DRAFT
ENVIRONMENTAL IMPACT REPORT

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

EXECUTIVE SUMMARY

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

EXECUTIVE SUMMARY
TABLE OF CONTENTS

EXECUTIVE SUMMARY
LIST OF FIGURES

FIGURE

EXECUTIVE 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. This Draft EIR (DEIR) has been prepared by the City of Los Angeles to analyze and disclose the potential impacts of implementing the Fashion Square Expansion Project (Proposed Project), as proposed by the Applicant, Sherman Oaks Fashion Associates (an affiliated company of Westfield), in their application dated July 2007.

A. PROJECT SUMMARY

The Applicant is seeking approval of a proposal (herein after referred to as the "Proposed Project"), to expand the existing Fashion Square shopping center located at 14006 Riverside Drive in the Sherman Oaks community of the City of Los Angeles (see *Figure A: Project Location*). A detailed description of the Proposed Project is provided in Section II: Project Description of the DEIR.

The Proposed Project includes improvements with the intent 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 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.

FIGURE A
PROJECT LOCATION

MAP SOURCE: THOMAS BROS. GUIDE

NORTH

- 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[1] certifiable and enhance sustainability.

To attain these objectives, the Applicant has requested approval to construct 280,000 gross leasable square feet (GLSF)[2] 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). 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. Proposed development will be consistent with the type, height, and massing of existing development on the site. *Figure B: Proposed Site Plan – Fashion Square Level 1*, *Figure C: Proposed Site Plan – Fashion Square Subterranean Level*, *Figure 8: Proposed Site Plan – Fashion Square Level 2*, *Figure D: Proposed Site Plan – Fashion Square Roof Level*, and *Figure E: Proposed Site Plan – Fashion Square Cross Section*, shows the Proposed Project relative to the existing structures. Additional 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;

[1] Leadership in Energy and Environmental Design (LEED) is a green building rating system designed to guide and distinguish high-performance projects targeting sustainability and wholoistic design. The United States Green Building Council evaluates a project and issues certification to qualified developments.

[2] 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.)

