project site as a Historical-Cultural Monument or as a portion of a Historic Preservation Overlay Zone.[4] The Van Nuys-North Sherman Oaks Community plan identifies five historic resources within the Community Plan Area - Tower of Wooden Pallets, the Van Nuys Woman's Club Building, the Valley Municipal Building (Van Nuys City Hall), "The Magnolia" (aka Hirschberg) residence, and the Baird House. None of the identified cultural-historical monuments are located on or adjacent to the project site.

Archaeological and Paleontological Resources. The City of Los Angeles City-wide General Plan Framework does not designate the project site as a Prehistoric or Historic Archaeological Site nor is it part of an Archaeological Survey Area.[5] The City of Los Angeles City-wide General Plan Framework does not designate the project site as a paleontological resource.[6]

The project site has been developed and covered with structures or pavement since the early 1960s. Due to previous site disturbance and the length of time that the property has been developed, no archaeological or paleontological resources, or significant human remains, are known to exist on the site. Furthermore, the Proposed Project will not exceed the boundaries of the current shopping center which will reduce the potential for disturbance of unknown resources. The Proposed Project will not cause a substantial adverse change in the significance of an historical resource, will result in a less than significant impact to historical resources, and will result in a less than significant impact to archaeological or paleontological resources. However, in the event that remains or archaeological/paleontological resources are encountered during excavation, standard regulations and practice by LAMC would require work to immediately stop until any such findings can be assessed. The Proposed Project will result in a less than significant impact to cultural and historic resources.

Impacts to cultural/historical resources are considered to be site specific. There are no identified cultural or historical resources located on the project site. The Proposed Project is anticipated to result in a less than significant impact to both cultural and historical resources and will not contribute to a potential cumulative impact to cultural resources. A separate, site-specific environmental analysis will be prepared for related projects to assess and mitigate related project-specific potential impacts to cultural resources.

[4] Figure CR-4: Historical-Cultural Monuments and Historic Preservation Overlay Zones (HPOZs) in the City of Los Angeles. Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan*. Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>.
[5] Los Figure CR-1: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles. Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan*. Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>.
[6] Figure CR-2: Vertibrate Paleontological Resources in the City of Los Angeles. Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan*. Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>.

Geology and Soils

The Proposed Project will not:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - 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,
    - Seismic-related ground failure, including liquefaction,
    - Landslides.

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

Surface Rupture - The site is not within an Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards, or City of Los Angeles fault rupture study area[7]. Based on the available geologic data, active or potentially active faults with the potential for surface fault rupture are not known to be located directly beneath or projecting toward the site. The potential for surface rupture due to fault plane displacement propagating to the surface at the site during the design life of the Proposed Project is considered less than significant and further analysis is not warranted.

Landslides, Seiche, Tsunami and Mudflow - The project site is not known to have, or be located within an area known to be prone to, any landslides, seiches, tsunami or mudflows. The site is relatively flat (i.e. 22 feet of relief from west to east), and located away from major sloped areas or large bodies of water that contribute to these seismic and slope related hazards. Hence, the Proposed Project will result in a less than significant geologic hazards impact due to the potential for landslides, seiches, tsunami and mudflows, and further analysis is not warranted.

Landform Alteration - The project site has been previously graded and is relatively level due to past construction of the shopping center in the 1960's. Mass grading for the Proposed Project is expected to entail only minor cuts and fills from the existing grades to establish the building pad and to provide surface drainage of the site. Because significant land alterations are not proposed and the Proposed Project will have a less than significant impact to local landforms, further analysis is not warranted.

The determination of potential significance of impacts related to seismic groundshaking, soils stability and soil erosion are subject to further evaluation and have been addressed in Section IV: Environmental Impact Analysis: C-Geology and Soils.

[7] Figure GS-8 Alquist-Priolo Special Study Zones and Fault Rupture Study Areas in the City of Los Angeles. Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan*. Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>.

Hazards and Hazardous Materials

The Proposed Project will not:

- 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.
- Be 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, where the Proposed Project would result in a safety hazard for people residing or working in the project area.
- Be within the vicinity of a private airstrip, where the Proposed Project would result in a safety hazard for people residing or working in the project area.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Listed Hazardous Site - The Cortese List of hazardous materials sites, compiled pursuant to Government Code Section 65962.5 does not list the project site as having a hazardous materials problem needing cleanup. The Proposed Project will not create a significant hazard to the public or environment as a result of a listing on the Cortese List.

Soil Contamination - As noted above, the project site is not identified on any list as having a hazardous materials problem needing cleanup. Hence, there are no soils on-site having any known contamination. The Proposed Project is not expected to exceed maximum regulatory requirements for hazardous materials and is not expected to release hazardous materials to soils within the project site or adjacent areas. The Proposed Project is not expected to be affected by and/or have an effect upon soil contamination and further analysis is not warranted.

Groundwater Contamination - The project site is not identified on any list as having a hazardous materials problem needing cleanup. As noted in Section IV: Environmental Impact Analysis: D-Hazardous Materials and Man-Made Hazards, the adjacent westerly property (Sunkist) was identified in as having a leaking underground gasoline storage tank (LUST) that had affected the aquifer. Remedial action was completed and the case was closed in 1996 and this previous LUST event was not known to have affected the project site. Four other LUST sites were identified within a one-half mile radius of the project site, but due to their distance and cross/down-gradient location from the project site, these sites are not expected to negatively affect the project site. The Proposed Project is not expected to exceed maximum regulatory requirements for hazardous materials and is not expected to release hazardous materials to local groundwater underlying the project site or adjacent areas. The Proposed Project including excavation and construction of subterranean parking is not expected to encounter groundwater, thus will not be affected by and/or have an effect upon groundwater supplies and further analysis is not warranted.

Airport Hazards - No private airstrip is located within the project vicinity. The closest airport (public airport) is Burbank/Bob Hope Airport, located approximately 9 miles northeast of the project site. The Proposed Project will not result in a safety hazard for people residing or working in the project area.

The determination of potential significance of impacts related to the transport and generation of hazardous materials, and the potential effect of such to sensitive receptors, are subject to further evaluation and have been addressed in Section IV: Environmental Impact Analysis: D-Hazardous Materials and Man-Made Hazards.

Hydrology and Water Quality

The Proposed Project will not:

- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.
- Place within a 100-year flood hazard area structures that would impede or redirect flood flows.
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Groundwater - Existing development does not currently directly extract or recharge to groundwater resources and permeable surface area is very limited and urban runoff is directed to the stormwater system. With the Proposed Project, there would be no change to groundwater resources as the Proposed Project does not propose to extract or recharge to groundwater facilities. Further, the permeability of the site will not substantially increase and conveyance of groundwater to local recharge and spreading facilities will not be impaired or substantially altered. Even with the implementation of surface materials that are more pervious, the net change to groundwater infiltration would be negligible. The Proposed Project will result in a less than significant impact related to groundwater quality and further analysis is not required.

Flood Zone/Flood Hazard - As determined by the Flood Insurance Rate Maps, the project site is located within Flood Zone C (since reclassified as Zone X-No Shading), which is located outside of both the 100- and 500-year flood zones. The Proposed Project will result in a less than significant impact due to flooding and further analysis is not required.

The determination of potential significance of impacts related to the transport and generation of surface water pollutants, are subject to further evaluation and have been addressed in Section IV: Environmental Impact Analysis: E.1- Water Resources: Hydrology/Water Quality.

Land Use and Planning (Habitat or Natural Community Conservation Plan)

The Proposed Project will not:

- Conflict with any applicable habitat conservation plan or natural community conservation plan.

The Proposed Project would result in a less than significant impact to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan because there are no such plans that affect the project site. Additional analysis of such habitat plans is not warranted.

The determination of potential significance of impacts related to other land use and planning issues, are subject to further evaluation and have been addressed in Section IV: Environmental Impact Analysis: F-Land Use.

Mineral Resources

The Proposed Project will not:

- 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.
- 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.

Mineral Resources. According to the Los Angles City-wide General Plan Framework, the project site is not located in an area containing significant mineral deposits, nor is it in an area of current or historical aggregate mining and is not within the limits of an active or historic oil field.[8] [9] The project site is located within the Van Nuys-North Sherman Oaks Community Plan for which no mineral resource recovery is identified in this Plan.

The proposed construction is limited to one level of subterranean construction which reduces the potential for encounter with mineral resources. A separate, site-specific environmental analysis will be prepared for related projects to assess and mitigate related project-specific potential impacts to mineral resources.

Because the project site is not known to support mineral resources, and the Proposed Project does not directly involve the extraction of mineral resources, the Proposed Project is anticipated to result in no impact to mineral resources and will not contribute to a potential cumulative impact to mineral resources. Further analysis of mineral resources is not warranted.

