Il Villaggio Toscano Project

Final EIR
Supplemental Responses to Comments

March 2013

Table of Contents

Appendices

Final EIR Supplemental Responses to Comments

Comment Letter No. 1

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Comment No. 1-1

I. INTRODUCTION.

This office represents Sherman Oaks Residents for a Safe Environment ("SORSE"), whose members live in Sherman Oaks and who will be adversely impacted by development of the proposed II Villagio [sic] Toscano project ("Project"). This correspondence constitutes our initial written comments on and objections to the proposed EIR and entitlements for the Project, and the Project itself.

As a preliminary matter, please ensure that notice of all hearings, actions, events and decisions related to the Project are timely provided to this office. All objections, including those regarding proper notice and due process, are expressly reserved.

Response to Comment No. 1-1

These introductory comments are noted for the administrative record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the EIR are provided and responded to below. The commenter requests that the contact listed on the comment letter will receive all public noticing related to the City's processing of the proposed project. CEQA requires that all direct notice of required CEQA notices be given to any person who makes such a request.

Comment No. 1-2

II. THE PROJECT DESCRIPTION IS INCOMPLETE AND MISLEADING.

A. Description of uses.

The EIR never quite tells us how many buildings there are. At one point it mentions a "series of six-story buildings." (EIR,II-7.) At another point, the EIR mentions "several six-story buildings." (EIR, II-1.) The description also misleads the reader as to the true size and scope of the Project: describing the Project as "several six-story buildings, located on top of a structural podium," masks what the Project really is an unspecified number of buildings as high as eight stories.

A project description must be both accurate and consistent. "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 193. In this respect and on this preliminary but foundational basis, the Project description fails and constitutes a violation of CEQA.

Response to Comment No. 1-2

This comment regarding the description of the proposed project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. Section II, Project Description, of the Draft EIR provides a comprehensive description of the proposed project. In both the Draft EIR and the Final EIR, the proposed project is described both in text and graphics (i.e., conceptual site plan and building elevations) and as such provides a clear and comprehensive description of the proposed buildings and building heights (see Figures II-3 through II-6 as well as Figures IV.A-4 through IV.A-10 of the Draft EIR, and Figures II-1 through II-5 of the Final EIR). As shown in the Figures in the Final EIR, building heights were reduced in response to public comments. Specifically, buildings located within zero to 45 feet from Sepulveda Boulevard would be a maximum of four stories (two stories above the podium), buildings located within 45 feet to 125 feet from Sepulveda Boulevard would be a maximum of six stories (four stories above the podium), and buildings located more than 125 feet from Sepulveda Boulevard would be a maximum of eight stories. The description of the proposed project as set forth in the EIR is accurate and stable and meets and exceeds all CEQA requirements as set forth in Section 15124 of the CEQA Guidelines.

Comment No. 1-3

B. Access and Parking.

The Draft EIR mentioned five points of access to the Project parking garage, plus one additional point of access to the Project via a porte-cochere driveway. Four of these six points of access are on Camarillo.

The text of the EIR indicates two access points along the rear fire lane – one residential and one commercial – and four along Camarillo, two residential, one commercial, and one porte-cochere. (EIR II-10.) The FEIR revised concept plan, however, only shows three points of access – one retail, one residential, and the porte-cochere. (FEIR Figure II-1.) This discrepancy must be reconciled in a recirculated Draft EIR.

Moreover, FEIR Figure II-1 and Appendix H (page ii) indicate that the residential-only driveway[s] on Camarillo accesses only residential guest parking. No such restriction exists in the text of the Draft EIR. (See EIR, II-10.) Does this mean that the only point of access for residents is along the back fire lane?

All of these issues must be disclosed, analyzed and mitigated in a recirculated Draft EIR.

Response to Comment No. 1-3

As shown in conceptual site plan provided in Final EIR Figure II-1, the Project has the following driveway and internal circulation elements:

- A private two-way, dual-purpose driveway/fire lane extending from Sepulveda Boulevard to Camarillo Street along the backside of the site (the "Back Lane") with ingress and egress on both Camarillo Street and Sepulveda Boulevard. Ingress from Sepulveda is restricted to right turn in and egress onto Sepulveda is restricted to right-turn out;

- Two retail driveways into and out of the parking structure: 1 from the Back Lane and 1 from Camarillo Street;

- One resident driveway into and out of the subterranean levels of the parking structure from the Back Lane;

- One residential guest driveway into and out of the parking structure from Camarillo Street;

- One residential drop off and drive-thru on Camarillo Street, which requires two curb cuts.

Furthermore, final access to the project site including specific driveway widths and locations would be reviewed and approved by the City's Bureau of Engineering/LADOT. Also refer to Response to Comment Nos. 1-17, 1-81, and 1-82 below regarding the analysis of driveways in the EIR.

CEQA Guidelines Section 15088.5 requires that an EIR which has been made available for public review, but not yet certified, be recirculated whenever significant new information has been added to the EIR. Per Section 15088.5(a)(1-4), significant new information requiring recirculation could include the following: (1) a new significant environmental impact that would result from the project or from a new mitigation measure proposed to be implemented; (2) a substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) a feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it; and/or (4) the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. None of the driveway questions raised in the comment are accompanied by any evidence that the driveway and circulation plan meet any of the criteria for recirculation, there is no basis under CEQA that requires the recirculation of the Draft EIR.

Comment No. 1-4

III. THE AESTHETICS ANALYSIS IS DECEPTIVE AND MISLEADING.

A. The Draft EIR Fails To Provide Appropriate Comparative Standards; Doing So Shows A Significant And Unmitigated Impact.

The EIR fails to provide substantial evidence to support its conclusion that the Project will have no significant impact on aesthetics. To the contrary, the analysis is misleading and deceptive, obfuscating the true significant impacts of the Project.

This deception stems from an inadequate description of the environmental setting. While the maximum Project height is given – 100 feet – the height of surrounding buildings is not. Instead, buildings in the surrounding neighborhood are described in stories or levels (EIR, IV.A-14), preventing attempts at meaningful comparison, and thus masking the actual and significant impacts of the oversized Project.

Moreover, by using both levels and stories to describe the height of nearby buildings as a comparative standard, the EIR improperly implies that the two are equivalent. They are not.

A six-level parking structure can be the functional equivalent of five stories, since the top level of parking would be the roof.

In order to provide any meaningful analysis, one needs to look elsewhere in the EIR, where the Project is described as a six-story building on top of a two-level parking podium. This is the functional equivalent of an eight-story building.

The environmental documentation must provide consistency in description in order to provide the ability for meaningful comparison. Currently, that has been denied to the decisionmakers and the public. When so done, proper comparison reveals a Project that is as much as four times taller than the two-story motel directly across Camarillo on Sepulveda, and 60% taller than the Grand Apartments,[1] as much as 60% taller than the parking garage, and as much as eight times as tall as the residential buildings and homes across Sepulveda. Under no circumstances can the Project be considered "only marginally taller" than the adjacent and nearby buildings to the south. To so claim, as the EIR does, borders on fiction, and shows a fundamental dishonesty that mars the EIR. The Project height and massing would dramatically alter the existing visual character of the area. Moreover, Sepulveda Boulevard will not serve as a "buffer" sufficient to mitigate the significant aesthetic impacts. Further, the "buffer" concept, whatever that is intended to mean, is vague, ambiguous and unsupported in the EIR.

[1] *The Grand Apartments are actually four residential stories on top of ground level parking.*

The EIR's use of the 16-story Comerica Bank building at the opposite comer of Galleria Plaza and Sepulveda Boulevard as a comparative standard is also misleading. The bank building itself rises significantly over everything to the north and east. It also is separated from the Project site by a relatively uniform, intervening five-story roof line approximately one-eighth of a mile in length. If anything, the Comerica Bank building suggests that aesthetically appropriate development for the site would be that which "steps down" the farther one moves north on Sepulveda Boulevard from Ventura Boulevard.

Response to Comment No. 1-4

There is no deception inserted into the EIR. Rather, Section IV.A.,Aesthetics, provides a clear description of proposed building heights. As stated on page IV.A-16, the maximum building heights would be approximately 100 feet as measured from finished grade to the top of the roof plate per the Los Angeles Municipal Code (LAMC) definition of building height. Furthermore, page IV.A-16 clearly states that a podium level would be developed that would extend approximately 23 feet above the ground level and that proposed residential uses would be located within a series of six-story buildings located on top of the podium or plaza. In addition, to further integrate the proposed project into the

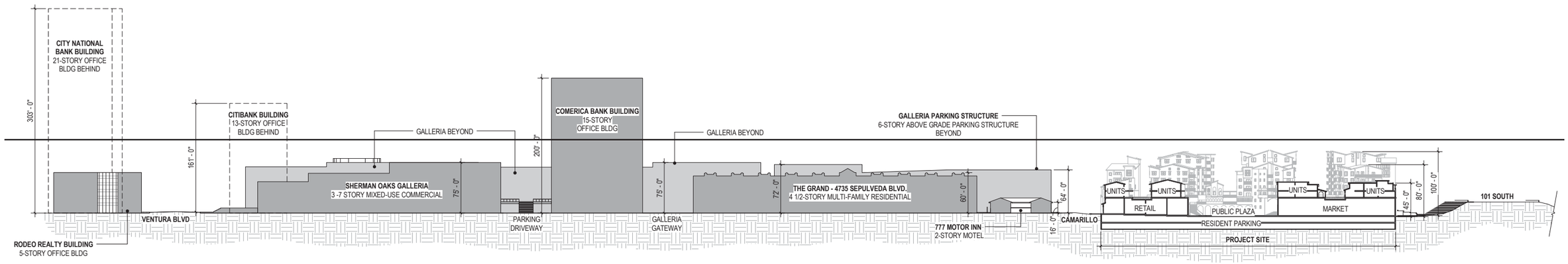
project area, the Applicant, as set forth in the Final EIR, has reduced building heights along Sepulveda Boulevard based on their distance from the Sepulveda Boulevard property line. Specifically, buildings located within zero to 45 feet from Sepulveda Boulevard would be a maximum of four stories (two stories above the podium), buildings located within 45 feet to 125 feet from Sepulveda Boulevard would be a maximum of six stories (four stories above the podium), and buildings located more than 125 feet from Sepulveda Boulevard would be a maximum of eight stories. Refer to Figures II-3 through II-5 on pages II-4 to II-6 of the Final EIR that illustrate the updated conceptual elevations for the proposed project with the proposed design modifications.

Describing the heights of surrounding buildings in terms of stories is an appropriate methodology to use for establishing the baseline conditions for the EIR's aesthetics analysis. Stories provide an easily identifiable metric for the public. In addition, building height information for the existing buildings in the project area is also communicated via Figures IV.A-1 through IV.A-3 of the Draft EIR, which provide photographs of the surrounding project area.

As shown in Figure 1 on page 7, the proposed building heights are consistent with building heights along Sepulveda Boulevard in the project vicinity. These nearby buildings range in height from approximately 16 to 200 feet. In addition, The Grand Residential Building south of the project site is approximately 60 feet in height and the Galleria Parking Garage immediately south of the project site is approximately 75 feet in height with appurtenances permitted extending up to 95 feet. Proposed building heights would range from 45 to a maximum of 100 feet in height. Thus, as stated in the EIR and shown in Figure 1, some of the proposed buildings would be shorter than, while other parts would be taller than, The Grand Residential Building and the Galleria Parking Garage, and the project's buildings overall would visually blend into the surrounding locale.

In considering existing building heights in the area it is critical to also recognize the role that Sepulveda Boulevard plays in terms of creating a physical separation between the project site and buildings located on the east side of Sepulveda Boulevard. The recognition that roadways create substantial separations and barriers is reflected in the City's CEQA Thresholds Guide.[1] Designated a major highway, Sepulveda Boulevard has a sidewalk-to-sidewalk width of approximately 100 feet in the project area. This distance clearly provides a substantial and meaningful separation (i.e., buffer) between the project

[1] *One of the Screening Criteria identified in Section H.2, Land Use Compatibility, states "Would the project includes features such as a highway… through an established neighborhood community that could cause a permanent disruption in the physical arrangement of that established community or otherwise isolate an existing land use," p. H.2.-1, L.A. CEQA Thresholds Guide, 2006.*



SITE SECTION @ SEPULVEDA TO VENTURA

Source: Killefer Flammang Architects, 2013.

matrix environmental

Figure 1
Section Illustrating Building Heights

site and development with lower building heights ranging from one to three-stories that are located on the east side of Sepulveda Boulevard. In addition, with the proposed stepbacks, the taller buildings would be concentrated across the street from the Galleria Parking Garage and generally past the motel use. The EIR analysis also appropriately includes consideration of development along the Sepulveda Boulevard corridor, including the 16-story Comerica Bank building, as it is located just one block south of the Project site and also contributes to defining the aesthetic context within which the proposed project would occur.

The EIR provides a clear, accurate, and comprehensive analysis of the project's less than significant aesthetic impacts taking into full consideration, based on substantial evidence, the context within which the project is proposed (i.e., consideration of the proposed project's building heights in terms of the heights of the other buildings located in the project area). Based on this fully compliant CEQA analysis, the EIR clearly and independently concludes, taking into consideration the full range of potential aesthetic impacts, that the proposed project would not dramatically alter the existing visual character of the area thereby supporting the appropriate determination that project development would result in a less than significant aesthetic impact. Based on this restatement of the facts presented in the EIR, the EIR does not meet any of the criteria for recirculation, as set forth in Response to Comment No. 1-3 above, and, thus, there is no basis under CEQA that requires recirculation of the EIR.

Comment No. 1-5

B. The Project Conflicts With Design-Related Policies Of The Relevant Land Use Plans.

The EIR in Table IV.A-1 attempts to show consistency between the Project and what the EIR refers to as "design policies" of the relevant plans. What the EIR fails to acknowledge, however, and which was noted by several other commentators, is the obvious: the Project is inconsistent with the design standards contained in the Ventura-Cahuenga Boulevard Corridor Specific Plan ("Specific Plan") because it needs variances from those standards.[2]

[2] *The response to comments takes great pain to assert that no "variances" are being sought, only "exceptions." An exception, however, is merely a variance by another name. The only real difference is that the former is applicable to Specific Plans, while the latter is applicable to the Municipal Code.*

In the planning hierarchy, the Specific Plan is designed to refine and implement the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan ("SOCP") and Los Angeles General Plan Framework. An inconsistency with the design elements in the Specific Plan, such as those related to height, FAR, and setbacks, presumptively creates an inconsistency with the plans above it in the hierarchy.

With respect to the specific policies and objectives, the EIR first identifies one goal and two objectives from the General Plan Framework Element. These, however, address urban form and neighborhood design. They bear little, if any, relevance to a site-specific development project.[3] The General Plan Framework Element defines "urban form" as the general pattern of building height and development intensity. "Neighborhood design" is defined as the physical character of neighborhoods and communities within the City. (See **Exhibit 1**.)

[3] *We also point out that General Plan Framework goals and policies are not applicable to a site-specific entitlement. See Section VI.A, infra.*

Nevertheless, with respect to one of the objectives mentioned, "Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development. and improving the quality of the public realm," it is important to remember that the public realm includes the streets. A project that creates significant traffic impacts to study intersections almost one mile away and creates significant unmitigable impacts to five study intersections, including a freeway on/off ramp, does not improve the quality of the public realm.

The EIR also cites three residential policies from the Community Plan. Two of these policies are designed to implement Community Plan Objective 1-3, "[t]o preserve and enhance the varied and distinct residential character and integrity in existing single and multi-family neighborhoods." (SOCP, III-4.) These two policies, 1-3.1 and 1-3.3, address protecting the character of the existing residential neighborhood and compatibility with adjacent development. As noted above in Section III.A, however, the Project is vastly out of scale with the existing apartment and single family residential neighborhood to the east and adjacent development to the south.

The third residential policy listed, 1-5.4, is designed to implement Objective 1-5, "[t]o limit the intensity and development in hillside areas." (SOCP, III-5.) The program associated with this policy is implementation of the Citywide Hillside Ordinance and the Mulholland Scenic Parkway Specific Plan. It is thus not applicable to the Project and appears to have been included here only to create a false sense of consistency.

Response to Comment No. 1-5

The opinion expressed regarding the project's lack of consistency with the Specific Plan, the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, and the City's General Plan Framework is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. Although the commenter expresses his own opinion regarding the project's consistency with applicable plans, the EIR provides substantial evidence to support findings of consistency by the City. The City

ultimately interprets the meaning of its own plans and determines whether the project is consistent with applicable plans.

As stated in Response to Comment No. 11-53, of the Final EIR, the project does not propose variances from the Specific Plan. Rather, the project includes several exceptions to the Specific Plan which is the correct terminology that is consistently used throughout the EIR to characterize the project's requested discretionary actions with regard to the Specific Plan.

The proposed exceptions to the Specific Plan are requested in response to the unique circumstances related to development of the project site rather than based on a broad set of substantive changes to the Specific Plan. Further, an inconsistency between a project and some land use controls does not in itself mandate a finding of a significant impact. Inconsistency with a policy is merely one factor to be considered in determining whether a particular project may cause a significant environmental effect. As such, the request for exceptions does not unto itself automatically equate to a conclusion that the project is fully inconsistent with the Specific Plan. As stated in Response to Comment No. 7-1 of the Final EIR, the policy decision of whether the lead agency should or should not approve requested exceptions from an adopted plan or policy is beyond the purview of CEQA. Response to Comment No. 7-1 of the Final EIR further states the following:

> "[T]he Specific Plan includes express provisions for granting exceptions to the Specific Plan. Therefore, seeking exceptions to the Specific Plan is not inconsistent with the Specific Plan's express procedures and granting of the Specific Plan exceptions would be consistent with the Specific Plan's procedural requirements."

As stated in Response to Comment Nos. 8-1 and 10-3 of the Final EIR, Section IV.G, Land Use, of the Draft EIR, provides a detailed analysis of project consistency with the Specific Plan and concludes that while the project does seek certain exceptions to the Specific Plan, substantial evidence that the proposed project is consistent with principles, intent, goals and spirit of the Specific Plan has been provided in Section IV.G, Land Use, of the Draft EIR and in the project application materials submitted to the City and which are part of the public record. In summary, the evidence was provided to support a finding that the project is consistent with the spirit of the Specific Plan by locating the appropriate type of development in the appropriate location. Further, once the requested exceptions are granted by the City, the proposed project would be fully compliant with the provisions of the Specific Plan.

The EIR's land use analysis also provides independent analyses of the project's consistency with various regional and City land use plans and polices including the City's

General Plan Framework, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, the Specific Plan, City of Los Angeles Do Real Planning Guidelines as well as the Walkability Checklist (see pages IV.G-23 through IV.G-67 of the Draft EIR). Policies set forth in plans such as the City's General Plan Framework are clearly relevant to site-specific development proposals as the attributes of the urban environment addressed by these plans are directly influenced and determined based on the collective effects of individual development projects. It is counter to basic planning principles not to consider how individual projects contribute to defining the environment that is addressed by policies set forth within broader based planning documents such as the City's General Plan Framework. General Plan Framework Chapter 5, within which Objective 5.5 is presented, is titled Urban Form and Neighborhood Design and as such addresses issues relating to the physical form of development and not the environmental effects of development. Therefore, it is inappropriate and inaccurate to reach a policy consistency conclusion relative to Objective 5.5 based on future traffic conditions which are clearly physical impacts that have no effect on urban form and neighborhood design. Through its design and amenities, the project upgrades the quality of on-site development as well as improves the quality of the project area's public realm which supports the conclusion that the project is consistent with the urban form and neighborhood design concepts expressed in Objective 5.5.

As demonstrated by the analysis within the EIR, the project would preserve and enhance the character of the area, consistent with Community Plan Objective 1-3. Specifically, the project would extend the medium-density residential and commercial uses located to the south along Sepulveda Boulevard. In addition, the location of the proposed residential and commercial uses would be appropriate given the site's location within a populated, heavily traveled, mixed-use Regional Center. Furthermore, as demonstrated by the photographs and elevations provided in Figures II-2 through II-6 as well as Figures IV.A-4 through IV.A-10 of the Draft EIR, and Figures II-1 through II-5 of the Final EIR, the project would enhance the character of the project site and surrounding area as the project site is generally vacant, underutilized and devoid of aesthetic features. Further, as described in Response to Comment No. 1-4 above, Sepulveda Boulevard, a City designated major highway with a sidewalk-to-sidewalk distance of approximately 100 feet, provides a substantial buffer between the project site and the residential neighborhood that starts on the east side of Sepulveda Boulevard. In addition, the project site is surrounded by two freeways to the east and north, with intervening sound walls between the project site and the freeways. Thus, project development would result in less than significant land use compatibility impacts as it would not substantially or adversely change the existing relationship between on- and off-site land uses and properties or adversely alter a neighborhood or community through disruption, division or isolation.

Section IV.G, Land Use, of the Draft EIR, analyzes project consistency with a total of 10 residential objectives and policies and numerous other objectives and policies set forth in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan. This comprehensive analysis concludes that overall, the proposed project would be consistent with all applicable Community Plan objectives and policies as well as the stated goal with regard to residential development. The claim regarding the integrity of the Draft EIR's land use analysis is without merit. Section IV.A, Aesthetics, and Section IV.K, Transportation and Circulation, also provide an analysis of the project's consistency with the goals of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan.

Comment No. 1-6

IV. THE AIR QUALITY ANALYSIS UNDERESTIMATES SIGNIFICANT IMPACTS TO HUMAN HEALTH.

As part of the Air Quality section, the EIR examines the impact of off-site sources of toxic air contaminants on potential Project residents; in effect, it purports to examine the impact to human health of locating a dense multi-family project adjacent to the 101/405 interchange. In doing so, the EIR uses SCAQMD significance thresholds. Agency "thresholds of significance" are not the only thresholds, however, that may be used in determining the existence of a "significant" impact. A significant impact may occur even if the particular impact does not trigger or exceed an agency's arbitrarily set threshold of significance. Communities for a Better Environment v. California Resources Agency (2002) 103 Cal.App.4th 98, 114.

In this case, emphasis on these thresholds underestimates the impact to human health and leads to an incorrect conclusion of a less than significant impact after mitigation with respect to carcinogenic risk, PM_{10}, and $PM_{2.5}$. It also ignores significant impacts with respect to other public health issues, the additional analysis in the FEIR notwithstanding.

The EIR itself notes CARB siting recommendations that include avoiding siting sensitive receptors within 500 feet of freeways and high-traffic roads. (EIR, IV.B-14.) It also notes that SCAQMD has adopted similar land use planning guidelines in the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (May 2005). (EIR, IV.B-17.) What this means is that locating multi-family housing in which children may be present within 500 feet of a freeway presumptively creates a significant impact to human health. This impact is well-documented, including the 2004 Children's Health Study and another 2007 study conducted by researchers at USC, which linked such exposure to increased risk of asthma and impaired lung development (**Exhibits 2 & 3**), and a 2010 study that found a link between living freeway adjacent and autism. (**Exhibit 4**).

As one of the authors of the 2004 Children's Health Study told the Los Angeles Planning Commission in 2008, "there's strong health-science justification for regulating exposures within 500 feet of roadways with heavy traffic," he said. "I'm not sure that will guarantee the health of our children, but I think that there's very good evidence that within that margin, what might be thought of as a margin of safety, that there are health effects that children are going to be suffering." (See **Exhibit 5**, ["Black Lung Lofts, L.A. Weekly, March 6, 2010, http://www.laweekly.com/2010-03-06/news/black-lung-lofts/].)

The way the Draft EIR generally addressed these issues was to refer to a report issued by the Planning Department in 2009 that discussed measures for mitigating the impacts of exposure to air pollutants adjacent to freeways. (EIR, IV.B-24 -26.) There is no evidence that the report was ever adopted. Some of the design features of the Project indicate they were not, such as placing an active recreation area – the pool – adjacent to the freeway, and providing operable windows.

There is also no evidence of the efficacy of any of the purported mitigation measures the 2009 report discussed. Indeed, as the article "Black Lung Lofts" notes, suggested mitigation in the form of air-filtration systems and windows that don't open are ineffective; they are "both measures that scientists say do not keep fine-particulate matter out of the lungs of children and others because the dust is so pervasive and works its way through a building's tiniest cracks and holes." The efficacy of filtration systems is also compromised by operable windows, although this is apparently a design feature of the Project. (See EIR, IV.H-27 [the presence of balconies with direct line-of-sight to the freeway interchange shows operable windows and/or balcony doors].)

As the attached memorandum from Hans Giroux, an expert in both air quality and noise impact analysis with over 30 years experience, notes, the reliance on air filtration as adequate mitigation is misplaced because filters do not trap many gaseous pollutants. (**Exhibit 6**.) A design requirement/mitigation measure requiring particulate filters with a MERV of 15 does nothing to address this problem. It only addresses the risks of particulate matter. The SCAQMD also raised this problem (comment 5-11), a comment that was ignored.

Response to Comment No. 1-6

Air Quality expert Bill Piazza prepared a report in response to Comment 6 and to the memorandum from Hans Giroux attached to the comment. Mr. Piazza's response report is attached hereto as Appendix A and is incorporated herein by reference. It should be noted at the outset that Mr. Giroux's credentials attached to his memorandum show that he holds general undergraduate and graduate degrees in meteorology and physics but does not

show that Mr. Giroux possesses any specialized training or education in the fields of human health, public health, or particulate filtration systems.

To the extent the comment claims that the existing air quality pollutants generated by vehicles on the existing freeway will result in a significant environmental impact upon project residents, potential impacts generated by the existing environment upon a proposed project are not considered CEQA impacts. CEQA measures the environmental impacts of the project's physical changes to the existing environment—not the impact of existing environment on the project.

While the SCAQMD significance thresholds are not the only thresholds, the project is within the jurisdiction of the SCAQMD. The commenter does not provide a different recommended threshold or a rationale for use of other thresholds. The significance thresholds used in the analysis of potential human health impacts are not arbitrarily set, as suggested in the comment, but rather are based on exposure levels which if exceeded would have an adverse health effect for those who are most sensitive to these effects. The commenter also incorrectly describes the nature and extent of the analysis provided. Contrary to the claims made in the comment, the analysis addresses the full range of potential health risks related to both diesel particulate matter (DPM) and non-DPM sources. The health risk assessment (HRA) considers toxic compounds generated from mobile sources, such as benzene and their subsequent carcinogenic risks and/or non-carcinogenic hazards. Criteria pollutants (e.g., PM_{10} and $PM_{2.5}$) were also assessed and compared to identified regulatory thresholds. Discussion associated with the evaluation of non-DPM pollutants is found in Section 4.0 (Source Characterization) and Section 6.0 (Risk Characterization) of the HRA. As such, the comment is also incorrect in its statements that impacts with respect to public health issues have been ignored.

The commenter also incorrectly concludes that the project's potential health risks are underestimated. To the contrary, the project's potential health risks as analyzed in the EIR are more likely to be overestimated rather than underestimated as the modeling of these potential impacts was conducted using very conservative assumptions which when layered on top of one another more than likely overstates the impacts that would actually occur.

The commenter erroneously concludes that significant public health impacts would occur solely based on proximity to a freeway and cites recommendations, guidelines, and selected studies to support their claim. The general topic citations provided in the comment serve as important information to consider and an indicator that a potential adverse health effect may occur, but do not automatically guarantee a significant impact as such a determination can only be definitively made based on an analysis of localized and site-specific conditions. For this reason, the CARB information is provided as a

recommendation and the SCAQMD information is provided as a guideline. Through the issuance of the recommendation/ guideline, the CEQA lead agency is alerted to the presence of a situation that requires specialized attention. The City of Los Angeles in consideration of the cited recommendations, guidelines, and studies on the issue, conducted site-specific computer modeling of localized air quality conditions to determine the actual health risk for project occupants based on the specific attributes of the project and the specific conditions present at the project site. This type of site-specific analysis provides a much more accurate assessment of potential conditions at the project site and substantially more insight as to the potential for an adverse health effect to occur. Based on the site-specific modeling presented in the EIR, developing the project at its proposed location would result in a less than significant impact human health impact with regard to DPM and non-DPM emissions. In other words, the proposed project is an example of a situation when a project located within 500 feet of a freeway would not result in a significant human health impact for its occupants.

As described above, the conclusion of a less than significant human health impact was based on site-specific modeling and not as incorrectly stated in the comment as being based on a 2009 Planning Department report. As explained in detail in the responses to Exhibit 6 to the comment letter (see Response to Comment Nos. 1-43 through 1-73), the mitigation measure requiring filtration systems was not designed to control gaseous pollutants as their contribution to the cancer risk estimate was *de minimus*. In addition, the evaluation of the project's ventilation requirements to mitigate air quality impacts was based upon documented industry standards promulgated by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2.

Comment No. 1-7

Mr. Giroux's analysis identifies numerous other flaws in the Air Quality Analysis of the Draft EIR, including the failure to analyze air quality impacts associated with the haul route and failure to use age-sensitivity factors in the HAS assessment. Neither of these issues was properly addressed in the HRA prepared for the Final EIR.

Response to Comment No. 1-7

The responses provided to the air quality comments set forth in Exhibit 6 to the comment letter (see Response to Comment No. 1-44 and 1-56 through 1-73), support the conclusion that the EIR's air quality analysis is complete (i.e., addresses all identified issues), accurate, and uses appropriate assumptions. As such, the EIR's air quality analysis, as is also the case with all of the EIR's analyses, meets and satisfies all CEQA requirements.

Comment No. 1-8

What we can only be left with is a conclusion that Project impacts to public health are still significant and unavoidable and greater than recognized by the EIR.

Response to Comment No. 1-8

Based on the responses to the air quality comments presented above, the Piazza Response Report, and the comments raised in Exhibit 6 to this comment letter (see Response to Comment Nos. 1-43 and 1-56 through 1-73), the EIR's conclusion that the proposed project would result in less than significant public health effects remains unchanged and is supported by substantial evidence in accordance with all CEQA requirements.

Comment No. 1-9

V. THE NOISE IMPACT ANALYSIS IS INADEQAUTE AND INACCURATE.

The conclusion in the EIR that the noise impacts of the Project will be less than significant when mitigated defies logic. Locating multi-family residential units adjacent to two freeways with traffic levels of 600,000 vehicles per day will result in significant and unavoidable noise-related impacts. The expert technical assessment of Mr. Giroux (**Exhibit 6**) confirms this, contrary to the conclusion of the EIR. As Mr. Giroux's analysis explains more fully, the EIR analysis ignores relevant implementation programs in the Los Angeles General Plan Noise Element, uses incorrect data for determining ground-borne vibration impacts, and omits analysis of noise impacts associated with use of the haul route.

Response to Comment No. 1-9

Acoustical engineer and noise expert Amir Yazdanniyaz (Acoustical Engineering Services) prepared a report in response to Comment 9 and to the memorandum from Hans Giroux attached to the comment. Mr. Yazdanniyaz's response report is attached hereto as Appendix _B and is incorporated herein by reference. It should be noted at the outset that Mr. Giroux's credentials attached to his memorandum do not show that Mr. Giroux possesses any specialized training or education in acoustical engineering, acoustics, or vibration.

To the extent the comment claims that the existing noise of the existing freeway will result in a significant environmental impact upon project residents, potential impacts generated by the existing environment upon a proposed project are not CEQA impacts. CEQA measures the environmental impacts of the project's physical changes to the existing environment—not the impact of existing environmental on the project.

The proposed project's operational roadway noise analysis was based on scientific methods and conducted in accordance with industry standard methodologies including, but not limited to, the use of the Caltrans Traffic noise prediction model. The comments provided in Exhibit 6 to the comment letter do not result in changes to the EIR analysis or conclusions (see Response to Comment Nos. 1-43 through 1-73). As set forth in these responses the EIR appropriately considered and analyzed the City's General Plan Noise Element (see Response to Comment Nos. 1-47 and 1-48), used correct data for determining ground vibration levels during project construction (see Response to Comment No. 1-50), and provides the requisite analysis of the project's construction haul trucks.

Based on the responses to the noise comments presented above and below, as well as the comments raised in Exhibit 6 to this comment letter, the EIR's conclusions regarding the proposed project's noise impacts remains unchanged and is supported by substantial evidence in accordance with all CEQA requirements.

Comment No. 1-10

Mr. Giroux also takes to task the statement in the Draft EIR that "private balconies of the residential units, which have direct line-of-sight to the freeway interchange, would be exposed to freeway noise level up to 78 dBA (CNEL). However, there are no City's [sic] noise limits applicable to the private balconies." (EIR, IV.H-27.) This incorrectly implies that 78 dBA does not create a significant impact because there allegedly is no City threshold of significance for outdoor balconies.[4]

[4] *The statement in the Draft EIR is followed by the sentence "Incorporation of the mitigation measures below would reduce potential impacts associated with the introduction of residential uses on the project site to a less than significant level." There is no mitigation provided, however, related to noise impacts on outdoor balconies. (See EIR, IV.H-29-30.)*

First, an adopted threshold of significance is not the only threshold that may be used in determining the existence of a significant impact. Communities for a Better Environment v. California Resources Agency (2002) 103 Cal.App.4th 98. 114. As Mr. Giroux points out, standing next to the equivalent of a garbage disposal or standing three feet away from a person shouting at you will have a potentially significant noise related impact.

Moreover, there is an identified threshold of significance. The land use compatibility table, Table IV.H-l, suggests that noise exposure for multi-family homes is clearly unacceptable above 70 dBA. Implicit in the "multi-family homes" classification is reasonably expected ancillary outdoor use, such as balconies and patios. This is implicit because other land uses identified in the Table are uses in which normal and expected activity occurs outdoors (e.g., outdoor spectator sports, playgrounds).

Response to Comment No. 1-10

Detailed responses to each of the noise comments presented in Exhibit 6 have been prepared (see Response to Comment No. 1-45 and 1-47 through 1-55). With regard to the issue of balcony noise levels (see Response to Comment No. 1-53), the EIR appropriately did not apply the EIR noise significance threshold to the project's balconies. In general, outdoor balconies are exempt from exterior noise standards. The City of Los Angeles Municipal Code does not regulate noise exposure levels at balconies, and therefore these areas are not considered a noise sensitive use under the Code. Typically, Caltrans' primary consideration for traffic noise abatement is given to exterior areas where "frequent human use" occurs, an area where people are exposed to traffic noise for an extended period of time on a regular basis.[2] Private balconies are generally not considered as noise sensitive use with respect to exterior noise because of the infrequent use (i.e., people are not expected to be out on the balcony for an extended of time).

As discussed in detail in Response to Comment No. 1-47 and 1-48 the City of Los Angeles General Plan Noise Element has established that a CNEL noise level above 75 dBA is the Clearly Unacceptable level for multi-family residential uses. It should be noted that the Project estimated 78 dB CNEL at the exterior of the future balcony of the proposed residential use is the 24-hour average noise level (with adjustment factors applied to the evening and nighttime hours, page IV.H-4.) The actual noise levels that would be heard at the exterior of the balcony would be lower than the estimated CNEL level, approximately 4 dBA lower (based on the ambient noise measurements at project noise monitoring locations R1 and R2). Therefore, the ambient noise levels at the balcony would be approximately 74 dBA L_{eq}. Furthermore, comparison of the background traffic noise level to that of a garbage disposal or a person shouting, as noted by the Comment is inaccurate, as these are different types of noises with a different pitches and tonal contents.