FIGURE B
PROPOSED SITE PLAN – FASHION SQUARE LEVEL 1

MAP SOURCE: WESTFIELD

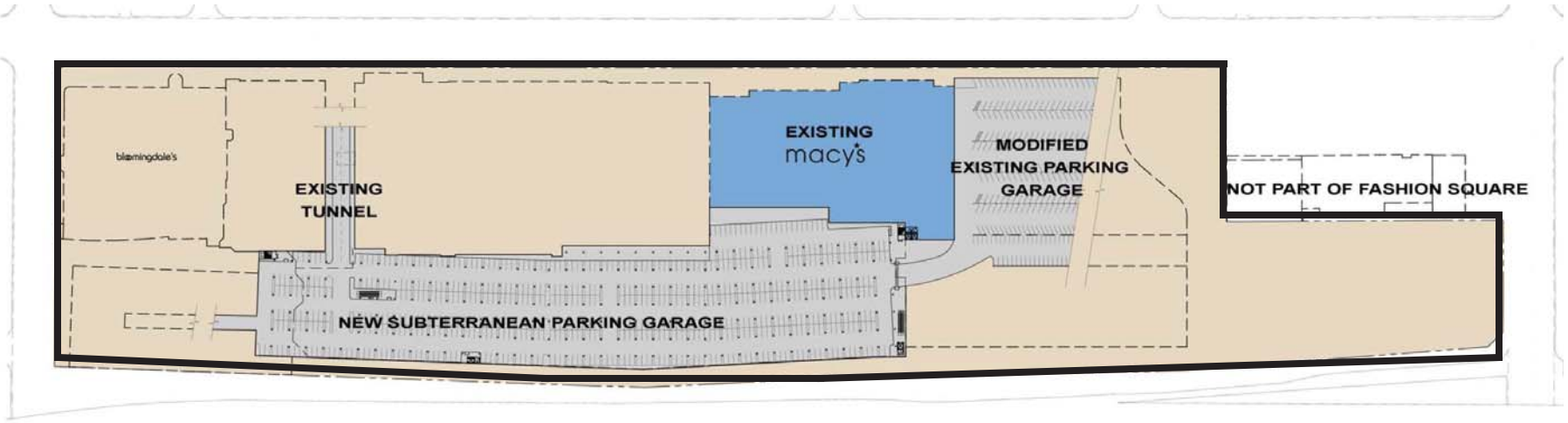


FIGURE C
PROPOSED SITE PLAN – FASHION SQUARE SUBTERRANEAN LEVEL

MAP SOURCE: WESTFIELD

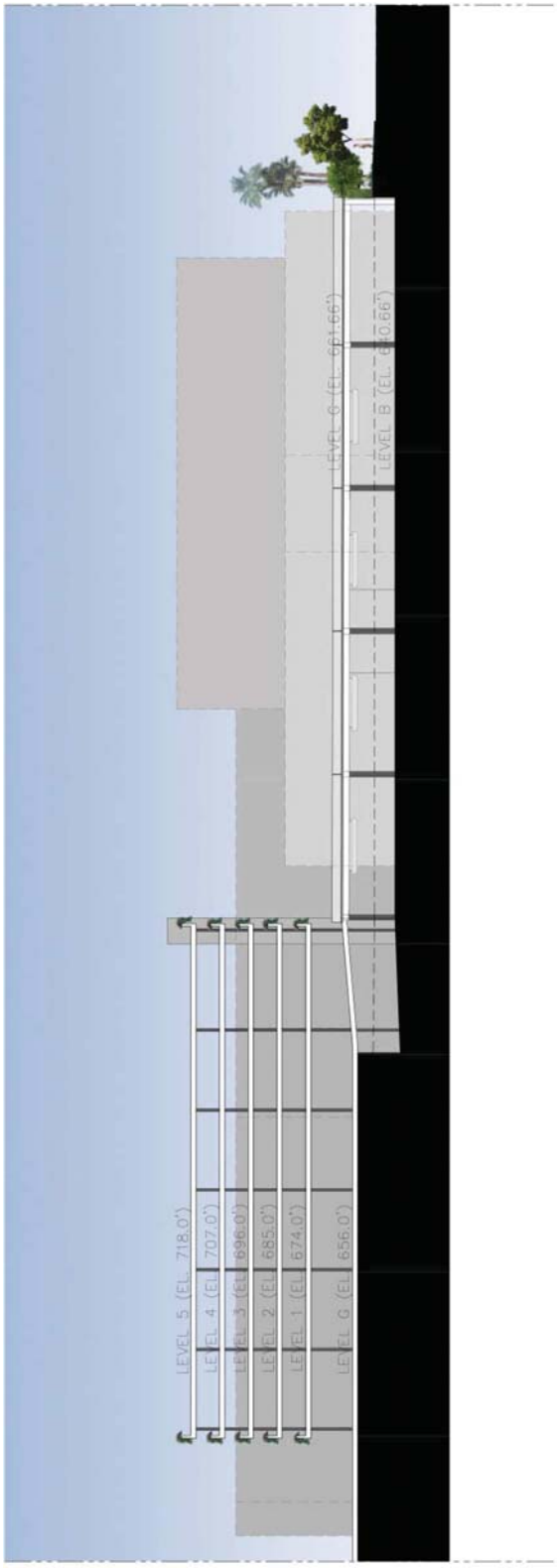
NORTH

FIGURE D
PROPOSED SITE PLAN – FASHION SQUARE LEVEL 2

MAP SOURCE: WESTFIELD

FIGURE E
PROPOSED SITE PLAN – FASHION SQUARE ROOF LEVEL

MAP SOURCE: WESTFIELD



NORTH

FIGURE F
PROPOSED SITE PLAN – FASHION SQUARE CROSS SECTION

MAP SOURCE: WESTFIELD

- 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, 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;

- Construct one level of subterranean parking below the new retail building

- 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.

Overall, the functional configuration of the project site will remain similar to what currently exists due to implementation of the Proposed Project. With the exception of the addition of the expanded retail building, existing areas for parking will remain used for parking, but at the more intense level afforded by utilization of parking structures. Even with the replacement of the existing three-level southerly parking structure with the two-level retail expansion building, the portion of the site will continue to function as a dual-use parking area through the incorporation of both one level of subterranean parking and roof-top parking. The Proposed Project site layout changes are best characterized as changes in the configuration of site access and circulation.

Implementation of the Proposed Project would require 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. 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 requests for the following entitlements and approvals:

- 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, a new subterranean parking level, 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[3] 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,[4] 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.

[3] 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.

[4] 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.

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.[5] 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 throughout the EIR as appropriate as the basis for certain analyses 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.

[5] Square footage calculations per LAMC Section 12.12.1.

B. ENVIRONMENTAL REVIEW PROCESS

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. Such activity is reviewed and monitored through the CEQA process, as provided in the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387). The CEQA process distinguishes varied levels of documentation and public review based on a project's anticipated level of effect on the environment.

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 "scope" of the EIR may be determined through preparation of an Initial Study and a public scoping process. The EIR should consider both the potential project-specific (direct and indirect) and cumulative environmental impacts that could result from the implementation of the Proposed Project.

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. 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. The decision-makers must consider the information in an EIR before taking action on a proposed project. The EIR may constitute substantial evidence in the record to support the agency's action on the project.

The EIR is prepared by or under the direction of the Lead Agency, in this case the City of Los Angeles, Department of City Planning, herein referred to as the Los Angeles Department of City Planning. The Los Angeles Department of City Planning is the public agency with the primary responsibility for approving or carrying out a project. Further, Responsible Agencies, which are public agencies that have a level of discretionary approval over some component of the Proposed Project, may rely upon the EIR prepared by the Los Angeles Department of City Planning.

An EIR is prepared in two key stages. First, a DEIR is prepared and distributed for public and agency review. Once comments on the DEIR are received, responses to those comments and any additional relevant project information are prepared and compiled in a Final EIR (FEIR). Both of these documents (i.e., the DEIR and the FEIR), along with any related technical appendices, represent the complete record of the EIR. Throughout this document, the term EIR or DEIR may be used interchangeable since both are part of the ultimate EIR record; however, "DEIR" may be used specifically when referring to information provided specifically in that volume.