[8] Figure GS-1: Areas Containing Significant Mineral Deposits in the City of Los Angeles. Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan.* Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>.

[9] Figure GS-6: Oil Field and Oil Drilling Areas in the City of Los Angeles. Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan*. Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>.

Noise

The Proposed Project will not:

- Be 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, where the project would expose people residing or working in the project area to excessive noise levels.
- Be within the vicinity of a private airstrip, where the project would expose people residing or working in the project area to excessive noise levels.
- Result in noise-sensitive land use being located within 3,000 feet of a railroad line.

Airport Noise - The project site is not located within an airport land use plan or private airstrip. The closest airport is Burbank Airport (a public facility), located approximately eight miles northeast of the project site. The Proposed Project would not expose people residing or working within the project site to excessive noise levels from an airport and, as such, would not have any impacts relative to airport noise.

Railroad Noise - The project site is not located adjacent to any railroad tracks or crossings; therefore, the proposed project would not have significant adverse impacts relative to railroad noise.

The determination of potential significance of impacts related to other noise issues are subject to further evaluation and have been addressed in Section IV: Environmental Impact Analysis: G-Noise.

Population, Housing and Employment

The Proposed Project will not:

- Induce substantial 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).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Population. The City's CEQA Thresholds Guide indicates that determination of a significant impact to population should consider the degree to which the Proposed Project would cause or accelerate development in an undeveloped area that would result in an adverse physical change in the environment; whether the Proposed Project would introduce unplanned infrastructure no previously evaluated in the Community Plan; and the extent to which growth would occur without implementation of the Proposed Project. The Proposed Project is estimated to generate approximately 2590 employees at the site daily, an increase of approximately 788 employees over existing uses. The Proposed Project does not include a residential component. A substantial

employment base and residential population currently exist in the San Fernando Valley. The necessary employees for the proposed redevelopment can be found nearby and the proposed commercial expansion will not directly increase the permanent population within the community.

Furthermore, the Proposed Project is an expansion of the existing shopping center. The development will not exceed the existing project site boundaries and will not grade any undeveloped area, causing a physical change in the environment. The site is currently improved for necessary stormwater drainage and erosion control. The project site is currently served by City of Los Angeles infrastructure including sanitary sewer, water, and roadways, and will not require an unplanned expansion of infrastructure in the community. The Van Nuys-North Sherman Oaks Community Plan identifies, "The major commercial center in North Sherman Oaks is the Sherman Oaks Fashion Square." As a result, commercial growth and development in this area would most likely continue, without this project, in accordance with the goals and policies of the Community Plan. As a result, the Proposed Project would not be considered to create a substantial growth in the permanent population of the community directly or indirectly. The Proposed Project would result in a less than significant population impact due to a substantial project increase.

Housing. There are no housing units currently located on the project site that might be displaced, forcing the displacement of substantial numbers of people. The Proposed Project is an expansion of the existing shopping center uses and does not include a residential component that could result in the construction of housing units. The commercial use of the project site as a shopping center will not be changed under the Proposed Project. The development will not exceed the existing project site boundaries and will not grade any undeveloped area, causing a physical change in the environment. The Proposed Project will result in a less than significant impact to the population due to the displacement of existing housing in the area and will not require the construction of additional housing off-site. Nor will the Proposed Project result in displacement of substantial numbers of people.

Impacts to population and housing are typically based on the degree to which a project would cause growth or accelerate development within an undeveloped area; whether the Proposed Project would introduce unplanned infrastructure not previously included in a General Plan; and the extent to which growth would occur without implementation of the Proposed Project.

The Proposed Project will not result in an increase in the permanent, resident population of the area and does not include a residential component. As such, the Proposed Project will result in a less than significant impact to population and housing.

Identified related projects could result in a net increase of approximately 1,092 dwelling units and a net population increase of approximately 2,728 residents. The Van Nuys-North Sherman Oaks Community Plan is considered to be a fully developed area and does not have large portions of undeveloped areas that could be adversely affected by the identified related projects. Furthermore, these identified areas are within the Community Plan area that has identified infrastructure including streets, sewer, and water. The related projects will not trigger unplanned infrastructure development that could indirectly induce growth in the area. As such, the identified related projects are anticipated to result in a less than significant impact to population

and housing within the Community Plan area. The Proposed Project, which does not include a residential component, will result in a less than significant cumulative impact to population and housing.

Parks and Recreation

The Proposed Project will not:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

Parkland. The operation and management of public recreational facilities in the project area is provided by the City of Los Angeles Department of Recreation and Parks. The Department of Recreation and Parks currently operates approximately 176 recreation centers, 59 pools, 30 senior citizen centers, 7 museums and historic sites, 13 golf courses, 24 child care centers, and 7 skate parks.[10]

The project site is currently developed with retail/shopping center facilities. No parkland, open space or recreational facilities are currently located on the project site. The proposed expansion of the retail and restaurant facilities will not result in the creation or removal of parkland or active recreational facilities. Furthermore, the Proposed Project does not include a residential component which could increase the permanent population that could accelerate the use of recreational facilities in the area.

Based on the proposed shopping center expansion, employees at the site on a daily basis could increase from approximately 1,800 to approximately 2,590, an increase of approximately 788 employees per day. A substantial employment base and residential population currently exist in the San Fernando Valley. The necessary employees for the proposed redevelopment can be found nearby. The increase in employees will not result in an increased use of park and recreational facilities in the project area. As a result, the Proposed Project will not substantially increase the use of existing recreational facilities and will not encourage the physical deterioration of any such facility. The Proposed Project will result in a less than significant impact to surrounding parklands and recreation facilities due to deterioration.

No parkland, open space, or recreational facilities are currently provided on the project site. The Proposed Project does not include the development of recreational facilities. Additionally, the Proposed Project will not remove any existing parkland or recreational facilities within the community.

[10] Los Angeles Department of Recreation and Parks. 2007. *City of Los Angeles Department of Recreation and Parks*. 22 May 2008 <http://www.laparks.org/ dept.htm>.

Recreational Services. An impact to parks and open space is generally based on the number of residents and employees located on a project site that would intend to utilize park facilities. The City of Los Angeles CEQA Significance Thresholds indicate that consideration should be given to the net population increase resulting from the Proposed Project, the demand for recreation services anticipated at the time of buildout, and whether the Proposed Project includes features that would reduce demand for recreational services.

As part of a worst-case scenario, the potential for recreational use by employees at the site during their work shift has been analyzed. Employees at the site on a daily basis could increase to approximately 2,590, an increase of approximately 788 employees per day. An increase of this magnitude will not generate the need for or involve the construction of new or altered park facilities since a substantial employment base and residential population currently exist in the San Fernando Valley. The necessary employees for the proposed redevelopment can be found nearby which will not substantially increase the use of existing recreational facilities and will not encourage the physical deterioration of any such facility. The Proposed Project also includes provision of a new community room.

Impacts to recreational facilities are typically based on the increase in demand on facilities linked to a project. As discussed above, the Proposed Project will result in a less than significant impact to recreational and park facilities. The Proposed Project will not result in a substantial increase in the new permanent, resident population in the area and will not decrease the amount of parkland within the Community Plan Area. A review of the related projects indicates that there are no General Plan Amendment cases requested. As such, the identified related projects are consistent with growth impacts within the Community Plan Area and population will not increase above anticipated levels which could result in a significant related projects impact on parks. As such, identified related projects will result in a less than significant impact to recreational facilities. The Proposed Project will not contribute to a significant cumulative impact to recreational facilities or parks.

Schools

The Proposed Project will not:

- Result in substantial adverse physical impacts or reduction in acceptable level of services associated with schools.

Schools. According to the City of Los Angeles CEQA Significance Thresholds, in determining an impact to school facilities, consideration should be given to the population increase resulting from the Proposed Project based on the net increase of residential units or square footage of non-residential floor area, the demand for school services at the time of project buildout, whether accommodation of the increased demand would require construction of new facilities, and whether the Proposed Project includes features that would reduce demand for school facilities.

The Proposed Project includes expansion of the existing retail and restaurant uses at the shopping center. The Proposed Project does not include a residential component. The Proposed Project will result in a less than significant impact due to a significant population increase. The

Proposed Project could result in an increase of approximately 788 employees at the site daily. Based on the location of the shopping center within the heavily populated San Fernando Valley, it is anticipated that an adequate workforce is locally available and the Proposed Project will not materially increase the permanent resident population of the community. The number of school-aged children within the community will not change substantially due to the Proposed Project.