Comment No. 1-11

VI. THE PROJECT IS INCONSISTENT WITH THE RELEVANT LAND USE PLANS.

According to CEQA, a project has a potentially significant impact if it "conflict[s] with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning

[2] *Caltrans Traffic Noise Analysis Protocol, May 2011.*

ordinance) adopted for the purpose of avoiding or mitigating an environmental effect." (Initial Study Checklist IX.b.)

Response to Comment No. 1-11

At the outset it should be noted that much of the comment regarding plan consistency is the commenter's opinion regarding how the commenter would interpret the applicable plans and the commenter's policy opinion regarding how his interpretations should be applied to the project. Opinion and policy discussions are important public discourse for the decision-maker to consider, but do not necessarily raise or identify CEQA issues. CEQA concerns itself with environmental impacts arising from inconsistency with applicable plans and policies adopted for the purpose of mitigating environmental effects. For purposes of this Final EIR supplemental analysis, the responses to the comment are limited to CEQA implications and considerations.

The text quoted by the commenter is from Appendix G of the CEQA Guidelines. Appendix G is a sample form of questions to be considered for use in preparing an Initial Study for a project. The introduction to Appendix G specifically states that "the sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance." In accordance with CEQA, the City of Los Angeles has set forth its own thresholds of significance within its L.A. CEQA Thresholds Guide 2006. The L.A, CEQA *Thresholds Guide* states that the determination of significance with regard to impacts to land use consistency shall be made on a case-by-case basis, considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site; and

- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

Based on these factors, the proposed project would have a significant impact on land use if it was found to be in substantial conflict with either the adopted Community Plan, Specific Plans, or with the whole of relevant environmental policies in other applicable plans. This threshold of significance was appropriately used in the analysis of land use impacts for the project.

Comment No. 1-12

As demonstrated below, the Project is not consistent with the relevant land use plans. Not only does this create a significant impact not identified in the EIR, it prevents the City from making the findings required by Los Angeles City Charter section 556.

Response to Comment No. 1-12

As demonstrated by the responses to comments below, the project would not substantially conflict with the adopted Community Plan, Specific Plans, or with the whole of relevant environmental policies in other applicable plans. Thus, the project would not result in significant land use impacts.

Comment No. 1-13

A. The Los Angeles General Plan Framework Is Inapplicable To Site Specific Entitlements.

A Project is consistent with the relevant land use plans "if, considering all its aspects, it will further the objectives and policies of the [those plans] and not obstruct their attainment." Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342,378. The relevant plans here are those applicable to individual entitlement requests. They do not include the Los Angeles General Plan Framework Element, the assertion of the EIR to the contrary notwithstanding.

The Draft EIR spends a great deal of time purporting to show consistency with the General Plan Framework Element. By the very language of the document, however, ***'[t]he Framework Element is not sufficiently detailed to impact requests for entitlements on individual parcels.*** Community plans will be more specific and will be the major documents to be looked to for consistency with the general plan for land use entitlements." (**Exhibit 7**; emphasis added.)

Thus, by its very terms, the relevant analysis to determine land use consistency is not the General Plan Framework. It is the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan and the Ventura/Cahuenga Boulevard Corridor Specific Plan. As is demonstrated below, the Project clearly obstructs attainment of the goals of those relevant plans.

Response to Comment No. 1-13

As discussed in Response to Comment No. 1-5, policies set forth in plans such as the City's General Plan Framework are clearly relevant to site-specific development proposals as the attributes of the urban environment addressed by these plans are directly influenced and determined based on the collective effects of individual development projects. It is counter to basic planning principles not to consider how individual projects contribute to defining the environment that is addressed by policies set forth within broader based planning documents such as the City's General Plan Framework.

Furthermore, the EIR does not treat the General Plan Framework Element as binding upon site-specific entitlement requests. Nor does the EIR include the Framework Element to the exclusion of directly applicable plans. The EIR provides a comprehensive of the projects consistency with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan and the Ventura/Cahuenga Boulevard Corridor Specific Plan. Refer to Sections IV.A, Aesthetics; IV.G, Land Use; and IV.J, Transportation and Circulation, of the Draft EIR.

Comment No. 1-14

B. The Project Is Inconsistent With The Residential Goals, Policies And Objectives Of The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan.

The EIR claims that the Project is consistent with Community Plan Objective 1.1, "to provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010," because it provides new housing. One cannot make that determination, however, without actually reviewing the policies adopted by the City to implement the Objective. In actually reviewing the policies that implement this Objective (which the EIR conveniently does not), the inconsistency of the Project with this Objective 1.1 becomes readily apparent. In particular, Project is inconsistent with the following policies:

> "1-1.2: Protect existing single family residential neighborhoods from new, out-of-scale development.
>
> 1-1.3: Protect existing stable single-family and low density residential neighborhoods from encroachment by higher density residential and other incompatible uses.

> 1-1.4: Protect the quality of the residential environment through attention to the appearance of communities, including attention to building and site design.
>
> 1-1.6: The City should promote neighborhood preservation, particularly in existing single family neighborhoods, as well as in areas with existing multi-family residences."

As amply demonstrated throughout this correspondence, a Project of the height, size, and scale sought by the applicant does not protect nearby residential neighborhoods from out-of-scale, incompatible uses. No matter how nice a building may look in a vacuum, a Project out-of-scale and incompatible with the surrounding neighborhood degrades the quality of that neighborhood. A project that creates significant unmitigable traffic impacts to virtually the entire ingress/egress of a residential neighborhood, as this Project does to the neighborhood bordered by Kester, Sepulveda, the Ventura Freeway and Ventura Boulevard, does not promote preservation of that neighborhood. Rather, it promotes destruction of that neighborhood.

The EIR claims the Project is consistent with Community Plan Objective 1.3, "to preserve and enhance the varied and distinct residential character and integrity in existing single-and multi-family residential neighborhoods," by comparing it to the Sherman Oaks Galleria and the Grand Apartments complex located southeast of the project site. (EIR,IV.G-38.) Again, in reviewing the policies that implement this Objective, the inconsistency of the Project with this Objective 1.3 becomes readily apparent.

Policy 1.3-1 is to "seek a high degree of compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods." As noted elsewhere, the Project is as much as 60% taller than the Grand Apartments, as much as four times as tall as the motel directly across the street at Camarillo and Sepulveda, and as much as eight times higher than the residential neighborhood to the east. This is not a high degree of compatibility and does not protect the character and scale of nearby neighborhoods.

Opening some of the interior landscaping to Sepulveda, as revisions to the Project purport to do, does little to change this – not when the landscaping appears to be on top of a two-story parking podium above the Sepulveda Blvd. sidewalk. Making a plaza visible from the street is not the same as making a plaza accessible from the street. (See FEIR, III-72 [comment 9-6].)

Moreover, this incompatibility of scale and size, when combined with the significant unmitigable traffic impacts that result explicitly from the applicant's decision to expand

existing residential density through exceptions to the Specific Plan, renders the Project inconsistent with Policy 1.3-2.

As a result of these inconstancies with the policies and objectives, the Project overall is inconsistent with Goal 1 of the Community Plan. It is important to note that the inconsistency is not a result of the proposed uses, per se. It is a result of deviations sought from a Specific Plan that implements these goals, policies and objectives in the Community Plan.

Response to Comment No. 1-14

The Draft EIR did not include an analysis of Community Plan Polices 1.1-2 or 1.1-3 as these policies are directed towards projects located within single-family or low-density residential neighborhood. As described in detail in the EIR, the project site is vacant and is surrounded to the north and west by two freeways, to the south by medium-density residential and commercial development and to the east by Sepulveda Boulevard a major highway. In addition, the project site is vacant with the exception of a single residence. Thus, the project is not located within a single-family or low-density residential neighborhood. Furthermore, review of the City programs to implement these policies further underscores that these policies are not directly applicable to the project. In addition, as discussed in Sections IV.A., Aesthetics and IV.G. Land Use of the Draft EIR, the project would not be out of scale or incompatible with surrounding land uses.

Community Plan Policy 1-1.4 is evaluated in Section IV.A, Aesthetics. As discussed therein, the proposed project would develop a mix of residential and commercial uses that would be carefully integrated through building and site design. The project buildings would be arranged around interior courtyards. Commercial uses would be located on the ground level along Sepulveda Boulevard and Camarillo Street with residential uses located on the upper floors. This building and site design would create compatibility with the adjacent commercial uses (i.e. Sherman Oaks Galleria) to the south and would yet provide a distinct and private living environment for residents. In addition, the incorporation of street frontage improvements on Sepulveda Boulevard and Camarillo Street would create a pedestrian friendly setting. Overall, the project would enhance the quality of the community. Therefore, the proposed project would be consistent with this Community Plan policy.

The project site is nearly vacant. Thus, Community Plan Policy 1-1.6 and the associated implementation programs are not applicable to the project.

As discussed in the EIR, the project would also be consistent with Community Plan Objective 1.3 and Community Plan Policies 1.3-1 and 1.3-2. With regard to Community Plan Objective 1-3, as discussed in Section IV.G, Land Use, the project site is located in a

Regional Commercial area of Sherman Oaks, which is characterized by a mix of commercial and residential uses. The proposed project would develop 399 new multi-family residential units and approximately 52,000 square feet of neighborhood-serving commercial uses. This mix of uses would be compatible with nearby commercial and multi-family uses, particularly the Sherman Oaks Galleria and The Grand Apartments complex located southeast of the project site. Overall, the project would preserve and contribute to the area's character and integrity as a high intensity Commercial area. Thus, the proposed project would be consistent with this Community Plan objective.

With regard to Community Plan Policy 1.3-1, as discussed in Section IV.A, Aesthetics, the project area is characterized by a mix of medium to high density commercial and residential uses, typical of a Regional Center area. Thus, the proposed project's infill mixed-use development of residential and commercial uses would be compatible with the existing surrounding uses. Furthermore, the design of the project would enhance the overall visual quality of the areas, thus contributing to the existing character of the existing Regional Center uses. Additionally, the project would provide new landscaping along the street frontages of Sepulveda Boulevard and Camarillo Street that would further enhance the character of these streets. The closest residential-only neighborhoods are located to the east across Sepulveda Boulevard, and therefore, would be buffered from the project by this six-lane roadway. Therefore, the proposed project would be consistent with this Community Plan policy.

With regard to Community Plan Policy 1.3-2, Community Plan Policy 1.3-2 seeks consideration of various livability factors including "impacts on traffic levels when changes in residential densities are proposed." The policy expressly contemplates changes in residential densities and does not prohibit traffic impacts, but instead requires careful consideration of them—which is what the EIR has done. As discussed in Section IV.G, Land Use, the analysis of land use impacts considers the project's impacts relative to neighborhood character and identity, compatibility with surrounding land uses, and livability. Impacts on public services are addressed in Sections IV.J(1), Police Protection; IV.J(2), Fire Protection; IV.J(3), Public Schools; IV.J(4), Parks and Recreation, and IV.J(5) Libraries. Impacts on public infrastructure are analyzed in Sections IV.L(1), Water Supply; IV.L(2), Wastewater; and IV.L(3), Solid Waste. Finally, impacts on traffic levels are discussed in Section IV.K, Transportation and Circulation. Therefore, by considering these factors and planning for appropriate project features and mitigation measures as necessary, the proposed project would be consistent with this Community Plan policy.

Overall, as discussed in detail in Section IV.A, Aesthetics, of the Draft EIR and in Response to Comment Nos. 1-4 and 1-5, the project would be compatible in scale and with surrounding land uses, particularly the medium-density commercial and residential uses to the south. This compatibility is further demonstrated in Figure 1 on page 7. The project

continues to be consistent with the relevant Community Plan policies cited in this comment. Refer to Response to Comment No. 1-5 regarding the proposed exceptions that are an anticipated land use action within the Specific Plan.

Comment No. 1-15

C. The Project Is Inconsistent With Commercial Goals, Policies And Objectives Of The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan.

Simply plunking down a mixed commercial/residential development in a commercial zone does not automatically confer consistency with the goals, policies and objectives that support commercial activity at that location. As many of the goals, policies and objectives make abundantly clear, the context of the surrounding neighborhood is important.

While the EIR claims consistency between the Project and Policy 2-1.3, "requir[ing] that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development," the evidence shows the contrary. As noted above, the Project is as much as 60% taller than the Grand Apartments, as much as four times as tall as the motel, and as much as eight times higher than the residential neighborhood to the east. It also creates significant and unmitigable traffic impacts at the intersection that serves as entrances and exits to that residential neighborhood. That emphatically is not a project designed and developed to achieve compatibility with existing uses and development.

The EIR also claims consistency with Policy 2-3.3, "ensure that commercial infill projects achieve harmony with the best of existing development." Harmony and compatibility are equivalent, and the lack of compatibility with the residential neighborhood to the east and development to the south has been amply demonstrated. Moreover, the program to implement this policy includes implementation of the Ventura/Cahuenga Boulevard Corridor Specific Plan. This Project is not consistent with the Specific Plan unless the plan is effectively overridden through the use of multiple exceptions, creating further inconsistency with this Community Plan policy.

Policy 2-3.5 and Policy 2-4.1 also require that development be compatible with existing uses and adjacent development. Similarly, Policy 2-4.2 seeks to preserve community scale. Again, the scale and size of the Project ensures that these policies will be violated. Additionally, the program for implementation of Policy 2-4.1 is "continue the implementation of the Ventura/Cahuenga Boulevard Corridor Specific Plan, and implement the applicable design standards identified in the Design Guidelines of the Community Plan." The implementing program is similar for Policy 2-4.2. Again, this Project is not consistent with

the Specific Plan unless the applicable standards to address height and mass are ignored and overridden.

Response to Comment No. 1-15

As demonstrated in Sections IV.A, Aesthetics, and IV.G, Land Use, of the Draft EIR; Response to Comment No. 1-4, above; and Figure 1 on page 7, above, the project is compatible with surrounding land uses, including the commercial uses to the south. The project is also consistent with Community Plan policies 2-1.3, 2-3.3, 2-3.5, 2-4.1 and 2.4-2. Specifically, with regard to Community Plan Policy 2-1.3, as discussed in Section IV.G, Land Use, of the Draft EIR, the project would enhance the overall visual quality of the areas, thus contributing to the existing character of the existing commercial uses in the area. Furthermore, in terms of land use compatibility, the project's proposed residential and commercial uses would be mutually compatible with the existing mix of commercial office, retail, and restaurant uses. Therefore, the proposed project would be consistent with this Community Plan policy.

With regard to Community Plan Policy 2-3.3, as discussed in Section IV.G, Land Use, of the Draft EIR, the proposed project constitutes infill development that would be compatible with existing uses in the Regional Commercial area of Sherman Oaks. The project's 399 new multi-family residential units would enhance the residential base for nearby commercial uses such as the Sherman Oaks Galleria. Furthermore, the project's neighborhood-serving commercial uses would serve the needs of project residents as well as existing nearby residents. Therefore, the proposed project would be consistent with this Community Plan policy. To the extent that the comment limits its analysis of harmony to the residential neighborhood to the east, these residential uses already exist within a present environment characterized by proximity to large commercial uses such as the Sherman Oaks Galleria.

With regard to Community Plan Policy 2-3.5, as discussed in Section IV.G, Land Use, of the Draft EIR, the project site is not located in a designated pedestrian-oriented area. However, implementation of the project would provide a high-quality mixed-use development that would enhance the character of the project area. With the development of 399 residential units and approximately 52,000 square feet of neighborhood serving commercial uses, the project would compliment and support the existing uses in the Regional Commercial area of Sherman Oaks. Additionally, the project would: (1) create a new development that would incorporate a contemporary architectural style, exhibiting multi-faceted massing building forms, roof forms, elevations, and a mix of colors; (2) provide a substantial amount of landscaping, including a main central courtyard with gardens; and (3) encourage pedestrian activity by locating commercial storefronts along Sepulveda Boulevard and Camarillo Street. Thus, the project would enhance the

pedestrian-oriented areas associated with the Sherman Oaks Galleria and other commercial uses along the Ventura Boulevard corridor to the south. Thus, the proposed project would be consistent with this Community Plan policy.

With regard to Community Plan Policy 2-4.1, as discussed in Section IV.G, Land Use, of the Draft EIR, the project site is located in a Regional Commercial area of Sherman Oaks, which is characterized by a mix of commercial and residential uses. The proposed project would develop 399 new residential units and approximately 52,000 square feet of neighborhood-serving commercial uses. These uses would be compatible with nearby commercial and multi-family uses, particularly the Sherman Oaks Galleria and The Grand Apartments complex. Therefore, the proposed project would be consistent with this Community Plan policy.

With regard to Community Plan Policy 2-4.2, as discussed in Section IV.G, Land Use, of the Draft EIR, the project would: (1) create a development that would incorporate a contemporary architectural style, exhibiting multi-faceted massing building forms, roof forms, elevation, and a mix of colors; (2) provide a substantial amount of landscaping including a main central courtyard with gardens; and (3) encourage pedestrian activity by locating commercial storefronts along Sepulveda Boulevard and Camarillo Street. In addition, the proposed mixed-use development would be complementary to both the adjacent commercial development and the nearby residential uses. The project would enhance the aesthetic character of the area and the appearance of the community. Therefore, the proposed project would be consistent with this Community Plan policy.

As discussed in Response to Comment No. 1-5 above, exceptions to the Specific Plan are anticipated by the Specific Plan. While the project does seek certain exceptions to the Specific Plan, substantial evidence that the proposed project is consistent with principles, intent, goals and spirit of the Specific Plan has been provided in Section IV.G, Land Use, of the Draft EIR and in the project application materials submitted to the City and which are part of the public record.

Comment No. 1-16

D. The Project Is Inconsistent With The Ventura-Cahuenga Boulevard Specific Plan.

Given the number of exceptions from the Specific Plan necessary for the Project to move forward, no one could argue anything other than the inconsistency of the Project with the Specific Plan. The Specific Plan does create a mechanism for granting exceptions, but granting the specific exceptions sought by the applicant for this will not eliminate inconsistency with the Specific Plan.

In granting any exception from a standard in the Specific Plan, consistency must still be demonstrated with the relevant purposes outlined in Section 2 of the Specific Plan. The Project, however, is not consistent with those purposes and remains inconsistent with the Specific Plan even if the exceptions sought are granted.

Purpose A of the Specific Plan is "to assure that an equilibrium is maintained between the transportation infrastructure and land use development in the Corridor and within each separate community of the Ventura-Cahuenga Boulevard Corridor Specific Plan area." The unmitigable traffic impacts caused by the Project ensure disequilibrium and incompatibility with this first and fundamental purpose of the Specific Plan.

Purpose B of the Specific Plan is "to provide for an effective local circulation system of streets and alleys which is minimally impacted by the regional circulation system and reduces conflicts among motorists, pedestrians, and transit riders." This Project, with the exceptions it seeks, creates significant and unmitigable traffic impacts at every intersection along Sepulveda from Ventura Blvd. to the freeway and severely impacts access to parking for the motel and Grand Apartments. This is far more than a minimal impact. Granting the exceptions to allow this impact will not be consistent with this Specific Plan purpose.

Purpose C of the Specific Plan is "to provide building and site design guidelines to promote attractive and harmonious multi-family and commercial development. In a similar vein, Purpose E of the Specific Plan is "to provide a compatible and harmonious relationship between residential and commercial development where commercial areas are contiguous to residential neighborhoods." Granting the exception will thwart accomplishment of these purposes by allowing disharmony, a Project grossly out-of-scale to that which surrounds it.

Purpose L of the Specific Plan is "to provide community development limitations based on the community infrastructure's transportation capacity." That is exactly what the Standards in the Specific Plan are intended to do. If a project results in significant and unmitigable impacts to circulation, those impacts are substantial evidence that the transportation capacity is being exceeded. This Project does have those impacts, creating further evidence of inconsistency with this purpose of the Specific Plan.

None of the foregoing should be used to respond that any exceptions would violate the stated purposes of the Specific Plan. If that were the case, then the process for seeking exceptions for a project would be superfluous. It is the exceptions being explicitly sought for this Project that result in inconsistency with the stated purposes of the Specific Plan.

Responses to comments to the Draft EIR are even more revealing in showing a violation of the spirit – if not the letter – of the Specific Plan. In responding to the Plan Review Board ("PRB") for the Specific Plan, which highlighted the Draft EIR's improper attempt to imply

that the Project met the definition of a "mixed use development" in the Specific Plan, the Final EIR says this:

> "While it is true that the II Villaggio Toscano does not meet the Specific Plan's technical definition of mixed-use, the fact remains that the II Villaggio Toscano project is a mixed-use project which combines both residential and commercial uses. The Specific Plan's definition of a mixed-use project is only relevant in that consistency with the Plan entitles the project to development incentives offered such as increased height and in some areas increased floor area." (Response to comment 7-3.)

This is remarkably revealing. What this response does is acknowledge that the Project does ***not*** meet the definition of a mixed-use development and thus cannot take advantage of development incentives such as increased height and FAR that are available to those projects. A project that seeks these incentives without meeting the definition of a mixed-use development is not consistent with the Specific Plan. Yet that is exactly what the Project does by seeking multiple exceptions to the Specific Plan without providing a true mixed-use project.

The FEIR appears to dismiss the inconsistencies with the Specific Plan by implying that the Specific Plan does not apply as strongly here as it does to the rest of the Plan area: "The Specific Plan was established largely to ensure that development along Ventura Boulevard did not create traffic impacts in excess of the capacity of the transportation infrastructure within the Specific Plan's subareas." (Response to comment 7-3.) This response, however, is given without any support whatsoever. If that were the case, Specific Plan land use controls would only be along Ventura Blvd. – which is not the case.

Response to Comment No. 1-16

The project is consistent with the relevant purposes of the Specific Plan. With regard to Purpose A, the project does maintain equilibrium between the transportation infrastructure and land use development. As discussed in Response to Comment 7-5 of the Final EIR, historically, development along the corridor has been commercial which tends to generate substantially more trips than a similar sized (or even larger) residential project. This proposed mixed-use project is predominately a residential use generating significantly less traffic than a typical development project along the Ventura Boulevard corridor, particularly the type of commercial development envisioned in a Regional Commercial land use designation. Even the small amount of commercial square footage, 52,000 square feet or 8 percent of this project's square footage, is dedicated to neighborhood retail use which attempts to capture business from the area's residents and

employees. As such, the project's neighborhood-serving retail space is not the type of destination-oriented commercial space that would generate any significant new traffic.

The applicant's requested Specific Plan exceptions do not cause unmitigated traffic impacts. Substantial evidence shows that a fully Specific Plan compliant regional commercial development of 1.5 FAR and within the 75-foot height limit would generate approximately twice as many net daily traffic trips as the proposed Project. Substantial evidence shows that eliminating a Specific Plan exception and reducing the proposed Project to a Specific Plan–compliant 1.5 FAR comprised of 277 residential units, would result in significant unmitigated impacts at 5 local intersections like the proposed Project. In order to reduce the proposed Project to a level that would eliminate all significant traffic impacts, the Project would need to be reduced by 86 percent to 70 residential units and 7,700 square feet of commercial—a reduction far below the permitted FAR and height limits in the Specific Plan. Consequently, the evidence establishes that it is not the Specific Plan exceptions that generate significant unmitigated traffic impacts. The project generates significantly less trips than other uses that could be developed on the site within a 1.5 FAR. For example, 333,000 square feet of regional commercial uses, or a mixed use project (as defined by the Specific Plan) with 116,000 square feet of commercial uses and 216 residential uses, both of which are permitted uses, would generate 11,205 daily trips and 6,045 daily trips, respectively, as compared with the 5,844 trips that would be generated by the project. Furthermore, while the project would result in significant traffic impacts, the mitigation measures proposed by the project would improve the operation of many of the intersections in the project vicinity when compared with future conditions without the project. In addition the site's proximity to a large employment node and quality transit creates an opportunity to further the goal the transportation and development equilibrium established by Purpose A. As outlined in the Housing Element, there is a defined need for housing to be provided throughout the City and in the Sherman Oaks area. If housing is not built on this site, it would need to be built elsewhere in the community to meet the Housing Element's allocation for the area. There are few, if any, locations able to achieve the trip reduction potential of the proposed site due to its proximity to jobs and transit. Thus, the project does further the goal to maintain equilibrium between the transportation infrastructure and land use development.

Specific Plan Purpose B does not impose a moratorium on any development that would create any significant unmitigated traffic impacts. The project would also meet the intent of Purpose B of the Specific Plan to provide for an effective local circulation system of streets and alleys which is minimally impacted by the regional circulation system and reduces conflicts among motorists, pedestrians and transit riders. As indicated above, while the project would result in significant traffic impacts, the mitigation measures proposed by the project would improve the operation of many of the intersections in the project vicinity when compared with future conditions without the project. Furthermore, the

project site is located adjacent to the I-101 and I-405 freeways. Thus, when compared with other development locations in the community that are more distant from the freeways, the location of the project reduces regional traffic within the community. Furthermore, the project would provide new living opportunities in close proximity to jobs, public transit, shops, restaurants, and entertainment uses, thus reducing both local and regional traffic. The project would also provide improvements to foster a pedestrian environment along Sepulveda Boulevard. With regard to consistency with Purposes C and E of the Specific Plan, the Project is in proximity to but is not "contiguous" with residential uses. The Project is separated from the nearest residential uses by Sepulveda Boulevard. The contiguous uses to the Project site are commercial and freeway infrastructure. More importantly, the Project height along Sepulveda Boulevard across from multi-family residential uses is within the permitted 75-foot height limit. The Project only reaches to over 75 feet at depth of 125 feet from western edge of Sepulveda Boulevard—approximately 240 feet from the residential uses to the east. In addition, with the proposed stepbacks, the taller buildings would be concentrated across the street from the Galleria Parking Garage and generally past the motel use south of Camarillo Street. This stepped-back design reflects direct input from the community and is consistent with Purposes C and E.

As discussed in detail in Sections IV.A. Aesthetics and IV.G. Land Use of the Draft EIR, as well as within Response to Comment No. 1-4 above, the project would promote attractive and harmonious multi-family and commercial development and would be compatible with surrounding development. Thus, the project would also promote these purposes of the Specific Plan.

Response to Comment No. 7-3 of the Final EIR accurately acknowledges that the project does not meet the Specific Plan's technical definition of mixed-use and that the Specific Plan's definition of a mixed-use project is only relevant in that consistency with this definition entitles the project to development incentives offered such as increased height and in some areas increased floor area. However, the commenter omits the remainder of the response that demonstrates that a mixed-use project as defined by the Specific Plan would actually increase the amount of traffic generated within the community and would therefore increase traffic impacts.

As discussed in Response to Comment No. 1-5 above, the Specific Plan includes express provisions for granting exceptions to the Specific Plan. Therefore, seeking exceptions to the Specific Plan is not inconsistent with the Specific Plan's express procedures and granting of the Specific Plan exceptions would be consistent with the Specific Plan's procedural requirements. Based on the above and as set forth in the EIR and the findings prepared for the project, the project is consistent with the purpose and intent of the Specific Plan. Further, if the requested exceptions are granted by the City, the proposed project would be fully compliant with the provisions of the Specific Plan.

Comment No. 1-17

VII. THE DISCUSSION OF TRANSPORTATION IMPACTS IS INADEQUATE.

Expert traffic analysis by Traffic Engineer Roy Nakamura at Crain & Associates has been prepared in response to the Comment Letter and Arthur Kassan's report accompanying the Comment Letter (the "**Crain Response**"). Please refer to Appendix C. According to Mr. Nakamura, the traffic issues raised by Bradley Torgan and Arthur Kassan are outside the appropriate transportation-related environmental issues and outside the scope for a typical project being reviewed by City of Los Angeles decision-makers. Furthermore, the issues raised by Arthur Kassan and Bradley Torgan that are not based on false or misleading assumptions and analyses, will be addressed at the administrative level (such as during the building permit review process).

A. The Transportation Analysis Fails To Account For The Alley To The West Of Sepulveda.

There is an alley approximately 200 feet west of Sepulveda, headed south from the Project site, which provides access to parking for an apartment complex. (See **Exhibit 8** [aerial photo].) On the south side of Camarillo between the alley and Sepulveda is access to the motel parking.

The Draft EIR estimates that during the p.m. peak, 872 vehicles will exit the Camarillo/Sepulveda intersection, 502 of them turning northbound onto Sepulveda. As indicated in the attached analysis by Arthur L. Kassan, P.E., a consulting transportation engineer with over 50 years of experience ("Kassan Report," **Exhibit 9**), there is a reasonable foreseeability that this amount of traffic will potentially result in the alley and driveway being blocked at times during the p.m. peak while motel guests and apartment residents attempt to enter the motel entry and/or alley, creating unacceptable safety hazards as the 580 vehicles trying to move westbound on Camarillo during that same time potentially back up into the intersection. This could also potentially occur at other times during the day.[5] This is a significant adverse impact that the Draft EIR fails to analyze.[6] Because it was never analyzed, reducing the size of the Project does not remedy the deficiency.

[5] *Security features at the Project entrances could further exacerbate this problem, but we are provided no information on driveway security arrangements, further rendering the analysis inadequate.*

[6] *Now that we better know the location of Project ingress/egress, we would expect a similar problem for cars attempting to exit the retail parking on the north side of Camarillo, also about 200 feet west of Sepulveda. Most of that traffic would be expected to attempt to make a left turn onto Camarillo.*

This and other traffic-related items that have not been, but must be, addressed in the EIR are more fully detailed in Mr. Kassan's report.

Response to Comment No. 1-17

The project's traffic study was prepared in accordance with LADOT policies and procedures as well as those set forth in the City's CEQA Thresholds Guide. The comment speculates about potential significant impacts to driveways near the project and safety hazards at the Camarillo Street/Sepulveda Boulevard intersection. Standard engineering principles, in conjunction with LADOT practice, were applied to ensure safety at this as well as all other analysis locations. The comment raises the potential for safety concerns but does so without providing any evidence that the project would result in such impacts or specifying what criteria has been applied to reach such conclusory and speculative conclusions.

Detailed responses to all of the comments provided in Exhibit 9 of the comment letter are set forth below as Response to Comment No. 1-76 through 1-88. As stated in Response to Comment No. 1-82, the purpose of the traffic study was to analyze impacts to critical intersections that are part of the overall street system, which it did. The analysis of individual driveways and access points of individual properties is beyond the scope of the traffic study which was also reviewed and approved by LADOT (see the LADOT assessment letter provided in Appendix FEIR-B of the Final EIR). Nonetheless, the forecasted conditions at the driveways referenced in this comment are typical of operating conditions occurring in the City of Los Angeles and do not require specialized analysis. Further, the owners of the properties where the referenced driveways are located have not commented that the project presents any potential circulation or traffic impacts to their uses. In addition, the detailed design review that will be conducted as part of the City's standard building permit process, which takes into account the full range of traffic safety issues, including but not limited to access and circulation, would ensure that the significant impacts of the type addressed in this comment would not occur. Refer to Response to Comment No. 1-82 which provides the detailed response to the issues raised in this comment as set forth in Exhibit 9 of this comment letter.

Comment No. 1-18

B. The Internal Circulation Pattern For The Project Creates Significant Unmitigated Safety Hazards.

There is only one northbound exit out of the Project. According to the Draft EIR, "it is anticipated that at Sepulveda Boulevard, the City would restrict the private driveway/fire lane to right turn-only movements due to the proximity of the US-101 Freeway eastbound

on-ramp and La Maida Street and the channelization for these two roadways on Sepulveda Boulevard." (EIR, IV.K-2.) This means that all north-bound traffic – including commercial truck traffic from the market – must exit through the Camarillo/Sepulveda intersection. The impact of essentially routing all northbound commercial truck traffic through the Project onto Camarillo is not analyzed in the Draft EIR, in part, as Mr. Kassan notes, because we were provided little or no information about the driveways. Without this information, the Draft EIR failed to provide sufficient information about critical traffic and public safety issues associated with the proposed Project. While we now know the location of the entrances/exit and market loading dock, we are still not provided with this information.

A retail parking exit approximately 200 feet west of Sepulveda creates additional potentially significant safety hazards. Mr. Kassan noted the reasonable foreseeability of traffic post-Project effectively blocking the motel entrance and driveway on the south side of Camarillo. (Section VII.A, supra.) This same traffic will also foreseeably result in traffic attempting to exit the retail parking being backed up into what will now be an enclosed parking structure. (FEIR, II-9.) This will create public safety, circulation, and air quality hazards within the parking podium.

Response to Comment No. 1-18

As stated in Response to Comment No. 1-17, above, the project's traffic study was prepared in accordance with LADOT policies and procedures and was also reviewed and approved by LADOT. As such, the traffic study incorporated all of the project's operational circulation parameters including but not limited to those referenced in the comment (e.g., turning movement limitations). Thus, the traffic volumes forecasted in the EIR take into account anticipated roadway operating conditions at project buildout for all analyzed locations including, but not limited to the Camarillo/Sepulveda intersection.

Regarding truck traffic accessing the project grocery store, as shown in Figure II-1 of the Final EIR, the loading dock is angled to the northeast. This configuration would require large trucks to exit to and turn right onto Sepulveda Boulevard. They would not use Camarillo Street to exit the project site. If these trucks desire to head northbound, presumably via the 405 Freeway, they can travel south on Sepulveda Boulevard to access the 405 Freeway northbound on-ramp opposite Greenleaf Street. To minimize disruptions on-site, truck deliveries generally would be scheduled for off-peak periods.

As demonstrated repeatedly in response to all traffic related comments provided in this comment letter as well as all other comments submitted with regard to the project, all traffic and related public safety issues associated with the project are adequately and appropriately addressed in the EIR in accordance with all CEQA requirements. Further, all of the assumptions and data supporting the analysis and conclusions of the traffic study, as

well as all other components of the EIR, were made available to the public through multiple means in accordance with all standard City practices (i.e., posting of all EIR documents on the City's website, having all EIR documents available for review at the local public libraries, etc.). Therefore, the comment incorrectly states that project traffic travelling through the Camarillo/Sepulveda intersection was not analyzed in the EIR and that the project's traffic analysis was not made available to the public.

Refer to Response to Comment No. 1-17, above, for additional information regarding the project driveway referenced in the comment and the absence of public safety and circulation hazards related to project development. Based on the analysis presented in the EIR, less than significant air quality conditions are anticipated within the parking podium. Also refer to Response to Comment No. 1-80 and 1-82 which provide detailed responses to the issues raised in this comment as set forth in Exhibit 9 of this comment letter.

Comment No. 1-19

C. The Project Has A Significant And Unmitigated Impact On Parking.

Under CEQA Guideline § 15126.4(a)(l)(D), "[i]f a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." Several transportation mitigation measures proposed create their own potentially significant impacts. However, there is no discussion of the effects of those mitigation measures, as required by CEQA.