The FEIR becomes the springboard for the entitlement process to begin. This becomes the document used by the recommending bodies (i.e., hearing officer and City Planning

Commission) and the final decision-makers (City Council) to weigh the environmental impacts against the 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 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.

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.

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.

3. PROJECT APPROVAL AND INTENDED USES OF THIS EIR

In accordance with CEQA and its implementing guidelines, the purpose of this EIR is to identify all potentially significant effects of the project on the physical environment, to determine the extent to which those effects can be reduced or avoided and to identify and evaluate feasible

alternatives to the project. The City of Los Angeles will use this information when considering action on the project. The EIR itself is not a decision document and does not determine whether the project will be approved. Rather, the EIR is an informational and disclosure document to be taken under consideration during the decision process.

The City of Los Angeles, including its individual departments and any Responsible Agencies providing approvals or permits, will use the information contained in this EIR.

C. OVERVIEW OF PLANNING CONTEXT

The 28.8-acre project site, located at 14006 Riverside Drive, between Woodman Avenue and Hazeltine Avenue, in Sherman Oaks, 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.

In 1987 the shopping center was approved for up to 826,000 GLSF of retail uses, and was permitted 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 149,000 GLSF of development, for a total of 975,000 GLSF across the entire 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.

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. Existing building heights range between 49 to 75 feet (as defined by Building and Safety) at their tallest elevations.

The Van Nuys-North Sherman Oaks Community Plan (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. The Proposed Project and the 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 in height. Surrounding properties are designated a mix of commercial, residential and public facility land uses through the Community Plan. A more detailed discussion of the planning context and relationship to other land uses is provided in Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay of the DEIR.

D. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Section 15123 of the CEQA Guidelines requires that an EIR identify areas of controversy and issues to be resolved which are known to the Lead Agency, including issues raised by other agencies and the public. Potential areas of controversy and issues to be resolved by the City's decision-makers include those environmental issue areas where the potential for a significant unavoidable impact has been identified and/or an area where community concerns elevate the project's perceived effects beyond reasonable threshold criteria.

Areas of controversy associated with the Proposed Project are known through the comments received to the NOP, as well as input solicited during the public scoping meeting and an understanding of the community issues in the project area. Areas of known controversy, including issues raised by some members of the community through the 2007 NOP and scoping process, 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. In addition, the public comment letters received on the project are attached as Appendix A-2: NOP Written Comment Letters and Appendix A-3: Public Scoping Meeting Comments.

E. ALTERNATIVES TO REDUCE OR AVOID SIGNIFICANT EFFECTS

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. CEQA Guidelines state that only those alternatives necessary to permit a "reasoned choice" are required. 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 impact analysis, as presented in Section IV: Environmental Impact Analysis of the DEIR, concluded that the Proposed Project generated no significant impacts after mitigation, except for temporary construction impacts related to air quality. Further, anticipated conditions after implementation of the Proposed Project and mitigation may result in an improved condition than what currently exists (e.g. improved site access and local circulation). 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.

Aside from improvements to local roadways adjacent to the project site (e.g., Riverside Drive, Woodman Avenue and Hazeltine Avenue), the Proposed Project does not propose to modify any areas outside of the existing shopping center site. Rather, the project would result in an intensification of on-site land uses by approximately 32%, improved on-site access, parking and circulation, and enhanced landscaping and street frontage presentation.

Seven alternatives, including the Proposed Project, were evaluated, and an Environmentally Superior Alternative was identified. These alternatives are summarized as follows:

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.

Relative to the project objectives (see Section II: Project Description: D-Statement of Project Objectives of this DEIR), 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. The existing parking structures would remain with minor modifications, and a new four-level parking structure would be constructed south of Macy's department store. Improvements to the Fashion Square Lane circulation and project driveways at Hazeltine Avenue, Riverside Drive and Woodman Avenue would not be implemented under this alternative. 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. Additionally, 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. Under this 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 Matilija Avenue intersection) would be implemented, but the tunnel reactivation would not be included. Unlike with the Proposed Project, the existing two-level Macy's parking structure would be completely demolished and replaced with the new consolidated terraced six-level parking structure. Parking for the shopping center would be provided at a 4.25 parking spaces per 1,000 GLSF ratio under an anticipated shared parking analysis. A request for a parking variance to temporarily allow a reduction in on-site parking during the construction phase would be requested and until built out, some project parking would have to be temporarily accommodated at nearby off-site locations (e.g., the adjacent Sunkist site). 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. 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, minor modifications to the Bloomingdale's and Macy's parking structures would be required to tie in new structures and implement circulation improvements. 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; however, reactivation of the tunnel access would not be included. Parking for the shopping center would be provided at a 4.25 parking spaces per 1,000 GLSF ratio under an anticipated shared parking analysis. A request for a parking variance to temporarily allow a reduction in on-site parking during the construction phase would be requested, and until build out, some project parking would have to be temporarily accommodated at off-site locations. This Reduced Project 2 Alternative represents an approximate 16% reduction in new commercial square footage compared to the Proposed Project. 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.