Based on the finding that the Proposed Project will result in a less than significant impact on schools services and will result in a less than significant population increase in the community, the Proposed Project will not result in the need for construction of new school facilities. Due to the commercial nature of the Proposed Project and the less than significant impact anticipated on population in the area, no on-site school facilities are proposed at the Proposed Project. Furthermore, the applicant will pay school facility fees required by the Los Angeles Unified School District during the building permitting process to mitigate incremental secondary effects from new job creation. The Proposed Project will result in a less than significant impact to schools.

All related projects will be required to pay their applicable school fees, which will reduce all potential impacts of the identified related projects. As such, the Proposed Project will not contribute to a significant cumulative impact to schools.

Services (Police and Fire Protection)

The Proposed Project will not:

- 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:
    - Fire protection due to the use and storage of toxic, readily combustible, or otherwise hazardous materials,
    - Police protection during project construction.

Police Services During Construction (Short-Term) Activity - Construction activity can be a source of increased hazards and attractive nuisances. Construction sites, when not properly secured, can become a target for theft and vandalism. Disruption of traffic patterns and added construction traffic and trucks to the area can also pose hazards on adjacent roadways. In urban environments such as the project site, precautions are generally taken during the construction phase to secure the project sites and prevent trespassing. Typically, temporary fencing with lockable gates are installed around construction sites and roving security and/or video surveillance utilized to minimize the potential for intruders and theft. The shopping center shall continue to utilize on-site security throughout the construction stage and would stage construction activity for the Proposed Project in such a manner that construction areas are segregated from the ongoing uses of the shopping center. Under such circumstances, the impacts to local police services are less than significant. And, although minor traffic delays may occur during the construction phase, impacts to police response times would be minimal and

temporary. The Proposed Project would have a less than significant effect on police services during the construction phase, and further analysis is not warranted.

Hazardous Materials Response - The LAFD also responds to hazardous materials spills and other similar health hazard incidents. Due to the nature of land uses proposed with the Proposed Project, and the commercial use of the shopping center in general, the potential for hazardous material response incidence at the project site is low and the potential impact on fire protection services is considered to be less than significant. This issue is discussed in more detail in Section IV: Environmental Impact Analysis: D-Hazardous Materials and Man-Made Hazards of this DEIR.

The determination of potential significance of impacts related to other police and fire protection services, are subject to further evaluation and have been addressed in Section IV: Environmental Impact Analysis: H-Public Services.

Traffic, Transportation and Access (Air Traffic)

The Proposed Project will not:

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Air Traffic - The project site is not within the flight path of an airport or airfield and the Proposed Project will not result in a measurable direct or indirect increase to air traffic levels in the area. The Proposed Project will result in a less than significant impact to air traffic patterns and further analysis of this issue is not required.

The determination of potential significance of impacts related to other traffic, transportation and access issues, are subject to further evaluation and have been addressed in Section IV: Environmental Impact Analysis: J-Transportation and Traffic.

Utilities (Sewer and Water)

The Proposed Project will not:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements needed.

- Result in a determination by the wastewater treatment provider, which serves or may serve the Proposed Project that it does not have adequate capacity to serve the Proposed Project's projected demand in addition to the provider's existing commitments.

The site is currently developed with approximately 867,000 GLSF, including approximately 842,045 GLSF of retail space and approximately 24,955 GLSF of restaurant/food court area. The Proposed Project will result in approximately 1,147,000 GLSF including approximately 1,075,223 GLSF of retail, 28,000 GLSF of sit-down restaurants, and 43,777 GLSF of the Gourmet Dining Terrace (food court).

Sewer **-** Existing development generates approximately 77,467 gallons per day (gpd) of wastewater.[13] This total development will result in approximately 111,757 gpd of wastewater, an increase of approximately 34,290 gpd of wastewater.[14]

The City's sewer system is subject to Section 201 of the Federal Clean Water Act (CWA). According to the CWA, the City must adopt a wastewater facilities plan in accordance with the United States Environmental Protection Agency (EPA) Rules and Regulations, 40 CFR, Section 35.917. Section 201 specifies the following:

> "Facilities planning will demonstrate the need for facilities and, by a systematic evaluation of feasible alternatives, will also demonstrate that the proposed measures represent the most cost-effective means of meeting established effluent and water quality goals while recognizing environmental and social considerations."[15]

The City prepared a Wastewater Facilities Plan (WFP) in 1982 and updated it in 1991. The 1991 WFP update planned for facilities through the year 2010 and currently regulates wastewater facilities in the City. In addition, to guarantee sufficient sewer capacity, the City of Los Angeles has taken various steps to manage growth in the system. In 1990, to respond to the problem of insufficient sewer capacity, the City adopted Ordinance No. 166,060. In summary, Ordinance No. 166,060 established sewer permit allocation regulations for projects that discharge sewage to the Hyperion Treatment System (HTS). Allocation is based on a City Council determination of "priority" and "non-priority" projects. "Priority" projects, which include such uses as nonprofit hospitals, emergency medical trauma centers, and affordable rental housing projects, are first allocated a monthly sewage allotment. The remaining "non-priority" projects receive a monthly sewage allotment, of which 65 percent goes to residential projects and 35 percent goes to non-residential projects. The applicant must comply with the provisions of ordinances regarding

[13] Based on the City of Los Angeles, Department of Public Works, Sewer Facility Connection Rates Table, March 20, 2002. This Table provides the following generation rates for the Project: 80 gallons per day per 1,000 square feet of retail/shopping center space, 300 gallons per day per 1,000 square feet of take-out restaurant space, 30 gallons per day per seat of fixed seat restaurant space. Assumes approximately a worst-case scenario of 35 square feet per seat of approximately 4,680 GLSF of sit down restaurant, or the equivalent of 134 seats.

[14] Based on the City of Los Angeles, Department of Public Works, Sewer Facility Connection Rates Table, March 20, 2002. This Table provides the following generation rates for the Project: 80 gallons per day per 1,000 square feet of retail/shopping center space, 300 gallons per day per 1,000 square feet of approximately 39,097 GLSF of take-out restaurant space, 30 gallons per day per seat of approximately 32,680 GLSF of fixed seat restaurant space. Assumes approximately a worst-case scenario of 35 square feet per seat. Assumes one half of the total gross leasable square footage for sit-down restaurants to exclude foyers, waiting areas, hallways, and storage areas.

[15] *City of Los Angeles Integrated Resources Plan Facilities Plan, Volume 1, July 2004, Revised November 2005, page 3-1.*

sewer capacity allotment in the City of Los Angeles. It should be noted that during the slow development period of the 1990s, much of the sewer permit allocation went unused resulting in a residual sewer capacity "surplus" from which projects today can draw. Adherence to the provisions of the sewer capacity allotment ordinances by the City of Los Angeles would further ensure that permitted development would not exceed the HTS capacity.

As a follow-up to these plans and programs, the City adopted the Integrated Resources Plan (IRP) in 2006 that incorporates a new City-prepared WFP for facilities through 2020, as the City was faced with the task to meet future wastewater needs of more than 4.9 million residents to live within the City by 2020. The IRP serves to update the information prepared in the 1991 WFP, while also considering the City's recycled water and urban runoff system needs. Specifically, the IRP was developed to accommodate the projected increase in wastewater flow over the next 20 years while maximizing the beneficial reuse of recycled water and urban runoff and as a result, optimizing the use of the City's existing facilities and water resources. Demographics (population and employment) projections and data sources used in the IRP were based on the Southern California Association of Governments (SCAG) 2001 Regional Transportation Plan (RTP), which estimates that the population of Los Angeles would reach almost 4.9 million people in 2020.

In order to meet the needs of increased wastewater generation, the City chose to expand its current overall treatment capacity, while maximizing the potential to reuse recycled water through groundwater replenishment in future years. As identified in the IRP, the Hyperion Water Treatment Plan (HWTP) can currently serve roughly 450 million gallons of wastewater per day (MGD), while the Donald Tillman Water Reclamation Plant (TWRP) in the Sepulveda Basin in Van Nuys can accommodate approximately 80 MGD. With an expected 18.7 percent population growth to occur in the City, the TWRP may be increased in size to convey approximately 100 MGD of wastewater by 2020. A third treatment plant, the Los Angeles-Glendale Water Reclamation Plant (LGWRP) has capacity for another 20 MGD. According to the IRP, the TWRP could be expanded to provide additional service capacity of up to an additional 20 MGD.