Mitigation Measure K.8 would result in the loss of 21 on-street, mostly unrestricted, parking spaces on Camarillo. The mitigation measure would also result in additional parking restrictions on Sepulveda. Mitigation Measure K.11 results in the loss of 3 on-street spaces on Ventura near Beverly Glen. Mitigation Measure K.14 will also result in additional parking restrictions on Ventura near Haskell. Nowhere, however, is there discussion of the potential impacts of the loss of these public parking spaces. The Draft EIR also fails to account for the loss of off-street, presumably unrestricted, parking along Peach and La Maida. As is clear from the attached Google earth photo, both streets are used for parking. (**Exhibit 8**.)

The closest the EIR comes to discussion of this impact is not in the Traffic and Circulation section of the EIR, but in the Other Environmental Considerations section at IV-12: "the project would provide a parking supply that would exceed City requirements." This borders, though, on being a non-sequitur. The issue is the loss of public, mostly unrestricted parking, some of it more than ½ mile from the Project. Simply saying that there will be on-site private parking to meet City policy does not meet the discussion requirements of

CEQA Guideline § 15126.4(a)(1)(D). This loss of on-street parking resulting from the implementation of mitigation measures must, as Mr. Kassan notes, be fully studied as a secondary impact.

Moreover, to state the Project "would provide a parking supply that would exceed City requirements" is misleading and incorrect. The requirement against which the Draft EIR compares the project is not the correct standard for CEQA analysis.

A project for purposes of CEQA "means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." CEQA Guideline § 15378(a). Here, regardless of the entitlements that are being sought at this time, the "whole of the action" for purposes of CEQA analysis must include ultimate conversion to condominiums.

According to the original Project description, "[t]he project's 500 multi-family residential units [now 399] could be developed either as condominiums or apartments." (EIR, II-7, n.1.)[7] In discussing the entitlements being sought at this time, the Project description goes on to say:

> "Pursuant to L.A.M.C. Section 17.01, the Applicant requests approval of Vesting Tentative Tract Map (Tract No. 061216) to merge the land into a single ground lot, with 9 airspace lots, to facilitate the creation of a mixed use development consisting of approximately 500 residential condominium units with approximately 55,000 square feet of commercial space." (EIR, II-16.)

[7] *The footnote goes on to say "[w]here applicable, this Draft EIR analyzes the unit type that would provide the most conservative (i.e., worst case) analysis of impacts." This statement is false and misleading to the decisionmakers and the public. Analysis of the parking for a multi-family project as condominiums, not as apartments, is the worst case scenario.*

A footnote goes on to say that the Applicant will "rent them in the near term." The Transportation section of the DEIR uses the City Planning Department's Residential Parking Policy for Division of Land – No. AA 2000-1 explicitly "to account for the possibility of condominium conversion at a later time." (EIR, IV.K-42.)

Thus, for purposes of CEQA analysis, conversion of the Project to condominiums is a reasonably foreseeable change in the environment and part of the "whole of the project." This makes the City Planning Department's Residential Parking Policy for Division of Land – No. AA 2000-1 the required standard for CEQA review, not the Los Angeles Municipal Code requirements for apartments. Under the correctly applied standard, the Project does not exceed City requirements. It provides the minimum amount necessary for

the new construction.[8] It does not, however, account for the loss of public on-street parking. The result is a net amount of Project parking less than that required by Policy No. AA 200-1, and a significant impact to parking that has not been mitigated.

[8] *Changes to the Project made over the course of review by the Neighborhood Councils do not change this conclusion. The revised Project still provides only the minimum required, if that, for new construction.*

Mitigation Measure K.15 does not sufficiently address the impacts from the loss of off-street parking. It is vague and undefined. The "Special Parking Congestion Zone" does not yet exist and the cost of implementation in unknown. The "new on- and off-street parking technology" is unspecified and unknown and may not be feasible. This total lack of detail makes it impossible to make informed decision as to the feasibility and efficacy of the mitigation measure.

Response to Comment No. 1-19

The commenter incorrectly asserts that the EIR fails to address the environmental impacts of the project's mitigation measures. The EIR provides the requisite analysis in all cases when the implementation of a mitigation measure would result in a change to the physical environment in accordance with all CEQA requirements. With regard to potential impacts related to the loss of on-street parking, the EIR did disclose that the removal of on-street parking in connection with the implementation of mitigation measures could have an effect on parking in the area, although this impact is concluded to be less than significant. (See Section VI, Other Environmental Considerations, page VI-12 of the Draft EIR.) The basis for this conclusion is that in the vicinity of the Camarillo Street/Sepulveda Boulevard intersection, there is metered on-street parking available along the east side of Sepulveda Boulevard between Camarillo Street and Moorpark Street, along the south side of Moorpark Street between Sepulveda Boulevard and Columbus Avenue, and along both sides of Columbus Avenue between Moorpark Street and Ventura Boulevard. Off-street parking is also available in the Galleria parking structure. In the vicinity of the Ventura Boulevard/Beverly Glen intersection, there is metered on-street parking available along both sides of Ventura Boulevard between Beverly Glen Boulevard and Van Nuys Boulevard. In light of other available on-street and off-street parking within reasonable walking distance (i.e., approximately 1/4-mile), the on-street parking removals that would result from the project were concluded to be less than significant. Moreover, the commenter presents no evidence to support the claim that the removal of these spaces would result in spillover parking into adjacent residential neighborhoods.

In addition, it should be noted that contrary to the comment, Mitigation Measure K-14 for the intersection of Ventura Boulevard and Haskell Avenue (North) does not include any parking removal or new parking restrictions. As the City has already prohibited parking along Peach Avenue and most of La Maida Street from 8:00 A.M. to 6:00 P.M., Monday

through Friday, the vacation of these two streets is also expected to result in a less than significant parking loss in the future.

Further, as stated in the comment itself, the conclusions of the EIR are correct in that the project would exceed City requirements with regard to the provision of residential parking when the project's residential units are rented as apartments and meet the City's policy standard when, and if, the residential units are sold as condominiums. The City's CEQA Thresholds address a shortfall of on-site parking compared to applicable codes and policies. The Project's on-site parking exceeds the LAMC parking requirements for multi-family residential development, meets the LAMC parking requirements for retail, and meets the un-codified Deputy Advisory Agency parking policy for condominiums. Further, as demonstrated in the EIR and summarized above, the project would not have a significant impact with regard to the loss of on-street parking and thus, the bases upon which the commenter asserts a significant parking impact is invalid and without technical merit. Although no mitigation measure is required to mitigate the less-than-significant impact of removing on-street parking to improve traffic flow, Mitigation measure K-15 establishes a fund to implement local parking and circulation improvements.

Comment No. 1-20

D. The EIR Fails To Account For Spillover Effects In The Adjacent Residential Neighborhood.

The Project creates a significant unmitigable impact at essentially every intersection along a one-third mile stretch of Sepulveda from the Ventura Freeway to Ventura Boulevard, including a signalized ingress/egress into the Sherman Oaks Galleria not mentioned in the Transportation Impact section of the EIR. According to Mr. Kassan, this will result in secondary spillover effect in the adjacent residential neighborhood that is unaccounted for in the EIR.

A secondary spillover effect is a change in traffic patterns. Traffic impacts on Sepulveda will be so bad that some of the neighborhood traffic that would, absent the Project, enter or exit the neighborhood from Sepulveda Boulevard via Camarillo or Moorpark will instead use Kester. This failure to account for this secondary effect means that not only will the impact to Sepulveda intersections remain significant and unmitigated, but impacts to the intersections at Kester/Ventura, Kester/Burbank, and Kester/Magnolia will be more severe than identified in the EIR. These failures of analysis render the EIR incomplete and insufficient for decisionmakers and members of the public to make informed decisions.

An additional spillover effect into the adjacent residential neighborhood is parking. To avoid Project-related congestion on Camarillo, some guests and customers will park in the

adjacent residential neighborhood. Changes from the Draft EIR to the Final EIR recognize this by indicating that both commercial and residential leases will prohibit parking in the adjacent residential neighborhood. (FEIR II-38.) We question the feasibility of this Project feature based on the practical inability to enforce such a provision, nor could businesses compel guests or patrons to comply with it. Short of time-limited parking or the creation of a parking permit zone, which itself would need to be disclosed, analyzed and mitigated, there is no practical or feasible means of addressing this additional spillover effect acknowledged in the Final EIR.

Response to Comment No. 1-20

Please refer to Response to Comment No. 1-19, above, regarding the project's less than significant impact with regard to the loss of on-street parking.

Project traffic impacts to the residential neighborhood east of Sepulveda Boulevard were not ignored as suggested by the commenter. These impacts were thoughtfully and carefully analyzed in accordance with the standard policies and procedures of LADOT. The traffic study and EIR disclosed impacts at all study intersections, including those along Sepulveda Boulevard and Kester Avenue. These two streets run along the western and eastern boundaries of the broader residential neighborhood referenced in the comment. Four such intersections were analyzed, which included three residential streets, namely, La Maida Street, Camarillo Street, and Moorpark Street. Significant, unavoidable impacts were determined for the intersections of La Maida Street and Sepulveda Boulevard, and Moorpark Street and Sepulveda Boulevard, as noted in the comment.

However, considering the many all-way stop sign controls and speed humps installed in this neighborhood to discourage cut-through traffic, LADOT did not assume that Project traffic would be cutting through this neighborhood. Further, due to the local-serving nature of the project grocery store and retail uses, it was estimated that approximately two percent of the trips attributable to these uses would be generated by residents within this general neighborhood and would thus use neighborhood streets. Based on the project's trip generation, applying the two percent forecast equates to 58 trips per day. Based on the LADOT criteria used to assess this type of impact for all projects located within the City, the 58 daily trips would result in a less than significant residential street impact.

To provide an additional layer of conservative analysis, in response to this comment, the issue was quantitatively analyzed assuming some Project traffic may cut through this neighborhood, despite the numerous stop signs and speed humps. This residential street analysis assumed that the two residential streets in this neighborhood that are likely to experience much or most of the cut-through traffic would be Camarillo Street and Moorpark Street, both of which intersect Sepulveda Boulevard. La Maida Street also intersects

Sepulveda Boulevard; however, given its closeness to the 101 Freeway eastbound on-ramp, it is difficult to travel across Sepulveda Boulevard at that location and, therefore, was assumed to be an unlikely candidate for use by any meaningful amount of project traffic. Applying LADOT's standard quantitative residential street criteria, project trips would result in a less than significant impact on both streets. The analysis also considered the potential for increasing congestion in the area to also induce additional cut-through traffic from other sources. While such additional traffic would exacerbate conditions in this neighborhood, even with the additional cut-through due to others, the project's impact would still be forecasted to be less than significant. Refer to Response to Comment No. 1-85 which provides the detailed response to the issues raised in this comment as set forth in Exhibit 9 of this comment letter.

Regarding the signalized intersection of Galleria Gateway (private street) and Sepulveda Boulevard, this was not assumed to be a capacity constraint location by LADOT and was not analyzed further.

As the analysis presented above confirms the conclusion that the project would have a less than significant residential street impact, the commenter's assertions regarding the deficiencies of the EIR are invalid and without technical merit.

The analysis presented in the EIR demonstrates that parking in the neighborhood adjacent to the project site is not anticipated as on-site parking is sufficient to meet the needs of the project. The commenter misrepresents the analysis in the Final EIR by incorrectly equating the addition of a mitigation measure to further reduce less than significant impacts in recognition of the sensitivity of this issue to the neighborhood with an acknowledgment of an impact. As no nexus exists between the commenter's alleged impact and a CEQA required mitigation measure, issues relating to the feasibility of this voluntary mitigation measure have no standing under CEQA.

Comment No. 1-21

E. The EIR Underestimates Significant Impacts By Undercounting Traffic.

According to the EIR, "[t]he project site was previously graded as part of the removal of a four-story earthquake-damaged office building on the northeast portion of the site, 24 multi-family residential units in three two-story buildings on the southeast portion of the site, and 10 single-family detached residential units on the western portion of the site." (EIR, III-I.) The trip generation table, however, takes trip credits for the 35 dwelling units that have not existed or been occupied for years. This undercounts the net trip generation and underestimates the true impact of the Project. (See Table IV.K-8.)

Table IV.K-8 implicitly recognizes that this raises a red flag because a footnote to the table notes that the trip credit "was taken for the residential uses removed as allowed per LADOT Policy." This does nothing to address the underestimation of impact, though. All it does is say that LADOT policy, even if it were appropriately applied by the applicant, underestimates impacts.

The footnote to the table goes on to say that "to consider the worst-case scenario, the office building, (which had been vacant prior to its removal) was not included in the baseline analysis or given credit for its trip generation toward the project trip generation." The table does not consider the worst-case scenario as it purports to do. A worst-case scenario would exclude the former residential uses from the baseline as well.

Response to Comment No. 1-21

Project trip generation was determined according to standard LADOT policy and methodology. Trip credits are allowed for existing uses removed within two years of the approval of the traffic study Memorandum of Understanding, which was approved in 2008. The existing residential units were removed from the site in 2007, which is within the two-year time frame. Even if no trip credits were allowed for the removal of the existing residential uses, the conclusions of the project's traffic analysis would not change.

Comment No. 1-22

F. The EIR Uses An Incorrect Future Study Year.

The EIR uses 2013 as the future study year. As Mr. Kassan's February 2013 correspondence indicates, the City cannot use the current year as the future study year. The future study year is supposed to take into account completion and full operation of the Project. Even the Crain & Associates letter in Appendix H-1 suggests a future study year three years out – one year beyond the Project becoming operational. A new traffic study must be prepared and circulated as part of a recirculated Draft EIR, using 2016 as the future study year.

Response to Comment No. 1-22

Given the time that has passed since publication of the Draft EIR, the anticipated timing of construction and buildout year for the proposed project have changed. Specifically, the EIR anticipated a buildout year of 2013 that is now anticipated to occur in 2015. As such, an analysis has been prepared to address the extended buildout year of 2015 (see Appendix D to this document), and to determine whether the extended buildout year would result in any new significant impacts or a substantial increase in a significant

impact previously identified in the EIR. With regard to traffic issues, the updated traffic analysis concludes no change in conditions with project buildout occurring in 2015 (i.e., the project would result in the same significantly impacted locations for the year 2015, without and with mitigation, as determined for the year 2013).

Comment No. 1-23

G. The True Transportation Impacts Of The Project Render It Inconsistent With The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan.

Goal 12 of the Specific Plan seeks "a well maintained, safe, efficient freeway, highway and street network." As noted above and in the Kassan Report, the Project creates potentially unsafe conditions at the Camarillo/Sepulveda intersection, rendering the Project inconsistent with this Goal.

According to Policy 13-1.4, "new development projects should be designed to minimize disturbance to existing flow with proper ingress and egress to parking." Again, as noted above in Section VLA, the Project potentially creates a severe disturbance to the existing ingress and egress to parking accessible only from the alley west of Sepulveda and south of Camarillo. This results in an inconsistency with Policy 13-1.4. The Project also potentially creates ingress/egress disturbances at the signalized ingress/egress to the Sherman Oaks Galleria on Sepulveda between Moorpark and Camarillo that are not analyzed in the EIR.

According to Policy 13.2-1, "[n]o increase in density and intensity shall be effectuated by zone change, variance, conditional use, parcel map, or subdivision unless it is determined that the transportation system can accommodate the increased traffic generated by the project." The Project results in significant and unavoidable impacts at five intersections, even if all of the mitigation measures proposed are determined to be feasible or alternative measures of equivalent effectiveness are provided. (EIR,I-88.) No such determination can be made for a project that creates such a significant and unavoidable impact to traffic.

Goal 15 seeks "a sufficient system of well-designed and convenient on-street parking and off-street parking facilities throughout the plan area." The Project removes at least 21 on-street parking places and places additional time restriction on an undisclosed number of other on-street parking spaces without sufficient mitigation. This renders the Project inconsistent with Goal 15.

Response to Comment No. 1-23

It should be noted that the Project mitigation measure for the Camarillo Street/Sepulveda intersection improves the efficiency of this intersection and results in capacity beyond that needed by Project traffic and available for use by others. Thus, there is no basis to support the commenter's opinion that the project would create potentially unsafe conditions at the referenced intersection. As such, the conclusions of the EIR regarding project consistency with regard to Goal 12 of the Specific Plan remain valid and unchanged.

As stated in Response to Comment No. 1-5, above, an inconsistency between a project and some land use controls does not in itself mandate a finding of a significant impact. Inconsistency with a policy is merely one factor to be considered in determining whether a particular project may cause a significant environmental effect. Moreover, with regard to Policy 13.2-1, the fact that the Project results in significant, unavoidable impacts at five intersections does not mean that the transportation system cannot accommodate project traffic.

Objective 13-2 states: To insure that the location, intensity and timing of developed transportation infrastructure utilizing the City's streets and highways standard.

Policy 13.2-1 states: No increase in density and intensity shall be effectuated by zone change, variance, conditional use, parcel map, or subdivision unless it is determined that the transportation system can accommodate the increased traffic generated by the project.

Program: The decision-maker shall adopt a finding which addresses this factor as part of any decision.

Program: Require that new development projects incorporate TSM and/or TDM programs with Citywide Land Use Transportation Policy

The "transportation system" referenced in the Policy 13.2-1 is the transportation system of the entire Community Plan area. Objective 13-2 specifically refers to contemporary street and highway standards; i.e., the required street widths and standards set forth in the Department of Public Works Standard Street Dimensions, Standard Plan S-470-0. Policy 13.2-1 does not prohibit approval of a zone change or any other permit for a project that may cause a significant unavoidable traffic impact. Rather, in making the finding required by Policy 13.2-1, the traffic impacts generated by a specific project are one of many factors to be considered by the decision-maker. Other factors the City Planning Department may consider in making the finding required by Policy 13.2-1 include: (1) the

density and intensity of development according to the applicable Community Plan Land Use Designation; (2) the TSM or TDM programs of the specific project in question; (3) the historical context of the project site *vis-à-vis* the Community Plan; (4) the scope of transportation infrastructure improvements being made by a specific project; or (5) whether the specific project is implementing improvements consistent with contemporary street standards and dimensions.

Consistent with Policy 13.2-1 Program requirements, the Project incorporates a TDM plan. At minimum, the Project TDM plan shall include following:

- Provide information regarding discounted bus passes to residential tenants at the time of lease execution.
- Designate a Transportation Coordinator that is part of the property management team on-site.
- Coordinate with area businesses to maximize leasing to their employees as central focus of marketing strategy.
- Provide preferential parking for carpools and vanpools for retail employees.
- Create and deliver personal trip plans (transit, carpool, vanpool, bicycle, walking) for each new resident and employee and provide updates upon request.
- Deliver transportation information to residents in project communications including website/page.
- Host semi-annual events to promote ridesharing and transit usage.
- Install Transportation Information Display(s) in common area(s).
- Wire residential units for high speed internet access.
- Unbundle the leasing of dwelling units from parking spaces.

Despite 5 unmitigated traffic impacts at local intersections, the Project implements important transportation infrastructure improvements and mitigation such as ATSAC implementation, street widening, and new turn lanes. The project also provides $300,000 in direct local funding to parking, transportation, and circulation improvements in the immediate area of the proposed Project. All of these efforts are consistent with insuring that street and highway standards are met and maintained. The proposed Project is required to improve impacted streets to Standard Street Dimensions prior to occupancy.

The Project site Community Plan land use designation is Regional Commercial. This designation already assumes an increase in density and intensity associated with Regional Commercial development. Although the Project seeks a zone change to bring the site-zoning into consistency with Community Plan, the proposed Project is not increasing the intensity planned for by the Community Plan by virtue of the site's Regional Commercial designation.

The Proposed Project is consistent with Housing and Transportation elements of the General Plan which discuss clustering and compact development. The proposed Project is a clustered development. Current Planning at Local, State and Federal level push for compact development. According to Transit Cooperative Research Program Report 128: *Effects of TOD on Housing, Parking and Travel sponsored by the Federal Transit Administration*:

> "This research helps confirm what had been intuitively obvious: TOD housing produced considerably less traffic than is generated by conventional development." The anticipated level of reduction was discussed on page 9 of Growing Cooler: The Evidence on Urban Development and Climate Change which states "When viewed in total, the evidence on land use and driving shows that compact development will reduce the need to drive between 20 and 40 percent, as compared with development on the outer suburban edge with isolated homes, work places and other destination. It is realistic to assume 30 percent cut in VMT with compact development."

Compact development such as the proposed Project has the potential to reduce vehicle miles traveled by as much as 40 percent. (Growing Cooler: *The Evidence on Urban Development and Climate Change*, page 9.)

The Project's historical context *vis-à-vis* the Community Plan involves some unique factors. The Community Plan did not anticipate the I-405 Expansion or the Orange Line, both of which are significant improvements on the transportation system of the Community Plan area. The Project location adjacent to the I-405 and near the Orange Line is appropriately located within the area where the benefits of the Orange Line are already occurring and the I-405 expansion project benefits will occur.

Throughout the City, projects have been approved where their traffic demands have been accommodated by the street system, even though individual intersections may be determined to be unavoidably and significantly impacted. As Policy 13.2-1 indicates, the decision-makers determine whether a project's traffic can be accommodated or adopt the necessary findings to address this condition. Such would be the case with the Project. It should also be noted that the Project impacts on the freeway and transit systems, both part

of the transportation system, were found to be less than significant. In addition, while the project would result in significant traffic impacts, the mitigation measures proposed by the project would improve the operation of many of the intersections in the project vicinity when compared with future conditions without the project. Furthermore, the Project will be implementing a TDM Program, which is identified as a program to be incorporated by new development as part of Policy 13-2.1.

Please refer to Response to Comment No. 1-19 regarding the project's less than significant impact with regard to the loss of on-street parking. Based on the analysis presented therein, the project is consistent with Goal 15 of the Specific Plan.

Comment No. 1-24

VIII. A CONCLUSION OF NO SIGNIFICANT FIRE PROTECTION IMPACTS IS NOT SUPPORTED BY SUBSTANTIAL EVIDENCE.

In March 2012, it came to the public's attention that the Los Angeles Fire Department has "for years released misleading data on the response time of firefighters." (See **Exhibit 10**, generally.) This includes response times in the Valley. (**Exhibit 11**.) This includes the time frames referred to in the correspondence from the Planning Section of the LAFD contained in an Appendix to the Draft EIR. What corrected data apparently show is that response times have not met federal standards for several years, and continue to deteriorate. Traffic conditions impact response time and this new and significant knowledge of at least several years of substandard response time – times that will continue to deteriorate – creates new potentially significant impacts that must be analyzed in a recirculated Draft EIR.

Response to Comment No. 1-24

Section IV.J.2, Public Services—Fire Protection, of the Draft EIR analyzes potential project impacts with regard to the delivery of fire protection services. The analysis presented in the Draft EIR is based on a number of factors including the distance between the project site and nearby fire stations, the availability of emergency access during project construction and operations, the adequacy of existing fire facilities to serve the project area, fire flow requirements, as well as response times. The conclusion of the analysis would remain unchanged even with updated emergency response time data as the assessment of the adequacy of existing fire facilities is based on Fire Station 88 being located within 0.4 mile of the project site (compared to LAFD's recommended response distance of 1.5 miles), the limited number of additional calls for service generated by the project, and LAFD's review of the project's site plans before construction of any portion of the project. In addition, through compliance with the City's Fire and Building Codes, the proposed project would adequately address fire safety, access, and fire flow requirements.

Even with updated response time data, the proposed project would still have a less than significant impact with regard to emergency response times since fire trucks would be able to navigate through the project area by using a number of standard operating procedures such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. In addition, during project construction, traffic management personnel (flag persons) would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access thereby ensuring that traffic flow would be maintained on street right-of-ways.

Comment No. 1-25

IX. THE CUMULATIVE IMPACTS ANALYSIS IS INADEQUATE AND OUTDATED.

The cumulative impacts analysis for transportation fails to take into account the I-405 Sepulveda Pass Improvements Project, which will widen the freeway and make other improvements north to US-101. See http://www.metro.net/projects/I-405, click "overview" and "interactive maps" (incorporated herein by this reference). Construction will occur through 2013, likely having impacts to Sepulveda Blvd. and circulation on other area streets that will have overlapping and cumulative impacts with Project construction. None of that was disclosed, analyzed or mitigated, thus further rendering the EIR defective under CEQA.

The list of related Projects is almost 4 ½ years old and should be updated and the cumulative impact analysis revised. The Project cannot hide behind a 2004 Notice of Preparation as a basis for failing or refusing to include the I-405 improvements or other more recent projects in the cumulative impacts list. Administrative agencies not only can, but should, make appropriate adjustments, including to the baseline, as the environmental review process unfolds. No purpose would be served, for example, if an agency was required to remain wedded to an erroneous course and could only make a correction on remand after reversal on appeal. Citizens for East Shore Parks v. State Lands Commission (2011) 202 Cal.App.4th 549.

Moreover, the preparers of the Draft EIR knew or should have known of the I-405 Project at the time the related projects list was generated in order to determine cumulative impacts. The related projects list was not generated until October 2008. (Table III-I.) The Draft EIR for the I-405 project was released in May 2007. (**Exhibit 12**.)

Response to Comment No. 1-25

The project's traffic analysis is conservative, and contains an expansive related projects list. The related projects database in the traffic study and EIR was large and

extensive, analyzing 51 related projects within an approximate 3.5-mile radius of the Project site, which is substantially greater than the 1.5 to 2.0 mile radius typically used in most traffic studies. While it is expected that some of the related projects have not proceeded or have been downscaled due to the economic recession that began in 2008, the trips from all of these projects were still included in the analysis of future traffic volumes. In addition, a conservative ambient traffic growth factor has been incorporated into the analysis. Therefore, the future traffic volumes at the study intersections have been appropriately and accurately analyzed and have not been underestimated as suggested by the commenter. Refer to Response to Comment No. 1-77, 1-78, and 1-79 for additional detailed information regarding the project's cumulative traffic analysis.

It is also important to note that in accordance with CEQA Guidelines Section 15151, an evaluation of the environmental impacts of a project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Related projects lists are continuously changing and it is not reasonable to continuously modify an analysis to provide for related projects that may be removed, reduced or added to a related projects list. Thus, as indicated above, the EIR provided a conservative ambient growth factor to account for potential modifications to the list of related projects. This approach is adequate, complete and reflects a good faith effort at full disclosure. It is also important to note that the commenter provides no evidence that demonstrates that a change to the related projects list has occurred that results in significant impacts not already identified in the EIR.

Regarding the 405 Freeway Improvement Project, this is a construction project that is temporary in nature and with short-term construction effects. Once completed, the 405 Freeway Improvement Project is expected to improve capacity along the Sepulveda Pass corridor and have long-term transportation benefits. For purposes of a conservative analysis, no capacity improvement or other similar credit attributable to this freeway project was assumed in the EIR.

It should also be noted that the 405 Freeway Improvement Project will not have a capacity impact at any of the study intersections and, therefore, will not change Project impacts at any of the study intersections. Furthermore, the EIR concluded that the project would not significantly impact the 405 or 101 Freeways under year 2013 conditions. This is the same conclusion for the Project as indicated in the updated 2015 analysis (see Response to Comment No. 1-22). Since the freeway project is currently scheduled for basic completion in mid-2014, the operational impacts of the Project will not be within the construction time frame of the freeway project.

Although the worksites for the two projects are not contiguous, the project will coordinate its construction activities with the construction activities of the freeway project.

The goal will be to address and coordinate as feasible potential cumulative disruptions to transportation mobility, such as temporary lane or street closures, detours, truck access patterns and unanticipated roadway conditions. The Project coordination effort will include Caltrans, Metro, LADOT, transit operators, law enforcement, and other appropriate transportation entities. This coordination effort will also be in concert with the provisions of the Construction Management Plan, as required by Mitigation Measure K-3 set forth in the EIR.

Comment No. 1-26

X. THE DRAFT EIR IMPROPERLY FAILS TO ANALYZE A REASONABLE RANGE OF ALTERNATIVES.

A. The Legal Standard For Alternatives Analysis.

"The purpose of an EIR is to give the public and government agencies the information needed to make informed decisions, thus protecting 'not only the environment but also informed self-government.' [Citation omitted.]" In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1162. Mitigation and alternatives discussion forms the core of the EIR. Id.

The CEQA Guidelines state that an EIR must "describe a range of reasonable alternatives to the project... which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project..." CEQA Guidelines § 15126.6(a).

"An agency may not approve a project that will have significant environmental impacts if there are feasible alternatives or feasible mitigation measures that would substantially lessen those effects…. CEQA requires lead agencies to include within EIRs potentially feasible alternatives that, if adopted, would avoid or substantially lessen the otherwise significant environmental effects of the proposed projects." Lincoln Place Tenants Ass'n v. City of Los Angeles (2007) 155 Cal.App.4th 425, 445.

"It is the agency's responsibility to provide an adequate discussion of alternatives." CEQA Guidelines § 15126(d). That responsibility is not dependent in the first instance on a showing by the public that there are feasible alternatives. If the agency concludes there are no feasible alternatives, it must explain in meaningful detail in the EIR the basis for that conclusion." Preservation Action Council v. City of San Jose (2006) 141 Cal.App.4th 1336, 1351. Bare conclusions or opinions will not suffice. Id.

Response to Comment No. 1-26

The comment sets forth citations from the CEQA Guidelines as well as case law with regard to the requirements that apply to an EIR's alternatives analysis. The analysis of alternatives presented in Section V, Alternatives, of the Draft EIR, meets all of the requirements identified in this comment. Further, none of the points raised in the comments that follow changes this conclusion. As such, the alternatives analysis presented in the Draft EIR is, and remains, fully compliant with all applicable CEQA provisions and requirements.

CEQA sets forth other important factors in evaluating alternatives that the Comment does not reference, such as:

- CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR.
- The analysis of alternatives is evaluated against a rule of reason. (Guidelines §15126.6, subds. (a), (f).)
- An EIR need not evaluate alternatives that cannot achieve the fundamental goals and purposes of the proposed project.
- To be legally sufficient, the consideration of project alternatives in an EIR must permit informed agency decision-making and informed public participation.
- An agency's discretion to choose alternatives for study should be upheld unless they are "manifestly unreasonable."

Alternatives are suitable for study in an EIR if they meet the following thresholds: (1) substantially reduce or avoid the project's significant environmental impacts; (2) attain most of the basic project objectives; (3) are potentially feasible; and (4) are reasonable and realistic. (Guidelines § 15126.6, subds. (a), (c).) Candidate alternatives that do not satisfy these requirements may be excluded from further analysis.

Comment No. 1-27

B. The Draft EIR Bases Its Alternatives Analysis On Misleading And Incorrect Information.

An EIR that bases it alternatives on incorrect information misleads the public and government agencies and prevents informed decision making. It also precludes the establishment and analysis of a reasonable range of alternatives required by CEQA. In this regard, the alternatives analysis here misleads the public and prevents informed analysis of

a reasonable range of alternatives because Alternative B, Development in Accordance with Existing Plans/Regional Commercial Use Alternative, uses incorrect information.

The EIR states that "under this alternative, the inconsistent zoning on the site [CR, R3, R1, PF, and P zones] would be rezoned to C2 in conformance with the land use designation." (EIR, V-25.) This statement incorrectly implies that all of the current zoning designations for the Project site are inconsistent with the Regional Center designation in the Specific Plan or the Community Plan.

Pursuant to the Community Plan, each plan land use category indicates the corresponding zones permitted by the Plan unless further restricted by the Plan text, footnotes, adopted Specific Plans or other specific limitations on discretionary approvals." (SOCP, II-4.) The CR zone and R3 zone are expressly allowed in the Community Plan Summary of Land Use Table after page III-26 of the SOCP. There are no restrictions in the Specific Plan that would prevent the use of those two zones.

Use of a C2 zone here to establish the alternative is nothing more than an arbitrary choice based on a false assertion as to what zones are consistent or inconsistent with the Community Plan and Specific Plan.

Response to Comment No. 1-27

The commenter is incorrect in its assessment of the adequacy of the EIR's alternative's analysis. The analysis of alternatives as presented in the Draft EIR meets all CEQA requirements and the assumptions used to formulate and analyze each of the alternatives are reasonable. The alternatives analyzed also provide a reasonable range of alternatives. Specifically, the alternatives include a No Project Alternative, an Existing Plan/Regional Commercial Use Alternative, an All Residential Use Alternative and an Alternative Site Alternative.

In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), a No Project Alternative may discuss "predictable actions by others, such as some other project if disapproval of the project under consideration were to occur." CEQA Guidelines Section 15126.6(e)(3)(C) further states that the No Project Alternative should project "what would reasonably be expected to occur in the foreseeable future if the project were not approved based on current plans and consistent with available infrastructure and community services." Based on this guidance, Alternative B. Development in Accordance with Existing Plans/Regional Commercial Use Alternative was formulated. The project site's land use designation under both the Community Plan and the Ventura-Cahuenga Boulevard Corridor Specific Plan is Regional Commercial. As such, Alternative B, Development in Accordance with Existing Plans/Regional Commercial Use Alternative, was

defined as consisting of land uses that respond to the intent of the Community Plan and Specific Plan to develop the project site with regional commercial uses. Of the available corresponding zones, the City's C2 zoning designation was selected as the basis for defining the land uses that would occur under Alternative B as the C2 zoning designation includes permitted uses that would be specifically characterized as regional commercial in character. While the Community Plan identifies other corresponding zoning designations that could occur on the project site, the development of these uses (e.g., residential [R3] or commercial recreation [CR] uses) are not land uses that are typically characterized as regional commercial uses. Hence they were appropriately excluded from consideration for purposes of defining the land uses that comprise Alternative B. As such, Alternative B was appropriately defined as commercial uses consistent with the project site's Community Plan and Ventura-Cahuenga Boulevard Corridor Specific Plan Regional Commercial land use designation.

Comment No. 1-28

C. The Project's Impacts Relative To The Residential-Only Alternative Are Greater Than Disclosed By The Draft EIR.

While the Draft EIR is correct in its ultimate conclusion that the all-residential alternative, Alternative C, is the environmentally superior alternative, some of the analysis is problematic. The appropriate analysis shows even greater comparative impacts between the Project and Alternative C.

Response to Comment No. 1-28

The analysis of Alternative C, All Residential Use Alternative, as presented in the Draft EIR is correct and appropriate and meets all CEQA requirements. The "problematic" nature of the analysis asserted by the commenter merely reflects their opinion. The definition of Alternative C and comparative analyses presented in the Draft EIR reflect the Lead Agency's determinations.

Comment No. 1-29

At the outset, it is unclear why implementation of Alternative C requires R5 zoning. R4 zoning, for example, is also consistent with the Regional Center land use designation and is encompassed within the C2 zoning that already exists for a portion of the site. L.A.M.C §§ 12.14.A.1, 12.13.5.A.1.

Response to Comment No. 1-29

The commenter incorrectly interprets the description of Alternative C as presented in Section V.C.1, Description of the Alternative, on page V-46, of the Draft EIR. The use of the word "require" in the last sentence is correctly referring to the fact that to develop the project site with 500 residential units would require a zone change. The reference to R5 zoning is solely to establish the basis for determining the number of residential units that could be developed on the project site under Alternative C.