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. Similar to the Proposed Project, a new four-level (one-level at grade plus three-levels above grade) parking structure would be constructed on the eastern most portion of the project site. 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. Also, this alternative represents 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.

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. 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.

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. New commercial retail space would also be constructed as an extension to the existing mall building opposite the parking structures.

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. This temporary construction parking impact would be less than significant. 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. The impacts of the six selected alternatives are evaluated in comparison to the impacts of the Proposed Project in Section V: Alternatives and the impact conclusions are summarized in *Table 56: Summary of Alternatives Impacts* and *Table 57: Alternatives Comparison to the Proposed Project* of that section for easy comparison.

As required by CEQA, an environmentally superior alternative must be identified. An environmentally superior alternative would be one which results in substantially reduced impacts to either all environmental issues areas or within one or several key environmental issue areas.

Of the alternatives analyzed in the EIR (Section V: Alternatives of the DEIR), 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.

F. SUMMARY OF PROJECT IMPACTS

Section IV: Environmental Analysis of this EIR includes a detailed analysis for each of these environmental topics: 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.

Each topical analysis presents: a description of the relevant existing conditions; applicable regulatory and policy requirements; thresholds of significance criteria; an overview of relevant project characteristics (including identification of relevant project design features and standard conditions of approval)[6]; discussion of potentially significant impacts; discussion of cumulative effects[7]; recommended mitigation program; and the net (residual) impact conclusion. The summary of project impacts below focuses primarily on the conclusions of the impact analysis and identification of the recommended mitigation program for the Proposed Project. The reader should refer to the specific topical analysis section for a more detailed explanation of terms, methodology and assumptions.

For each topical issue analyzed, the Proposed Project's contribution toward cumulative impacts was determined to be less than significant and adequate cumulative mitigation was found to be addressed through the Mitigation Program recommended for the Proposed Project. Further summary of the cumulative impacts is not provided in this Executive Summary overview, but is provided in detail (as appropriate) in the topical analysis sections.

For many of the topical issues analyzed for the Proposed Project, implementation of the PDFs and SCAs alone would serve to adequately reduce most impacts to less than significant levels. To ensure that these features are carried through development and implementation of the Proposed Project, PDFs and SCAs that were critical to the analysis assumptions have been incorporated into the Mitigation Program. Additional Mitigation Measures have been recommended as appropriate to further reduce impacts to less than significant for all topical issues (except for short-term construction air quality impacts, which have a residual unavoidable significant impact).

1. AESTHETICS AND VISUAL RESOURCES

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

[6] Project design features (PDFs) are features that the Applicant has identified as integral to the Proposed Project and that contribute (directly or cumulatively) toward reduced potential environmental impacts. Similarly, standard conditions of approval (SCAs) are requirements of various permitting agencies that include code provisions, mandated conditions and standard conditions of permitting that also serve to reduce potential environmental impacts. A more detailed explanation of PDFs and SCAs, including a complete listing of each, is provided in Section II: Project Description, G: Project Assumptions of this EIR.

[7] Section III: General Description of the Environmental Setting of this DEIR provides a complete definition of "cumulative impacts" and a list of projects that are planned or are under construction in the project area that were considered for the analysis in this EIR. Generally for the Proposed Project, a cumulative impact occurs when two or more individual projects, which when considered together, are considerable or which compound or increase the environmental impacts.

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.

Under the project, the Hazeltine Avenue frontage of the existing shopping center will not be altered substantially. Buildings that front Hazeltine Avenue would remain intact and would only be altered for updated façade and landscape treatments, resulting 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, and will 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 south.

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 Project will be consistent with the type and height of existing development on the site, and will 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.

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. Development of the retail portion of the new mall structure would generally not be visible from this view as existing buildings and the new parking structure would obscure the view. For all these reasons, the project will result in a less than significant impact to the visual character of the area from the north.

Although enhanced landscaping is proposed along each edge of the project site, a Conditional Use Permit (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 0 to 5 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 (including the tunnel reactivation) 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. The most visually accessible area where construction activities will be visible would be in association with the new easterly parking structure (southeast of the Macy's department store) from residents in the Matilija Avenue vicinity. 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. 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 Fashion Square shopping center will continue to be open to the public during the construction phase, efforts will be made to continue to present an attractive community presence throughout the duration of the construction activities, and construction areas will be clearly partitioned and visually segregated from public areas to enhance safety concerns.

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). Following the completion of construction, the Fashion Square 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.

Views. That portion of the Proposed Project that has the potential to affect views is limited to the view as observed from residences along the block of Matilija Avenue immediately north of Riverside Drive.

The new parking structure will be visible from the north 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 (not part of the project). The portion of the parking structure that exceeds two levels is set back by approximately 150 and 210 feet from Riverside Drive.

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 obstructed to most residents in this area by the existing Fashion Square shopping center, the elevated Ventura Freeway and intervening tree canopies, would be fully obstructed

from a handful of residences situated closer to Riverside Drive that may currently have a partially unobstructed view. Because of the physical distance of these mountains in the 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 a protected view and therefore the change of this limited viewshed would be less than significant.