These improvements, along with new sewer pipelines, will ensure that untreated wastewater is not discharged to rivers or the ocean, thereby protecting the environment. As stated previously, the IRP also proposes to maximize recycled water reuse through groundwater replenishment, as this is considered a valuable potential benefit, since it would allow the City to reduce the need to import water from other regions. However, the IRP states that if the City does not implement groundwater replenishment by the time additional treatment capacity is needed, the expansion of wastewater treatment capacity would occur at the HWTP rather than at the TWRP. This will result in additional wastewater capacity levels at the HWTP and improved sewer facilities and pipelines. In general, implementation of the IRP will enable the City to adequately convey wastewater to the treatment plants with minimal potential for sewage spills, which will result in the protection of public health and safety. It will also enable the City to treat future wastewater flows that protects public health and safety and meets regulatory requirements, thereby protecting the environment, in general, and surface waters, in particular.[16]

[16] *City of Los Angeles Integrated Resources Plan, IRP Findings and Statement of Overriding Considerations, September 2006, page 33.*

In November 2006, the City Council certified the Final EIR for the IRP. The City of Burbank filed suit against the City challenging that the conclusions in the Final EIR involving construction of a new 5.75-mile underground sewer conveyance, the Glendale-Burbank Interceptor Sewer (GBIS) that would be constructed to divert future flows from and allow rehabilitation of an existing aging sewer line. The Superior Court ruled in favor of the City of Burbank and found the IRP EIR lacking in five areas relating to the GBIS only that need to be clarified or corrected. In response to this ruling, the City Council: 1) Decertified the Final EIR; 2) Suspended the GBIS portion of the IRP pending adequate environmental review consistent with the Court's final decision; 3) Recertified the Final EIR (excluding references to the GBIS portion of the IRP); and 4) instructed the Board of Sanitation and other relevant staff to conduct the necessary environmental review of the GBIS portion of the IRP and correct deficiencies in the EIR that have been identified in the Court's decision, prior to any re-approval of the GBIS portion of the IRP.

However, even before the improvements associated with the IRP are implemented, the HTS will still have sufficient capacity to serve the wastewater treatment needs of the Proposed Project and the related projects. According to the City's City-wide Framework, the project site is located within the Hyperion Water Treatment Plant (HWTP) Service Area. As explained above, the three treatment plants within the HWTP Service Area together have a total treatment capacity of approximately 550 MGD (450 MGD at HWTP, 80 MGD at TWRP and 20 MGD at LGWRP). According to the City's CEQA Threshold Guide, the HWTP currently treats approximately 413 MGD, so it operates at a surplus of approximately 37 MGD.[17] Therefore, the existing wastewater treatment provider would have adequate capacity to serve the anticipated wastewater generation of the 34,290 gpd from the Proposed Project. Therefore, the Proposed Project will not exceed established wastewater treatment requirements and will result in a less than significant impact to sewers.

With respect to cumulative sewer impacts, the identified related projects could generate an additional approximately 172,000 gpd. As this additional wastewater generation is well below the remaining capacity within the HSA, the existing wastewater treatment provider would have adequate capacity to serve the anticipated wastewater generation of the related projects. Therefore, development of the Proposed Project in conjunction with the related projects will result in a less than significant wastewater impact.

In addition, the City's CEQA Threshold Guide has identified Sewer Capacity Threshold Study Areas, which are considered to be areas of known sewer constraint and potential areas of insufficient service. Neither the Proposed Project nor any of the identified related projects is located within an identified Sewer Capacity Threshold Study Area. The Proposed Project will result in a less than significant cumulative impact to wastewater service provision and infrastructure.

Water Supply

Groundwater - Existing development does not currently directly extract or recharge to groundwater resources. With the Proposed Project, there would be no change to groundwater

[17] *City of Los Angeles, L.A. CEQA Thresholds Guide, M.2. Waterwaste, 2006*

resources in the site vicinity as the Proposed Project does not propose to directly extract or recharge to groundwater facilities. Groundwater use as part of the regional water supply is addressed through the MWD water planning process. The Proposed Project will result in a less than significant impact related to groundwater and further analysis is not required.

Water Treatment Facilities - Most of the water supply through LADWP is derived from "clean" sources that typically have undergone some level of pre-treatment. An emphasis on managing the water quality plays a primary role in the delivery of clean water supplies. As discussed above, the three outside sources for Los Angeles' water are: approximately 60% from the Eastern Sierra via the Los Angeles Aqueduct system, 15% from the San Fernando groundwater basin, and 25% from the MWD's Colorado River supplies. Treated reclaimed water (processed at local wastewater treatment facilities) is an additional source.

Water from the Owens River watershed is protected from industrial and agricultural contamination by LADWP land management practices. However, some turbidity arises as water from the watersheds travels through unlined channels in a natural rural setting before being diverted into the two aqueducts for destination to the City. To reduce this turbidity, the Los Angeles Filtration Plant treats up to 600 million gallons of water each day using ozone and rapid rate deep bed filters. New operations, commencing in 1999, have allowed the plant to convert to biologically active filtration, or biofiltration. Also in 1999, Los Angeles began to fluoridate its water at the Los Angeles Aqueduct Filtration Plant. Additional fluoridation facilities have already, or will soon, come on line at groundwater treatment sites and at MWD service connections.

Water provided through MWD has already gone through filtration and chlorination. Further, when MWD sells the water from its reservoirs to a local water agency, the water quality is monitored by the USEDA and the Department of Health Services to ensure that it meets certain minimal health and safety standards. In order to deliver water that meets required standards, MWD operates five water treatment/filtration facilities throughout its service area.

The San Fernando groundwater basin not only supplies 15% of Los Angeles' domestic needs, but it also acts as a vast underground reservoir where water accumulates during years of abundant rainfall and is stored for use in the future. The North Hollywood Aeration Facility removes and treats any contaminated groundwater in the upper zone of the aquifer and prevents the migration of the contaminants downward into the San Fernando groundwater basin. The Pollock Wells Treatment Plant (PWTP) restores the contaminated groundwater wells back to operation. The operation of Pollock wells also limits excessive rising groundwater discharges from the San Fernando Basin to the Los Angeles River.

Because water treatment capacity is addressed in tandem with securing water supplies, the need for water treatment is minimized through improved watershed management practices, and sufficient wastewater treatment capacity is available, the Proposed Project would result in a less than significant impact to water and wastewater treatment facilities and further analysis is not required in this EIR.

Utilities (Electric and Natural Gas)

The Proposed Project will not:

- Result in a need for new systems, or substantial alterations to power or natural gas.

Electricity - Electricity at the project site is currently provided by the City of Los Angeles, Department of Water and Power (LADWP). LADWP owns the electrical power generation plant and, as such, electrical service within the LADWP service area has not been affected by the recent statewide energy shortage. According to the City's Significance Thresholds, a project would have a significant impact on electricity service systems if it would create a need for new supply facilities, distribution infrastructure, or would result in the need for capacity enhancing alterations to existing facilities. The existing shopping center generates a demand for electricity of approximately 11,443,542 KilowattHour per year (KwH/yr).[18] The proposed retail and restaurant expansion is anticipated to generate a demand for approximately 14,666,581 KwH/yr, an increase of approximately 3,223,039 KwH/yr.[19] LADWP is projected to have an annual demand of 26,906,000 Mwh in 2012.[20] The projected demand by LADWP is based on the growth projections assumed in the General Plan for the City of Los Angeles. While the Proposed Project will result in an increase in the demand for electricity, the Proposed Project is consistent with the General Plan designation on the project site and would not require new service facilities or upgrades to existing infrastructure and capacity. As the Proposed Project falls within the projected demand levels of DWP, levels which DWP expects to have sufficient supply to meet. The Proposed Project will result in a less than significant impact to electricity service. While the identified related projects will increase the demand on electricity facilities compared to existing conditions, a review of the related projects indicates that there are no General Plan Amendment cases requested. As such, the identified related projects are consistent with growth impacts within the Community Plan Area and demand for utilities is not anticipated to increase above supply levels identified by the providers, which could result in a significant related projects impact on utility services. Related projects will result in a less than significant impact to electricity systems. The Proposed Project will not contribute to a significant cumulative impact on electricity systems.