Comment No. 1-30

1. Aesthetics.

The difference in aesthetic impact between the Project and Alternative C is far greater than indicated in the Draft EIR. The analysis in the EIR, without substantial evidence behind it, calls the comparative impacts "similar." As noted above, however, the Project will have significant and unmitigated aesthetic impacts as a result of its height and scale. By contrast, Alternative C is one-quarter less in height, is closer to the visual massing of neighboring structures to the south, and will have a greater effect of "stepping down" development the more one moves north on Sepulveda from Ventura to the northern end of the Regional Commercial designation. As such, the aesthetic impacts of the Project are far greater than this alternative.

Response to Comment No. 1-30

The comment merely sets forth the commenter's opinion regarding the relative aesthetic impact of the project compared to the alternative. The purpose of the alternatives analysis is to consider alternatives that could substantially reduce or avoid the *significant* impacts of the proposed project. The project does not generate any significant aesthetic impacts. The analysis presented on page V-47 of the Draft EIR provides substantial evidence to support the EIR's conclusion of a similar aesthetic impact for the project and Alternative C. Based on the analysis presented in the Draft EIR, the conclusion of a similar aesthetic impact reflects the analytic trade-off of shorter building heights under Alternative C (which results in a reduced aesthetic impact) and a less enhanced pedestrian environment along Sepulveda Boulevard and Camarillo Street under Alternative C (which results in an increased aesthetic impact).

Comment No. 1-31

2. Land Use.

Similarly, the EIR states the land use impacts of the Project and Alternative Care similar, except that the alternative has greater impacts with respect to land use compatibility and consistency with the applicable land use plans. This is not just deceptive; it is incorrect.

First, by saying that the impacts are greater for Alternative C with respect to land use compatibility and consistency with the applicable land use plans, the EIR implies a different level of significance for the Alternative C with respect to these impacts. The EIR, though, refers to both as having less than significant impacts in this area.

Moreover, as explained more fully in Sections III.B, VI, and VII.F above, the Project is inconsistent with all applicable Plans: the General Plan Framework Element, the Community Plan, and the Specific Plan. As such, the impacts to land use are significant, unmitigated, and far greater for the Project than the alternative.

Notwithstanding that the General Plan Framework Element does not apply to site-specific projects, the analysis of the Project here in the context of the General Plan Framework that "this alternative would not meet the objectives of the General Plan Framework to maintain and enhance existing businesses in the City and establish a balance of land uses that provide for commercial development to assure maximum feasible environmental quality" is unsupported by any evidence in the record. (See EIR, V-53 -54.) First, maintenance and enhancement of existing businesses requires existing businesses. The Project site is a vacant lot. With respect to existing off-site businesses, there is no evidence that an all-residential alternative would not provide an enhancement to nearby businesses in the Galleria and along Ventura Blvd. Common sense would actually suggest the opposite. Additionally, the balance of land uses called for in the General Plan Framework refers to regional balance. Nowhere is any evidence provided of a commercial/residential imbalance as a result of a residential-only alternative.

We also question how the preparers of the EIR came up with this random sentence, "[f]inally, this alternative would not reflect the high-quality development promoted by the Ventura-Cahuenga Boulevard Corridor Specific Plan." (EIR, V-53.) The description of the alternative is only one paragraph long and provides no rendering, although the description of the alternative does provide that "It is assumed that the site design (e.g., access, building layout, and configuration) would be similar to that of the project." (EIR, V-46.) Given this EIR assertion of general similarity between the Project and the alternative, this results in the EIR taking the position that the Project would also not reflect the high-quality development promoted by the Specific Plan, and is thus inconsistent with the Specific Plan.

With respect to comparative analysis in the context of the Specific Plan, the Draft EIR ignores the obvious. The Project requires variances from the Specific Plan. Alternative C does not. From this fact alone, the Project on its face has greater Land Use impacts than the alternative.

Response to Comment No. 1-31

An adequate alternatives analysis under CEQA requires a determination with regard to the following: (1) whether the impact of the alternative is significant or less than significant, and (2) whether the impact of the alternative is greater, similar, or less than that of the proposed project. The purpose of the alternatives analysis is to consider alternatives that could substantially reduce or avoid the *significant* impacts of the proposed project. The project does generate any significant land use impacts.

As concluded in the EIR, and reiterated above in Response to Comment No. 1-5, 1-11 through 1-16, and 1-22, overall, the proposed project would be consistent with the relevant goals, objectives, and policies of the General Plan Framework Element, the Community Plan, and the Specific Plan. Therefore, the commenter's conclusion that the impacts of the project are far greater than those of the alternative is incorrect. Further, the commenter's conclusion that no substantial evidence is provided in support of the cited statement regarding the alternative's comparative impacts with regard to the General Plan Framework is also incorrect and misconstrues the intent of the cited statement. The substantial evidence the commenter states is lacking is actually provided in the sentences that follow the cited text on page V-54 of the Draft EIR. The concept of high quality development as referenced in the statement regarding Alternative C's relationship to the Specific Plan is based on reduced pedestrian enhancements along Sepulveda Boulevard and Camarillo Street (see Response to Comment No. 1-30). Further, land use consistency with the Specific Plan is based on the extent to which the project or an alternative implements the intent and policies of the Specific Plan and is not simply or solely based on the project's request for Specific Plan exceptions (which are incorrectly referenced as variances by the commenter). In closing, the EIR's conclusion regarding the land use impacts of Alternative C is based on substantial evidence set forth in the EIR and analysis is not provided in this comment to alter this determination.

Comment No. 1-32

D. A Reasonable Range Of Alternatives Must Include A Scaled-Back Version Of The Project That Is In Accordance With Existing Plans.

Reading the description of Alternative B in a vacuum, one would get the impression that only commercial uses are allowed in the C2 zone. This impression would not be correct.

The Los Angeles Municipal Code allows both commercial and residential uses in the C2 zone, as well as the CR zone, subject to the restrictions of the Specific Plan.

This leads to the obvious. A reasonable range of alternatives must include a mixed-use version of the Project scaled back in accordance with existing plans. Such an alternative is presumptively feasible and addresses the applicant's desire to have both commercial and residential components in the Project. "It is the agency's responsibility to provide an adequate discussion of alternatives." CEQA Guideline § 15126(d). "That responsibility is not dependent in the first instance on a showing by the public that there are feasible alternatives. If the agency concludes there are no feasible alternatives, it must explain in meaningful detail in the EIR the basis for that conclusion." Preservation Action Council v. City of San Jose (2006) 141 Cal.App.4th 1336, 13 51. Bare conclusions or opinions will not suffice. Id.

A mixed use alternative that does not require exceptions to the existing plans also satisfies the demands of many members of the community who spoke of the desire for a project that does not require exceptions, as emphasized by the public during the process before the Neighborhood Councils and submitted comments to Draft EIR on the same subject.

Response to Comment No. 1-32

The description of Alternative B as presented on page V-25 of the Draft EIR clearly provides the logic upon which the determination was made to base the definition of Alternative B in terms of the City's C2 zoning designation. As stated in Response to Comment No. 1-28, above, CEQA only requires the analysis of a reasonable range of alternatives, a provision the EIR is in full compliance with, and not every single alternative that could occur on the project site. The impacts of the alternative suggested in the comment would fall within the range of impacts associated with Alternatives B and C, which further supports the determination that the EIR provides a reasonable range of alternatives.

Furthermore, a mixed use project that complies with the definition of mixed-use as set forth in the Specific Plan was discussed in Response to Comment No. 7-3 of the Final EIR. As indicated therein, a mixed use project comprised of 216 residential units and 116,000 square feet of floor area would actually increase the number of daily and P.M. peak-hour trips when compared with the project. In addition, in response to public comments, Crain and Associates has also evaluated another mixed use alternative that would not require exceptions and that would be within the Floor Area Ratio permitted for the site under the Ventura-Cahuenga Boulevard Corridor Specific Plan. This alternative consists of 277 multiple-family dwelling units, 45,000 square feet for a grocery store and 7,000 square feet of retail use. (This alternative would not meet the mixed-use definition set forth under the Specific Plan). This alternative would generate 4,237 net trips per day,

including 204 A.M. and 405 P.M. peak-hour trips. As shown in the memorandum from Crain & Associates attached hereto, prior to mitigation, this alternative would result in significant impacts at 10 of the 11 study intersections that would be significantly impacted by the project. In addition, with mitigation, this alternative would result in significant and unavoidable impacts at the same five intersections that would be subject to significant and unavoidable impacts under the project. Thus, this alternative would not eliminate the significant intersection impacts associated with the project.

Comment No. 1-33

XV. THE FINDINGS REQUIRED FOR THE EXCEPTIONS SOUGHT FROM THE VENTURA-CAHUENGA BOULEVARD SPECIFIC PLAN CANNOT BE MADE.

The Project requires numerous exceptions from the Specific Plan. The findings necessary for any exception are:

> "(a) That the strict application of the regulations of the specific plan to the subject property would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of the specific plan;
>
> (b) That there are exceptional circumstances or conditions applicable to the subject property involved or to the intended use or development of the subject property that do not apply generally to other property in the specific plan area;
>
> (c) That an exception from the specific plan is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other property within the specific plan area in the same zone and vicinity but which, because of special circumstances and practical difficulties or unnecessary hardships is denied to the property in question;
>
> (d) That the granting of an exception will not be detrimental to the public welfare or injurious to the property or improvements adjacent to or in the vicinity of the subject property; and
>
> (e) That the granting of an exception will be consistent with the principles, intent and goals of the specific plan and any applicable element of the general plan." (L.A.M.C. §11.5.7)

These findings are virtually identical to those required for a variance under L.A.M.C. § 12.27. In essence, exceptions are variances by another name.

Response to Comment No. 1-33

The applicant's representatives submitted proposed findings and provided the evidentiary support the Specific Plan exception findings. The EIR does not contain all the evidence necessary to make these finding because Specific Plan exception findings are part of the discretionary approval process, and while the findings relate to some extent to CEQA impacts, the findings themselves and much of the evidence supporting them is appropriately included in the Project applications and the City's land use findings, not the EIR. To the extent that land use plan consistency and CEQA analysis overlaps, the project's land use impacts have already been fully addressed.

As demonstrated by the materials submitted to the City, the required findings for the exceptions to the Specific Plan can be made.

Comment No. 1-34

Although the Draft EIR merely notes the need for these exceptions without analysis, it is abundantly clear from the Draft EIR and the additional analysis provided herein that findings (d) and (e) cannot be made for this Project. The traffic impacts alone ensure that finding (d) cannot be made. The welfare of the residential neighborhood to the east[9] will clearly be damaged by the significant unmitigable impacts to intersections along Sepulveda Blvd., Ventura Blvd., and Kester Avenue that provide access in and out of the neighborhood. As noted in section VIII.C, above, the Project will also be injurious to nearby properties by degrading access to parking.

[9] *A count using ZIMAS maps indicates approximately 510 parcels in the neighborhood. See* ***Exhibit 13****.*

Further, as noted above in Sections III.B, VI, and VII.F, the 'Project is inconsistent with the Specific Plan, the Community Plan, and the General Framework. Finding (e) cannot be made.

The response to comments suggests that "urgently needed" housing justifies the exceptions. (See FEIR, III-89.) Substantial evidence for such a finding, though, cannot exist until the population and housing baseline used in the EIR are reconciled with more recent U.S. Census data.

The requirement for reconciliation is identified in the City's own CEQA Thresholds Guide discussion of the use of population estimates:

> "The City of Los Angeles uses two different estimates of its population. The first is prepared by the California Department of Finance (DOF) and provided

> to SCAG. For purposes of conformity with the requirements of these other agencies, the City uses this estimate when and where appropriate. The City Planning Department prepares an estimate of its population based on a number of locally derived factors including: building and demolition permits issued, school enrollments, and the percentage of active electric meters. The City Planning Department estimates are used for planning purposes in the City of Los Angeles. It should be noted that both sets of numbers are estimates and, therefore, only close approximations of the actual population. Every 10 years these estimates are reconciled by the U.S. Census." (L.A. CEQA Thresholds Guide [2006], Page J.1-1.)

By pointing out the need for reconciliation, the Thresholds Guide indicates that the most recent Census data should be used if it post-dates the population projections used. That is the case here, but that data had not yet been provided.

What data are available suggest that the projections used in the EIR are inflated. Using the same methodology as that of the EIR, the City of Los Angeles was projected to have a 2010 population of 4,049,936 and the County of Los Angeles a population of 10,602,804. Actual Census data for 2010, though, show the projections overestimated population by almost 6% for the City and over 7% for the County. Similar findings for the Community Plan area would suggest slower growth and a need for housing not as urgent as the applicant suggests, or more accurately, not "urgent" at all.

Response to Comment No. 1-34

As demonstrated by the response to comments provided herein, the EIR fully evaluated the impacts of the project, including the physical impacts associated with the proposed exceptions (e.g., building heights, setbacks and lot area associated with the project). Refer to Response to Comment No. 1-5, 1-16, and 1-23 regarding the traffic impacts associated with the project and the projects consistency with the purposes and intent of the Specific Plan. Also refer to Section IV.G, Land Use, and Response to Comment Nos. 1-5 and 1-16 regarding the project's consistency with the Community Plan, Specific Plan and General Plan Framework.

With regard to the population and housing data presented in the Draft EIR, as described in the Draft EIR, population and housing projections were based on the Southern California Association of Government's (SCAG) 2008 Regional Transportation Plan, which included the latest population and housing data available at the time of the release of the Draft EIR in December 2010. It is noted that the Draft EIR was published prior to the release of 2010 Census data. Notwithstanding, as set forth in the City's General Plan Housing Element, over 14,000 residential units need to be built to address its Regional

Housing Needs Assessment (RHNA) numbers and it anticipates that the Sherman Oaks area can accommodate approximately 4,300 of these required units over the course of its January 2007 to June 2014 timeframe.

More recently, SCAG's 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS) states that Southern California is faced with unprecedented challenges in accommodating the additional population and economic activity expected over the next 25 years, particularly since population growth is now driven mostly by natural increase from within the region and by international immigration. Specifically, as provided in the 2012 RTP/SCS, the SCAG region's official regional housing need for the planning period 2014–2021 is 409,000 to 438,000 housing units. The regional target considered projected household growth and socioeconomic data based on local input, the 2010 Census, and the California Department of Finance. The 2012 RTP/SCS incorporates the overall RHNA target for the SCAG region and provides a land use pattern that shows where new housing growth can be accommodated in the future. The land use pattern accommodates approximately 644,000 additional households in the SCAG region by 2020 and a total of 1.5 million additional households by 2035. Additionally, based on the shift in demographics and household demand, the 2012 RTP/SCS provides that a significant increase in small-lot single-family and multi-family housing would occur in infill locations near transit infrastructure.

Based on the above, the proposed project's 399 housing units in an infill location and in close proximity to public transit would help to meet a substantial demand for housing in the region.

Comment No. 1-35

XVI. FINDINGS FOR APPROVAL OF A TRACT MAP CANNOT BE MADE.

According to Los Angeles Municipal Code section 17.06.A.2(a):

> "The Advisory Agency may disapprove a Tentative Map because of the flood hazard, inundation, lack of adequate access, lack of adequate water supply or fire protection, insufficient sewerage facilities, potentially hazardous geological conditions or non-compliance with the requirements of this article, the Subdivision Map Act, or the standards, rules or regulations adopted by the Commission pursuant to the provisions of Section 17.05 of this Code."

Section 17.05.C requires conformance with the General Plan. The Subdivision Map Act also disapproves of a tentative tract map if the design or improvements of the proposed subdivision are not consistent with applicable general and specific plans. Govt. Code

§ 66474.61(a). In addition to being inconsistent with the purposes of the Specific Plan generally, see Section VI.D, it is also inconsistent specifically with the design-related policies of the Specific Plan. Section III.B, supra. It is also inconsistent with the residential and commercial goals and objectives of the Community Plan. Section VI, supra.

Government Code section 664 71.61 (d) indicates that a tract cannot be approved if the advisory agency finds that the site is not physically suitable for the proposed density of development. The Project, even as revised, creates significant and unavoidable circulation impacts at every intersection along a significant stretch of Sepulveda Boulevard from Ventura Boulevard to well north of the 101. It also creates significant and unavoidable impacts to parking and creates a significant spillover effect into the single family residential neighborhood to the east. Given that these impacts cannot or are not mitigated to a level of less than significant, the site is not physically suitable for the proposed density of development, even as revised.

A tract map also cannot be approved if the design of the subdivision or the type of improvements is likely to cause serious public health problems. Govt. Code § 66471.61(d). As implied by the EIR reference to CARB siting recommendations, locating multi-family housing in which children may be present within 500 feet of a freeway presumptively creates serious public health problems. Absent mitigation measures to reduce indoor and outdoor health risks to an acceptable level below SCAQMD thresholds, as has been recommended for similar projects located adjacent to the Hollywood Freeway in the Hollywood Community Plan area (see **Exhibit 14**), the Advisory Agency must find that the Project is likely to cause serious public health problems.

Response to Comment No. 1-35

The applicant's representatives submitted proposed findings and provided the evidentiary support the Tract Map findings. The EIR does not contain all the evidence necessary to make these finding because Tract Map findings are part of the discretionary approval process by the Deputy Advisory Agency, and while the findings relate to some extent to CEQA impacts, the findings themselves and much of the evidence supporting them is appropriately included in the Project applications and the City's land use findings, not the EIR. To the extent that land use plan consistency and CEQA analysis overlaps, the project's land use impacts have already been fully addressed.

As demonstrated by the materials submitted to the City, the required findings for approval of a tract map can be made.

Comment No. 1-36

XVII. THE ANALYSIS OF IMPACTS TO LIBRARY SERVICES IS INADEQUATE.

The EIR claims that the Project will have no significant impact on library services and, as such, requires no mitigation. This, however, is contrary to information provided in the EIR itself.

According to Appendix G, October 2007 correspondence from the Los Angeles Public Library, the Sherman Oaks Branch Library that serves the Project area:

> "adequately meets the current demand for library services. However... it do [sic] not meet the new branch size criteria. An increase in residential population has a direct impact on library services with increase demands for library materials, computers and information services and will require additional resources to meet the demand of the additional population."

This correspondence is quite clear. The threshold of significance for physical facilities is already exceeded, creating a potentially significant impact that must be mitigated. The mitigation suggested for overall impacts to the library system is $200/capita.

Moreover, the analysis with respect to impacts on library services is cursory and based on outdated information. While the environmental setting at the time of the Notice of preparation is "normally" the baseline for analysis (CEQA Guideline § 15125(a)), that baseline can and should change based on evidence of changed conditions. In the case of the Sherman Oaks Branch Library, operational hours have dropped from 58 hours/week at the time of the 2007 correspondence to 50 hours/week currently.[10] Additionally, the Branch Library Services Division of LAPL confirms that since the 2007 correspondence, staff positions at Sherman Oaks Branch have decreased by over 25% and staff actually assigned to the library has decreased by 35%. (See **Exhibit 15**.) The increase in population, both Project and cumulative, combined with a decrease in available resources and services, is a potentially significant impact that must be analyzed and mitigated.

[10] *See http://www.lapl.org/branches/Branch.php?bID=51, accessed February 7, 2013.*

Response to Comment No. 1-36

Issues relating to the size of the Sherman Oaks Branch Library have been adequately addressed in the Draft EIR with the appropriate less than significant conclusion made based on substantial evidence. The following is a reprint of the relevant analysis as stated on pages IV.J-62 and IV.J-63 of the Draft EIR:

> "As identified by the LAPL, while the Sherman Oaks Branch Library does not meet the LAPL size criteria of 14,500 square feet for libraries with a service population above 45,000, this library does adequately meet the demand for library services within its community. Additionally, the Van Nuys Branch Library, the Studio City Branch Library, and Encino-Tarzana Branch Library, are located nearby (within five miles) and thus, would also be available for use by project residents. Use of these libraries would help in reducing the project's demand on the Sherman Oaks Branch Library. Therefore, considering the population increase from the project and the project's nominal increased demand for library services, impacts would be less than significant."

Consistent with the provisions set forth in the CEQA Guidelines, mitigation measures are not required for impacts determined to be less than significant. In addition as set forth in Response to Comment No. 11-38 of the Final EIR, the Project's demand for library services would be reduced from that analyzed in the Draft EIR with the project's proposed over 20 percent reduction in residential units (i.e., number of proposed residential units reduced from 500 to 399 residential units).

In addition, as stated in Response to Comment No. 1-25, the baseline used to conduct the project's environmental analysis is correct and meets all CEQA requirements. Further, even with consideration of the changes in the operational conditions of the Sherman Oaks Branch Library that are cited in the comment, the EIR's conclusion that the project would have a nominal demand on library services and that the project's cumulative impacts would not be cumulatively considerable would be unchanged.

Comment No. 1-37

XVII. CONCLUSION

This EIR might be considered a good marketing tool for the Project, but it utterly fails to provide the mandatory information needed to make an informed decision on this Project as required by CEQA. Even if revised with proper analysis and correct conclusions, the EIR is so inadequate in its identification of potentially significant impacts that it cannot move forward without recirculation in accordance with CEQA Guideline § 15088.5.

Even if an adequate document were put forward, however, the findings required for the myriad of exceptions sought for this Project cannot be made.

On behalf of SORSE, I respectfully urge that the Project be denied in its entirety.

Response to Comment No. 1-37

The EIR is comprehensive and has been prepared in accordance with CEQA requirements. As demonstrated by the response to comments in this letter and its attached exhibits, no new impacts or a substantial increase in the severity of an already identified impact would result from the comments provided. Thus, in accordance with CEQA, recirculation of the Draft EIR is not required. In addition, as demonstrated by the materials submitted to the City, the required findings for the proposed exceptions to the Specific Plan can be made.

Attachments

Comment No. 1-38

Exhibit 1—Chapter 5. Urban Form and Neighborhood Design (City of Los Angeles General Plan Framework)

Response to Comment No. 1-38

The information provided in this comment was referenced previously in Comment No. 1-5. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-5. Refer to Response to Comment No. 1-5 for additional information.

Comment No. 1-39

Exhibit 2—Article: The Effect of Air Pollution on Lung Development from 10 to 18 Years of Age (The New England Journal of Medicine)

Response to Comment No. 1-39

The information provided in this comment was referenced previously in Comment No. 1-6. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-6. Refer to Response to Comment No. 1-6 for additional information.

Comment No. 1-40

Exhibit 3—Article: Living near a highway affects lung development in children, according to a USC study (Southern California Environmental Health Sciences Center)

Response to Comment No. 1-40

The information provided in this comment was referenced previously in Comment No. 1-6. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-6. Refer to Response to Comment No. 1-6 for additional information.

Comment No. 1-41

Exhibit 4—Article: Researcher from Children's Hospital Los Angeles and USC Finds Proximity To Freeway Is Associated with Autism (Children's Hospital Los Angeles)

Response to Comment No. 1-41

The information provided in this comment was referenced previously in Comment No. 1-6. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-6. Refer to Response to Comment No. 1-6 for additional information.

Comment No. 1-42

Exhibit 5—Article: Black Lung Lofts (LA Weekly)

Response to Comment No. 1-42

The information provided in this comment was referenced previously in Comment No. 1-6. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-6. Refer to Response to Comment No. 1-6 for additional information.

Comment No. 1-43

Exhibit 6—Memorandum: Hans Giroux to Bradly S. Torgan, May 26, 2011

As per your request, we have reviewed the air quality and noise impact analyses form [sic] the above project. We have focused more heavily on the air quality issue because the severity of the impact is greater. Moreover, the Sherman Oaks Homeowner's Association has a highly respected acoustician on its board (Dr. Marshall Long) such that the noise impact analysis will receive a separate and thorough review.

Response to Comment No. 1-43

Comment noted. Please refer to Response to Comment Nos. 1-44 through 1-73 for responses to specific comments raised in this letter.

Comment No. 1-44

General Comments: My overall impression after 45 years as an atmospheric phenomena specialist is that the proposed project is poorly placed and wrongly sized. Every land use planning policy with which I am familiar strongly recommends not placing 500 residential units as close as 50 feet from a major freeway. There are 600,000 vehicles per day on the 101 and 405 Freeways passing the site along with another 50,000 per day on Sepulveda and Camarillo. Aside from the diesel particulate exhaust inhalation cancer risk, numerous studies have found that gaseous tailpipe emissions have observed links to diminished lung capacity, pulmonary irritation such as asthma and bronchitis, and a recent study reports a possible nexus between freeway proximity and autism in children.

Response to Comment No. 1-44

The commenter erroneously concludes that significant public health impacts would occur solely based on proximity to a freeway and cites recommendations, guidelines, and selected studies to support their claim. The citations provided in the comment serve as important information to consider and an indicator that a potential adverse health effect may occur, but do not automatically guarantee a significant impact as such a determination can only be definitively made based on an analysis of localized and site-specific conditions. For this reason, the CARB information is provided as a recommendation and the SCAQMD information is provided as a guideline. Through the issuance of the recommendation/ guideline, the CEQA lead agency is alerted to the presence of a situation that requires specialized attention. The City of Los Angeles in consideration of the cited recommendations, guidelines, and studies on the issue, conducted site-specific computer modeling of localized air quality conditions to determine the actual health risk for project occupants based on the specific attributes of the project and the specific conditions present at the project site. This type of site-specific analysis provides a much more accurate assessment of potential conditions at the project site and substantially more insight as to the potential for an adverse health effect to occur. Based on the site-specific modeling presented in the EIR, developing the project at its proposed location would result in a less than significant impact human health impact with regard to DPM and non-DPM emissions. In other words, the proposed project is an example of a situation when a project located within 500 feet of a freeway would not result in a significant human health impact for its occupants. The conclusion of a less than significant human health impact was based on site-specific modeling. As such, the EIR's air quality analysis, as is also the case with all of the EIR's analyses, meets and satisfies all CEQA requirements.

Comment No. 1-45

Residential development is proposed within an acoustic environment labeled "clearly unacceptable" in the Noise Element of the General Plan and violates the Implementation Policies of the General Plan.

Response to Comment No. 1-45

As discussed in Response to Comment No. 1-47 and 1-48 below, the project does not propose residential uses in a clearly unacceptable noise environment.

Comment No. 1-46

The level of traffic generated by the proposed massive project scope creates unacceptable levels of traffic congestion that add not only the project congestion increment, but slow already congested baseline traffic to more pollution-inefficient travel speeds. Our specific comments are as follows:

Response to Comment No. 1-46

Refer to Section IV.K, Transportation and Circulation, and Section IV.B, Air Quality, of the Draft EIR for specific analyses related to the project's potential impacts associated with traffic and air quality, respectively.

Comment No. 1-47

Noise

Page IV.H-5 fails to include Implementation Program P16 of the Los Angeles General Plan Noise Element, which states:

> Use, as appropriate, the "Guidelines for Noise Compatible Land Use" (Exhibit I)... to guide land use and zoning reclassification... especially relative to sensitive uses... within a line of sight of freeways..." (Noise Element, Page 4-4)

It is directly relevant to consideration of this Project and must be included in section 2.b(1)(a).

Response to Comment No. 1-47

The Noise Element of the Los Angeles General Plan states in part; "…that noise elements guide policy makers in making land use determinations and preparing noise ordinances that would limit exposure to their populations to excessive noise levels." (Noise Element page 1-1). The analysis in the Draft EIR is based on the understanding of the noise planning guidelines as published by the L.A. CEQA Thresholds Guide (Thresholds Guide) dated 2006. The guidelines for noise compatibility by land use set forth in the L.A. CEQA Thresholds Guide are generally similar to the guidelines provided in the City of Los Angeles General Plan Noise Element (Exhibit I). However, per discussion with the Planning Department Staff, the noise compatibility guidelines within the L.A. CEQA Thresholds Guides contain a few errors and the noise compatibility guidelines set forth in the Noise Element should instead be utilized. Specifically, as discussed in more detail in Response to Comment No. 1-48, below, the CNEL noise levels for the Normally Unacceptable and Clearly Unacceptable categories for residential uses provided in the L.A. CEQA Thresholds Guide are incorrect and the CNEL noise levels provided in the Noise Element should instead be used.

Comment No. 1-48

Table Iv.H-1, [sic] states that noise environments exceeding 75 dB CNEL are clearly unacceptable for multi-family residential use, with clearly unacceptable meaning "new construction or development should generally not be undertaken." Proposed placement of residential use in an area exceeding 75 dB CNEL as shown to occur on the Project site violates both Policy 3.1 and Implementation Program P16. If Table IV.H-1 is correct, the far right hand column suggests that residential uses are clearly unacceptable at ambient noise levels exceeding 70 dB CNEL, although this conflicts with the third column that the transition from normally unacceptable to clearly unacceptable ambient noise environments for residential use occurs with the 70-75 dB CNEL range.

Response to Comment No. 1-48

As shown in Table IV.H-1, the City of Los Angeles Land Use Compatibility for Community Noise Exposures provided in the L.A. CEQA Thresholds Guide contains overlapping categories for residential uses (e.g., Multi-Family Homes). The noise environment between 70 and 75 CNEL is stated in the table as Normally Unacceptable for Multi-Family Homes, whereas the noise environment of above 70 CNEL also is described as Clearly Unacceptable, pursuant to the L.A. CEQA Threshold Guide (Page I.2-4). Per discussion with City Planning Department staff, the overlapping of noise levels for the Residential use category currently shown in the L.A. CEQA Threshold Guides document is incorrect, and the noise levels provided in the City of Los Angeles General Plan Noise Element, Exhibit I should instead be used. As indicated in the City of Los Angles General

Plan Noise Element, the CNEL level for the Residential Multi-Family Clearly Unacceptable category is above 75 dBA.

The City of Los Angeles Land Use Compatibility for Community Noise Exposures provided in Table IV.H-1 is based on the existing ambient noise levels for the Project Site as measured at the grade level. The measured ambient 24-hour CNEL noise levels at the Project Site at grade level ranged from 68 to 75 CNEL, which is within the Multi-Family Homes Land Use category of Normally Unacceptable (as indicated in the Draft EIR, page IV.H-12). As provided in the footnote of Table IV.H-1, based on the City of Los Angeles Land Use Compatibility Guidelines, new construction or developments in the 75 CNEL noise environments would require a detailed noise analysis to ensure the building design and construction would adequately reduce the noise levels to the interior. Therefore, Mitigation Measure H-5 was included for this purpose of ensuring that construction of the Project would provide adequate sound insulation in accordance with the City Building Code.

Comment No. 1-49

Page IV.H-11 contains substantial amount of baseline noise information based upon measurements made in 2004. Even the updated data is from 2007. Given that the DEIR was released at the end of 2010, it would be more appropriate to provide contemporaneous data by which to characterize the existing environment rather than out-dated history.

Response to Comment No. 1-49

As indicated in the Draft EIR, the project's initial ambient noise measurements were made at the time of the issuance of Notice of Preparation in 2004 as indicated on page IV.H-11. Additional ambient noise measurements were taken in 2007 to validate the 2004 data. As indicated in the Draft EIR (page IV.H-12), the ambient noise levels measured in 2007 are consistent with those made in 2004. Moreover, use of these measurements provides a more conservative approach, since they do not account for any increase in the ambient noise levels that may have occurred since due to general growth in the area.

Comment No. 1-50

Page IV.H-15 suggests that the ground-borne vibration of "rubber-tired vehicles" is 63 VdB at 50 feet from the roadway centerline. That figure is correct from rubber-tired vehicles such as buses or other people movers equipped with shock absorbers for human travel comfort. That figure is completely incorrect for loaded trucks traveling at a substantial rate of speed. Table 12-2 from the same cited reference (FTA Manual) shows that the vibration levels from loaded trucks are actually 86 VdB at 25 feet, or 77 VdB at 50 feet. The use of

the correct factor for loaded trucks creates quite a different conclusion than that reached by the Draft EIR. It is not below the acceptable ground-borne vibration levels for residences and buildings where people normally sleep. Vibration impacts to the closest proposed residences to the freeway are potentially significant and must be reanalyzed in light of this contradictory evidence.

Response to Comment No. 1-50

The vibration data provided by Table 12-2, Chapter 12 Noise and Vibration During Construction of the FTA document are applicable to the proposed construction site activities. Typically, the higher vibration levels such as the 86 VdB level indicated by FTA are for construction trucks that are traveling on the construction site, which generally has a rough surface (unlike the local roads and freeway, which have smooth pavements). Ground vibration level from trucks traveling on normal road surfaces (i.e., local roads and freeway) is approximately 63 VdB (Figure 7-3 Typical Levels of Ground-Borne Vibration of the FTA document). Therefore, vibration impacts from road traffic (including vehicles traveling on the freeway) on the proposed residences are properly evaluated.

With respect to construction-related vibration, the noise analysis was based on the pieces of construction equipment with the highest vibration levels; i.e., 87 VdB level for a large bulldozer, which is slightly higher than the loaded trucks. As concluded on page IV.H-22 of the Draft EIR, Project-related construction activities would result in a temporary significant ground vibration impact at the 777 Motor Inn, during the site grading and excavation phases (with construction equipment operating at the perimeter of the Project site, near the 777 Motor Inn).

Comment No. 1-51

Page IV.H-19 notes that construction activities are permitted by law up to 9 p.m. on Monday through Friday. Subsequent analysis predicts a temporary noise level increase of 16-19 dB at the 777 Motor Inn. This is 3-4 times louder than the ambient level. Equipment noise at 9 p.m. of such magnitude would be highly intrusive to any guest attempting to fall asleep at that time and create a potentially significant impact.

Response to Comment No. 1-51

The Draft EIR concluded that Project-related construction activities would result in a temporary increase in ambient noise of 16 to 19 dBA at the exterior of the 777 Motor Inn during the most intensive construction periods, as indicated by the comment. The estimated construction noise levels at the 777 Motor Inn represent a worst-case scenario, which includes multiple pieces of equipment operating simultaneously (including drill rig, excavator, dump/haul truck, backhoe, and air compactor). Construction related noise

would be reduced by a minimum 10 dBA with the prescribed Mitigation Measure H-1, which is a substantial noise reduction. Furthermore, the construction activities would only occur during the allowable hours per the City's noise ordinance, 7 a.m. to 9 p.m. Monday through Friday and 8 a.m. to 6 p.m. on Saturday, to avoid the nighttime hours' noise impacts where most people would be sleeping. Notwithstanding this substantial reduction, the Draft EIR concluded that these temporary impacts to the 777 Motor Inn resulting from Project construction activities would still be significant and unavoidable.

Comment No. 1-52

Page IV.H-20 makes no mention of noise impacts associated with the hauling and disposal of 165,000 cubic yards of excess soil. In order to reduce traffic conflicts, many major excavation projects in Los Angeles haul spoils at night with associated noise conflicts. For typical truck capacities of 14 cubic yards per truck, there would be almost 12,000 truck trips outbound full, and another 12,000 truck trips inbound empty. The failure to even acknowledge this level of activity, much less to analyze the impact, is a fatal flaw of the noise impact analysis.