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 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 Riverside Drive frontage of the project site and associated lighting sources would not be substantially altered. The building frontage along this area does not incorporate reflective materials that may create nuisance glare. 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. Therefore, 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, as discussed below, 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.

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. However, that lighting source 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 so that light 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. The physical distance of these southerly oriented residences would further minimize the potential influence of the ambient illumination from security/safety lighting associated with the upper levels of the parking structures.

Furthermore, the proposed lighting sources would be consistent with existing lighting sources at the existing Fashion Square 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 this portion of community and will not substantially increase ambient illumination levels.

Because the Fashion Square Lane driveway will be relocated further to the west, 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 homes along Matilija Avenue 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 of cars exiting 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. However, 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 anticipated to be less than significant.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts would be reduced to less than significant levels.

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.

2. 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 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 South Coast Air Basin (Basin) to comply with South Coast Air Quality Management District (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 particulate matter at 10 microns (PM_{10}) and particulate matter at 2.5 microns ($PM_{2.5}$) emissions associated with construction activities by approximately 61 percent.

The estimated daily emissions associated with each construction phase, which are detailed in Section IV: Environmental Impact Analysis: B-Air Quality, would not exceed the SCAQMD "regional" significance thresholds for VOC, carbon monoxide (CO), sulfur oxides (SO_X), $PM_{2.5}$, or PM_{10}. However, regional NO_X emissions during construction would exceed thresholds and the regional construction emissions would not result in a significant impact.

Emissions for the localized construction air quality analysis of $PM_{2.5}$, PM_{10}, CO, and NOx were assessed by using Localized Significance Thresholds (LST) methodology promulgated by the SCAQMD.[8] As detailed in the analysis provided in Section IV: Environmental Impact Analysis: B-Air Quality, the estimated localized daily emissions 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.

[8] The concentrations of SO_2 are not estimated because construction activities would generate a small amount of SO_X emissions. No State standard exists for VOC. Hence, concentrations for VOC were not estimated.

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[9] vehicle trips during the weekday and 6,252 net daily vehicle trips during the weekend.[10]

Mobile and area source emissions were estimated using agency-accepted modeling (as described in Section IV: Environmental Impact Analysis: Section B-Air Quality. 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, as detailed in Section IV: Environmental Impact Analysis: B-Air Quality, 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 traffic volumes are expected to be offset by increases in cleaner-running cars as a percentage of the entire vehicle fleet on the road.[11] This reduction is accounted for in the EMFAC2007 model and included in the CO analysis. State one- and eight-hour CO standards may potentially be exceeded at congested intersections with high traffic volumes. Therefore, the United States Environmental Protection Agency (USEPA) CAL3QHC micro-scale dispersion model was used to calculate CO concentrations for 2012 "no project" and "project" conditions. Weekday one-hour CO concentrations under "project" conditions would be approximately 5 parts per million (ppm) at worst-case sidewalk receptors. 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. Notre Dame High School is located near Riverside Avenue and Woodman Avenue. Weekday one- and eight-hour weekday CO concentrations at Notre Dame High School would be approximately 7 and 4.6 ppm, respectively. Therefore, weekday CO concentrations would not exceed the one- and eight-hour CO standards of 20 and 9.0 ppm, respectively.

[9] Bravio, F. 2007 (August 23). E-mail. E-mail communication between F. Bravio (Linscott, Law & Greenspan, Engineers) and D. Steinert (Planning Associates, Inc.).
[10] 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]
[11] Consistent with CARB's vehicle emissions inventory.

Consistency with Adopted Plans and Policies. The Air Quality Management Plan (AQMP) establishes goals and policies to reduce long-term emissions in the Basin. The Plan identifies two key indicators of consistency:

- **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. 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.*

CO was utilized as an indicator for AQMP consistency since it is the air pollutant that would be generated in large quantities by the project related traffic trips. 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.

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, the Southern California Association of Governments (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. 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[12]. 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.

Climate Change Gas Emissions. Global climate change refers to historical variance in the Earth's meteorological conditions, which is 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.[13]

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

[12] Provided by the Project Applicant.
[13] 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>.

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-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.[14] This reduction was conservatively applied only to the new development portion of the Westfield Fashion Square. As a result, Proposed Project energy use would be reduced to approximately 4,378,008 kWh per year.

The existing shopping center generates 1,366 tons per year of carbon dioxide (CO_2) emissions from energy use and the expansion would generate an additional 441 tons per year. 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.[15] 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.[16] This reduction was conservatively applied only to the new development portion of the shopping center. The resulting Proposed 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 existing shopping center generates 80 tons per year of CO_2 emissions from water consumption and the expansion would generate an additional 26 tons 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 existing shopping center generates 1,548 tons per year of CO_2 emissions from natural gas consumption and the expansion would generate an additional 431 tons per year. When construction is complete, 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

[14] 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 >.
[15] Construction-related water usage would be de minimis when compared to overall water usage and was not factored into the analysis.
[16] 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>.