Natural Gas - Natural gas at the project site is currently provided by the Southern California Gas Company (Gas Company). According to the City's CEQA Significance Thresholds, a project would have a significant impact on natural gas service systems if it would create a need for new supply facilities, distribution infrastructure, or would result in the need for capacity enhancing alterations to existing facilities. The existing shopping center generates a demand for natural gas

[18] Table A9-11-A. South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Diamond Bar: Author. 6 June 2008 <http://www.aqmd.gov/ceqa/oldhdbk.html>. Assumes an electricity generation rate of 13.55 KwH/sf/yr for retail uses and 47.45 KwH/sf/yr for restaurant uses.
[19] Table A9-11-A. South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Diamond Bar: Author. 6 June 2008 <http://www.aqmd.gov/ceqa/oldhdbk.html>. Assumes an electricity generation rate of 13.55 KwH/sf/yr for retail uses and 47.45 KwH/sf/yr for restaurant uses.
[20] PCR Services Corporation. 2005. *Grand Avenue Project Initial Study*. Los Angeles, CA: The Los Angeles Grand Avenue Authority. 6 June 2008 <http://ftp.cajaeir.com/eirs/2006_Projects/Grand_Ave/DEIR%20Sections/DEIR/Appendix%20A-part1%20NOP_IS_Scoping%20Meeting%20Trans.pdf>.

of approximately 2,443,998 cubic feet per month (CF/month).[21] The proposed retail and restaurant expansion is anticipated to generate a demand for approximately 3,124,094 CF/month, an increase of approximately 680,096 CF/month.[22] The Gas Company has a projected annual demand of 883,400 million cubic feet in 2012 within the entire service area.[23] The projected demand by The Gas Company is based on the growth projections assumed in the city's General Plan. While the Proposed Project will increase demand for natural gas, it is consistent with the General Plan designation on the project site and would not require new service facilities or upgrades to existing infrastructure and capacity. As the project falls within the projected demand levels of the Gas Company, levels which the Gas Company expects to have sufficient supply to meet. The Proposed Project will result in a less than significant impact to natural gas service.

While the identified related projects will increase the demand on natural gas facilities compared to existing conditions, a review of the related projects indicates that there are no General Plan Amendment cases requested. As such, the identified related projects are consistent with growth impacts within the Community Plan Area and demand for utilities is not anticipated to increase above supply levels identified by the providers, which could result in a significant related projects impact on utility services. Related projects will result in a less than significant impact to natural gas systems. The Proposed Project will not contribute to a significant cumulative impact on natural gas systems.

[21] Table A9-11-A. South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Diamond Bar: Author. 6 June 2008 <http://www.aqmd.gov/ceqa/oldhdbk.html>. Assumes an natural gas generation rate of 2.9 CF/SF/month for retail uses and 2.9 CF/SF/month for restaurant uses.

[22] Table A9-11-A. South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Diamond Bar: Author. 6 June 2008 <http://www.aqmd.gov/ceqa/oldhdbk.html>. Assumes an natural gas generation rate of 2.9 CF/SF/month for retail uses and 2.9 CF/SF/month for restaurant uses.

[23] PCR Services Corporation. 2005. *Grand Avenue Project Initial Study*. Los Angeles, CA: The Los Angeles Grand Avenue Authority. 6 June 2008 <http://ftp.cajaeir.com/eirs/2006_Projects/Grand_Ave/DEIR%20Sections/DEIR/Appendix%20A-part1%20NOP_IS_Scoping%20Meeting%20Trans.pdf>.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

B. SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126(b) requires that an EIR discuss significant environmental effects that cannot be avoided if the Proposed Project is implemented. Based upon the analysis in Section IV: Environmental Impact Analysis, with implementation of mitigation measures, the Proposed Project will not result in a significant environmental effect with regard to the issues analyzed herein, except for potentially significant short-term construction phase air quality with respect to $PM_{2.5}$, PM_{10} and NO_x.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126(c) requires that an EIR discuss irreversible environmental changes due to the Proposed Project. Irreversible environmental changes will not occur as a result of project implementation. The site has been committed to urban use for many years, and the Proposed Project uses are consistent with City planned land uses for the site. Thus, development of the site is not considered a new commitment to urban development and does not represent the conversion of undeveloped land.

Construction of the Proposed Project will require the consumption of natural resources and renewable and nonrenewable materials, including building materials (e.g., wood and metal) and fossil fuels (e.g., gasoline, diesel fuel, and natural gas). Once operational, the Proposed Project uses will require consumption of natural resources and renewable and non-renewable materials such as electricity, natural gas, potable water, and fossil fuels for project-generated vehicle trips. The commitment of resources associated with the Proposed Project is consistent with planned future development within the City of Los Angeles. Moreover, the use of resources represents a very small percentage of the resources to be utilized by development City-wide.

Additionally, the Proposed Project provides public benefits, such as a reduction in the improvement to local adjacent roadways, implementation of neighborhood protection and traffic calming measures, enhancement of aesthetic conditions at the project site, and improved economic vitality resulting in increased tax revenues for the City. There is no particular justification for avoiding or delaying the continued commitment of these resources.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

D. GROWTH-INDUCING IMPACTS

How the Proposed Project Could Foster Growth

Section 15126(d) of the CEQA Guidelines requires that an EIR "discuss the growth inducing impact of the Proposed Project, including “ways in which the Proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."

The Proposed Project is not expected to generate growth in the area beyond the intensification of the project site. Construction of the proposed 280,000 GLSF of retail/restaurant commercial uses will result in an increase in short-term construction and long-term employment opportunities. While the Proposed Project would create new job opportunities, the City of Los Angeles and surrounding areas include a large employee base and new jobs in this area would offer employment opportunities closer to those who may reside in the Van Nuys/Sherman Oaks area.

Further, the site is readily accessible from area freeways, local roadways and mass transit (buses). It is not expected that any significant number of employees will move to the area specifically because of the Proposed Project. No significant growth inducing impact would occur. Short-term construction jobs are not anticipated to induce unanticipated new population growth, because of the short-term nature of the construction process.

It is anticipated that the Proposed Project will be adequately serviced by existing extensions of the electrical, water, sewer and natural gas utility systems existing on or near the project site. No additional infrastructure of this nature would be constructed that could generate additional population growth in the project area.

The Proposed Project would physically and may economically revitalize the shopping center that has been underutilized. Surrounding land uses and businesses may experience secondary effects of the economic revitalization. Construction of the Proposed Project will create short-term construction jobs, as well as permanent jobs associated with the new businesses. Although the Proposed Project inherently represents growth at the project site, such growth is not outside the scope of what has been anticipated and planned for in the Community Plan area. Thus, no significant growth inducing impacts are anticipated.

Cumulative Development Impacts

The related projects (see Section III: General Description of the Environmental Setting) are primarily infill projects that will similarly add to the physical and economic revitalization of Van Nuys/Sherman Oaks area. Cumulative impacts relating to each environmental issue discussed in this EIR are addressed under the individual impact analysis sections (see Section IV: Environmental Impact Analysis). The City will require the preparation of an EIR for those related projects that the City anticipates will have potentially significant environmental impacts.

Those EIRs must similarly discuss cumulative impacts and growth inducing effects. Individual project mitigation measures may be required in order to reduce environmental impacts. The Proposed Project and the related projects are not expected to generate unwanted or unplanned growth inducing effects. On the contrary, the City's General Plan Framework favors infill development, and the continued development of vital, Regional and/or Community Centers such as the project area to provide for high-intensity centers, consistent with the preservation and protection of low-density, single-family residential areas from encroachment by other types of uses. Such land use arrangements are generally considered to have less of an effect on the environment by preserving unplanned or premature lands from development on the urban fringe or in more remote and rural locations.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

E. MITIGATION MONITORING PROGRAM

A Mitigation Monitoring Program (MMP) has been prepared in accordance with Public Resources Code Section 21081.6, which requires a Lead or Responsible Agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a "reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." The City of Los Angeles is the Lead Agency for the Proposed Project.

The function and format of the MMP are described here while a copy of the Draft Mitigation Monitoring Program (MMP) is provided in Appendix M. A Final MMP will be adopted at the conclusion of the EIR process and will reflect the final set of required mitigation measures to address project impacts.

The MMP is designed to monitor implementation of all feasible mitigation measures as identified in the EIR for the Proposed Project. In the Draft MMP, mitigation measures are listed and numbered consistent with the relevant section numbering provided in the Draft EIR. Each mitigation measure is listed and categorized by topic with an accompanying discussion of the following:

- The phase of the Proposed Project during which the mitigation measure should be monitored (i.e., prior to issuance of a building permit, construction, or occupancy);

- The enforcing agency (i.e., the agency with the authority to enforce the mitigation measure); and

- The monitoring agency (i.e., the agency which monitors compliance and implementation of the required mitigation measure).

The project Applicant shall be obligated to provide certification prior to the issuance of site or building plans (or an appropriate subsequent stage) that compliance with the required mitigation measures has been achieved. All departments listed in the MMP are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the project Applicant unless otherwise noted.