Response to Comment No. 1-52

Noise impacts associated with Project construction haul trucks are provided in the Final EIR. (See response to Comment No. 11-26 [Final EIR, page III-105].) As indicated therein, the Project construction would generate a total of 300 truck trips per day (150 inbound and 150 outbound trips). Based on an eight-hour workday, there would be approximately 38 truck trips per hour (19 empty trucks inbound and 19 loaded trucks outbound). In addition, the haul trucks would travel a short distance (less than 500 feet) from the Project site to the nearest US-101 freeway on- off-ramp. The noise from the haul trucks would be 66.5 dBA (L_{eq}), which would be below the existing ambient levels of 68.5 to 76.6 dBA (L_{eq}). Furthermore, Mitigation Measure H-3 would require that the idling of haul trucks be limited to 5 minutes at any given location. Therefore, noise impacts from haul trucks associated with the Project construction would be less than significant.

Comment No. 1-53

Pages IV.H-26-27 implies [sic] that outdoor noise levels of 78 dB CNEL will occur on private balconies with a freeway view, but no land use/noise incompatibility would exist. The fact that levels exceeding 75 dB CNEL are designated as "clearly unacceptable" for residential use in the General Plan is completely ignored. The implication arises from the statement that "there are no City's [sic] noise limits applicable to the private balconies.". [sic] Figure IV.H-1 on page IV.H-2 shows that 78 dB is close to the sound generated by a garbage disposal or a person shouting from 3 feet away. Standard or no standard, one cannot possiblly [sic] conclude that sitting or standing on one's balcony with an ambient

noise comparable to standing next to a continuously running garbage disposal is not an incompatible land use.

Response to Comment No. 1-53

See Response to Comment Nos. 46 and 47 above with respect to the land use compatibility comment. It should be noted that the Project estimated 78 dB CNEL at the exterior of the future balcony of the proposed residential use is the 24-hour average noise level (with adjustment factors applied to the evening and nighttime hours, page IV.H-4.) The actual noise levels that would be heard at the exterior of the balcony would be lower than the estimated CNEL level, approximately 4 dBA lower (based on the ambient noise measurements at project noise monitoring locations R1 and R2). Therefore, the ambient noise levels at the balcony would be approximately 74 dBA L_{eq}. Furthermore, comparison of the background traffic noise level to that of a garbage disposal or a person shouting, as noted by the Comment is inaccurate, as these are different types of noises with a different pitches and tonal contents.

The EIR appropriately did not apply the noise significance threshold to the project's balconies. In general, outdoor balconies are exempt from exterior noise standards. The City of Los Angeles Municipal Code does not regulate noise exposure levels at balconies, and therefore these areas are not considered a noise sensitive use under the Code. Typically, Caltrans' primary consideration for traffic noise abatement is given to exterior areas where "frequent human use" occurs, an area where people are exposed to traffic noise for an extended period of time in a regular basis. Private balconies are generally not considered to be a noise sensitive use with respect to exterior noise because of the infrequent use (i.e., people are not expected to be out on the balcony for an extended of time).

Comment No. 1-54

Page IV.H-29, Mitigation Measure H-1, suggests that an 8-foot high wood fence would provide a 10 dBA construction equipment noise reduction. Because noise sources such as exhaust stacks on heavy equipment are elevated, an 8-foot high wall would not come close to a 10 dB benefit. Furthermore, at least the 777 Motor Inn is multi-storied such that upstairs motel windows will have a direct line of sight of the equipment with or without such a wall.

Response to Comment No. 1-54

Mitigation Measure H-1 requires that the noise mitigation in the form of sound barrier shall provide a minimum 10-dBA noise reduction and that the barrier shall be a minimum of 8 feet in height. The Project recommended barrier height is provided as a minimum height

with the goal of providing a minimum 10-dBA noise reduction performance. Generally, the 8-foot-high sound barrier would provide a 10-dBA noise reduction for noise sources that are up to 5 feet high (e.g., for medium-size construction equipment, such as small bulldozer, generators, and compressors). Larger construction equipment, such as large bulldozer, would require a noise barrier of approximately 10 feet in height. Therefore, the 10-dBA noise reduction performance requirement is required in Mitigation Measure H-1, as well as the minimum 8-foot height of the barrier. As described in the Draft EIR (page IV.H-30), the temporary construction noise barrier would only be effective where the line-of-sight between the equipment and the receptors will be interrupted; i.e., at the ground level. The noise barrier would not be effective for receptors at the upper levels at the 777 Motor Inn with direct line-of-sight to the construction site. The EIR, therefore, concluded that temporary noise impacts to the 777 Motor Inn would remain significant and unavoidable.

Comment No. 1-55

Page IV.H-31 references a Mitigation Measure H-7. The Draft EIR posted on-line, however, does not contain any Mitigation Measure H-7.

Response to Comment No. 1-55

The reference to Mitigation Measure H-7 on page IV.H-31 of the Draft EIR is incorrect. The reference regarding noise associated with on-site recreational areas should instead refer to the project design feature on page IV.H-19 of the Draft EIR that specifically states that "Courtyard areas and pool facility would be developed such that off-site noise sensitive receptors would be shielded from these uses by the project buildings."

Comment No. 1-56

Air Quality

Page IV.B-3 uses Burbank air quality monitoring data to characterize the existing air quality environment. The background air quality in Burbank is dramatically different from the Project site air quality immediately next to the interchange of two major freeways each carrying approximately 300,000 vehicles per day. Given the long gestation period of this project, there has been more than ample time and opportunity to conduct on-site air quality measurements. In my professional opinion, the findings of such monitoring will likely strongly contra-indicate the wisdom of placing 500 housing units adjacent to the freeway. The setting also fails to discuss the prevailing site meteorology relative to the freeway. It would be highly instructive to know the frequency with which freeway air pollution is carried across the project site versus the percent of time winds blow from the site toward the freeways. That same information should have been gathered while diesel particulates and

gaseous exhaust pollutants were monitored. Given that locating residential uses within the immediate proximity of not just one, but two major freeways is so strongly contra-indicated by cognizant air quality regulatory agencies, the use of baseline data from Reseda for this project impact analysis in almost indefensible. Even if long-term air quality data gathering had not been conducted (as is should have been), limited monitoring should certainly have been performed to justify the use of a data resource so far physically removed from this critical location.

Response to Comment No. 1-56

The DEIR appropriately used ambient air quality monitoring data from the most representative SCAQMD monitoring station (Burbank) for purposes of establishing baseline conditions. Use of this data is consistent with SCAQMD recommended methodology and forms the basis for SCAQMD localized significance thresholds.[3] On-site air quality measurements are not required by the City of Los Angeles or SCAQMD for CEQA purposes. Instead, it is recommended in SCAQMD's Final Localized Significance Thresholds Methodology, dated July 2008, to identify the most representative of the 38 SCAQMD air quality monitoring stations to characterize background pollutant concentrations in the project area. In addition, monitoring data from the SCAQMD monitoring stations is used for purposes of demonstrating conformity with ambient air quality standards in which the SCAQMD has followed a rigorous process with the EPA to strategically place these monitoring stations to capture exceedances of ambient air quality standards. A suggestion that these monitoring stations are not placed appropriately within the Air Basin should be raised with the SCAQMD. No changes to the DEIR are necessary in response to this comment.

Comment No. 1-57

Table IV.B-1 contains some outdated information because of the lag time between completion of the air quality analysis and release of the Draft EIR.

Response to Comment No. 1-57

Commented noted. Based on a review of the most recently available air monitoring data from the Burbank station, air quality conditions have continued to improve. Thus, the monitored data provided in Table IV.B-1 provides an upper-end of background pollutant concentrations (more conservative).

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[3] *Web site www.aqmd.gov/ceqa/handbook/LST/LST.html.*

Comment No. 1-58

Pages IV.B-6-7 state that NO_2 standards were not exceeded. This is not correct relative to the new federal one-hour standard as shown in Table IV.B-2.

Response to Comment No. 1-58

The text provided in the DEIR regarding existing ambient NO_2 concentrations is not erroneous and clearly reflects the data available at the time of preparation of the DEIR for the State standard. A determination regarding the newly adopted federal standard was not available nor would it make a difference in determination of significant impacts. As shown in Table IV.B-4 on page IV.B-45, localized construction impacts were conservatively concluded to exceed the newly adopted federal standard.

Comment No. 1-59

Page IV.B-14 and several subsequent references highlight the mandatory ARB program to reduce emissions from in-use, off-road diesel-powered equipment. These notations suggest that compliance will reduce diesel exhaust emissions from construction activities perhaps more than assumed in emissions prediction models. In December, 2010, at the time of release of the DEIR, implementation of these regulations was substantially delayed (AB 1085 and SB 855) with the initial, required action beginning in 2014 and final phased completion in 2028. Unless early compliance is made a mitigation condition for the proposed Project, the claims of an impact reduction benefit made in this document are invalid.

Response to Comment No. 1-59

The commenter correctly identifies delays in implementation of the ARB program. However, no credit was taken for this program in the air quality analyses and no changes are necessary in the DEIR.

Comment No. 1-60

Page IV.B-17 states that the SCAQMD recommends use of the URBEMIS2007 emissions model as used in the air quality impact analysis. The correct statement is that the SCAQMD now recommends use of the CalEEMod computer model, but accepts use of URBEMIS for projects whose analysis was substantially completed when CalEEMod was released. It would be instructive, however, to provide a limited comparison of the results using the formerly approved model versus the currently supported analysis routine.

Response to Comment No. 1-60

While the commenter correctly identifies that the SCAQMD currently recommends use of CalEEMod, at the time of preparation of the DEIR SCAQMD recommended use of URBEMIS2007. In addition, the SCAQMD currently still allows use of URBEMIS2007 for preparation of CEQA analysis. Therefore, no changes are necessary to the DEIR based on this comment.

Comment No. 1-61

Page IV.B-23 focuses heavily on diesel particulate matter (non-DPM) as the pollutant of greatest concern and later recommends air filtration as adequate mitigation. The baseline discussion of potential health impacts should reference study results linking freeway proximity to a variety of observed adverse health effects likely related to non-DPM pollution exposure. Increased rates of asthma, reduced lung function, and, most recently, even possible juvenile autism, have been surmised to be related to elevated non-DPM air pollution exposure. Increased rates of hospitalization and mortality are directly couple to elevated PM-10/PM-2.5 exposure likely to be found adjacent to a major freeway interchange. The discussion of potential health effects in this section is excessively generic and nebulous and does not provide sufficient information on which to based reasoned conclusions.

Response to Comment No. 1-61

The commenter incorrectly describes the nature and extent of the analysis provided. Contrary to the claims made in the comment, the analysis addresses the full range of potential health risks related to both diesel particulate matter (DPM) and non-DPM sources. The health risk assessment (HRA) considers toxic compounds generated from mobile sources, such as benzene and their subsequent carcinogenic risks and/or non-carcinogenic hazards. Criteria pollutants were also assessed and compared to identified regulatory thresholds. Discussion associated with the evaluation of non-DPM pollutants is found in Section 4.0 (Source Characterization) and Section 6.0 (Risk Characterization) of the HRA. As such, the comment is also incorrect in its statements that impacts with respect to public health issues have been ignored.

Based on the site-specific modeling presented in the EIR, developing the project at its proposed location would result in a less than significant human health impact with regard to DPM and non-DPM emissions. In other words, the proposed project is an example of a situation when a project located within 500 feet of a freeway would not result in a significant human health impact for its occupants. The FEIR adequately discloses health risks from non-DPM. The comment does note some specifics regarding health

effects from non-DPM which are noted for the record, but the impact analysis and significance conclusions remain accurate and unchanged by this comment.

In addition, the evaluation of the project's ventilation requirements to mitigate air quality impacts was based upon documented industry standards promulgated by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2.

Comment No. 1-62

Page IV.B-26 cites the results of the "next steps" recommendations presented by Gail Goldberg to the Planning Commission in January, 2009. Planning Commissioner Michael Woo characterized these recommendations as "weak" ("Black Lung Lofts", *L. A. Weekly*, March 6, 2010). The over-reliance on air filtration is disputed in the scientific community because the filters do not trap many gaseous pollutants and recent SCAQMD studies on filtration efficiencies for the tiniest particulates have been overstated. See Exhibit 1 ("Pilot Study of High Performance Air Filtration for Classroom Applications, October 2009 [(www.agmd.gov/rfp/attachments/2010/AQMDPilotStudyFinaIReport.pdf)] for results of a classroom filtration study using various types of filters.

Response to Comment No. 1-62

The commenter incorrectly asserts that the assessment does not consider the contribution of gaseous pollutants to assess exposure. The commenter makes a broad declaration about a dispute among the "scientific" community associated with the "over-reliance" of air filtration to control pollutant exposures without explaining what that dispute is.

The mitigation measure was not designed to control gaseous pollutants as their contribution to the cancer risk estimate was *de minimus*. Diesel particulates from both trucks and vehicles contributed to more than 95 percent of the reported cancer risk values. By reducing the concentration of diesel particulates through filtration, the carcinogenic risk estimates were reduced thereby reducing the risk estimates to within acceptable limits. For exposures to particulates such as PM10, filtration control efficiencies were directly applied to the exposure point concentration to reduce exposures below significance thresholds. There were no exceedances of identified significance thresholds associated with chronic/acute non-carcinogenic exposures or exposures to criteria pollutants associated with mobile source combustion (e.g., carbon monoxide, nitrogen dioxide).

The commenter's reference to the SCAQMD pilot classroom study has no relevance to the evaluation of air infiltration into residential occupancies. As noted on page 1 of the SCAQMD study:

> "Filtration in classrooms presents some unique challenges. The older HVAC systems that exist in older schools were not designed with air filtration in mind. The classroom is a noise sensitive environment, so filtration systems must meet strict decibel limits when in operation. Classrooms often have high ventilation rates with doors and windows that are frequently open to outside air. Finally, classrooms are large, densely occupied spaces with a lot of activity that can lead to indoor generation of particles and other pollutants."

It is for these reasons the study is not applicable to assessing filtration requirements for residential occupancies. The assessment's evaluation of the project's ventilation requirements to mitigate air quality impacts was based upon documented industry standards promulgated by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2.

Comment No. 1-63

Page IV.B-43 notes that 165,000 cubic yards of excess soil will be exported. The regional exhaust emissions appear to have been included in the URBEMIS modeling. However, locally there is no analysis of the air quality impacts, especially in light of the fact that there is no mitigation measure requiring trucks to tarp their loads. Blow-off dirt and diesel exhaust will be released along the haul route. This is a potentially significant impact that is never identified or analyzed.

Response to Comment No. 1-63

Comment noted that the construction analysis correctly evaluated regional emissions associated with haul truck activity. Regarding localized impacts it should first be noted that the haul truck activity would be limited to an approximate four month period and that control of fugitive dust would be controlled consistent with requirements of SCAQMD Rule 403 (Fugitive Dust). From an exhaust standpoint, the SCAQMD does not recommend health risk assessments for short-term activities (e.g., four month haul duration). In addition, operational vehicular activity would result in more peak-hour traffic than haul truck activity during construction and would not be considered short-term. As shown in Table IV.B-8, traffic from the project would result in less than significant air quality impacts. No additional analysis is necessary as a result of this comment.

Comment No. 1-64

Page IV.B-44 states that diesel emissions control programs will reduce exhaust pollution to less than shown in Table IV.B-4 assuming a year 2013 project occupancy. As previously stated, these enhanced programs do not begin to take effect until 2014 and would not provide any suggested benefit unless made an early implementation requirement for project contractors.

Response to Comment No. 1-64

Comment noted. However, no significance conclusions were made based on this information and no changes are necessary in the Draft EIR.

Comment No. 1-65

Table IV.B-7 presents a somewhat skewed result of project impacts. While there often is a tendency to downplay impacts, Table IV.B-7 incorporates a number of assumptions designed to inflate impacts. This approach was likely taken to create a substantial gap between Project related impacts and the SCAQMD CEQA thresholds that would justify rejection of the reduced intensity alternative as a mechanism to create a less-than-significant impact. In particular, NO_X emissions of 29 pounds above threshold are considered too substantial to be reduced through fewer housing units. Assumptions contributing to this degree of excess include:

- 17 pounds of electrical generation emissions are attributed to the project. LADWP is part of the Western Interconnect grid. Emissions from project electrical demand can/will occur anywhere in the Western United States and Canada. Project implementation will not create a 17 pound per day spike in LADWP power-plant emissions. These numbers were further calculated using emission factors that are decades old and do not reflect current power resources.

- The calculation assumes 100% project build-out and full occupancy in 2013. Given that the environmental process and the entitlement process are not yet completed and that two years of construction are needed, full occupancy will not occur in 2013 but at a later year when vehicles will be cleaner.

- The analysis presents winter-time NO_X emission levels that are higher than in summer. NO_X is an ozone precursor critical during the warmer months, but less so in winter.

- Page IV.B-42 identifies multiple project design features that might reduce trip generation, but the analysis uses model default factors that over-predict impacts.

With a more realistic emissions profile, the smaller degree of excess NO_X emissions above the CEQA threshold would be such that it no longer could be used as justification that a reduced residential intensity would be a preferred alternative in terms of air quality impacts. Had there not been an obvious attempt to over-state the NO_X impact to such a degree that a reduced density alternative cannot be found to be the environmentally superior alternative, a size reduction of 30-40 percent clearly would be found to have a less-than-significant air quality impact.

Response to Comment No. 1-65

The commenter does not dispute the conclusion of the EIR that project air quality impacts may be significant. Instead the commenter accuses the EIR of artificially *inflating* the impacts. This accusation is made without substantial evidence. The Final EIR includes an operational analysis for the extended build-out year which demonstrates that the project would result in less than significant regional operational air quality impacts. Thus, these comments are moot. Regardless, a response to the points raised in the comment is provided below.

- The DEIR appropriately calculated electricity emissions related to the project based on emission factors provided in the SCAQMD CEQA Handbook. As discussed above, had these emissions not be calculated, then the commenter would have commented that the analysis did not include them.

- Commented noted. Please refer to the 2015 analysis.

- While the City concurs that NO_X it is more of an issue during Summer, the significance threshold is in pounds per day and does distinguish regarding the time of year. Thus, the maximum increment must be used for evaluation against SCAQMD recommended thresholds.

- Contrary to what is stated in this comment, the air quality analysis was based on the traffic study and accounted for project features (e.g., pass-by, TDM, and internal capture).

Comment No. 1-66

Page IV.B-50 states that compliance with SCAQMD rules is sufficient evidence of a less-than-significant impact from diesel generators. Compliance with rules by itself is not a sufficient basis for such a finding, and use of cleaner alternative-fueled generators would reduce any cumulative impact with other project-related emissions such that the presented lack of analysis is deficient.

Response to Comment No. 1-66

Compliance with regulations that are intended to reduce potentially significant impacts is acceptable mitigation in CEQA. The SCAQMD permitting process for new sources requires specific information not available during preparation of the DEIR (e.g., exhaust temperature, stack height, stack diameter) and would also require TBACT (e.g., diesel particulate filter) and use of a screening modeling tool such that impacts would not occur. Thus, compliance with SCAQMD's rules is sufficient mitigation.

Comment No. 1-67

On Page IV-B-55, carcinogenic exposures from freeway DPM were evaluated for 9- and 30-year exposure periods. The SCAQMD guideline for risk assessments, however, is based upon a lifetime exposure adjustment factor of 1.0 for a 70-year lifetime and does not recognize that EPA acknowledges that 9- or 30-year doses are more reasonable. The most fatal flaw in the analysis, however, is that since 2009, the guidelines of the Office of Environmental Health Hazard Assessment (OEHHA) have specified the use of age sensitivity factors (ASF) in any health risk assessments (HRA) as stated in the OEHHA Technical Support Document, May 2009. The HRA must be revised to comply with OEHHA and SCAQMD standards to be acceptable.

Response to Comment No. 1-67

The commenter notes that the assessment does not utilize a 70-year exposure estimate to assess cancer risk. CEQA requires an impact analyses to take into account reasonably foreseeable factors and not to speculate beyond what is reasonable. There is no evidence that any recognizable portion of modern urban apartment dwellers in Los Angeles remain within a specific apartment complex for 70 years. To assume they would remain for 70 years is not reasonably foreseeable. Furthermore, CEQA prohibits mitigation measures that are not rationally related to foreseeable impacts. Therefore, no mitigation would rationally be related to a speculative impact of a 70-year exposure because an exposure time of such length is neither reasonable nor supported by any evidence. CEQA's purpose is to provide public disclosure of likely and reasonably foreseeable impacts. A conservative 30-year exposure is reasonable and is supported by substantial evidence.

The assessment employed the U.S. EPA's guidance to develop dose estimates based on reasonable maximum exposures. Specifically, activity patterns for population mobility were used as presented in the Exposure Factors Handbook. As a result, lifetime risk values for residents were adjusted to account for an exposure duration of 350 days per year for 30 years. A 9-year exposure duration was additionally assessed to identify risk

estimates reported by the U.S. EPA to reflect the average time individuals reside at a given residence.

The commenter additionally asserts that the assessment is not consistent with recent guidance published by the Office of Environmental Health Hazard Assessment (OEHHA), which addresses potential early life exposures to carcinogens. As discussed below, OEHHA's recommended assessment methodology for implementing the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, Connelly, Statutes of 1987; Health and Safety Code Section 44300 et seq.) are not applicable in this case.

The Air Toxics "Hot Spots" Information and Assessment Act requires stationary sources (facilities) to report the type and quantity of substances they routinely release into the air. The regulation requires that toxic air emissions from facilities be quantified and compiled into an inventory according to criteria and guidelines developed by the California Air Resources Board, that each facility be prioritized to determine whether a risk assessment is conducted, that risk assessments be conducted according to methods developed by OEHHA and that the public be notified of significant risks. It is relevant to note that OEHHA clarifies its risk assessment's applicability by stating that "(r)oadways are not part of the Hot Spots program because the program only addresses stationary sources."

Notwithstanding, it is the intent of the assessment to provide cumulative risk estimates from near-field on-road sources that are "reasonable" and reflect anticipated exposure experienced at a given residential occupancy. As such, a review of relevant guidance was conducted to determine applicability of the use of early life exposure adjustments to identified carcinogens. For risk assessments conducted under the auspices of The Air Toxics "Hot Spots" Information and Assessment Act, OEHHA applies specific adjustment factors to all carcinogens regardless of purported mechanism of action. However, the assessment relied upon U.S. EPA guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act "through the mutagenic mode of action." A mutagen is a physical or chemical agent that changes genetic material, such as DNA, increasing the frequency of mutations to produce carcinogenic effects. The use of adjustment factors is recommended to account for the susceptibility of producing adverse health effects during early life stages from exposure to these mutagenic compounds. None of the carcinogens considered in the assessment for this project elicit a mutagenic mode of action and, therefore, the use of age specific adjustment factors is not warranted. The assessment correctly used a lifetime exposure adjustment factor of 1.0**.**

Comment No. 1-68

Page IV.B-56 for non-DPM exposure is silent on the numerous documented health effects from non-DPM exposure that would be critical in making a land use decisions to place 500 housing units immediately adjacent to two freeways.

Response to Comment No. 1-68

The commenter incorrectly asserts the assessment does not address non-DPM exposures. The assessment considers toxic compounds generated from mobile sources, such as benzene and their subsequent carcinogenic risks and/or non-carcinogenic hazards. Criteria pollutants were also assessed and compared to identified regulatory thresholds. Discussion associated with the evaluation of non-DPM pollutants is found in Section 4.0 (Source Characterization) and Section 6.0 (Risk Characterization) of the assessment.

Based on the site-specific modeling presented in the EIR, developing the project at its proposed location would result in a less than significant human health impact with regard to DPM and non-DPM emissions. In other words, the proposed project is an example of a situation when a project located within 500 feet of a freeway would not result in a significant human health impact for its occupants. The EIR adequately discloses health risks from non-DPM and significance conclusions remain accurate and unchanged by this comment.

Comment No. 1-69

Page IV.B-62 purports that the Project is consistent with AQMP growth assumptions on a sub-regional scale. Use of a sub-regional comparison ignores the inconsistency created at the local level by proposed land use changes from current zoning.

Response to Comment No. 1-69

The commenter incorrectly asserts that the air quality consistency analysis was conducted incorrectly. The analysis provided in Section IV.B, Air Quality, of the Draft EIR was conducted consistent with the methodology outlined in Chapter 12 of the SCAQMD's CEQA Handbook. Specifically, it states "…a comparison to the growth projections in the appropriate regional statistic area (RSA) for the build-out year should be performed to determine consistency." No changes to the Draft EIR are required based on this comment.

Comment No. 1-70

Page IV.B-71 claims credit for urban forestry initiatives to plant "several trees." At 83% lot coverage, how many carbon-sequestering trees can possibly fit on the site?

Response to Comment No. 1-70

The project is planting as many trees as feasible.

Comment No. 1-71

Table IV.B-10 fails to include the "on-site renewable energy systems" identified in the Project Design Features (PDF). Please clarify.

Response to Comment No. 1-71

As shown on page IV.B-42, of Section IV.B, Air Quality, of the Draft EIR, a Project Design Feature (Energy Efficiency) is included as part of the Project which requires the following:

- LEED 2009 requires that new buildings achieve at least a 10 percent reduction below ASHRA 90.1-2007 or an equivalent standard, such as Title 24 2008 Standards. In order to achieve this reduction, the project will likely implement energy and water saving appliances and fixtures. For example, Energy Star CFLs can reduce lighting energy demands by 75 percent, and Energy Star appliances use up to 50 percent less energy than their non Energy Star counterparts.

To clarify, use of on-site renewable energy systems to offset building energy demand is an example of how the project might be able to help achieve a 10 percent reduction below ASHRA 90.1-2007. No specific plan to include on-site renewable energy systems is part of the proposed project.

Comment No. 1-72

Mitigation Measures B-5 and B-6 are qualified with "to the extent possible" and "as feasible" without any assurance that they are possible or feasible at all. The entire construction emissions mitigation section is woefully inconsistent with SCAQMD guidelines contained in the CEQA Handbook sub-section labeled "Mitigation Measures and Control Efficiencies" as updated November 3, 2010. Given the magnitude of the proposed project and the scope of the impact, the mitigation section is a weak token effort that goes little beyond standard grading permit requirements.

Response to Comment No. 1-72

Although this comment does not provide any specific recommend mitigation measures, Mitigation Measures B-5 and B-6 have modified in response to this comment. Please see the following changes to these mitigation measures provided below.

Mitigation Measure B-5: ~~To the extent possible, petroleum~~ Petroleum-powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators except for areas that construction worker or public safety would be of concern.

Mitigation Measure B-6: On-site mobile equipment shall be powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) ~~as feasible~~ where such equipment is commercially available and equivalent in performance to existing petroleum based equipment.

Comment No. 1-73

Mitigation Measure B-11 purports to reduce DPM exposure impacts to less than significant by making windows facing the freeways inoperable. Air pollution is not a line of sight event. The back sides of buildings not facing the freeway will have almost the same levels of air pollution as windows facing the freeway such that this measure cannot achieve the desired objective. The noise section also speaks of balconies facing the freeway. How will those balconies be reached if any freeway side access is inoperable, or does the inoperability only apply to windows but not to sliding glass doors?

Response to Comment No. 1-73

Mitigation Measure B-10 is the primary mitigation to control DPM exposure and requires highly efficient MERV filtration. Mitigation Measure B-11 would also serve to reduce pollutant exposure. However, the measure was added as a City policy for additional mitigation (primarily for noise) and the impact conclusion was based on implementation of Mitigation Measure B-10 (MERV filtration). It should be noted that balconies were analyzed appropriately for shorter durations of exposure (e.g., 1-hour NO_2 standard) and concluded less than significant. No additional analysis is necessary as a result of this comment.

Comment No. 1-74

Exhibit 7—The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan

Response to Comment No. 1-74

The information provided in this comment was referenced previously in Comment No. 1-13. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-13. Refer to Response to Comment No. 1-13 for additional information.

Comment No. 1-75

Exhibit 8—Google maps image

Response to Comment No. 1-75

The information provided in this comment was referenced previously in Comment Nos. 1-17 and 1-19. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment Nos. 1-17 and 1-19. Refer to Response to Comment Nos. 1-17 and 1-19 for additional information.

Comment No. 1-76

Exhibit 9—Letter from Arthur L. Kassan to Bradly S. Torgan, February 12, 2013

At your request, I have reviewed the Environmental Impact Report (EIR) for the Il Villaggio Toscano residential/commercial project proposed for the west side of Sepulveda Boulevard, north of Camarillo Street, in the Sherman Oaks community of the City of Los Angeles. I have concentrated my review on transportation/traffic issues. I also reviewed other sections of the complete EIR for descriptions of the planned project and other pertinent background information.

Response to Comment No. 1-76

Comment noted.

Comment No. 1-77

Following are my comments.

1. The traffic impact study for the 2010 Draft Environmental Impact Report (DEIR) is based on a previous traffic impact study dated December 2008. The sole change from the 2008 study was the addition of a factor of 4% to the counted traffic volumes at all of the study locations to estimate the traffic growth between the two study dates. However, for the 2010 study, there were no revisions of the related projects data to

account for the additional projects that were proposed for the area during the year and one-half between the two traffic studies (fall of 2008 to spring of 2010).

The Sherman Oaks and neighboring Encino communities are locations of high levels of continuing development activity, and new projects that may affect the same intersections that will be impacted by the Il Villaggio Toscano should be included in the analysis. Without those, the baseline data and ability to analyze and mitigate impacts are skewed, and the EIR fails as an informational document. The related projects list and associated traffic and circulation data and impacts must be added and the EIR recirculated with this additional, essential information.

Response to Comment No. 1-77

The project's traffic analysis is conservative, contains an expansive related projects list and has been updated twice since 2008 to include additional ambient growth. The 2008 related projects database in the traffic study and EIR was large and extensive, analyzing 51 related projects within an approximate 3.5-mile radius of the Project site. A radius of 1.5 to 2.0 miles is typically used in most traffic studies. As a result, the traffic study conservatively assumed higher traffic volumes from related projects. While it is expected that some of the related projects have not proceeded or have been downscaled due to the economic recession that began in 2008, the trips from all of these projects were still included in the analysis of future traffic volumes. In addition, a generous ambient traffic growth factor of two percent per year was used at the time of the original traffic study, accounting for potential projects not yet proposed at the time the related projects database was developed.

As noted by the commenter, in 2010, the traffic study was updated to reflect a revised buildout year for the Project and, as part of that update, additional ambient growth again was added to the counted traffic volumes, consistent with LADOT-approved methodologies for traffic study updates. Using the same related projects list and adding ambient growth is a conservative approach in that: (i) the ambient growth itself generally accounts for traffic volume increases attributable to development projects in an area; and (ii) no related projects were removed from the list. As discussed in Response to Comment No. 1-78 and 1-79 below, an additional update to the traffic study has been prepared reflecting the current assumed buildout of the project in 2015, which again incorporates additional ambient growth into the counted traffic volumes, without removing any related projects. Therefore, the future traffic volumes at the study intersections have not been underestimated.

Comment No. 1-78

2. Although a new development program has been proposed by the applicant since the completion and circulation of the DEIR, there is no new and up-to-date traffic impact analysis for that currently-proposed program. Instead, the applicant's consultants have modified their previous analysis by making only one adjustment – they have changed the analysis study year from 2010 to 2013. [FEIR Appendix H-1] The study year, by definition, should be the year in which the project will be not only fully built but also, essentially, fully occupied.

   Again, a traffic growth factor of 4% has been applied to the results of the 2008 study traffic study. With that one change in the analysis parameters, the consultants have identified three additional intersections at which there will be significant traffic impacts in the year 2013 that cannot be mitigated.

   However, that analysis, made in 2010 for the 2013 study year, is invalid on the bases of the following issues:

   a) it is based on traffic counts that were made in 2008 and are currently five years old; and

   b) it is based on a related projects list that was initially produced in 2008 and that has not been up-dated in five years, despite the large number of substantial projects that have been proposed and approved for the vicinity of the development site.

Response to Comment No. 1-78

Reduction of the size of the project does not necessitate a new traffic study, and the traffic study has been updated since its preparation in 2008 in accordance with all LADOT policies and procedures.

First, the reduction of the size of the project does not invalidate the Project's traffic study or require that it be revised, since the traffic study's use of a larger Project provides more conservative impact conclusions. Moreover, as noted in Response to Comment No. 1-79 below, the traffic study has now been updated to reflect the reduced size of the Project, as well as an updated buildout year of 2015.

Second, use of traffic counts from 2008 was completed in accordance with LADOT policies and procedures, and these traffic volumes have been adjusted through two updates to the traffic study to account for additional ambient growth. Per standard LADOT policy, the study year for a traffic study is the year a project is expected to be completed,

which is called out in the LADOT Memorandum of Understanding form used in the scoping of requirements and methodology for a traffic study. Consistent with that policy, the Project's initial estimated year of completion of 2010 was used as the future year in the traffic analysis.

It should also be noted that traffic count volumes have generally remained the same, or in some cases, decreased in much of the region over the last several years. For example, for the 101 Freeway between Van Nuys Boulevard and the 405 Freeway, Caltrans reported average daily traffic volumes (ADTs) of 305,000 in 2008 and 304,000 in 2011. For the 405 Freeway between Burbank Boulevard and the 101 Freeway, Caltrans reported ADTs of 219,000 in 2008 and 213,000 in 2011. Both examples, near the Project site, show traffic volume decreases. Based on currently available count information from LADOT's website, examples of ADT decreases or little change on surface streets in the San Fernando Valley include Reseda Boulevard south of Sherman Way with ADTs of 32,237 in 2006 and 32,820 in 2010; Balboa Boulevard south of Sherman Way with ADTs of 31,478 in 2006 and 30,088 in 2010; Vanowen Street east of Firmament Avenue with ADTs of 36,732 in 2007 and 31,516 in 2010; and Ventura Boulevard west of Laurel Canyon Boulevard with ADTs of 38,369 in 2007 and 35,893 in 2010.

As noted above, the initial related projects database and the generous ambient traffic growth factor that were used in the Project traffic analysis and traffic study updates provided adequate estimates of future traffic volumes. It should also be noted that while the comment asserts that a large number of substantial projects have been proposed and approved for the vicinity over the past five years, no evidence regarding those projects has been provided, including whether any of these projects were already accounted for by the related projects list for the Project analysis.

Comment No. 1-79

3. The use of 2013 as the study year for traffic analysis, in itself, is now an invalid assumption. The development has not yet been approved by the several City bodies whose approvals are necessary prior to construction. Also, the extensive and complicated project will require several years to construct. Beyond that is the duration necessary to lease and move tenants into the approximately 400 apartments that are currently proposed.

   In the consultant's supplemental analysis [FEIR Appendix H-1], dated March 23, 2010, they showed that taking the single step of increasing the study year by only two years, from 2011 in the Draft EIR to 2013 in the FEIR, would result in significant traffic impacts at three additional intersections, that is, in addition to the ten impacted intersections identified in the original DEIR report. How many more intersections would be identified

as significantly impacted if the analysis were expanded to a more reasonable study year of 2016, when it is possible that a substantial level of development occupancy will have been attained?

In 2016, the traffic count data and related projects list (both produced in 2008) upon which all of the consultant's analyses are based will be eight years old. A project of this magnitude, with already-identified significant impacts that cannot be mitigated, should be subjected to a more rigorous and more current analysis than has been produced so far. The neighbors and the decision-makers are entitled to no less.