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 emissions from mobile sources and the expansion would generate an additional 4,743 tons per year. When construction is complete, the Proposed Project would generate 28,792 tons per year of CO_2 emissions. The existing shopping center generates 44 tons per year of CH_4 emissions from mobile sources and the expansion would generate an additional 9 tons per year. When construction is complete, the Proposed Project would generate 52 tons per year of CH_4 emissions. The existing shopping center generates 798 tons per year of N_2O emissions from mobile sources and the expansion would generate an additional 157 tons per year. When construction is complete, the Proposed Project would generate 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)[17]. Also the project will comply with the City's Green LA Action Plan. The Proposed 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.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts, with the exception of temporary construction-related impacts relative to NOx, PM2.5 and PM10, would be reduced to less than significant levels. Regional NO_X emissions and localized $PM_{2.5}$ and PM_{10} concentrations would exceed the SCAQMD significance thresholds and the Proposed Project would be considered to have a significant unavoidable regional and localized construction air quality impact.

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.

[17] AB 32 refers to the Global Warming Solutions Act of 2006 which was introduced during the 2006 California Legislative Session.

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.[18] 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

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

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.

3. GEOLOGY AND SOILS

Groundshaking and Liquefaction. 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. 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.

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. 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.

Sedimentation and Erosion. 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. Substantial erosion during construction is not anticipated and potential impacts due to soil erosion would be less than significant.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts would be reduced to less than significant levels.

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 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.

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 may 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, 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.

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 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.

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 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.

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, 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 should 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 may 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 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 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.

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, 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.

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 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. 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.

MM 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.

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.

4. HAZARDOUS MATERIALS AND MAN-MADE HAZARDS

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 or 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 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.

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.

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 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. 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 including compliance with SCAQMD Rule 1403 regulating the removal of ACMs from on-site buildings. 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.

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.

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 City of Los Angeles Fire Department (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.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts would be reduced to less than significant levels.

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, 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.

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 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.

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 should 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. WATER RESOURCES

Surface Water – 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. The Proposed Project would not substantially alter the existing drainage patterns at the project site or surrounding area.

During construction, existing buildings, pavement and landscaping would be removed to accommodate the proposed improvements, which would result in the temporary exposure of soils. Such 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. 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). However, implementation of routine safety precautions for handling and storing toxic and hazardous materials, and maintaining construction equipment in proper working condition, will effectively control the use of these items and their potential to contribute pollutants to the urban runoff.

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. 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 Best Management Practices (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. 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. With the proper design and implementation of BMPs, water quality impacts during the construction phase would be less than significant.

After development of 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 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.

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. 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. Impacts may result from the release of contaminants into the stormwater drainage channels during the routine operation of commercial development projects.

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 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.

The Proposed Project will utilize a variety of water quality improvement project design features (PDFs). PDFs for water quality and hydrologic impacts include site design, source control, and treatment control BMPs that will be incorporated into the Proposed Project. In accordance with the SUSMP requirements, minimum site design and source control BMPs will be met or exceeded. The Proposed Project will also 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 infrastructure without requiring large areas of dedicated open space while still meeting the SUSMP requirements. 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.

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.

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. The Proposed Project will result in a less than significant hydrologic impact due to erosion or siltation.

Water Demand. According to the Los Angeles Urban Water Management Plan (LA-UWMP), water demand City-wide in 2005 was approximately 661,000 acre-feet per year (AFY).[19] The proposed City-wide supply for 2012 is expected to be approximately 683,000 acre-feet annually. The existing shopping center's water demand is approximately 100,860 gallons per day (gpd) of water.[20] 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[21], assuming the same water usage 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). Based on the City of Los Angeles Department of Water and Power's (LADWP) 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. In particular, 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

[19] Los Angeles Department of Water and Power. 2005. *2005 Urban Water Management Plan*. 19 May 2008 <http://www.ladwp.com/ladwp/cms/ladwp007157.pdf>.

[20] 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.

[21] 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.

the year 2030. 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.[22] 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.

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 will result in a less than significant impact on LADWP's water supplies nor increase in water usage beyond the projections in the LA-UWMP. No significant impacts to water supply would occur as a result of the Proposed Project.

Water Supply – 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 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.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts would be reduced to less than significant levels.

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

[22] 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>.

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 Analysis: E.1-Water Resources – Water Quality, of this EIR.]

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 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.

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.

Compliance with Title 20 and Title 24 of the California Code of Regulations is also anticipated.

6. LAND USE, PLANNING AND URBAN DECAY

Consistency with the Van Nuys-North Sherman Oaks Community Plan. The Community Plan designates the Proposed Project site at the Fashion Square shopping center 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 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. The project is consistent with the Community Plan, in part due to the fact that the shopping center site has long been designated by the applicable land use plans as an appropriate location for concentrated retail facilities. The Proposed Project is consistent with the Community Plan 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 will not create any conflicts with policies and programs of the Community Plan.

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 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.

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.

Conditional Use Permit – Major Development Project (MDP). A Conditional Use Permit (CUP) for a "Major Development Project" is requested. 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, to lessen or prevent any detrimental effect on the surrounding property or neighborhood, and 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.