VII. PERSONS AND ORGANIZATIONS CONSULTED

A. LEAD AGENCY

Los Angeles Department of City Planning
6262 Van Nuys Boulevard, Suite 351
Van Nuys, California 91401
Mr. Tom Glick, City Planner

B. PROJECT APPLICANT

Sherman Oaks Fashion Associates, LP
11601 Wilshire Boulevard, 11th Floor
Los Angeles, California 90025

C. EIR PREPARATION & TECHNICAL STUDIES

General Analysis and Document Management
Planning Associates, Inc.
4040 Vineland Avenue, Suite 108
Studio City, California 91604
Mr. Dwight Steinert

Traffic
Linscott, Law & Greenspan, Engineers
234 E. Colorado Boulevard, Suite 400
Pasadena, California 91101
Mr. David S. Shender, P.E.

Air Quality/Noise
Terry A. Hayes Associates, LLC
8522 National Boulevard, Suite 102
Culver City, California 90232
Mr. Sam Silverman

Socio-Economic
HR&A
2800 28th Street, Suite 325
Santa Monica, California 90405

D. AGENCIES AND ORGANIZATIONS

City of Los Angeles, Department of Transportation

City of Los Angeles, Police Department
A. Cabunoc

City of Los Angeles, Fire Department
Terry O'Connell

VIII. REFERENCES

Aiyetiwa, M. (2007). "Finding of Conformance Sunshine Canyon Landfill – County Extension". Los Angeles County Solid Waste Management Committee/ Integrated Waste Management Task Force. Minutes of February 8, 2007 ATTACHMENT I. 7 November 2007 <dpw.lacounty.gov/epd/tf/Attachments/Minutes_Attachments/FPRattachmentstominutes 0208.pdf>.

American Public Works Association (APWA). 2006. *Work Area Traffic Control Handbook* (aka *"The WATCH Book"*) 12 June 2008 <http://www.apwa.net/bookstore/detail.asp?PC=PB.XWAT>.

American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE). 2004 *Standard 90.1: Energy Standards for Buildings Except Low-Rise Residential Buildings*. 6 June 2006 <http://www.realread.com/prst/pageview/browse.cgi?book=1931862664>.

Antioch, City of. 2004. *Construction & Demolition Debris Recycling & Reuse Program*. 22 May 2008 <http://ci.antioch.ca.us/Environment/cdro/antiochinfoconversions. pdf>.

Bravio, F. 2007 (August 23). E-mail. E-mail communication between F. Bravio (Linscott, Law & Greenspan, Engineers) and D. Steinert (Planning Associates, Inc.)

California Air Resources Board (CARB). 2007. *2006 State Area Designations*. 1 October 2007 <http://www.arb.ca.gov/desig/adm/adm.htm>.

California Air Resources Board (CARB). 2007 (November 19). Draft California Greenhouse Gas Inventory (millions of metric tonnes of CO2 equivalent) - By IPCC Category. 25 August 2008. <http://www.arb.ca.gov/cc/inventory/data/tables/rpt_Inventory_IPCC_Sum_2007-11-19.pdf>.

California Air Resources Board (CARB). 2007. *Proposed Early Actions to Mitigate Climate Change in California*. 6 June 2008 <http://www.climatechange.ca.gov/climate_action_team/reports/2007-04-20_CAT_REPORT.PDF>.

California Air Resources Board (CARB). 2007. URBEMIS 2007 Emissions Inventory Model, Version 9.2. 6 June 2008 <http://www.urbemis.com/>.

California Air Resources Board (CARB). 2006 (December 15). OFFROAD2007 Emissions Inventory Model, Version 2.0.1.2. 6 June 2008 <http://www.arb.ca.gov/msei/offroad/offroad.htm>.

California Air Resources Board (CARB). 2006 (November 1). EMFAC2007 Mobile Source Emissions Inventory Model, Version 2.3. 6 June 2008 <http://www.arb.ca.gov/msei/onroad/latest_version.htm>.

California Air Resources Board (CARB). 2005 (June). *N2O Emission Factors - Estimates of Nitrous Oxide Emissions from Motor Vehicles and the Effects of Catalyst Composition and Aging* (Table 8.2). 6 June 2008 <http://www.arb.ca.gov/research/apr/past/02-313.pdf>.

California Climate Action Registry. 2008 (April). *California Climate Action Registry General Reporting Protocol Version 3.0*. 6 June 2008 <http://www.climateregistry.org/resources/docs/protocols/grp/GRP_V3_April2008_FINAL.pdf>.

California Climate Action Registry. 2007. *Climate Action Registry Reporting On-Line Tool (CARROT)*. 19 May 2008 <http://www.climateregistry.org/tools/carrot.html>.

California Climate Action Team. California Climate Change Portal website. 12 June 2008 <http://climatechange.ca.gov/climate_action_team/index.html>.

California Department of Conservation, Division of Mines and Geology [now California Geological Survey]. 1998. *Seismic Hazard Zones Van Nuys Quadrangle Official Map*. 20 May 2008 <http://www.conservation.ca.gov/cgs/shzp/Pages/Index.aspx>.

California Department of Toxic Substances Control (DTSC). 2008 (as updated). Hazardous Waste and Substances Site List (Cortese List). 12 June 2008 <http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&city=&zip=&county=Los%20Angeles&federal_superfund=True&state_response=True&voluntary_cleanup=True&school_cleanup=True&permitted=True&corrective_action=True&display_results=Report&pub=True>.

California Department of Water Resources. 2005. *California Water Plan Update 2005*. 22 May 2008 <http://www.waterplan.water.ca.gov/previous/cwpu2005/index.cfm>.

California Energy Commission. 2006 (December). *Inventory of Greenhouse Gas Emissions and Sinks: 1990 to 2004*. 6 June 2008 <http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF>.

California Energy Commission. 2005. *2005 Building Energy Efficiency Standards Nonresidential Compliance Manual*. 19 May 2008 <http://www.energy.ca.gov/title24/2005standards/nonresidential_manual.html>.

California Environmental Protection Agency. 2006. *Climate Action Team Report to Governor Schwarzenegger and the Legislature*. 19 May 2008 <http://www.climatechange.ca.gov/climate_action_team/reports/index.html>.

California Governor's Office of Planning and Research (OPR). 2007 (as amended). *California Environmental Quality Act: Guidelines*. 1 May 2008 <http://ceres.ca.gov/ceqa/guidelines/>.

California Integrated Waste Management Board (CIWMB). 2003 (May 21). Solid Waste Facility Permit (SWFP) for the Sunshine Canyon Landfill. 12 June 2008 <http://sunshinecanyonlandfill.com/regulatory/pdf/SWFP_(Issued_5-21-03).pdf >.

California Regional Water Quality Control Board. (1994). *Water Quality Control Plan: Los Angeles, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*. 20 May 2008 <http://www.swrcb.ca.gov/rwqcb4/water_issues/programs/basin_plan/basin_plan_documentation.shtml>.

California, State of. 2006 (as amended). *California Code of Regulation*. 20 May 2008 <http://www.oal.ca.gov/ccr.htm>.

California, State of. 2006 (as amended). *California Government Code*. 20 May 2008 <http://www.leginfo.ca.gov/calaw.html>.

California, State of. 2006 (as amended). *California Public Resources Code* (Sections 21000-21177 [California Environmental Quality Act (CEQA)]; 15000-15387 [CEQA Guidelines]). 19 May 2008 <http://www.leginfo.ca.gov/calaw.html>.

California, State of. 2006 (as amended). *California Water Code*. 20 May 2008 <http://www.leginfo.ca.gov/calaw.html>.

California State Legislature. 2008 (as amended). *Porter-Cologne Water Quality Control Act*, State Water Resources Control Board. 6 June 2008 <http://www.swrcb.ca.gov/water_laws/docs/portercologne.pdf>.

California State Legislature. 2007. Senate Bill 97 (SB 97). Dutton. 6 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=sb_97&sess=CUR&house=B&author=dutton>.

California State Legislature. 2006. Assembly Bill 32 (AB 32), Global Warming Solutions Act of 2006. Nunez. 6 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=ab_32&sess=PREV&house=B&author=nunez>.

California State Legislature. 2002. Assembly Bill 1493 (AB 1493), Pavley. 6 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=ab_1493&sess=0102&house=B&author=pavley>.

California State Legislature. 2001. Senate Bill 221 (SB 221). Keuhl. 6 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=sb_221&sess=0102&house=B&author=kuehl>.

California State Legislature. 2001. Senate Bill 610 (SB 610). Costa. 6 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=sb_610&sess=0102&house=B&author=costa>.

California State Legislature. 1995. Senate Bill 901 (SB 901). Costa. 6 June 2008 <http://www.leginfo.ca.gov/cgi-bin/postquery?bill_number=sb_901&sess=9596&house=B&author=senator_costa_(coauthor:_assembly_member_setencich)>.

California State Legislature. 1988. Assembly Bill 2595 (AB 2595), California Clean Air Act of 1988. Sher. 16 June 2008 <http://www.arb.ca.gov/bluebook/bb06/HEA[14]/HEA_[14].htm>.