Response to Comment No. 1-79

Due to the lengthy environmental and entitlement process, Crain & Associates has prepared an updated traffic analysis for the Final EIR Project comprised of 399 dwelling units, a grocery store of 45,000 square feet, and 7,000 square feet of retail use. This updated analysis, which is for the year 2015 based on an approximate two-year construction duration, has reached the same conclusions for the Project as in the Final EIR. In particular, the updated traffic analysis concludes the Project would result in the same significantly impacted locations for the year 2015, without and with mitigation, as determined for the year 2013. This updated traffic analysis is included in the overall 2015 update of the environmental documentation that has been prepared.

Comment No. 1-80

4. The information presented throughout the DEIR regarding project access is incomplete and contradictory. In several places, the DEIR says that there will be no project driveways on Sepulveda Boulevard, for example: "No driveways on Sepulveda Boulevard would be proposed." [page II-10 of the DEIR main text]; and "No project driveways are proposed on Sepulveda Boulevard." [page 30 of the Traffic Impact Study, DEIR Appendix H].

   Yet, on page IV.K-23 of the DEIR main text there is discussion of a "new private driveway/fire lane along the back side of the site, extending from Sepulveda Boulevard to Camarillo Street." The paragraph following that sentence refers to the "driveway/fire lane" three more times, including a description of potential turning-movement restrictions at its intersection with Sepulveda Boulevard. The same wording appears on page II-10 of the DEIR main text. That implies that there <u>will</u> be a driveway (i.e., a private on-site roadway with the sole purpose of providing access to the site development) on Sepulveda Boulevard for the project, contrary to the statements quoted in the preceding paragraph.

The figures that depict the traffic volumes that will be generated by Il Villaggio Toscano assigned to the study intersections do not include the volumes that will use that driveway [Figures 5(a) and 5(b), pages 27 and 28, Traffic Impact Study, Appendix H]. Although the driveway is not one of the study intersections, it would be important and essential information to know what volumes are projected to be using that driveway because of its location on Sepulveda Boulevard between the freeway on-ramp and La Maida Street. Nowhere in the report main text or the Appendix could I find data on the potential traffic volumes that will use that driveway.

In the FEIR, the "Refined Conceptual Site Plan" [FEIR Figure II-1, page II-2] shows a clearly labeled driveway on Sepulveda Boulevard at the northern edge of the proposed development, despite several statements in the DEIR by the applicant's consultants that there would be no development driveways on that street.

The inconsistencies between certain text in the DEIR versus the illustrations, and other text in the DEIR have been continued into the FEIR. As driveway locations and operations along a primary highway are of substantial interest in evaluating traffic impacts, the development review process should not continue until those inconsistencies have been resolved.

Response to Comment No. 1-80

The project vehicular access on Sepulveda Boulevard is a private driveway/fire lane, as described in the traffic study and EIR. Due to this being a private, dual-purpose facility extending from Sepulveda Boulevard to Camarillo Street along the backside of the site, it was not specifically called out as just a driveway or just a fire lane. Although the descriptors used for this access point and facility may have been inconsistent, project traffic using this private driveway/fire lane was analyzed and incorporated in the traffic analysis, as discussed below.

Reference is made to Figures 4(a) and 4(b) in the Traffic Study, Appendix H-2 of the Draft EIR, which depict the project trip percentages. The inbound project trip percentage southbound on Sepulveda Boulevard and approaching the site is shown, without parentheses, just north of the private driveway/fire lane access point. Between this access point and Camarillo Street, a southbound percentage is shown, with parentheses, indicating that it is an outbound percentage. No southbound percentage, without parentheses, is shown between this access point and Camarillo Street. This means that the inbound percentage north of the access point made a right turn into the access point, and that the outbound percentage between the access point and Camarillo Street is from right turns exiting the access point onto Sepulveda Boulevard. These figures also show that all inbound Project trips approaching the site on northbound Sepulveda Boulevard turn

left onto Camarillo Street. No inbound percentage on northbound Sepulveda Boulevard goes past Camarillo Street, so there are no inbound left turns into the private driveway/fire lane. Lastly, as can be seen from these figures, the left-turn outbound percentage from Camarillo Street onto northbound Sepulveda Boulevard is the same as the outbound percentage heading north near the 101 Freeway eastbound on-ramp. This indicates that no exiting left turns were assumed from the private driveway/fire lane. Were this not the case, the outbound percentage heading north near the 101 Freeway eastbound on-ramp would be higher than the left-turn outbound percentage from Camarillo Street. Thus, both inbound and outbound Project trips relating to this access point were appropriately analyzed and incorporated in the analysis.

Based on the percentages in Figures 4(a) and 4(b) above, for the reduced project proposed in the Final EIR, the right-turning volumes at the private driveway/fire lane would be 44 inbound and 50 outbound trips during the A.M. peak hour, and 130 inbound and 73 outbound during the P.M. peak hour. It should be noted that these traffic volumes would not be at the project's critical access location, which is located to the south through the intersection of Camarillo Street and Sepulveda Boulevard. It should also be noted that since they are right-turn-only volumes, both inbound and outbound, they are much less conflicting than left-turn and through movement volumes. Accordingly, the private driveway/fire lane volumes were not required for analysis by LADOT and, therefore, were not depicted diagrammatically in the traffic study or EIR. By analyzing impacts at the Camarillo Street/Sepulveda Boulevard intersection, the EIR did analyze impacts to site access in accordance with the City of Los Angeles CEQA Thresholds Guide

Comment No. 1-81

5. Not only is the driveway on Sepulveda Boulevard ignored in the analysis of the project impacts, but all of the Il Villaggio Toscano driveways have been ignored throughout the DEIR, and therefore, in the FEIR, as well. Beyond stating the number and purposes of the proposed driveways (plus the confusing information on whether or not there will be a driveway on Sepulveda Boulevard), nothing about the proposed driveways is described.

   a) What will be the exact location and width of each driveway? City Department of Transportation policy calls for a minimum width of 30 feet for two-way driveways; that width is not shown in the site plan. [FEIR Figure II-1, page II-2]

   b) What will be the volumes of peak-hour traffic that will use each driveway?

   c) How many lanes will be provided at each driveway?

d) For each driveway, will there be gates or other security devices, and where will such devices be located?

e) What will be the impacts of peak-hour left turns to and from each driveway?

Without this information, the EIR fails to inform the public and decision makers about critical traffic, circulation and pedestrian/vehicle safety issues associated with the proposed project.

Response to Comment No. 1-81

While the commenter has requested additional detail regarding the precise widths and locations of Project driveways beyond that already provided in the EIR, the absence of such building- permit level detail in the EIR does not render the analysis insufficient. The EIR provided substantial diagrammatic information regarding the location of Project driveways and their interrelation with neighboring uses to meet the disclosure requirements of CEQA.

Figure II-1 in the Final EIR is a conceptual Project site plan and for illustrative purposes. The exact locations, widths and design of the Project driveways and access points, along with parking control gates and other related details, are not known at this stage. While LADOT has recommended driveway widths for different types of development and driveway operation, its design principles also recognize that driveway recommendations may vary, depending on site constraints, location and usage, and that narrower driveway widths may be considered where it may be more appropriate or field conditions preclude use of recommended widths.

The critical driveway volumes are those that collectively use the west leg of Camarillo Street approaching Sepulveda Boulevard, which amount to an estimated 62 to 75 percent of the Project trips, depending on the use and inbound/outbound directionality. These volumes were presented and analyzed at this location in the traffic study and EIR. Also, as previously noted, the EIR did analyze impacts to site access in accordance with the City's CEQA Thresholds Guide by analyzing the intersection closest to the Project's primary access point.

The Camarillo Street/Sepulveda Boulevard intersection is projected to operate at LOS E during the P.M. peak hour, which, based on the City's significance threshold for access, would result in a significant impact with respect to access. However, the Project mitigation for this intersection would improve the LOS to C, taking into account the Project's contribution to additional traffic on Camarillo Street. This mitigation would also mitigate access impacts to a level that is less than significant.

The comment speculates about possible impacts to driveways, without citing any supporting facts for its assertions. To the extent commenter is raising concerns about vehicles seeking to make turning movements on Camarillo Street causing a back-up into the Camarillo Street/Sepulveda Boulevard intersection, it should be noted that the California Vehicle Code prohibits unsafe turn movements at intersections and motorists are assumed to abide by the law and make turns only when safe.

For pedestrians, the network of sidewalks, crosswalks and "Walk" signal indications adjacent to the site will be maintained and enhanced by the Project. As with motorists, there are regulations in the Vehicle Code for pedestrians using the public right-of-way, which pedestrians are assumed to obey for their own safety and to walk responsibly in order to avoid or minimize conflicts with motorists.

Comment No. 1-82

6. No attention has been paid to the impacts of Il Villaggio Toscano traffic on the other developments and existing driveways along Camarillo Street. Currently, the south side of Camarillo Street is fully developed with a parking structure for the Sherman Oaks Galleria shopping and office center and a motel. The Galleria parking structure has three significant driveways on Camarillo Street – one for visitor parking entry and exit; one for employee parking entry and exit; and one for visitor parking exit only. The motel at the southeast corner of the Sepulveda Boulevard/Camarillo Street intersection has two entry/exit driveways for its patrons and employees. And, there is an alley separating the Galleria structure from the motel; the alley connects Camarillo Street to the apartment development south of the motel. The DEIR and the traffic impact report make no mention of any of those potentially impacted driveways, nor is there any figure on which they are illustrated.

   The designers of Il Villaggio Toscano are proposing several driveways for the north side of Camarillo Street – a residential drop-off/pick-up area with one entry driveway and one exit driveway; a two-way driveway for residential guests; and a two-way driveway for retail traffic. For the original project, the traffic analysts have estimated that more than 500 vehicles of Il Villaggio Toscano traffic will use Camarillo Street in the peak hour.

   What will be the impacts of Il Villaggio Toscano traffic on the operations of the several existing driveways along the south side of Camarillo Street? It can reasonably be inferred based on the facts in the record to date that the operations of those existing driveways and the alley will be significantly impacted. Additionally, Il Villaggio Toscano traffic would not only likely impact the existing alleys and driveways, it may also result in significant safety hazards at Camarillo Street and Sepulveda Boulevard as vehicles attempting to enter those driveways and alley potentially back up into the intersection.

Yet there is no disclosure, analysis or mitigation of those conditions and impacts. The EIR fails as a sufficient informational document on this additional ground.

As illustrated in FEIR Figure II-1 [page II-2], the residential guest parking driveways will be close to the driveway for the drop-off/pick-up area and also close to the intersection of the driveway/fire road with Camarillo Street. What will be the safety and traffic flow impacts of so many access points within a short frontage and located directly opposite the Galleria parking structure driveways?

Response to Comment No. 1-82

The traffic study was prepared in accordance with LADOT policies and procedures. The comment speculates about potential significant impacts to driveways near the project and safety hazards at the Camarillo Street/Sepulveda Boulevard intersection. Standard engineering principles, in conjunction with LADOT practice, were applied to ensure safety. The comment posits safety concerns without providing any evidence that the project would result in such impacts or specifying what criteria has been applied to reach such conclusive and speculative conclusions.

If driveway access becomes impeded along the cited segment of Camarillo Street, the City may choose to install “Keep Clear” or “Do Not Block” pavement markings on Camarillo Street, such as at the alley intersection. These marking would create an opening that would allow vehicles to make left turns into the alley. In addition, motorists experiencing delay while attempting to make left turns into access points along the south side of Camarillo Street can continue westerly to the terminus of Camarillo Street, a relatively short distance, make a U-turn, and proceed easterly and make a right turn into their access point.

The proximity of the residential guest parking driveway, the residential drop-off area, and the private driveway/fire lane are not expected to affect traffic flow on Camarillo Street, as they are toward the end of the street where traffic volumes would be decreased. It is estimated that guest traffic usage would be low during much of the day, with the early evening hours experiencing higher usage. It is anticipated that the guest traffic volumes would be readily accommodated and also not adversely impact the Galleria driveways. LADOT review of the Project driveways and access points would be undertaken as part of the building permit process, according to appropriate safety and ingress/egress criteria.

The purpose of the traffic study was to analyze impacts to critical intersections that are part of the overall street system, which it did. The main factors affecting conditions on the public street system are the conditions at signalized intersections. The analysis of individual driveways and access points of individual properties is beyond the scope of the

of the traffic study. While the operations of driveways need to be maintained at adequate levels set by the City, these driveways are typical of those operating in developed urban areas and do not require specialized analysis. Such specialized analysis also was not requested by LADOT during the traffic study scoping process, during the Notice of Preparation scoping process for the preparation of the Draft EIR, or during the Draft EIR public comment period. The owners of the properties where the referenced driveways are located have not commented that the project presents any potential circulation or traffic impacts to their uses. The EIR did analyze Project access in accordance with LADOT procedures, as well as the City's CEQA Thresholds Guide, which has screening criteria and then requirements for the analysis of impacts at intersections nearest a project's access points. Furthermore, the detailed design review will be conducted as part of the standard City building permit procedures, which take into account safety for all elements, including access and circulation.

Comment No. 1-83

7. The privately-owned [sic] road along the western edge of the Sherman Oaks Galleria is not discussed. It will likely be a potential access route of Il Villaggio Toscano traffic, even though it is not a public right-of-way, and Il Villaggio Toscano traffic may not be entitled to use it. The road intersects Camarillo Street opposite the proposed intersection of the new driveway/fire road for Il Villaggio Toscano and extends south through the Galleria property to an intersection with Ventura Boulevard. Therefore, traffic heading towards Il Villaggio Toscano could turn left or right to enter the Galleria road from Ventura Boulevard, and traffic leaving Il Villaggio Toscano could turn right from the Galleria road onto westbound Ventura Boulevard heading toward the San Diego Freeway on-ramp and Encino.

   Within the Galleria site, this private road serves parking structure driveways and truck delivery/service areas for the Galleria shopping center. There are numerous locations for vehicle turning and trucks maneuvering into and out of dock areas.

   The DEIR contains no discussion of the potential use of this private road as a short-cut or bypass for Il Villaggio Toscano traffic, with the attendant increase in potential liability to the owners of the Galleria. Because there is no such evaluation, there are no measures that have been proposed to prevent the use the Galleria road as a convenient route to and from Il Villaggio Toscano. That discussion, together with appropriate mitigation measures that will be acceptable to the Galleria management, should be presented in the DEIR and the FEIR. This omission of information ignores both vehicular and pedestrian safety issues in such a high-volume area as the Galleria site and its private road serving parking structure driveways and truck delivery/service areas for the Galleria shopping center.

Response to Comment No. 1-83

The traffic study appropriately did not assume usage of Galleria Lane by the Project. Galleria Lane is the private street that runs along the west side of the Galleria. In the scoping of the traffic study with LADOT, LADOT indicated that Project trips should be assigned to public streets, rather than assume or include private roadways not under the control of the Project developer. This is because it would be reasonable to expect that public streets would remain and be available to regular traffic, but there is no such assurance for a private street under the control of another property owner, which could become restricted and function in a different manner at some point in the future. Project usage of Galleria Lane and the volume of such usage are therefore speculative. The traffic study's methodology is consistent with the City's CEQA Thresholds Guide, which does not contain any adopted thresholds for impacts on private streets and therefore does not require such analysis. Accordingly, no Project usage was assumed for Galleria Lane. Lastly, the comment does not present any evidence of a significant impact, but rather speculates about potential impacts based on some assumed, but unsupported, level of usage.

Comment No. 1-84

8. Mitigation measures are presented for many of the intersections that will be impacted by the Il Villaggio Toscano traffic. At several locations, the measures call for on-street parking to be eliminated in order to provide the additional lane(s) that will be necessary to accommodate the new traffic.

   Camarillo Street, west of Sepulveda Boulevard: Parking will be eliminated on both sides of the street – a total of 14 parking spaces. Those spaces will not be replaced by the parking spaces that will be provided within the Il Villaggio Toscano project. The drivers who currently use those spaces will not be entitled to park within the new development.

   Ventura Boulevard at Beverly Glen Boulevard: Parking will be prohibited on the south side of Ventura Boulevard. According to the traffic engineer's "Conceptual Mitigation Plan", [sic] three parking spaces will be lost. [DEIR Appendix H, page 295]

   What will be the impacts of the removals of those on-street parking spaces, particularly on adjacent businesses? It is reasonable to expect that there will be increased parking spillover into the adjacent neighborhoods south of Ventura Boulevard and the neighborhood east of Sepulveda Boulevard, north and south of Camarillo Street. Yet there is no disclosure, analysis or mitigation of those conditions and impacts. The EIR fails as a sufficient informational document on this additional ground.

Response to Comment No. 1-84

The EIR did disclose that the removal of on-street parking in connection with the implementation of mitigation measures could have an effect on parking in the area, although this impact is not concluded to be significant. (See Draft EIR, Section VI, page VI-12). The basis for this conclusion is that in the vicinity of the Camarillo Street/ Sepulveda Boulevard intersection, there is metered on- street parking available along the east side of Sepulveda Boulevard between Camarillo Street and Moorpark Street, along the south side of Moorpark Street between Sepulveda Boulevard and Columbus Avenue, and along both sides of Columbus Avenue between Moorpark Street and Ventura Boulevard. Off-street parking is also available in the Galleria parking structure. In the vicinity of the Ventura Boulevard/Beverly Glen intersection, there is metered on-street parking available along both sides of Ventura Boulevard between Beverly Glen Boulevard and Van Nuys Boulevard. In light of other available on- and off-street parking within reasonable walking distance (i.e., approximately 0.25 mile), the on-street parking removals that would result from the project were not concluded to be a significant impact. Moreover, the commenter presents no evidence to support the claim that removal of these spaces would result in spillover parking into adjacent residential neighborhoods.

It is important to note that the amount of on-street parking removal that would result from the Project's mitigation measures has decreased since the preparation of the Draft EIR. For example, the mitigation measure approved by LADOT for the intersection of Camarillo Street and Sepulveda Boulevard involved the removal of approximately 14 parking spaces along the north and south sides of Camarillo Street west of Sepulveda Boulevard. However, during the last few years, the City has prohibited all parking along the south side of the street, removing the three spaces that had been available there. As a result, the mitigation measure would actually result in the removal of fewer parking spaces, approximately 11 spaces along the north side of Camarillo Street. It should be further noted that in reality, some of these remaining spaces have also been removed from use due to the long-term "Temporary No Parking" signs that are still in place along that segment.

The Camarillo Street/Sepulveda Boulevard mitigation plan also involved the prohibition of parking along the west side of Sepulveda Boulevard 7:00 A.M. to 10:00 A.M., Monday through Friday. However, the City has already prohibited parking along this segment for an even longer period of time, 7:00 A.M. to 7:00 P.M., Monday through Friday. This action by the City again means less on-street parking removal would actually be necessary when the mitigation measure is implemented.

It should also be noted that nearly all of the streets within the neighborhood east of Sepulveda Boulevard have parking restrictions of some sort, including no parking, two-hour

limitations or residential permit parking only. Therefore, considering all of these factors, no substantial parking spillover into this neighborhood is expected to result from the implementation of the Camarillo Street/Sepulveda Boulevard mitigation measure.

The mitigation measure for the intersection of Ventura Boulevard and Beverly Glen Boulevard involved the removal of up to approximately three parking spaces along the south side of Ventura Boulevard west of Beverly Glen Boulevard, to allow for the implementation of an eastbound right-turn-only lane. LADOT has subsequently determined that only two spaces might need to be removed. There is also on-street parking available on the opposite side of Ventura Boulevard. In addition, the buildings along the south side of this block of Ventura Boulevard have on-site parking in the back. Therefore, with the implementation of the Ventura Boulevard/Beverly Glen Boulevard mitigation measure, any parking spillover south of Ventura Boulevard or elsewhere is expected to be minimal.

Comment No. 1-85

9. The residential neighborhood east of Sepulveda Boulevard has been ignored in the impacts analysis. Only three streets that serve the neighborhood intersect Sepulveda Boulevard between the freeway and Ventura Boulevard – Camarillo Street, La Maida Street, and Moorpark Street. Of those three intersections, all will be significantly impacted by Il Villaggio Toscano traffic, but only one – Sepulveda Boulevard/Camarillo Street – is purported to have its impacts mitigated by the proposed measures. The other two intersections – Sepulveda Boulevard/La Maida Street and Sepulveda Boulevard/Moorpark Street – will not have mitigation measures and will remain significantly and unavoidably impacted after completion of the project. [DEIR page K-50 of the main text].

   With two of the three neighborhood access intersections significantly impacted, there will be a significant, unmitigated impact on the residents and visitors of the neighborhood. Many will choose to change their routes from and to the neighborhood in order to avoid congestion at the impacted intersections. Some may choose to use Camarillo Street for access to/from Sepulveda Boulevard, because it will have the best operations of the three neighborhood street intersections. Others may choose to use the neighborhood streets that intersect Ventura Boulevard, although the intersection of Ventura Boulevard and Kester Avenue (North), which could be viewed as an alternative, will be operating at such poor Levels of Service that it may not be attractive to neighborhood traffic.

   The impacts on neighborhood accessibility should not be ignored. There should be a substantial evaluation of those impacts of Il Villaggio Toscano traffic. The omission of

such information that is so meaningful to the neighborhood residents further results in an EIR that fails as a sufficient informational document.

Response to Comment No. 1-85

Project traffic impacts to the residential neighborhood east of Sepulveda Boulevard were not ignored. These impacts were analyzed in accordance with the standard policies and procedures of LADOT. The traffic study and EIR disclosed impacts at all study intersections, including those along Sepulveda Boulevard and Kester Avenue. These two streets run along the western and eastern boundaries of the broader residential neighborhood referenced in the comment. Four such intersections were analyzed, which included three residential streets, namely, La Maida Street, Camarillo Street and Moorpark Street. Significant, unavoidable impacts were determined for the intersections of La Maida Street and Sepulveda Boulevard, and Moorpark Street and Sepulveda Boulevard, as noted in the comment.

However, considering the many all-way Stop sign controls and speed humps installed in this neighborhood to discourage cut-through traffic, LADOT did not assume Project traffic cutting through this neighborhood. Due to the local-serving nature of the Project grocery store and retail uses, it was estimated that approximately 2 percent of their trips would use neighborhood streets. These trips were estimated to be generated by residents within this general neighborhood. The 45,000-square-foot grocery store and 7,000 square feet of retail uses in the Final EIR Project would generate approximately 2,888 net trips per day. Applying 2 percent to these trips amounts to 58 trips per day. Numerically speaking only, based on the LADOT criteria below, the 58 daily trips would not be sufficient to result in a significant residential street impact.

The current LADOT Traffic Study Policies and Procedures (May 2012) states that a local residential street shall be deemed significantly impacted based on an increase in the average daily traffic volume (ADT) as follows:

Final ADT With Project	Project Increase in ADT
0–999	120 or more
1,000–1,999	12 percent or more of Final ADT
2,000–2,999	10 percent or more of final ADT
3,000 or more	8 percent or more of final ADT

While, as noted above, it was reasonable for the EIR to assume that the Project would not result in a significant contribution to cut through traffic, in response to the

comment, a neighborhood traffic intrusion analysis has been performed, based on the above LADOT criteria.

This traffic intrusion analysis assumed that the two residential streets in this neighborhood likely to experience much or most of the cut-through traffic would be Camarillo Street and Moorpark Street, both of which intersect Sepulveda Boulevard. La Maida Street also intersects Sepulveda Boulevard; however, given its closeness to the 101 Freeway eastbound on-ramp and the heavy volumes on Sepulveda Boulevard, it is difficult to travel across Sepulveda Boulevard at that location and, therefore, would be expected to be used by negligible Project traffic, which would not result in a significant residential street impact.

Based on the Future (2013) Without Project A.M. and P.M. peak-hour volumes in the Final EIR updated analysis, it is estimated that the baseline ADTs are approximately 4,500 on Camarillo Street and 2,700 on Moorpark Street.[4] As depicted in Figures 4(a) and 4(b) in Appendix H-2 of the Draft EIR, it was estimated that 12 percent of the Project residential trips and 17 percent of Project retail trips use the intersection of Ventura Boulevard and Sepulveda Boulevard to travel to and from the east. It has been assumed for this analysis that due to worsening congestion at the intersection of Ventura Boulevard and Sepulveda Boulevard, up to approximately one-fourth of those trips might be induced to cut through this residential neighborhood to avoid this intersection. This would amount to 3 percent of the residential trips and 4.25 percent of the retail trips. For the Final EIR project of 399 dwelling units, 45,000 square-foot grocery store, and 7,000 square feet of retail use, 2,169 net daily trips would be generated by the residential component and, as previously discussed, 2,888 net daily trips by the retail component. Multiplying these daily trips amounts by 3 percent and 4.25 percent, respectively, results in 65 residential trips and 123 retail trips. This represents a total of 188 Project trips potentially cutting through this neighborhood. Based on roughly the proportion of their baseline ADTs to each other, it is estimated that approximately 65 percent of these trips (i.e., 122 trips) would largely use Camarillo Street to access the Sepulveda Boulevard and the Project site, and approximately 35 percent (i.e., 66 trips) would use Moorpark Street for the same purpose.

Adding the 122 Project daily trips to the estimated 4,500 ADT for Camarillo Street yields a Final ADT of 4,622 for this street. Similarly, adding the 66 Project daily trips to 2,700 ADT estimated for Moorpark Street results in a Final ADT of 2,766. Based on the

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[4] *Absent atypical conditions or circumstances, approximately 20 percent of a roadway's daily traffic volume occurs during the AM and PM peak hours. Based on this relationship, the sum of the AM and PM peak-hour volumes traveling in both directions can be multiplied by 5 to estimate the roadway's daily volume near that location.*

above LADOT criteria, the Project's relative ADT increases would be 2.6 percent (i.e., 122 ÷ 4,622) on Camarillo Street and 2.4 percent (i.e., 66 ÷ 2,766) on Moorpark Street. Applying the above LADOT residential street intrusion criteria, these Project trips would not result in a significant impact on either street.

Increasing congestion may also induce additional cut-through traffic from other sources. Such additional traffic would exacerbate conditions in this neighborhood. However, even with the additional cut-through traffic due to others, the Project's portion would still not be expected to be significant.

Comment No. 1-86

10. The alternatives analysis of the DEIR is insufficient in that it does not provide a complete evaluation of the potential for traffic impact mitigation by means of reducing the magnitude of the proposed project.

Beginning on page V-2 of the DEIR text is a section entitled, "2. Alternatives Considered and Rejected". [sic] In the sub-section, "Alternatives to Reduce Significant Traffic Impacts", [sic] there is the statement, "In order to eliminate the significant and unavoidable traffic impacts of the project (at all five intersections that would be significantly impacted), it is estimated that the project would need to be reduced by 86 percent." That is a misstatement. It is not the "project" that would have to be reduced; it is the traffic generated by the project that must be reduced to achieve mitigation. According to the trip generation estimates in Table IV.K-8 [DEIR page IV.K-36 of the main text], approximately 48% of the "Net Project Trips" will be generated by the grocery store and specialty retail components of the project. If those two components were eliminated, that would leave a remaining trip reduction of 207 afternoon peak-hour trips to come from the residential component. That would equate to a reduction of approximately 364 dwelling units, meaning that an alternative of 136 dwelling units, in addition to all of the commercial components, would reduce traffic impacts at all intersections to levels that would be less than significant with mitigation.

An All Residential Use Alternative is analyzed in the Alternatives chapter [beginning on DEIR page V-46 of the main text]; however, the only quantity of dwelling units for which the impacts were evaluated was the original proposal of 500 units. With the elimination of the two retail components, the 500-unit all residential project would still result in unmitigated and unavoidable traffic impacts at three intersections – Ventura Boulevard/ Sepulveda Boulevard; I-405 Freeway northbound ramps – Greenleaf Street/Sepulveda Boulevard; and Moorpark Street/Sepulveda Boulevard [DEIR pages V-59 and 60, DEIR main text]. Not mentioned in the DEIR is that at all three of the unavoidably impacted

intersections, the significant impacts would occur in the afternoon peak hour only; there would be no significant impacts in the morning peak hour at any of those three intersections with the all-residential alternative.

In conclusion, the EIR has failed to analyze a reasonable range of alternatives. As a result, it fails as an adequate informational document.

Response to Comment No. 1-86

The Draft EIR is correct in stating that the original Project would need to be reduced by 86 percent in order to eliminate the significant, unavoidable intersection impacts of the Project. This amount of reduction was based on a uniform reduction of the Project's component uses. It should be noted that there are numerous combinations and permutations of component uses that could be analyzed to achieve the same result.

The comment is made that a Project mix of 136 dwelling units and the same 55,000 square feet of commercial uses analyzed in the Draft EIR would reduce traffic impacts to less than significant levels with mitigation. No evidence has been provided supporting this result. Crain & Associates has analyzed the mix of uses described in the comment and determined that there would still be two remaining significant, unavoidable impacts at the intersections of Ventura Boulevard and Sepulveda Boulevard, and Moorpark Street and Sepulveda Boulevard.

The All Residential Use Alternative would result in significant, unavoidable impacts at the three intersections cited in the comment. However, at the intersection of 405 Freeway Northbound Ramps-Greenleaf Street and Sepulveda Boulevard, the impact would occur during both peak hours, not just the P.M. peak hour mentioned in the comment.

Comment No. 1-87

11. In DEIR sub-section V.E. "Environmentally Superior Alternative", [sic] it is acknowledged that the All Residential Use Alternative would be environmentally superior to the proposed project, including with respect to traffic impacts. "A comparative evaluation of the remaining alternatives indicates that the All Residential Use Alternative would be the environmentally superior alternative. With the elimination of the proposed commercial uses under this alternative, operational impacts associated with demand for public services, and demand for utilities would be less than the project.... this alternative would generate approximately 2,750 fewer daily trips than the project." [page V-69 of the DEIR main text]

The authors go on to say that the All Residential Use Alternative would not meet all of the "project's objectives," because the retail uses would be eliminated with the alternative. The project's objectives were not formulated by an objective and unbiased body, such as a panel of city planners and neighborhood residents and business people. The objectives were formulated by the project applicant and his consultants and were tailored to suit the development components that the applicant proposed, not the verifiable needs of the community. The objectives that would not be met by the alternative are discussed briefly in the DEIR. [DEIR page V-69.]

- "...to provide commercial uses to serve project residents in a manner that contributes to a synergy of site uses and enhances the character of the neighborhood within walking distance of numerous apartments and single-family residences..."

  Patronage of the commercial facilities by residents of the project apartments was not considered to be a significant component of the project trip attraction in the traffic impact study. The traffic analysts for both the applicant and the City assumed that only 5% of the commercial traffic would be "Internal Trip Credit," that is, walking trips between the commercial and residential components of Il Villaggio Toscano. [Table IV.K-8, page IV-36 of the DEIR main text] That means that 95% of the commercial trips were estimated to be coming from outside of the project.

  No trip credit was taken by the traffic engineers for walk-in trips from the nearby apartments and single-family neighborhood. The proposed market, which will constitute 82% of the commercial floor area, will be located in the northernmost part of the site, as far as possible from the nearest apartments on Sepulveda Boulevard south of the motel and as far as possible from the traffic-signal-controlled Sepulveda Boulevard/Camarillo Street intersection at which pedestrians can make the crossing of the wide boulevard that will separate the single-family neighborhood from the market.

  A market with 45,000 square feet of floor area requires a trade area of 1½ to 2 miles in radius. Most patrons will be reluctant to walk more than ¼ of a mile from a market considering the packages that they will have to carry. To consider the proposed market as a significant pedestrian destination is unrealistic.

  Additionally, there are already two supermarkets in the general vicinity of the neighborhood, a Whole Foods at 4520 N. Sepulveda Boulevard and a Pavillions [sic] at 14845 Ventura Boulevard. What pedestrian traffic to a market in the project there might otherwise be will be reduced by the locations and presence of those two supermarkets.

- "...presents an attractive retail face along street frontages while enhancing pedestrian activity and neighborhood commercial street life in the project area..."

  Approximately half of the project frontage along Sepulveda Boulevard will be taken up by the market. Generally, markets use their street frontages for extensive advertising that cannot be considered aesthetically pleasing. The other commercial facilities will be small, totaling 10,000 square feet, and they will have to advertise their names and merchandise/services to the passing traffic to compete with the many similar shops and services in the vicinity.

  As discussed above, the attraction of pedestrians to the commercial facilities will be not significant, and the few who will make that trip will not add meaningfully to the street life along an eight-lane wide Sepulveda Boulevard.

- ".. create a viable and successful mixed-use project through the development of new housing, commercial uses, and associated amenities consistent with market demands..."

  That description of the project's objective speaks more to the applicant's interests than to the interests of the community, considering the magnitude of the impacts that will be significant and unavoidable as a result of the proposed project. The All Residential Use Alternative could be developed as a viable and successful project consistent with market demands and with minimized traffic impacts, as discussed in comment 8, above. The commercial components, which will cause approximately half of the unmitigated and unavoidable traffic impacts, should be eliminated from the proposal.

Response to Comment No. 1-87

CEQA Guidelines Section 15124 states that the EIR shall contain "a statement of objectives sought by the proposed project. The statement of objectives will help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations." In accordance with CEQA, the objectives included in Section II, Project Description, of the Draft EIR incorporate input from the Applicant and the City.

The commenter disagrees with the Project objectives in the EIR related to creating a mixed-use, pedestrian-oriented Project, expressing skepticism that the Project's commercial components will enhance the pedestrian realm. The commenter asserts that the internal trip credit of 5 percent and the absence of walk-in trips from nearby uses assumed in the traffic study is evidence that the commercial component of the Project is not necessary. CEQA requires that an EIR employ a conservative analysis of worst possible scenarios. Therefore, to provide the most conservative analysis of the Project's

potential transportation impacts, a higher internal trip credit, as well as credit for walk-in trips, was not assumed by LADOT. Moreover, even if the actual percentages for these credits are not substantially higher than what was assumed, the amount of pedestrian trips generated by the Project's commercial uses would substantially increase the level of pedestrian activity in the area, compared to existing conditions, creating a more pedestrian-oriented environment.

Although there are two existing markets in the general vicinity, it is expected that the Project grocery store would be competitive and able to attract a large number of patrons, including some from the other two markets. The amount of patrons walking to the Project has not been estimated or credited in the analysis, but with the plaza and pedestrian-oriented environment, it is anticipated that pedestrian patronage would increase over time. A core objective of the Project is to create some synergy and enhance the pedestrian character of the neighborhood, and the EIR analysis supports that inclusion of commercial uses in the Project as a fundamental component of achieving that objective. Satisfaction of this objective does not require that most patrons of the grocery store arrive by foot, as is suggested by the commenter, but that additional pedestrian activity is generated to help create a more pedestrian friendly environment.

Comment No. 1-88

In summary, the EIR is no longer valid and fully-informative. [sic] The traffic impact analyses should be expanded considerably to address the following subjects and should be recirculated so the public and decision makers can review the new information that is vital to the understanding and evaluation of the impacts of the proposed Il Villaggio Toscano.