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. Pursuant to LAMC Section 12.24.W1, a specific CUP, referred to as a CUB, is required for the on-site sale and consumption of a full line of alcoholic beverages and is in 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 addition of up to 28,000 GLSF of new restaurant uses that could serve alcoholic beverages is not anticipated to constitute an undue concentration of the sale and service of alcoholic beverages in the area.

The sale and service of alcoholic 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 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.

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 (see discussion above), several minor deviations (some of which are addressed through the CUP process) are requested to facilitate a more efficient project design.

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 no greater than the existing Macy's building, (2) allowable hours of operation 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 project site has been developed with shopping center uses since the early 1960s and the Proposed Project would not physically change the commercial corner elements. As a continuation of the existing conditions, 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 façade treatments would be less than significant.

Other Approvals. Shared Parking, pursuant to LACM Section 12.24.X20, is requested to accommodate a range of varied commercial uses which compliment and off-set the peak parking demand.

A haul route for heavy-duty construction vehicles during the construction phase will be reviewed and established prior to the initiation of demolition and/or construction. The potential impacts associated with a future haul route 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.

Other Local Programs. 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 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.

The Proposed Project would not result in an increase in the local population or an increased use of park and recreational facilities in the project area. An increase of project employees 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. Therefore, the project will result in a less than significant impact to parks and recreational facilities.

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) 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 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. 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.

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. 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. 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.

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 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. Employees, customers, deliveries and services accessing the 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 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. A CUB for on-site sale and consumption of alcohol is in conjunction only with new sit-down restaurants proposed with the Proposed Project and would be incidental to the main use of the established shopping center. The addition of new restaurant uses that could serve alcoholic beverages is not anticipated to constitute an undue concentration of the sale and service of alcoholic beverages in the area. 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.

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. Construction measures included in the project include (1) compliance with City Code regarding hours of operation, (2) installation of up to a ten-foot construction noise barrier along Riverside Drive, and (3) acoustical screening of any pile driving activities. 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. 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.

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. A discussion of the potential

impacts of the Proposed Project on competitors in the area is provided in Section IV: Environmental Impacts: F-Land Use, Planning and Urban Decay and in Appendix H: Urban Decay Report.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts would be reduced to less than significant levels.

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.

7. 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. 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. The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. These nosiest phases occur for approximately one to two months each. Due to the distance between the edge of the parking structure construction area and the edge of the mall construction area, impacts at any off-site sensitive receptor would be limited to activities at only one construction area.

Construction activity could potentially increase 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. 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. on weekdays or between 6:00 p.m. to 8:00 a.m. on Saturdays or any time on Sundays). Regardless, 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 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. 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 or any five- decibel or more increase in noise level. The Proposed Project would result in a less than significant mobile noise impact.

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.

Parking Facilities. 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). 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.

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. 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.

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 the relocation of one and construction of two new loading docks on the south side of the property to accommodate expanded retail and restaurant uses. The existing and new retail structures would act as a noise barrier and would prevent audible noise increases at sensitive receptors from the proposed loading dock. 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 attenuate significantly with distance, and is the case with the Proposed Project, vibration levels at the adjacent sensitive receptors would not exceed the potential building damage thresholds of 0.5 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.

Operation of the Proposed Project would not include significant stationary sources of ground-borne vibration, attributable to 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.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts would be reduced to less than significant levels.

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.[23] 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.[24] 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.

[23]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>.

[24] 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-4: Grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).

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 Riverside Drive.

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.

8. FIRE SERVICES

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 Fire Department's judgment regarding needs and service in the area.

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. Therefore, the Proposed Project will result in a less than significant impact to fire flow capacity and fire protection services.

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. 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.

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.

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.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts would be reduced 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, 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.

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.

9. POLICE SERVICES

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.

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 Project will result in a less than significant impact to police protection.

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. However, 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 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 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.

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.

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 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 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.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts would be reduced to less than significant levels.

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.

10. SOLID WASTE

The 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.

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 an estimated 9,619 tons of one-time occurrence construction waste. 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 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.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts would be reduced to less than significant levels.

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 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 certifiable. The Proposed Project will

implement a variety of design and operational features, including waste recycling and stream reduction programs, to achieve LEED certifiable.

11. 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. Hauling of debris and export earth material would 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. While the Proposed Project's haul route has not been approved and thus remains subject to City review, a proposed haul route is provided in Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access of this DEIR. This process includes a public hearing and opportunities for the public to comment on the proposed route.

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 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 22 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.

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. 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. 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.

Long-Term Operation. During the 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 trip generation estimated for the Proposed Project (as detailed in Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access) likely overstates the actual amount of vehicular traffic that would be generated by the Proposed Project for both the weekday and weekend estimates.

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. 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).

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)[25] value to describe intersection operations.

During the weekday peak hours, the "With Proposed Project" scenario indicates that the Proposed Project is expected to create potentially significant impacts at six of the 18 study intersections. As shown below, with the addition of ambient growth, related project traffic, and project-related traffic. Incremental but not significant impacts are anticipated at the remaining 10 study intersections.