California State Legislature. 1983. Assembly Bill 1807 (AB 1807), Toxic Air Contaminant Identification and Control Act of 1983. Tanner.

California State Legislature. 1983 (as amended). Assembly Bill 797 (AB 797), *Urban Water Management Planning of 1983*. Klehs. 12 June 2008 <http://www.owue.water.ca.gov/docs/UWMPAct.pdf>.

California State Legislature. 1976. Senate Bill 151 (SB 151), Lewis-Presley Air Quality Management Act. 6 June 2008 <http://caselaw.lp.findlaw.com/cacodes/hsc/40400-40408.html>.

Constructive Technologies Group. 2007. Sustainable Communities Model. 6 June 2008 <http://www.ctg-net.com/energetics/resources/newsDetails.aspx?id=17>.

Cowan, James P. 1994. *Handbook of Environmental Acoustics*. Wiley, John & Sons, Inc. 6 June 2008 <http://www.wiley.com/WileyCDA/WileyTitle/productCd-0471285846.html>.

Cabunoc, A. 2007 (October 17). Personal communication. Telephone conversation between Officer A. Cabunoc (Los Angeles Police Department, Van Nuys Division) and D. Steinert (Planning Associates, Inc.).

Finlayson-Pitts, Barbara J., and James N. Pitts, Jr. (1999). *Chemistry of the Upper and Lower Atmosphere*. Burlington, MA: Academic Press. 16 June 2008 <http://www.cplbookshop.com/contents/C394.htm>.

Green Car Congress. 2007. *EPA Concludes Public Hearings on California Waiver for New Vehicle CO2 Regulations*. 19 May 2008 <http://www.greencarcongress.com/2007/05/epa_concludes_p.html>.

HR&A Advisors, Inc. 2008 (March 3). Letter "Re: Direct Employment Estimate for the Fashion Square Expansion Project" to D. Steinert (Planning Associates, Inc.). [See Appendix J of this Draft EIR]

HR&A Advisors, Inc. 2008 (March). *Analysis of "Urban Decay" as a Consequence of the Proposed Expansion of the Westfield Fashion Square Shopping Center*. Santa Monica, CA: Author. [See Appendix H of this Draft EIR]

Institute of Transportation Engineers. 2004. *Trip Generation Handbook, 2nd Edition*. Washington D.C.: Author. 12 June 2008 <http://www.ite.org/emodules/scriptcontent/Orders/ProductDetail.cfm?pc=RP-028B>.

Institute of Transportation Engineers. 2003. *Trip Generation, 7th Edition*. Washington D.C.: Author. 12 June 2008 <http://www.ite.org/emodules/scriptcontent/Orders/ProductDetail.cfm?pc=GP-001B>.

Intergovernmental Panel on Climate Change. 1995. *IPCC Second Assessment Report: Climate Change 1995*. 19 May 2008 <http://www.ipcc.ch/ipccreports/assessments-reports.htm>.

Krazan & Associates, Inc. 2006. *Geotechnical Engineering Investigation Proposed Fashion Square Expansion*. Clovis, CA: Author. [See Appendix E of this Draft EIR]

Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Traffic Count Comparison* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

Linscott, Law & Greenspan, Engineers. 2008 (August 14). *Westfield Fashion Square Expansion Project – Project Alternatives Review* memorandum to Planning Associates, Inc. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

Linscott, Law & Greenspan, Engineers. 2008 (August 5). *Traffic Impact, Parking, and Site Access Study for the Westfield Fashion Square Expansion Project*. Pasadena, CA: Author. [See Appendix I of this Draft EIR]

Linscott, Law & Greenspan, Engineers. 2007. *Westfield Fashion Square Vehicle Miles Traveled Study*. Pasadena, CA: Author. [See Appendix K of this Draft EIR]

Los Angeles, City of. 2008. *Draft Los Angeles River Improvement Overlay (RIO).* 25 August 2008 <http://cityplanning.lacity.org/Code_Studies/RIOproject/TOCRIO.pdf >.

Los Angeles, City of. 2007. *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming*. 19 May 2008 <http://www.lacity.org/ead/EADWeb-AQD/GreenLA_CAP_2007.pdf>.

Los Angeles, City of. 2007. *Los Angeles River Revitalization Master Plan.* 19 May 2008 <http://www.lariverrmp.org/CommunityOutreach/masterplan_download.htm>.

Los Angeles, City of. 2007 (as amended). *Official City of Los Angeles Municipal Code, Sixth Edition* (LAMC). Cincinnati, OH: American Legal Publishing Corp. 6 June 2008 <http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:lamc_ca>.

Los Angeles, City of. 2006 (May). *L.A. CEQA Thresholds Guide*. Los Angeles, CA: Author. 6 June 2008 <http://www.lacity.org/ead/EADWeb-AQD/thresholdsguide.htm>.

Los Angeles, City of. 2002. *2002 City of Los Angeles Environmental Quality Act Guidelines*. Los Angeles, CA: Author. 6 June 2008 <http://www.lacity.org/ead/EADWeb-AQD/CityCEQA.htm>.

Los Angeles, City of. 2000. *City of Los Angeles Ordinance No. 173,494*. 20 May 2008 <http://clkrep.lacity.org/councilfiles/99-2420_ORD_173494_09-14-2000.pdf>.

Los Angeles, City of. 1998. *City of Los Angeles Ordinance No. 172,176*. 20 May 2008 <http://clkrep.lacity.org/councilfiles/98-1083_ORD_172176_10-01-1998.pdf>.

Los Angeles, City of. 1998. *Van Nuys-North Sherman Oaks Community Plan*. 19 May 2008 <http://cityplanning.lacity.org/complan/pdf/vnycptxt.pdf>.

Los Angeles, City of. 1995. *The Citywide General Plan Framework An Element of the City of Los Angeles General Plan*. Agoura Hills, CA: Envicom Corporation. 19 May 2008 <http://cityplanning.lacity.org/>.

Los Angeles, City of. 1988. *City of Los Angeles Ordinance No. 163,617*. 19 May 2008 <http://clkrep.lacity.org/councilfiles/84-1515_ORD_163617_06-21-1988.pdf>.

Los Angeles County Department of Public Works. 2002. *Development Planning for Stormwater Management A Manual for the Standard Urban Stormwater Mitigation Plan (SUSMP).* 19 May 2008 <http://ladpw.org/wmd/NPDES/table_contents.cfm>.

Los Angeles County Department of Public Works (LACDPW), Environmental Programs Division. 1997 (June). *Los Angeles County Integrated Waste Management Plan*. Los Angeles, CA: the County. 12 June 2008 <http://ladpw.org/epd/tf/about.cfm>.

Los Angeles County Metropolitan Transportation Authority (Metro). 2004. 6 June 2008 <http://www.metro.net/images/cmp_2004.pdf >.

Los Angeles Department of Public Works, Bureau of Engineering. 2008 (as updated). *Permit and Procedure Manual*. 12 June 2008 <http://eng.lacity.org/techdocs/permits/index.htm>.

Los Angeles Department of Public Works, Bureau of Engineering. 2003. *Additions and Amendments to the 2003 Edition of the Standard Specifications For Public Works Construction* (AKA "The Brown Book," formerly Standard Plan S-610)). 12 June 2008 <http://eng.lacity.org/techdocs/stdplans/s-600/S61028.pdf>.

Los Angeles Department of Public Works, Bureau of Sanitation. 2008. Solid Resources Program. 12 June 2008 <http://www.lacity.org/san/solid_resources/index.htm>.

Los Angeles Department of Public Works, Bureau of Sanitation. 2008. Solid Waste Integrated Resources Plan (SWIRP) [inclusive of and/or formerly the City's Source Reduction Recycling element (SRRE) and the City's Solid Waste Management Policy Program (CiSWMPP)]. 12 June 2008 <http://www.lacity.org/san/srssd/swirp/home/index.html>.

Los Angeles Department of Public Works, Bureau of Sanitation. 2006 (January). *City of Los Angeles Solid Waste Planning Background Studies Summary Report.* 12 June 2008 <http://www.lacity.org/san/solid_resources/pdfs/rfp-swirp-appendix-b3.pdf>.

Los Angeles Department of Public Works, Bureau of Sanitation. 2004. *Development Best Management Practices Handbook Part A, Construction Activities, Third Edition*. 20 May 2008 <http://www.lacity.org/SAN/WPD/Siteorg/download/parta.htm>.

Los Angeles Department of Recreation and Parks. 2007. *City of Los Angeles Department of Recreation and Parks*. 22 May 2008 <http://www.laparks.org/ dept.htm>.