- The project addressed in the traffic (and other) studies should be the development program that is currently being proposed by the Applicant.
- The related projects list and analysis should be up-dated. This, in turn, will also require an updated cumulative traffic impacts analysis.
- There should be complete descriptions of all of the proposed driveways, including the types of ingress and egress controls that will be used, plus a quantification and analysis of the peak-hour traffic volumes that will use each driveway. Of particular importance are the "private driveway/fire lane" that will intersect Sepulveda Boulevard (despite internally conflicting statements and illustrations to the contrary within the EIR) and the intersection of the private driveway/fire lane with Camarillo Street.
- There must be consideration of the impacts of Il Villaggio Toscano traffic and driveway locations on the existing driveways and alley along the south side of Camarillo Street west of Sepulveda Boulevard.

- There must be analysis of the potential use of the Sherman Oaks Galleria western edge road as a bypass route between Il Villaggio Toscano and Ventura Boulevard.

- The loss of on-street parking resulting from the implementation of several mitigation measures must be studied as secondary impacts.

- The limitations on access to the neighborhood east of Sepulveda Boulevard resulting from the significant impacts of Il Villaggio Toscano traffic must be evaluated.

- The alternatives analysis must be expanded substantially to include analysis of reduced-size all-residential developments that will go further toward mitigating the significant impacts of Il Villaggio Toscano.

- The objectives of the development should be re-stated to address the concerns of the neighboring residents and business people. The objectives should not be mere descriptors of the proposed project primarily reflecting the interests of the applicant.

I would be pleased to discuss my comments and recommendations with you and with City officials and staff. Please contact me at your convenience.

Response to Comment No. 1-88

These comments summarize the comments made in Comment Nos. 1-76 through 1-87 of this Exhibit. As demonstrated by the responses to these comments above, the analysis of potential traffic impacts is adequate and has been prepared in accordance with CEQA under the direction of LADOT. No further analyses are required.

Comment No. 1-89

Exhibit 10—Article: L.A. Fire Department Admits Exaggerating Response Times (*Los Angeles Times*)

Response to Comment No. 1-89

The information provided in this comment was referenced previously in Comment No. 1-24. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-24. Refer to Response to Comment No. 1-24 for additional information.

Comment No. 1-90

Exhibit 11—Article: L.A. Fire Dept. Audit: Medical-Response Waits Lengthen by 12 Seconds Citywide and as Much as 20 Seconds in the Valley (*Los Angeles Daily News*)

Response to Comment No. 1-90

The information provided in this comment was referenced previously in Comment No. 1-24. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-24. Refer to Response to Comment No. 1-24 for additional information.

Comment No. 1-91

Exhibit 12—Interstate 405 Sepulveda Pass Widening Project Draft Environmental Impact Report (Federal Highway Administration and California Department of Transportation)

Response to Comment No. 1-91

The information provided in this comment was referenced previously in Comment No. 1-25. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-25. Refer to Response to Comment No. 1-25 for additional information.

Comment No. 1-92

Exhibit 13—Thomas Brothers Map image

Response to Comment No. 1-92

The information provided in this comment was referenced previously in Comment No. 1-34. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-34. Refer to Response to Comment No. 1-34 for additional information.

Comment No. 1-93

Exhibit 14—Letter to Department of City Planning from South Coast Air Quality Management District, December 8, 2011

Response to Comment No. 1-93

The information provided in this comment was referenced previously in Comment No. 1-35. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-35. Refer to Response to Comment No. 1-35 for additional information.

Comment No. 1-94

Exhibit 15—Letter to Bradly S. Torgan from Kyle Millager, Los Angeles Public Library, March 8, 2011

Response to Comment No. 1-94

The information provided in this comment was referenced previously in Comment No. 1-36. As such, the information provided in this comment was considered and fully addressed as part of Response to Comment No. 1-36. Refer to Response to Comment No. 1-36 for additional information.

Comment Letter No. 2

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765-4182

Comment No. 2-1

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be considered prior to adoption of the Final CEQA document.

SCAQMD staff originally commented on this project during the Draft EIR commenting period. At the time, we expressed concern with placing residents within such close proximity to one of the busiest freeway interchanges in southern California. SCAQMD staff maintains that until vehicle emissions can be more effectively controlled, buffer zones remain the most effective mitigation to reduce exposure. We made several comments regarding the technical air quality analysis in the Draft EIR, including the Health Risk Assessment (HRA) that was conducted for the site. In the Final EIR, the lead agency has provided written responses to all of our comments. In addition, it appears that the HRA was revised and the dispersion modeling files were provided to SCAQMD staff on cd. However SCAQMD staff was unable to locate any of the accompanying emission calculations in the Final EIR in either pdf or electronic format. Without these calculations, SCAQMD staff cannot confirm whether the revised HRA demonstrates that air quality impacts on future residents will fall below thresholds from the adjacent freeways' emissions.

Response to Comment No. 2-1

This comment acknowledges that the Final EIR provided written responses to all of the SCAQMD comments on the Draft EIR. The SCAQMD is correct that the HRA was revised to respond to SCAQMD's comments on the Draft EIR. That revised analysis was included in Revised Draft EIR Appendix B-5 of the Final EIR. The revised analysis continues to demonstrate that the proposed project would result in less than significant health risk impacts with incorporation of mitigation measures.

In accordance with CEQA requirements, a Notice of Public Hearing and Availability of Final Environmental Impact Report was sent to owners, occupants within a 500-foot radius of the Project Site, as well as interested parties, and those who requested notification. In addition, CD copies of the Final EIR with the appendices were also provided to persons that commented on the Draft EIR and numerous public agencies, including the SCAQMD. The Final EIR and associated appendices, including the revised health risk analysis, were also made available for public review on the City's website and other locations specified in the Notice of Public Hearing and Availability. As demonstrated by receipts from FedEx, two CD copies of the Final EIR and appendices were delivered to Ian MacMillan and Steve Smith, Ph.D., on Friday, January 25, 2013. In addition, the package to Ian MacMillan also included a separate CD with all of the modeling files. Thus, the SCAQMD had all necessary documentation and calculations for review of the revised HRA.

Comment No. 2-2

Further, the proposed mitigation, installation of MERV16 rated filters in the building's ventilation system appear to be a unique measure. SCAQMD staff is not aware of any other residential project with filters rated higher than MERV 13. The MERV scale does not test filter efficiency for particles sizes below 0.3 microns, yet the particles from freeway exhaust found to be of highest concern in recent research are ultrafine particles (<0.1 microns). Although some filters may be effective at these smaller size ranges, because of the unique demands of this project, SCAQMD staff recommends that the specific filters required for this project go through a verification process to ensure that they will meet the specified requirements for all particle size ranges.

Response to Comment No. 2-2

Air Quality expert Bill Piazza prepared a report in response to Comment No. 2-2. Refer Appendix E. As set forth therein, the SCAQMD notes that they are unaware of the use of MERV 16 rated filters for residential projects. Notwithstanding, a number of manufactures provide air cleaning devices specifically designed for use in residential applications. For example, York manufactures a whole house hybrid electronic cleaner which provides exceptional performance (MERV 16 equivalent) by incorporating disposable filter media eliminating the use of traditional collector plates. This and similar devices were discussed as appropriate mitigation options for the proposed project and are incorporated into the project design to reduce pollutant exposures below significance thresholds.

The filtration requirements, which were identified in the pollution exposure assessment and subsequent evaluation of revised building elevations report, control known pollutants with defined standards and thresholds. The filtration requirements meet or exceed the levels necessary to mitigate pollutant impacts for particle sizes with known health effects (DPM, PM_{10}, and $PM_{2.5}$). Ultrafine particles (UFPs) are only now emerging

as a focus for future research. No determination as to their health effects has been established. This fact is well documented in SCAQMD's 2012 Air Quality Management Plan (AQMP). As cited in the AQMP, SCAQMD notes recent findings in the U.S. Environmental Protection Agency Integrated Science Assessment for Particulate Matter report, which states:

> "[T]here is inadequate evidence linking long-term exposure of UFPs to health effects, including respiratory, developmental, cancer, and mortality. Overall, epidemiological studies of atmospheric PM suggest that cardiovascular effects are associated with smaller particles, but there are few reports that make a clear link between UFP exposures and increased mortality."

The SCAQMD continues by stating:

> "New toxicological and epidemiological studies targeting exposure to controlled and uncontrolled emissions from gasoline and diesel vehicles are needed to better characterize the exposure-response relationships to UFPs and to help develop health guidelines and potential regulations. The health effects of inorganic (largely related to oil consumption ash constituents) UFP emissions from vehicles are only now starting to receive significant attention."

It is for these reasons that UFPs are currently not regulated by the SCAQMD, California Air Resources Board or U.S. Environmental Protection Agency. As such, the identified filtration mitigation measures for the proposed project are appropriate and verification of their effectiveness to control DPM, PM_{10}, and $PM_{2.5}$ is not required.

Comment Letter No. 3

Gerald A. Silver
Homeowners of Encino (HOME)
P.O. Box 260205
Encino, CA 91426

Marshall Long
Sherman Oaks Homeowners Assn. (SOHA)
P.O. Box 5223
Sherman Oaks, CA 91413

Comment No. 3-1

We object to the traffic, noise, congestion, infrastructure damage and pollution that massive 8-story, 399 unit apartment buildings which violate the Ventura/Cahuenga Boulevard Corridor Specific Plan will bring to Encino and Sherman Oaks.

We ask that the City and County reject the Final EIR for this project. The Final EIR prepared by Matrix Environmental is "authoritative" looking on the surface, but is grossly inadequate and fails in its findings. The Final EIR is devoid of meaningful mitigation measures and contains many flawed conclusions. The lengthy document obfuscates traffic, congestion and infrastructure problems while going on at length about tangential matters and ignores mitigation measures that are required by CEQA. Throughout the Final EIR the preparer reaches faulty conclusions claiming impacts are reduced to "less than insignificant" when in reality the impacts are significant.

We ask that the City not approve any zone changes, height district changes, vesting zone changes, general plan amendments, specific plan amendments, variances, exceptions or conditional use permits or street vacations for this project. The project is in the Ventura/Cahuenga Specific Plan that forbids structures of this size and height. The project violates the language and spirit of the Specific Plan and will create environmental problems that cannot be mitigated.

We ask that you deny the Applicant's requests described below:

Pursuant to Sections 12.32 F and Q, of the Los Angeles Municipal Code (L.A.M C),), [sic] a Vesting Zone and Height District change from the (Q)CR-1L, (Q)P-1L, R3-1L and R1-1L Zones to the (T)(Q)C2-2D Zone (Height District 2D).

1. Pursuant to Section 11.S.7.F of the L.A.M.C, the Applicant requests the following Exceptions from the Ventura-Cahuenga Boulevard Corridor Specific Plan sections:

a) Section 6.B.4 restricts the floor area of a project to 1.5 to 1. The project involves a proposed floor area ratio of 2.75 to 1.

b) Section 7.A.2.a prohibits front yard setbacks in excess of 10 feet. The Applicant is requesting to exceed the front yard setback by 59 feet for approximately 137 lineal feet of the project's approximate 461 lineal-foot Sepulveda Boulevard frontage to accommodate portions of an approximate 13,000 square-foot public plaza, which is approximately 69 feet deep and approximately 137 feet wide.

c) Section 7.B.1 restricts the maximum lot coverage to 75%. The Applicant is requesting maximum lot coverage of 78.5% at grade.

d) Section 7.E.1.b.4 limits the building heights in this sub-area to 75 feet. The Applicant is requesting a maximum building height of 100 feet over approximately 32% of the site.

2. Pursuant to Section 11.5.7C of the L.A.M.C., the Applicant requests that the Director of Planning approve the project for compliance with the Ventura/Cahuenga Boulevard Corridor Specific Plan with the exceptions identified above.

3. Pursuant to L.A.M.C. Section 12.24W1, the Applicant requests permission to sell a full line of alcoholic beverages for off-site consumption in conjunction with a retail grocery store.

4. Pursuant to L.A.M.C. Section 17.01, the Applicant requests approval of Vesting Tentative Tract Map (Tract No. 61216) to merge the parcel of land into a single ground lot, with 9 airspace lots. The subdivision would include a haul route and the vacating of La Maida Street and Peach Avenue. The applicant also requests that Sepulveda Boulevard be designated as the front yard.

5. Pursuant to L.A.M.C. Section 16.05, the Applicant requests that the decision-maker make the Site Plan Review findings.

6. Also, pursuant to Section 21082.1(c) of the Public Resources Code, Certification of the Environmental Impact Report and the adoption of findings and Statement of Overriding Considerations of the environmental evaluation provided in the Environmental Impact Report.

The findings below further support our objections to this massive project:

1. The proposed location will not be desirable to the public convenience or welfare and is not proper in relation to adjacent uses and the development of the community. The object here is to determine what is harmonious with the neighborhood and community, not what will maximize the Applicant's profits.

2. The uses will be materially detrimental to the character of the development in the immediate neighborhood, and other projects on Sepulveda Blvd. This project is totally out of scale in height and bulk to other projects on Sepulveda Blvd.

3. The proposed location is not in harmony with the various elements and objectives of the Specific Plan. Exceptions, zone changes and variances are not needed to build a project on this property. Rather, this is a situation where the Applicant simply wants exceptions to the rules, to make this project more valuable, at a cost to the community. Benefits to the Applicant should not be the major determinant. Rather, the focus should be on this project's impact on the neighborhood. Moreover, the Applicant was aware of all restrictions on this property when he purchased the property. He can build and use his property rights without the exceptions requested.

4. The project's location will adversely affect the traffic in the community and result in increased congestion. The proposed use will detrimentally impact traffic on Ventura Blvd. and Sepulveda Blvd., in an area already congested. Adding hundreds or perhaps thousands of new trips will make traffic even more unbearable during peak hours. This stretch of Sepulveda Blvd. is located near many F level intersections including Ventura Blvd .and cannot handle increased trips.

5. Granting any of the Applicant's requests will make a mockery of the Specific Plan. It would allow massive 8-story buildings, with excessive bulk that is a bad precedent. Other property owners will use this case to trash the Specific Plan. The Specific Plan only provides minimal protection to the communities of Sherman Oaks and Encino. It must not be degraded further. \

Attached is a 135 Petition on behalf of our members, and the thousands of Encino and Sherman Oaks residents that object to this massive project.

Attached is the combined HOME, SOHA Response to the Final EIR.

We ask that you not approve the zone changes, height district changes, variances, exceptions or street vacations that are requested.

=====

I. HOMEOWNERS OF ENCINO [and] SHERMAN OAKS HOMEOWNERS ASSN.

This Response is filed jointly by the Homeowners of Encino and Sherman Oaks Homeowners Assn., Californian non-profit corporations duly organized and existing under the laws of the State of California. These Associations are organized for the purpose of promoting social welfare. These corporations seeks to protect the residential character of its neighborhoods and to enhance the quality of life for its members and the community. Many of its members reside within the neighborhood of the proposed project, and will be heavily impacted by it.

II. DESCRIPTION OF PROJECT

The proposed project would include a maximum of 399 multi-family residential units and approximately 52,000 square feet of neighborhood-serving commercial uses in a series of buildings built over a parking podium. Maximum height of the buildings would be 100 feet in a zone allowing a maximum of 75 feet. The combined gross floor area for the proposed project would total approximately 582,359 square feet, with a floor area ratio (FAR) of 2.75: 1, in a zone allowing a maximum FAR of 1.5: 1. The lot coverage requested is 78.5% in a zone allowing a maximum of 75%.

The Hearing Officer and Advisory Agency will consider: Pursuant to Sections 12.32 F and Q, of the Los Angeles Municipal Code (L.A.M C), [sic] a Vesting Zone and Height District change from the (Q)CR-1L, (Q)P-1L, R3-1L and R1-1L Zones to the (T)(Q)C2-2D Zone (Height District 2D).

1. Pursuant to Section 11.5.7.F of the L.A.M.C, the Applicant requests the following Exceptions from the Ventura-Cahuenga Boulevard Corridor Specific Plan sections:

a) Section 6.B.4 restricts the floor area of a project to 1.5 to 1. The project involves a proposed floor area ratio of 2.75 to 1.

b) Section 7.A.2.a prohibits front yard setbacks in excess of 10 feet. The Applicant is requesting to exceed the front yard setback by 59 feet for approximately 137 lineal feet of the project's approximate 461 lineal-foot Sepulveda Boulevard frontage to accommodate portions of an approximate 13,000 square-foot public plaza, which is approximately 69 feet deep and approximately 137 feet wide.

c) Section 7.B.1 restricts the maximum lot coverage to 75%. The Applicant is requesting maximum lot coverage of 78.5% at grade.

d) Section 7.E.1.b.4 limits the building heights in this sub-area to 75 feet. The Applicant is requesting a maximum building height of 100 feet over approximately 32% of the site.

2. Pursuant to Section 11.5.7C of the L.A.M.C., the Applicant requests that the Director of Planning approve the project for compliance with the Ventura/Cahuenga [sic] Boulevard Corridor Specific Plan with the exceptions identified above.

3. Pursuant to L.A.M.C. Section 12.24W1, the Applicant requests permission to sell a full line of alcoholic beverages for off-site consumption in conjunction with a retail grocery store.

4. Pursuant to L.A.M.C. Section 17.01, the Applicant requests approval of Vesting Tentative Tract Map (Tract No. 61216) to merge the parcel of land into a single ground lot, with 9 airspace lots. The subdivision would include a haul route and the vacating of La Maida Street and Peach Avenue. The applicant also requests that Sepulveda Boulevard be designated as the front yard.

5. Pursuant to L.A.M.C. Section 16.05, the Applicant requests that the decision-maker make the Site Plan Review findings.

6. Also, pursuant to Section 21082.1(c) of the Public Resources Code, Certification of the Environmental Impact Report and the adoption of findings and Statement of Overriding Considerations of the environmental evaluation provided in the Environmental Impact Report.

III. IMPACTS THAT HAVE NOT BEEN FULLY ASSESSED

We believe that the proposed project will have significant impacts on the environment that have not been fully addressed nor mitigated in the Final EIR. It will have a significant impact on air quality, water, natural resources, population, noise, geology, energy, and population growth.

We ask that the City reject the Final EIR for this project. The Final EIR prepared by Matrix Environmental is “authoritative” looking on the surface, but is grossly inadequate and fails in its findings. The Final EIR is devoid of meaningful mitigation measures and contains many flawed conclusions. The lengthy document obfuscates traffic, congestion and infrastructure problems while going on at length about tangential matters and ignores

mitigation measures that are required by CEQA. Throughout the Final EIR the preparer reaches faulty conclusions claiming impacts are reduced to “less than significant” when in reality the impacts are significant.

The Lead Agency must take into consideration the effects of this and other projects which, will have individually limited, but cumulatively considerable impact on the environment. With the effects of past, current and probably future projects mandatory findings of significance should be found. (Guidelines Sec. 15065) Throughout the Final EIR your Mitigation Monitoring and Reporting Program has relied upon “mitigations” that are required by law or official regulations and these are unacceptable. Such measures cannot serve as mitigations to satisfy the requirements of the California Environmental Quality Act (CEQA). Nor can mitigations be acceptable that are considered to be standard operating practices by developers who could be found negligent, if such operating procedures were not met.

In preparing your final EIR, you must recognize that any mitigations in your Mitigation Monitoring and Reporting Program must go beyond those mandated by law or existing policy and practice. Compliance with the law and standard operating procedures establishes the baseline. CEQA mitigations are discretionary actions taken beyond the baseline. You must include verifiable mitigations in the final EIR, not merely a recital of legal requirements or standard operating practices. We ask that you revise your findings and address the following environmental concerns which we believe have been overlooked or inadequately mitigated within your Final EIR:

IV. IMPACTS ON EARTH

Your geological impact mitigation measure D-1 is inadequate and does not reduce the earth impacts to insignificance, as is claimed in your Final EIR.

This project will result in disruptions, displacements, compaction and overcovering of soil. The final EIR should specify what grading will be done, and provide a time line indicating the starting and ending dates of all grading and construction activities. 3Haul [sic] routes should be described, and mitigation proposed for dealing with the traffic congestion created by the hauling of large amounts of soil on city streets to dumpsites. The information presented in the final EIR should be sufficient to allow for a clear understanding of the geologic hazards and their impacts. The final EIR should present a comprehensive summary of known geologic and seismic hazards near the site. These should be clearly identified to ensure that the proposed buildings plans willfully evaluate and mitigate the problems.

The final EIR should include maps that show areas of unsuitable fill soils, potentially unstable slopes, areas of differential settlement, areas of expansive soils, and the potential

zone of inundation from flooding, due to a 100 year flood. The final EIR should present a summary of seismic information on ground acceleration and the duration of strong shaking that could be expected from large earthquakes on nearby faults. Impacts of seismic shaking on existing buildings in the area, and on stability of slopes and fills, should be addressed.

V. AIR IMPACTS

Your air impacts mitigation measures B-1 through B-11 are inadequate and do not reduce the air impacts to insignificance, as is claimed in your Final EIR.

The Final EIR did not fully mitigate the air impacts. A project of this size will have a deteriorating effect on air quality in the region, which is located in a locality which does not meet Federal and State air quality standards. The construction of the project will generate Carbon Monoxide, Nitrous Oxide, Ozone and particulate matter, making it more difficult to attain the required air standards in the basin. Please identify in the final EIR the specific increases of air pollutants generated by this project, and the cumulative impacts on the air quality in the region.

Your assessment should show how this project, when taken together with all other proposed projects in the area will impact air quality. It should show threshold levels of significance for each type of air emission. Your final EIR should show that all impacts have been reduced to insignificance, in order to comply with the City of Los Angeles and EPA agreement.

Also address the air impacts at both the local level, and within the region. Explain how these impacts will be fully mitigated. Specifically, quantify all related vehicular air emissions, and include the factors, formulas and computations used to arrive at these impacts, and their mitigations. Provide an appendix with all necessary and supporting documentation, including the paper trail that will allow concerned citizens, or decision makers to trace your steps, and your conclusions with regard to air impacts.

Please explain in the final EIR what effects diesel fumes, gasoline powered equipment fumes and construction odors will have upon those with respiratory problems, or the aged living nearby. Also discuss the impact on local flora and fauna, giving specific effects upon plant and animal life, as a result of the additional air degradation that may be caused by the project. The EPA has stressed the importance of secondary air impact analysis. The final EIR should assess the secondary air impacts that will result from this project and please provide adequate mitigations for these air impacts.

VI. WATER IMPACTS

Your water mitigation measures F-1 through F-6 are inadequate and do not reduce the water impacts to insignificance, as is claimed in your Final EIR.

The Los Angeles basin is located in a permanent drought area. The direct water impacts from this project have not been fully mitigated. Identify source of water, how it will be used in the project, and how the removal of water from the aquifer will be replaced. Fully explain the quantitative impacts on the local and regional water supply, as a result of this project. Estimate water consumption both during and after construction. Provide a detailed list of mitigations to reduce the consumption of water to insignificance.

The City of Los Angeles has enacted ordinances which mandate many water saving and conservation measures. These items must be considered baseline, and do not qualify as mitigation measures, since they are already the law. Your final EIR should impose more extensive measures to deal with the water consumption issue. Please also provide mitigations for dealing with secondary water impacts. The growth sustained by a project of this size will consume large amounts of fresh water, which are in short supply in the region. Also please detail the amount of water necessary for control of dust as well as the cumulative amount of water needed by this project during the construction phase.

If reclaimed sewage water is to be used for dust control, the effects of misting and air borne transfer of viruses should be analyzed and reported. Include the factors, formulas and computations used to arrive at these impacts, and their mitigations.

VII. IMPACT UPON ANIMAL AND PLANT LIFE

Your mitigation measures C-1 through C-2 are inadequate and do not reduce the impacts to insignificance, as is claimed in your Final EIR.

A project of this size will have a detrimental effect upon the flora and fauna in the project area. The area is a natural habitat for birds and other animals. It will not be possible to construct the project, without a serious impact on the local biota. Provide a detailed assessment of impacts on both plant and animal life as a result of the project. Also provide detailed mitigations to reduce these potential impacts to insignificance.

VIII. NOISE IMPACTS

Your noise impact mitigation measures H-1 through H-6 are inadequate and do not reduce the noise impacts to insignificance, as is claimed in your Final EIR.

A substantial amount of noise will be generated by the proposed project during construction. The movement of heavy vehicles, trucks, compressors and construction equipment will create severe noise problems. Show how it will be possible to construct this project, including removal of many cubic yards of soil without creating severe noise impacts. Noise must be reduced to insignificance.

The final EIR should explain the effects of noise levels on local residents and construction workers, during construction, and the impact on the emotional and physiological well being of people living nearby. Please explain in detail the effects of specific pieces of construction equipment, the noise levels, dBA, frequency and duration of sound that people will be exposed to. Also explain the impact of sustained noise upon the aged or those who are ill and may reside near the construction site. The final EIR should provide mitigation measures that will reduce the noise created by this project to insignificance.

IX. LAND USE IMPACTS

Your Final EIR does not contain any Land Use mitigation measures and do [sic] not reduce the Land Use impacts to insignificance.

Light and glare was not adequately mitigated in the Final EIR. Residents living near the construction site will be subjected to light and glare. The applicant must be required to illuminate the premises without casting light and glare on nearby buildings. Any buildings located adjacent to the project will be directly impacted. The light and glare that will spill onto nearby buildings must be mitigated in the final EIR. The construction project will result in altered shade and shadow conditions which should also be mitigated to insignificance in the final EIR.

X. CHANGES IN POPULATION

Your Final EIR concludes that “Impacts related to population, housing, and employment would be less than significant and thus, no mitigation measures would be required” is a faulty conclusion and must be mitigated. Your do not include any mitigation measures for population, housing and employment, and these need to be included [sic]

Changes in population will occur if this project is approved. It will alter the distribution, density and growth rate in the region. Providing more buildings, jobs and employment in this region will make it more difficult to achieve a balance between the environment and the population. It may cause greater population density in a regional ready without adequate infrastructure. In your final EIR, please show how the project adheres to the job/housing balance. Provide a detailed assessment of the growth and job impacts. What kinds and types of jobs will be created, as a result of this project. Analyze the effects on

unemployment on individuals with various jobs skills. Also explore what housing is available to accommodate any increase in direct and indirect employment. Provide a detailed list of mitigation measures to deal with any job/housing imbalance created by the project.

XI. AIR TRAFFIC IMPACTS

Due to the proposed building height, it appears that the project will require a Notice of Proposed Construction or Alternation (Form7660-1) [sic] by the Federal Aviation Administration (FAA), in accordance with FAA regulations, Part 77. If a heliport is also contemplated, a State heliport permit is also needed. This subject has not been adequately addressed in the Final EIR. The final EIR should fully cover all air safety, and building height issues.

XII. TRAFFIC AND CIRCULATION

Your mitigation measures K-1 through K-16 are inadequate and do not reduce the traffic and circulation impacts to insignificance, as is claimed in your Final EIR. Only seven of the eleven intersections are minimally mitigated, while others remain with serious impacts.

Transportation and traffic circulation will be negatively impacted by the proposed project. There are a number of E and F level intersections in the vicinity of the project. The construction of this project and removal of large amount of soil over city streets will impede traffic and circulation and make gridlock worse. The final EIR should explain how the E and F level, gridlocked intersections in the area will be mitigated to insignificance.

Because of the project's magnitude and the substantial construction required, the proposed project will generate significant traffic congestion problems. Traffic congestion resulting from the expansion of freeways and access roads, lane closures, detours, slow moving construction vehicles and equipment, project personnel commutes, etc. significantly increase traffic and mobile-source air emissions. Please provide detailed maps in the final EIR which will show how the project will fully mitigate traffic in the area, including the number of lanes of traffic that will be lost due to the movement of heavy equipment to and from the site during construction.

Since the project has corridor level transportation impacts, what are the long term impacts? Estimate the number of trips generated, and provide documentation on the assumptions. How will the project affect public transportation in the region, and locally? What will the impact be on nearby freeways and will it encourage the need to double deck freeways. This project will have a mutual impact on other projects in the area. Explain in the final EIR

the interactive impacts on the existing circulation system, on Ventura Blvd. and the secondary highways.

The final EIR should deal with the phasing issue comprehensively. What will be the incremental impacts on traffic, and if phased, how will the infrastructure be phased in so that all mitigations are in place to prevent increases in traffic or a degradation of circulation? Include the factors, formulas and computations used to arrive at these impacts, and their mitigations.

Consideration should be given to elimination of the underground levels of parking and the substitution of shuttle buses, car-pool requirements or public transit for all employees using the site. This mitigation should entail businesses on the site giving customers and employees free bus passes, dial-a-ride services and the introduction of a post office, drug store and other services to discourage employees from leaving during working hours.

XIII. PUBLIC SERVICE IMPACTS

Your public service impact mitigation measures J-1 through J-5, are inadequate and do not reduce the public service impacts to insignificance, as is claimed in your Final EIR.

The Final EIR fails to mitigate how adding 399 new apartments with thousands of new resident will impact local schools, parks and libraries. The Final EIR offers only token mitigation measures. For example, Mitigation Measure J-6 states “Project Applicant shall pay developer fees to Los Angeles Unified School District prior to the issuance of building permits. Mitigation Measure J-S states “the Applicant shall do one or more of the following: (1) dedicate additional parkland to meet the requirements of Los Angeles Municipal Code Section 17.12; 2) [sic] pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in lieu fees. Without any foundation the Final EIR concludes “the project’s impacts to libraries would be less than significant. Therefore, no mitigation measures would be required.”

The final EIR should fully address all impact on public services. Police and fire services are inadequate to meet the present community needs. This project will generate additional demands that the City systems cannot handle. The final EIR should show how the applicant intends to mitigate the drain on local public services. It should present a detailed explanation of the degraded response times to police, fire and paramedic services. It should present specific mitigations and funding mechanism that show how the applicant will offset the deteriorated public service response capability.

Your final EIR should thoroughly cover the adequacy of fire-flow requirements for the necessary level of protection, response distance from existing fire stations, etc. The

quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Show what improvements will be needed to provide the adequate G.P.M. for fire-flow. The final EIR should contain a thorough analysis of this topic, in consultation with the Water Services Section of the Department of Water and Power. It should also show how the G.P.M. requirements for the first-due Engine Company will be met, and the distance of the first-due Truck company. You will also need to show at least two different ingress/egress roads that will accommodate major fire apparatus, and provide for major evacuation during emergency situations. Include off-site and on-site location of fire hydrants, fire lane widths, and how the project will affect staffing for existing facilities, or the location of present fire protection facilities.

The final EIR did not adequately analyze police services and crime rates in the area, and the impact of this project on these rates. It should include average response times, and show the number of officers deployed in the area, and the impact on current levels of staffing. Show how parking areas will be controlled, use of closed circuit television, and how elevators, lobbies and parking areas will be illuminated to prevent an increase in crime which could result from this project. In particular include data on burglary from autos, auto theft and assaults.

XIV. IMPACT ON ENERGY AND UTILITIES

Your mitigation measures L-1 through L-5, are inadequate and do not reduce the energy and utility impacts to insignificance, as is claimed in your Final EIR.

You offer no mitigations for the impacts on the wastewater system. The conclusion that “impacts to the City’s wastewater system would be less than significant. Therefore, no mitigation measures would be required” is faulty and must be mitigated.

Utilities will be impacted by the proposed project. The lead agency is, or should be, aware of the limits on solid waste disposal. Large amount of soil will have to be trucked to a dumpsite as the project proceeds, making landfill disposal problems worse. The final EIR should quantify the impact that this project will have on the capacity and exhaustion of local landfills, both during and after construction. Specifically how many cubic yards of soil will be trucked to landfills, and how much solid waste will be exported, and to which sites? Show haul routes and the time of day when city streets will be used for this purpose. How much electrical energy will be needed to operate the project, once it is in operation. Will backup energy sources be used?

What will be the impact on the wastewater system. Show the volume of sewage produced by the project, and how it will impact the Hyperion, Los Angeles-Glendale and Tillman

plants. Show which sewage lines will need to be upsized, which streets will be affected, and for how long a period. The final EIR should analyze the availability of hydraulic capacity for the anticipated flow in the local and interceptor sewers serving the proposed project area. The quantity and quality of wastewater to be discharged to the sewer system should be more thoroughly analyzed.

The City of Los Angeles has enacted ordinances which are designed to reduce the volume of water introduced into the sewage system. These measures must be considered baseline, and do not qualify as mitigation measures, since they are already the law. Your final EIR should impose more extensive measures to deal with the sewage flow issue. Include the factors, formulas and computations used to arrive at these impacts, and their mitigations. Provide an appendix with all necessary and supporting documentation, including the paper trail that will allow concerned citizens, or decision makers to trace your steps, and your conclusions with regard to energy, sewage and utility impacts.

XV. AESTHETIC IMPACTS

You offer no mitigations for aesthetic impacts. The conclusion that “Impacts related to aesthetics, views, light and glare, and shading would be less than significant” is faulty and must be mitigated.

This project will result in aesthetically offensive sites to public view. Some residents living near the site presently, have an open view of the skyline. Their view will be blocked by the structure that will be built. Mitigation should be proposed for this problem. The project will be out of scale in relation to the other buildings nearby. Explain how this project will impact the ambiance and habitability of the community. What impact will this project have on the other business establishments, access to businesses and the present viewscape? What impact will it have on the marketability of homes nearby?

XVI. GROWTH INDUCING IMPACTS

Your conclusion that “No mitigation measures would be required for the project with respect to population, housing, and employment. As such, no potential secondary effects would occur” is flawed. You must include mitigation measures to reduce the impacts to insignificance.

The final EIR should discuss properly the growth inducing impacts of the project and the environmental effects, and must be adequate under CEQA, Pub. Res. Code, Sec. 21000 et seq. What will be the cumulative impacts of growth in the region? Specifically the Supreme Court stated that “a final EIR must include an analysis of the environmental effects of future expansion or other actions if: (1) it is a reasonably foreseeable

consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." Please be sure the final EIR properly addresses and mitigates growth inducing impacts which will have individually limited, but cumulatively considerable impact. A final EIR must be prepared which gives thoughtful discussion to dealing with short-term versus long term effects.

XVII. ADDITIONAL ENVIRONMENTAL MITIGATIONS ARE NEEDED

We believe that the lead agency should not only include a review of the significant impacts, but also describe other realistic and practical mitigations. The following specific mitigations should be explicitly stated in addition to those described above, before a final EIR is certified:

1. All construction activities, unloading of cement trucks, material deliveries, etc., should be done from the site proper. The developer should be required to plan a phased construction activity which eliminates any blockage of Sepulveda Blvd. or Ventura Blvd.

2. There should be no staging or storage of materials on any public rights of way during construction. Sidewalks, roadways, and parkway should not be used for the storage of construction materials, trash dumpsters, etc.

3. No motion picture theaters, night club, or other activities that draw large numbers of people should be permitted at this site. Since the property abuts a residential neighborhood, only low level, low density usage should be permitted.

4. Any destruction to roadways or trees caused by the construction of this project should be repaired immediately. Adjacent roadways should not be allowed to fall into a state of disrepair.