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)]
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

[25] Level of Service varies from LOS A (free flow) to LOS F (jammed condition). LOS D is generally considered the design capacity of an intersection. Intersections operating above LOS D are considered to be congested.

[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)]

Additional analysis was prepared to evaluate the potential traffic impacts of the Proposed 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 seven study intersections located immediately adjacent to the project site. 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.

During the weekend peak hour, the "With Proposed Project" scenario indicates that the Proposed Project is expected to create significant impacts at four of the seven adjacent study intersections. The Proposed Project is expected to create potentially significant impacts at the four locations, as shown below, according to the City's impact criteria during the Saturday mid-day peak hour with the addition of ambient growth, related projects traffic, and project-related traffic. Incremental but not significant impacts are noted at the remaining two adjacent study intersections.

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)]

In summary, the "With Proposed Project" scenario indicates that the Proposed Project is anticipated to create potentially significant impacts, either during the weekday and/or weekend peak hours, 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

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. 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 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. LADOT estimates that the ATSAC system reduces critical V/C ratios by seven percent (0.07) which has already been accounted for in the analysis of intersection operations. The ATCS upgrade further reduces the critical V/C ratios by three percent (0.03). Therefore, an additional reduction of 0.03 was assumed in the calculation of the V/C ratios for this intersection.

While not required for traffic mitigation purposes, the Traffic Study (attached Appendix I: Traffic Study) and a traffic signal warrant prepared for the Proposed Project recommended that consideration be given to installation of a traffic signal at the two new driveways on Riverside Drive. These traffic signals would facilitate vehicular movements to and from the project site, particularly in consideration of the revised internal circulation.

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. The Proposed Project daily trips will incrementally affect traffic volumes on the analyzed street segments; 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. 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 and intended to address the impact of local growth on the regional transportation system. 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 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 Proposed Project will not add 50 or more trips during the A.M. or P.M. Peak hours at any of the CMP monitoring intersections which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required. Nor is the Proposed Project is not expected to create a significant impact at the Woodman Avenue/Ventura Boulevard intersection based on the CMP significant impact criteria. Therefore, 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 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. Therefore, no further review of potential impacts to freeway monitoring locations which are part of the CMP highway system is required.

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 (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 since it will not cause any substantial increase in hazards due to design features or incompatible uses.

The Proposed Project is designed to meet the access requirements of the City of Los Angeles Fire and Police Departments. The Proposed Project includes improved Riverside Drive

entrances which will provide for better circulation along Riverside Drive and within the shopping center. This improvement includes installation of two new traffic signals on Riverside Drive which will enhance and 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 the shopping center. It is anticipated that the proposed access, circulation and parking enhancements will provide sufficient incentive for patrons to approach the shopping center from local arterial roadways. 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.

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 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.[26] 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. As part of this request, a shared parking analysis was completed by Linscott, Law & Greenspan, Traffic Engineers (see Appendix I), per Section 12.21.A.4 of the LAMC. The analysis indicates that the Proposed Project will result in a less than significant parking impact. The purpose of a shared parking analysis is to evaluate a combination of compatible land uses in a single development to determine if the results in parking demand would be less than that required for separate free-standing land uses of similar types.

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 GLSF. Existing development at the shopping center yields a current parking requirement of approximately 3,902 parking spaces, which are currently provided on-site in parking structures and surface parking.

[26] 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.

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 GLSF (i.e., 5,148 spaces based on a total center of 1,147,000 GLSF). Thus, the project will request the City Planning Commission to issue a finding that Shared Parking is applicable to the project under the provisions of Section 12.24.X.20 of the LAMC. The basis for reduced parking under the Shared Parking provisions in the LAMC is demonstrated by the shared parking analysis (See Appendix I: Traffic Study).

A shared parking demand analysis has been prepared for future conditions at the shopping center following build-out of the Proposed Project. The shared parking analysis has been prepared for weekday and weekend conditions. 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).

For a weekday condition in December (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. 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. 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.

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 does not propose any change to adopted Plans or policies, nor reclassification of applicable designations. 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, 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.

Mitigation Program and Net Impact. The proposed Mitigation Program, which includes relevant PDFs and SCAs as well as any additional recommended mitigation measures, is provided below. With implementation of the Mitigation Program, all Proposed Project and cumulative impacts would be reduced to less than significant levels.

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.

12. GROWTH INDUCING

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. It is not expected that any significant number of employees will move to the area specifically because of the Proposed Project. Short-term construction jobs are not anticipated to induce unanticipated new population growth because of the short-term nature of the construction process.

The site is readily accessible from area freeways, local roadways and mass transit (buses). Further, 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 underutilized shopping center. 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.

The Proposed Project is not expected to generate unwanted or unplanned growth inducing effects. The City's General Plan Framework favors infill development, and the continued development of vital, Regional and/or Community Centers such as Fashion Square 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.

G. MITIGATION 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 Los Angeles-Department of City Planning is the Lead Agency for the Proposed Project. 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 described in Section VI: Other Environmental Considerations: E-Mitigation Monitoring Program of the DEIR, and a draft MMP is included in Appendix M: Mitigation Monitoring Program.