Los Angeles Department of Transportation. 2002. *Traffic Study Policies and Procedures*. Los Angeles, CA: Author.

Los Angeles Department of Water and Power. 2005. *2005 Urban Water Management Plan*. 19 May 2008 <http://www.ladwp.com/ladwp/cms/ladwp007157.pdf>.

Los Angeles Police Department. Crime Prevention Through Environmental Design (CPTED) strategies 6 June 2008 <http://www.lapdonline.org/prevent_crime/content_basic_view/1175>.

National Association of Clean Area Agencies (NACAA) [formerly the State and Territorial Air Pollution Program Administrators (STAPPA) and Association of Local Air Pollution Control Officials (ALAPCO)]. 2005. 12 June 2008 <http://www.4cleanair.org/InnovationDetails.asp?innoid=1>.

O'Connell, T. 2007 (August). Personal communication. Telephone conversation between T. O'Connell (Los Angeles Fire Department, Hydrants & Access Unit) and M. Traxler.

PCR Services Corporation. 2005. *Grand Avenue Project Initial Study*. Los Angeles, CA: The Los Angeles Grand Avenue Authority. 6 June 2008 <http://ftp.cajaeir.com/eirs/2006_Projects/Grand_Ave/DEIR%20Sections/DEIR/Appendix%20A-part1%20NOP_IS_Scoping%20Meeting%20Trans.pdf>.

The Reynolds Group, Inc. 2008. *Phase I Environmental Site Assessment, Westfield Shopping Mall Fashion Square*. Tustin, CA: Author. [See Appendix F of this Draft EIR]

Roos, Maurice. 2005 (December).. *Accounting for Climate Change*, California Water Plan Update 2005, Volume 4. California Department of Water Resources. 2005. 6 June 2008 <http://www.waterplan.water.ca.gov/docs/cwpu2005/vol4/vol4-globalclimate-accountingforclimatechange.pdf >.

Santa Monica, City of. 2008. *Santa Monica Green Building Program*. 22 May 2008 <http://greenbuildings.santa-monica.org/appendices/apawastegeneration.html>.

Smith, Mary S., et al. 2005. *Shared Parking, Second Edition*. Washington D.C.: Urban Land Institute (ULI). 12 June 2008 <http://www.uli.org/AM/Template.cfm?Section=Bookstore&Template=Ecommerce/ProductDisplay.cfm&Productid=1495>.

South Coast Air Quality Management District (SCAQMD). 2007 (April). *Overview–Fugitive Dust Mitigation Measures Tables.* 25 August 2008. <http://www.aqmd.gov/ceqa/handbook/mitigation/fugitive/Dust_MM_Overview.pdf>

South Coast Air Quality Management District (SCAQMD). 2007. *AQMD Meteorological Data Dispersal Model Application.* September 2007 <http://www.aqmd.gov/smog/metdata/ MeteorologicalData.html>.

South Coast Air Quality Management District (SCAQMD). 2007. *Final 2007 Air Quality Management Plan*. 19 May 2008 <http://www.aqmd.gov/aqmp/07aqmp/index.html>.

South Coast Air Quality Management District (SCAQMD). 2005. *AQMD Rule Book*. IV. Prohibitions (Rule 403). 19 May 2008 <http://www.aqmd.gov/rules/rulesreg.html>.

South Coast Air Quality Management District (SCAQMD). 2005 (January). *Sample Construction Scenarios for Projects Less than Five Acres in Size*. 19 May 2008 <http://www.aqmd.gov/ceqa/ handbook/LST/FinalReport.pdf>.

South Coast Air Quality Management District (SCAQMD). 2003 (June). *Final Localized Significance Threshold Methodology*. 19 May 2008 <http://www.aqmd.gov/CEQA/handbook/LST/ LST.html>.

South Coast Air Quality Management District (SCAQMD). 2002 (December). *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions.* 6 June 2008 <http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc>.

South Coast Air Quality Management District (SCAQMD). 2000. *An Air Toxics Control Plan for the Next Ten Years.* 19 May 2008 <http://www.aqmd.gov/aqmp/AirToxicsControlPlan .html>.

South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Diamond Bar: Author. 6 June 2008 <http://www.aqmd.gov/ceqa/oldhdbk.html>.

Southern California Association of Governments (SCAG). 2008. *Draft 2008 Regional Comprehensive Plan: Helping Communities Achieve a Sustainable Future*. 19 May 2008 <http://www.scag.ca.gov/rcp/draft.htm>.

Southern California Association of Governments (SCAG). 2004. *2004 Regional Transportation Plan: Destination 2030.* 1 December 2007 <http://www.scag.ca.gov/rtp2004/2004/FinalPlan.htm>.

Southern California Chapter of the American Public Works Association. 2006. *Greenbook: Standard Specifications for Public Works Construction* (aka "*The Green Book*") 12 June 2008 < http://www.greenbookspecs.org/>.

Sunshine Canyon Landfill. 2007. *Sunshine Canyon Landfill* Website. 22 May 2008 <http://www.sunshinecanyonlandfill.com/index.htm>.

Terry A. Hayes Associates, LLC. 2008 (February 26). *Westfield Fashion Square Expansion Project Air Quality and Noise Impact Report*. Culver City, CA: Author. [See Appendix D of this Draft EIR]

Terry A. Hayes Associates, LLC. 2007 (September 24). *Greenhouse Gas Emissions for the Westfield Fashion Square Expansion Project* memorandum to Ed Casey, Weston Benshoof, LLP. Culver City, CA: Author. [See Appendix D-2 of this Draft EIR]

U.S. Congress, 95th Congress. 1977 (as amended). *U.S. Code* (Title 33, Chapter 26). Federal Clean Water Act of 1977. 6 June 2008 <http://www.access.gpo.gov/uscode/title33/chapter26_.html >.

U.S. Congress, 101st Congress. 1990 (as amended). *U.S. Code* (Title 42, Chapter 85). Federal Clean Air Act of 1990. 6 June 2008 <http://www.epa.gov/air/caa/>.

U.S. Department of Energy. 2005. Internet Accessed Planning for Community Energy, Economic and Environmental Sustainability (I-PLACE3S). 6 June 2008 <http://www.energy.ca.gov/places/index.html>.

U.S. Department of the Interior (DOI), National Park Service (NPS). 2006 (as updated). *National Register of Historical Places*. 12 June 2008 <http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome>.

U.S. Department of Transportation, Federal Railroad Administration. 1998 (December). *High-Speed Ground Transportation Noise and Vibration Impact Assessment*. Washington D.C.: Parsons Transportation Group. 6 June 2008 <http://www.fra.dot.gov/downloads/RRDev/nvman.pdf >.

U.S. Department of Transportation, Federal Transit Administration. 1995 1st edition; 2006 2nd edition. *Transit Noise and Vibration Impact Assessment*. Washington D.C.: Author. 6 June 2008 <http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf>.

U.S. Environmental Protection Agency (USEPA). 1992. *Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Revised*. 19 May 2008 <http://www.epa.gov/oppt/exposure/presentations/efast/usepa_1992b_sp_for_estim_aqi_of_ss.pdf>.

U.S. Environmental Protection Agency (USEPA), Office of Water. 1992. *Storm Water Management for Construction Activities*. 20 May 2008 <http://www.epa.gov/npdes/pubs/owm0307.pdf>.

U.S. Geologic Survey (USGS). 1966. USGS Map, Van Nuys Quadrangle. 12 June 2008 <http://store.usgs.gov/b2c_usgs/catalog/setCurrentItem/(isQuery=yes&layout=6_1_61_62_2&uiarea=2&itemPageSize=5&page=8&ctype=catalogQuery&next=seeItem&carea=%24ROOT&citem=00000004730000000011)/.do>.

U.S. Green Building Council (USGBC). 2008. *LEED for New Construction v2.2 Registered Project Checklist*. 19 May 2008 <http://www.usgbc.org/DisplayPage.aspx?CMSPageID=220#v2.2>.

U.S. Green Building Council (USGBC). 2007. *Leadership in Energy and Environmental Design.* 19 May 2008 <http://www.usgbc.org/LEED>.

U.S. Green Building Council (USGBC). 2007 (November 19). *LEED-NC v2.2, LEED-CS and California Title 24-2005*. 6 June 2008 <http://www.usgbc.org/ShowFile.aspx?DocumentID=2255 >.

U.S. House of Representatives (HR), Office of the Law Revision Counsel. 2000. *United States Code*. 20 May 2008 <http://www.gpoaccess.gov/USCODE/index.html>.

Western Regional Climate Center. 2007. *Western Regional Climate Center*. 1 October 2007 <http://www.wrcc.dri.edu/>.