5. No trucks, cranes, or construction vehicles should be permitted to block Sepulveda Blvd. All construction activities should be conducted from within the site.

6. Adequate provision should be made for employee parking on site, both during construction and when the project is completed.

7. Adequate staff shall be required to police the adjacent area of trash. There shall be no disposal of trash by construction workers, including fast food containers, or other debris that will adversely impact the neighbors. Adequate police services shall be provided as a

prerequisite to construction to prevent workers from urinating on lawns, catcalling to nearby residents, parking on neighboring lawns, etc.

8. A construction ombudsman shall be employed. His or her phone number shall be posted, including a night telephone number, and regular office hours shall be maintained to handle resident complaints.

9. Air conditioning equipment shall be enclosed and muffled. No audible sounds shall be heard beyond the property line from this type of equipment. Restaurant exhaust vents and fans shall be so constructed as to absorb grease and odors so that neighboring homes are not impacted.

10. All pickups and deliveries to the building shall be made between the hours of 8 AM and 5 P.M. Adequate loading docks shall be provided at least 200 feet from nearby residents, with no pickups, deliveries, or other services permitted from the public right of way. Moving vans shall be prohibited from utilizing the public right of way to move tenants in and out of the building. Instead, they should be required to use an on-site loading dock.

11. Adequate funding shall be provided for the implementation of a Neighborhood Protection Ordinance to address traffic issues in surrounding neighborhoods and communities impacted by this project.

XVIII. NO PROJECT ALTERNATIVE

The importance of alternatives in the EIR process is clearly established in law. CEQA Sec. 21081 requires a finding of infeasibility for each environmentally superior project alternative in the EIR prior to approval of any project which will result insignificant adverse environmental effects. It will be essential that the final EIR make a full assessment of the impacts of alternatives, including a thorough discussion of a No Project alternative. (Citizens of Goleta Valley, 89 Daily Journal D.A.R. 11920) [sic] The No Project alternative is especially important since the project is located in the center of a polluted ecosystem with degraded air, water and earth. This alternative should consider not constructing the project, or shifting it elsewhere and thus reducing the demands on the infrastructure.

The lead agency is required to make a finding, supported by substantial evidence that the “no project” alternative is infeasible. You should be aware of this requirement in the preparation of the final EIR. Pub. Res. Code Seqs. 21002 and 21002.1(b) affirmatively mandate that public agencies take concrete actions to protect the environment” whenever it is feasible to do so.” This substantive duty is enforced through the findings requirements of Seq. 21081 and Guidelines Sec.15091. [sic] These sections require a public agency to make detailed findings regarding the feasibility of all environmentally superior alternatives

or additional mitigation measures available prior to approving any project which may cause significant impacts on the environment. See Village Laguna of Laguna Beach, Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022, 1034-1035, 185 Cal.Rptr. 41.

Where the project, as approved, will result in significant environmental impacts, the agency must make the finding, pursuant to Seq. 21081(c) [Guidelines Sec. 15091(a)(3)] that each environmentally superior alternative to the project proposed in the EIR but rejected by the agency is "infeasible" for specific economic, social, technical or other reasons. Village Laguna, 134 Cal.App.3d 1022, 1034. The findings must also expressly identify the "specific economic, social or other considerations" relied upon by the agency in determining that the alternative is infeasible. Each finding must also be supported by substantial evidence in the record. Sec. 21081.5; Guidelines Sec. 15091(b). An agency's failure to make the required findings for any major project alternative invalidates any subsequent project approval. Village Laguna, 134Cal.App.3d at 1034-1035; San Bernardino Valley Audubon Soc. v. County of San Bernardino, 155 Cal.App.3d. 738, 752-753; Resource Defense Fund v. LAFCO (1987) 87 Daily Journal D.A.R. 2105, 2108.

XIX. REQUIREMENTS REGARDING PUBLIC NOTICE AND INPUT

Due to the size and scope of this project it is recommended that an on-going public input requirement be established. The final EIR should require that the Applicant establish a list of, and hold quarterly public meetings with its residential neighbors (within 5000 feet) to discuss in a timely fashion issues of concern regarding the project's activities. The applicant should be required to bring to the community's attention any negative impacts, including any violations of conditions, permits, monitoring programs or other controls which relate to the project. The applicant shall submit a copy of the meeting notice and a list of notified persons to the Council office, and other city agencies, as ongoing evidence of compliance.

XX. NO STATEMENT OF OVERRIDING CONSIDERATION SHOULD BE ISSUED BY THE LEAD AGENCY

We request the lead agency require additional changes and alterations in the project to avoid and substantially lessen the significant impacts that have been reported in the Final EIR, satisfying the requirements of CEQA Section 21001. After certifying the EIR, we ask the lead agency select the no discretionary action alternative because it has a right to approve or disapprove the project. The size of the proposed project places it in the "discretionary" category. This is because the project "requires the exercise of judgment or deliberation when the public agency or body decides to approve or disapprove a particular activity, as distinguished from situations where the public agency or body merely has to determine whether there has been conformity with applicable statutes, ordinances or

regulations." (Guidelines 15002 and Friends of Westwood, Inc. v. City of Los Angeles (2d Dist. 1987) 191Cal.App.3d 259, 271-273). The Friends of Westwood Court stated that if there is a "doubt whether a project is ministerial or discretionary it should be resolved in favor of the latter characterization." This project is one in which the lead agency can impose reasonable conditions, based upon judgment.

XXI.

We appreciate your allowing us to comment on the Final EIR. We look forward to receiving a detailed and comprehensive revised, [mal EIR, fully in compliance with CEQA, State and local Guidelines.

Executed at Encino, California on
February 19, 2013

Response to Comment No. 3-1

Matrix Environmental has reviewed the late comment letter submitted by Homeowners of Encino (HOME) and the Sherman Oaks Homeowners Association (SOHA) dated February 19, 2013. This comment letter purports that impacts associated with geology, air quality, water, plant life, noise, land use, population, air traffic, traffic, public services, energy, utilities, and aesthetics are not fully addressed in the Draft EIR. However, as summarized below, in accordance with CEQA and the direction provided by the City of Los Angeles CEQA Thresholds Guide, the EIR provides a comprehensive a comprehensive analysis of each of these issues.

- Geology and Soils—Section IV.D, Geology and Soils, of the Draft EIR provides a detailed analysis of geologic and seismic hazards, sedimentation and erosion. Mitigation Measure D-1 requires that the project be constructed in accordance with the requirements set forth in the site specific geotechnical investigation prepared for the project, which include specific requirements regarding footings, slabs, fill, shoring, and retaining walls. This mitigation measure will ensure that potential impacts associated with geology and soils would be less than significant. The commenter provides no substantial evidence to support their statement that this mitigation measure is inadequate. The statements regarding duration of grading and haul routes are not relevant to the analysis of geology and soils. In addition, flooding is evaluated in detail in section IV.F, Hydrology and Water Quality, of the Draft EIR.

- Air Quality—The air quality analysis provided in Section IV.B, Air Quality, of the Draft EIR provides detailed analyses of local and regional impacts associated with construction and operation of the project. The analyses are based on specific thresholds set forth by the South Coast Air Quality Management District

(SCAQMD). Vehicular air emissions, diesel emissions and gasoline powered equipment are accounted for in these analyses. Cumulative impacts are also evaluated based on the methodology used by the SCAQMD. The analyses conclude that localized and regional emissions during construction will be significant and unavoidable, even with the implementation of feasible mitigation measures. The commenter provides no substantial evidence to support the statement that the proposed mitigation measures are inadequate. In addition, the comments regarding evaluation of secondary air impacts are too vague and unspecific to form a substantive response. All reasonably foreseeable secondary impacts have been identified and evaluated.

- Water—A comprehensive analysis of water supply is provided in Section IV.L.1, Water Supply, of the Draft EIR. The analysis describes existing water supply conditions and water resources and evaluates water supply during both construction and operation of the project. In addition, the analysis of water demand associated with operation of the project is based on a formal Water Supply Assessment approved by the Los Angeles Department of Water and Power and includes numerous water conservation features in addition to the conservation measures associated with the Project's proposed LEED silver rating. Reclaimed water is not anticipated to be used for dust control during construction activities. The commenter provides no substantial evidence to support the statement that the proposed mitigation measures regarding water supply are inadequate.

- Plant Life—As discussed in Section IV.C, Biological Resources, vegetation within the project site is limited. While the four existing on-site trees and street trees may be used by raptors, there is no natural habitat on-site. Mitigation Measures C-1 and C-2 are proposed to ensure that the project complies with the Migratory Bird Treaty Act and that street trees are removed and replaced in accordance with City requirements. The commenter provides no substantial evidence to support the statement that the proposed mitigation measures are inadequate.

- Noise Impacts—Construction and operational noise impacts are evaluated in detail in Section IV.H, Noise, of the Draft EIR. The commenter provides no substantial evidence to support the statement that the proposed mitigation measures regarding noise are inadequate.

- Land Use—Mitigation measures to address land use are not included in Section IV.G, Land Use, of the Draft EIR as the analysis demonstrates that no significant land use impacts would result from the project. Light and glare and shading impacts are appropriately addressed in Section IV.A, Aesthetics, of the Draft EIR.

- Population—Section IV.I, Population, Housing and Employment, of the Draft EIR addresses the population, employment and housing generated by the project.

As discussed therein, the project would not exceed population, housing or employment projections. In addition, the project would help to alleviate the jobs/housing imbalance for the local area and City and would support City policies related to new housing and employment opportunities. Thus, the Draft EIR accurately concludes that impacts associated with population, housing and employment would be less than significant.

- Air Traffic Impacts—The FAA requires that Form 7460-1, Notice of Proposed Construction or Alteration, be filed with the FAA regional office prior to construction for buildings that are 200 feet or greater in height from the grading terrain. Based on the maximum 100-foot height of proposed buildings, this Notice is not required for the project, nor is a heliport proposed.

- Traffic and Circulation—A comprehensive analysis of the traffic impacts associated with construction and operation of the project is provided in Section IV.K, Transportation and Circulation, of the Draft EIR. The analysis addressed both local streets and the adjacent freeways. In addition, as part of the project a Transportation Demand Management program would be implemented that would promote transit and use of bus passes among other requirements. The commenter provides no substantial evidence to support the statement that the proposed mitigation measures regarding traffic are inadequate.

- Public Services—The Draft EIR provides detailed analyses of the potential impacts associated with schools, parks, libraries, police protection and fire protection (including fire flows) based on specific input from the agencies that provide these services. Refer to Sections IV.J.1, Police Protection; IV.J.2, Fire Protection; IV.J.3, Schools; IV.J.4, Parks and Recreation; and IV.J.5, Libraries, of the Draft EIR. The commenter provides no substantial evidence to support the statement that the proposed mitigation measures regarding public services are inadequate.

- Energy and Utilities—Potential impacts associated with wastewater infrastructure and solid waste are addressed in detail in Sections IV.L.2, Wastewater, and IV.L.3, Solid Waste, of the Draft EIR. These analyses include specific computations to demonstrate that impacts would be less than significant. Furthermore, the project would be designed to achieve the LEED silver rating and thus would include numerous conservation features.

- Aesthetics—As evaluated in detail in Section IV.A, Aesthetics, of the Draft EIR, the project would not result in any significant impacts associated with aesthetics, views, shading or light and glare. As such, no mitigation measures are required.

- Growth-Inducing Impacts—Section VI, Other Environmental Considerations, of the Draft EIR provides a detailed evaluation of growth-inducing impacts, as required by CEQA.

- Additional Mitigation Measures—With regard to proposed Mitigation Measures 1, 2, 5, 7, and 8, the project is already required to implement mitigation measures that address parking, access, construction management personnel, traffic flows, deliveries, and queuing during construction. With regard to proposed Mitigation Measure 3 prohibiting activities that draw large numbers of people, no nexus to a reasonably foreseeable impact exists, and such mitigation is not required based on the uses proposed by the project. With regard to proposed Mitigation Measure 4, impacts to roads or trees are already required to be addressed as part of City requirements. With regard to proposed Mitigation Measure 6, the project will provide adequate parking on-site; thus, no additional mitigation measures are necessary. With regard to proposed Mitigation Measure 9, a mitigation measures is already required that will ensure that mechanical noise meets the requirements of the City's Noise Ordinance. In addition, any restaurant exhaust vents would be required to meet SCAQMD requirements. With regard to Mitigation Measure 10, separate loading areas will be accessed from a service/fire lane. In addition, the lead agency may exercise its discretion to impose additional restrictions on the location and timing of deliveries. However, the comment does not provide sufficient information regarding a reasonably foreseeable impact that would warrant the proposed mitigation. With regard to proposed Mitigation Measure 11, as discussed in Response to Comment No. 1-20 above, the project would not result in significant impacts associated with neighborhood cut-through traffic. Thus, no nexus to a reasonably foreseeable impact exists and additional measures are warranted beyond those set forth in the EIR.

- No Project Alternative—A no project alternative is specifically included in Section V, Alternatives, of the Draft EIR. In addition, in accordance with the requirements of CEQA, the Draft EIR also includes three other alternatives to the project, including identification of an environmentally superior alternative. With regard to the comments regarding findings, the appropriate findings can be made for the project.

As demonstrated by the responses above, the environmental issues raised in these comments have already been addressed in the EIR. The EIR for the project remains comprehensive and fully complies with CEQA. No new impacts or increases in the severity of an already identified impact result from these comments. Thus, new analyses are not required.

Appendices

Appendix A

Air Quality Dynamics Response to Bradly Torgan

February 23, 2013

Armbruster Goldsmith and Delvac LLP
11611 San Vicente Boulevard, Suite 900
Los Angeles, California 90049
Attn: David A. Goldberg, Esq.

Re: IL Villaggio Toscano – Response to Air Quality Comments

Mr. Goldberg:

Per your request, Air Quality Dynamics has prepared a response to comments submitted by Bradly S. Torgan on behalf of the Sherman Oaks Residents for a Safe Environment (SORSE). Specifically, SORSE alleges inadequacies in the pollutant exposure assessment (assessment) based upon a report prepared by Hans Giroux.[1] Upon review, the report was found to be inaccurate and without merit. The following provides specific responses to the commenters' purported inadequacies of the assessment.

Comment 1

Page IV.B-26 cites the results of the "next steps" recommendations presented by Gail Goldberg to the Planning Commission in January, 2009. Commissioner Michel Woo characterized these recommendations as "weak" ("Black Lung Lofts", L.A. Weekly, March 6, 2010). The over-reliance on air filtration is disputed in the scientific community because the filters do not trap many gaseous pollutants and recent SCAQMD studies on filtration efficiencies for the tiniest particulates have been overstated. See Exhibit 1 ("Pilot Study of High Performance Air Filtration for Classroom Applications, October 2009 [(www.aqmd.gov/rfp/attachments/2010/AQMDPilotstudyFinalReport.pdf)] for results of a classroom filtration study using various types of filters.

Response to Comment 1

The commenter incorrectly asserts that the assessment does not consider the contribution of gaseous pollutants to assess exposure. The commenter makes a broad declaration about a dispute among the "scientific" community associated with the "over-reliance" of air filtration to control pollutant exposures without explaining what that dispute is.

The mitigation measure was not designed to control gaseous pollutants as their contribution to the cancer risk estimate was *de minimus*. Diesel particulates from both trucks and vehicles contributed to more than 95 percent of the reported cancer risk values. By reducing the

[1] Hans Giroux, May 26, 2011. Il Villagio Toscana DEIR Review. Memorandum to Bradly S. Torgan.

concentration of diesel particulates through filtration, the carcinogenic risk estimates were reduced thereby reducing the risk estimates to within acceptable limits. For exposures to particulates such as PM10, filtration control efficiencies were directly applied to the exposure point concentration to reduce exposures below significance thresholds. There were no exceedances of identified significance thresholds associated with chronic/acute non-carcinogenic exposures or exposures to criteria pollutants associated with mobile source combustion (e.g., carbon monoxide, nitrogen dioxide).

The commenter's reference to the SCAQMD pilot classroom study has no relevance to the evaluation of air infiltration into residential occupancies. As noted on page 1 of the SCAQMD study:

> Filtration in classrooms presents some unique challenges. The older HVAC systems that exist in older schools were not designed with air filtration in mind. The classroom is a noise sensitive environment, so filtration systems must meet strict decibel limits when in operation. Classrooms often have high ventilation rates with doors and windows that are frequently open to outside air. Finally, classrooms are large, densely occupied spaces with a lot of activity that can lead to indoor generation of particles and other pollutants.

It is for these reasons the study is not applicable to assessing filtration requirements for residential occupancies. The assessment's evaluation of the project's ventilation requirements to mitigate air quality impacts was based upon documented industry standards promulgated by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2.

Comment 2

On Page IV-B-55, carcinogenic exposures from freeway DPM were evaluated for 9- and 30-year exposure periods. The SCAQMD guideline for risk assessments, however, is based upon a lifetime exposure adjustment factor of 1.0 for a 70-year lifetime and does not recognize that EPA acknowledges that 9- or 30-year doses are more reasonable. The most fatal flaw in the analysis, however, is that since 2009, the guidelines of the Office of Environmental Health Hazard Assessment (OEHHA) have specified the use of age sensitivity factors (ASF) in any health risk assessments (HRA) as stated in the OEHHA Technical Support Document, May 2009. The HRA must be revised to comply with OEHHA and SCAQMD standards to be acceptable.

Response to Comment 2

The commenter notes that the assessment does not utilize a 70 year exposure estimate to assess cancer risk. CEQA requires an impact analyses to take into account reasonably foreseeable factors and not to speculate beyond what is reasonable. There is no evidence that any recognizable portion of modern urban apartment dwellers in Los Angeles remain within a specific apartment complex for 70 years. To assume they would remain for 70 years is not reasonably foreseeable. Furthermore, CEQA prohibits mitigation measures that are not rationally

related to foreseeable impacts. Therefore, no mitigation would rationally be related to a speculative impact of a 70 year exposure because an exposure time of such length is neither reasonable nor supported by any evidence. CEQA's purpose is to provide public disclosure of likely and reasonably foreseeable impacts. A conservative 30-year exposure is reasonable and is supported by substantial evidence.

The assessment employed the U.S. EPA's guidance to develop dose estimates based on reasonable maximum exposures. Specifically, activity patterns for population mobility were used as presented in the *Exposure Factors Handbook*. As a result, lifetime risk values for residents were adjusted to account for an exposure duration of 350 days per year for 30 years. A nine year exposure duration was additionally assessed to identify risk estimates reported by the U.S. EPA to reflect the average time individuals reside at a given residence.

The commenter additionally asserts that the assessment is not consistent with recent guidance published by the Office of Environmental Health Hazard Assessment (OEHHA), which addresses potential early life exposures to carcinogens. As discussed below, OEHHA's recommended assessment methodology for implementing the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, Connelly, Statutes of 1987; Health and Safety Code Section 44300 et seq.) are not applicable in this case.

The Air Toxics "Hot Spots" Information and Assessment Act requires stationary sources (facilities) to report the type and quantity of substances they routinely release into the air. The regulation requires that toxic air emissions from facilities be quantified and compiled into an inventory according to criteria and guidelines developed by the California Air Resources Board, that each facility be prioritized to determine whether a risk assessment is conducted, that risk assessments be conducted according to methods developed by OEHHA and that the public be notified of significant risks. It is relevant to note that OEHHA clarifies its risk assessment's applicability by stating that "(r)oadways are not part of the Hot Spots program because the program only addresses stationary sources."[2]

Notwithstanding, it is the intent of the assessment to provide cumulative risk estimates from near-field on-road sources that are "reasonable" and reflect anticipated exposure experienced at a given residential occupancy. As such, a review of relevant guidance was conducted to determine applicability of the use of early life exposure adjustments to identified carcinogens. For risk assessments conducted under the auspices of The Air Toxics "Hot Spots" Information and Assessment Act, OEHHA applies specific adjustment factors to all carcinogens regardless of purported mechanism of action. However, the assessment relied upon U.S. EPA guidance relating to the use of early life exposure adjustment factors (*Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens*, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act "through the mutagenic mode of

[2] Office of Environmental Health Hazard Assessment, August 2012. Air Toxics Hot Spots Program Risk Assessment Guidelines – Technical Support Document for Exposure Assessment and Stochastic Analysis.

action." A mutagen is a physical or chemical agent that changes genetic material, such as DNA, increasing the frequency of mutations to produce carcinogenic effects. The use of adjustment factors is recommended to account for the susceptibility of producing adverse health effects during early life stages from exposure to these mutagenic compounds. None of the carcinogens considered in the assessment for this project elicit a mutagenic mode of action and, therefore, the use of age specific adjustment factors is not warranted. The assessment correctly used a lifetime exposure adjustment factor of 1.0.

Comment 3

Page IV.B-56 for non-DPM exposure is silent on the numerous documented health effects from non-DPM exposure that would be critical in making a land use decisions to place 500 housing units immediately adjacent to two freeways.

Response to Comment 3

The commenter incorrectly asserts the assessment does not address non-DPM exposures. The assessment considers toxic compounds generated from mobile sources, such as benzene and their subsequent carcinogenic risks and/or non-carcinogenic hazards. Criteria pollutants were also assessed and compared to identified regulatory thresholds. Discussion associated with the evaluation of non-DPM pollutants is found in Section 4.0 (Source Characterization) and Section 6.0 (Risk Characterization) of the assessment.

Comment 4

Mitigation Measure B-11 purports to reduce DPM exposure impacts to less than significant by making windows facing the freeways inoperable. Air pollution is not a line of sight event. The back sides of buildings not facing the freeway will have almost the same levels of air pollution as windows facing the freeway such that this measure cannot achieve the desired objective. The noise section also speaks of balconies facing the freeway. How will those balconies be reached if any freeway side access is inoperable, or does the inoperability only apply to windows but not to sliding glass doors ?

Response to Comment 4

Mitigation Measure B-10 is the primary mitigation to control DPM exposure and requires highly efficient MERV filtration. Mitigation Measure B-11 would also serve to reduce pollutant exposure. However, the measure was added as a City policy for additional mitigation (primarily for noise) and the impact conclusion was based on implementation of Mitigation Measure B-10 (MERV filtration). It should be noted that balconies were analyzed appropriately for shorter durations of exposure (e.g., 1-hour NO2 standard) and concluded less than significant. No additional analysis is necessary as a result of this comment.

As noted above, the responses clearly refute the allegations made by SORSE regarding the inadequacies of the assessment. The assessment is consistent with the provisions of CEQA and applies all relevant and appropriate regulatory guidance to support its conclusion.

I can be reached at (818) 703-3294 should you have any questions or require additional information.

Sincerely,

Bill Piazza

Biography

Bill Piazza

Mr. Bill Piazza has more than 20 years of experience in the field of environmental health and safety with particular expertise in both air dispersion modeling and health risk assessments. Mr. Piazza has completed more than 200 risk and hazard assessment studies. To date, he has characterized and modeled the contaminant emissions of more than 2,000 commercial and industrial operations.

Mr. Piazza has participated in the drafting of several environmental regulations including Public Resources Code Section 21151.8 and Education Code Section 17213 (e.g., SB 352) which requires school districts to evaluate the impacts of siting schools within close proximity to facilities that emit toxic air contaminants.

Mr. Piazza has performed private consultative services to clients such as MCA and Disney Development Companies, the Los Angeles City Department of Water and Power, Communities for a Better Environment, Corporation for Clean Air, Safe Action for the Environment and the Santa Clarita Organization for Planning the Environment. Mr. Piazza has provided services as a subcontractor to other consulting firms to assess the impact of both process and fugitive emissions associated with projects prepared under the auspices of the California Environmental Quality (CEQA) and National Environmental Policy Acts (NEPA).

Mr. Piazza has consulted with members of the Los Angeles, El Segundo, Huntington Park and Rolling Hills Estates city councils, as well as members of the City of Santa Monica Airport Commission, to address issues related to air toxic emissions.

Mr. Piazza has lectured for several health and hazard assessment classes conducted under the auspices of the University of California, Los Angeles and the University of Southern California and made several presentations to the American Industrial Hygiene Association, Southern California Society for Risk Analysis, California's Coalition for Adequate School Housing and Coalition for Clean Air on community-based risk and exposures to both criteria pollutants and toxic air contaminants.

Mr. Piazza participated as a member of the South Coast Air Quality Management District's (SCAQMD) Localized Significance Threshold Working Group which developed an assessment tool to assist lead agencies in the analysis of air pollution impacts at the local scale. Mr. Piazza was also a member of SCAQMD's MATES II external peer review group responsible for evaluating the agency's technical methodology and implementation plan to characterize ambient levels and "hot spot" concentrations of toxic compounds throughout the South Coast Air Basin.

Mr. Piazza additionally participated as a member of the California Air Resources Board's (ARB) Risk Management Subcommittee and Risk Characterization Technical Group responsible for developing statewide assessment methodologies to assess the generation and associated impact of diesel emissions on sensitive receptor populations. Mr. Piazza was also a member of ARB's Community Health Modeling Working Group which was responsible for developing guidelines for the assessment and mitigation of air pollution impacts at the neighborhood scale.

At the request of Ted Lieu, California Senator, 28th District, Mr. Piazza provided testimony to members of the Senate Select Committed on Air Quality relating to community impacts from aircraft and ground support operations at Santa Monica Airport.

Mr. Piazza's assessment work has also been featured in journal articles published by Environment and Planning C: Government and Policy 2002 and the Journal of Environmental Health.

Appendix B

AES Response to Noise Comments

A E S
ACOUSTICAL ENGINEERING SERVICES

Il Villaggio Toscano Project
Response to Late Public Comments on the Draft EIR

This memo provides responses to the noise comments from Bradly S. Torgan, JD, letter dated February 14, 2013, which reference the noise comments from Hans Giroux, memo dated May 26, 2011. We have studied carefully every point made and concern raised by Mr. Giroux. None of the points made by Mr. Giroux establish a significant noise or vibration impact, other than impacts already identified in the Draft EIR.

Comment #1 –

Page IV.H-5 fails to include Implementation Program P16 of the Los Angeles General Plan Noise Element, which states:

> *Use, as appropriate, the "Guidelines for Noise Compatible Land Use" (Exhibit I)… to guide land use and zoning reclassification… especially relative to sensitive uses… within a line of sight of freeways…" (Noise Element, Page 4-4)*

It is directly relevant to consideration of this Project and must be included in section 2.b(1)(a).

Response to Comment #1 –

The Noise Element of the Los Angeles General Plan states in part; *"…that noise elements guide policy makers in making land use determinations and preparing noise ordinances that would limit exposure to their populations to excessive noise levels."* (Noise Element page 1-1). The analysis in the Draft EIR is based on the understanding of the noise planning guidelines as published by the L.A. CEQA Thresholds Guide (Thresholds Guide) dated 2006. The guidelines for noise compatibility by land use set forth in the L.A. CEQA Thresholds Guide are generally similar to the guidelines provided in the City of Los Angeles General Plan Noise Element (Exhibit I). However, per discussion with the Planning Department Staff, the noise compatibility guidelines within the L.A. CEQA Thresholds Guides contain a few errors and the noise compatibility guidelines set forth in the Noise Element should instead be utilized. Specifically, as discussed in more detail in Response to Comment No. 2 below, the CNEL noise levels for the Normally Unacceptable and Clearly Unacceptable categories for residential uses provided in the L.A. CEQA Thresholds Guide are incorrect and the CNEL noise levels provided in the Noise Element should instead be used.

Comment #2 –

Table IV.H-1, states that noise environments exceeding 75 dB CNEL are clearly unacceptable for multi-family residential use, with clearly unacceptable meaning "new construction or

development should generally not be undertaken." Proposed placement of residential use in an area exceeding 75 dB CNEL as shown to occur on the Project site violates both Policy 3.1 and implementation Program P16. If Table IV.H-1 is correct, the far right hand column suggests that residential uses are clearly unacceptable at ambient noise levels exceeding 70 dB CNEL, although this conflicts with the third column that the transition from normally unacceptable to clearly unacceptable ambient noise environments for residential use occurs with the 70-75 dB CNEL range.

Response to Comment #2 –

As shown in Table IV.H-1, the City of Los Angeles Land Use Compatibility for Community Noise Exposures provided in the L.A. CEQA Thresholds Guide contains overlapping categories for residential uses (e.g., Multi-Family Homes). The noise environment between 70 and 75 CNEL is stated in the table as Normally Unacceptable for Multi-Family Homes, whereas the noise environment of above 70 CNEL also is described as Clearly Unacceptable, pursuant to the L.A. CEQA Threshold Guide (Page I.2-4). Per discussion with City Planning Department staff, the overlapping of noise levels for the Residential use category currently shown in the L.A. CEQA Threshold Guides document is incorrect, and the noise levels provided in the City of Los Angeles General Plan Noise Element, Exhibit I should instead be used.[1] As indicated in the City of Los Angles General Plan Noise Element, the CNEL level for the Residential Multi-Family Clearly Unacceptable category is above 75 dBA.

The City of Los Angeles Land Use Compatibility for Community Noise Exposures provided in Table IV.H-1 is based on the existing ambient noise levels for the Project Site as measured at the grade level. The measured ambient 24-hour CNEL noise levels at the Project Site at grade level ranged from 68 to 75 CNEL, which is within the Multi-Family Homes Land Use category of Normally Unacceptable (as indicated in the Draft EIR, page IV.H-12). As provided in the footnote of Table IV.H-1, based on the City of Los Angeles Land Use Compatibility Guidelines, new construction or developments in the 75 CNEL noise environments would require a detailed noise analysis to ensure the building design and construction would adequately reduce the noise levels to the interior. Therefore, Mitigation Measure H-5 was included for this purpose of ensuring that construction of the Project would provide adequate sound insulation in accordance with the City Building Code.

Comment #3 –

Page IV.H-11 contains substantial amount of baseline noise information based on measurements made in 2004. Even the updated data is from 2007. Given that the DEIR was released at the

[1] Discussion between Stephanie Eyestone-Jones (Matrix Environmental) and Adam Villani (City of Los Angeles) on February 14, 2013.

end of 2010, it would be more appropriate to provide contemporaneous data by which to characterize the existing environment rather than out-dated history.

Response to Comment #3 –

As indicated in the Draft EIR, the project's initial ambient noise measurements were made at the time of the issuance of Notice of Preparation in 2004 as indicated on page IV.H-11. Additional ambient noise measurements were taken in 2007 to validate the 2004 data. As indicated in the Draft EIR (page IV.H-12), the ambient noise levels measured in 2007 are consistent with those made in 2004. Moreover, use of these measurements provides a more conservative approach, since they do not account for any increase in the ambient noise levels that may have occurred since due to general growth in the area.

Comment #4 –

Page IV.H-15 suggests that the ground-borne vibration of "rubber-tired vehicles" is 63 VdB at 50 feet from the roadway centerline. That figure is correct from rubber-tired vehicles such as buses or other people movers equipped with shock absorbers for human travel comfort. That figure is completely incorrect for loaded trucks traveling at a substantial rate of speed. Table 12-2 from the same cited reference (FTA Manual) shows that the vibration levels from loaded trucks are actually 86 VdB at 25 feet, or 77 VdB at 50 feet. The use of the correct factor for loaded trucks creates quite a different conclusion than that reached by the Draft EIR. It is not below the acceptable ground-borne vibration levels for residences and buildings where people normally sleep. Vibration impacts to the closest proposed residences to the freeway are potentially significant and must be reanalyzed in light of this contradictory evidence.

Response to Comment #4 –

The vibration data provided by Table 12-2, Chapter 12 *Noise and Vibration During Construction* of the FTA document are applicable to the proposed construction site activities. Typically, the higher vibration levels such as the 86 VdB level indicated by FTA are for construction trucks that are traveling on the construction site, which generally has a rough surface (unlike the local roads and freeway, which have smooth pavements). Ground vibration level from trucks traveling on normal road surfaces (i.e., local roads and freeway) is approximately 63 VdB (Figure 7-3 *Typical Levels of Ground-Borne* Vibration of the FTA document). Therefore, vibration impacts from road traffic (including vehicles traveling on the freeway) on the proposed residences are properly evaluated.

With respect to construction-related vibration, the noise analysis was based on the pieces of construction equipment with the highest vibration levels, i.e., 87 VdB level for a large bulldozer, which is slightly higher than the loaded trucks. As concluded on page IV.H-22 of the Draft EIR, Project-related construction activities would result in a temporary significant ground vibration

impact at the 777 Motor Inn, during the site grading and excavation phases (with construction equipment operating at the perimeter of the Project site, near the 777 Motor Inn).

Comment #5 –

Page IV.H-19 notes that construction activities are permitted by law up to 9 p.m. on Monday through Friday. Subsequent analysis predicts a temporary noise level increase of 16-19 dB at the 777 Motor Inn. This is 3-4 times louder than the ambient level. Equipment noise at 9 p.m. of such magnitude would be highly intrusive to any guest attempting to fall asleep at that time and create a potentially significant impact.

Response to Comment #5 –

The Draft EIR concluded that Project-related construction activities would result in a temporary increase in ambient noise of 16 to 19 dBA at the exterior of the 777 Motor Inn during the most intensive construction periods, as indicated by the comment. The estimated construction noise levels at the 777 Motor Inn represent a worst-case scenario, which includes multiple pieces of equipment operating simultaneously (including drill rig, excavator, dump/haul truck, backhoe, and air compactor). Construction related noise would be reduced by a minimum 10 dBA with the prescribed Mitigation Measure H-1, which is a substantial noise reduction. Furthermore, the construction activities would only occur during the allowable hours per the City's noise ordinance, 7 a.m. to 9 p.m. Monday through Friday and 8 a.m. to 6 p.m. on Saturday, to avoid the nighttime hours' noise impacts where most people would be sleeping. Notwithstanding this substantial reduction, the Draft EIR concluded that these temporary impacts to the 777 Motor Inn resulting from Project construction activities would still be significant and unavoidable.

Comment #6 –

Page IV.H-20 makes no mention of noise impacts associated with the hauling and disposal of 165,000 cubic yards of excess soil. In order to reduce traffic conflicts, many major excavation projects in Los Angeles haul spoils at night with associated noise conflicts. For typical truck capacities of 14 cubic yards per truck, there would be almost 12,000 truck trips outbound full, and another 12,000 truck trips inbound empty. The failure to even acknowledge this level of activity, much less to analyze the impact, is a fatal flaw of the noise impact analysis.

Response to Comment #6 –

Noise impacts associated with Project construction haul trucks are provided in the Final EIR. (See response to Comment No. 11-26 (Final EIR Page III-105)). As indicated therein, the Project construction would generate a total of 300 truck trips per day (150 inbound and 150 outbound trips). Based on an eight-hour workday, there would be approximately 38 truck trips per hour (19 empty trucks inbound and 19 loaded trucks outbound). In addition, the haul trucks

would travel a short distance (less than 500 feet) from the Project site to the nearest US-101 freeway on- off-ramp. The noise from the haul trucks would be 66.5 dBA (L_{eq}), which would be below the existing ambient levels of 68.5 to 76.6 dBA (L_{eq}). Furthermore, Mitigation Measure H-3 would require that the idling of haul trucks be limited to 5 minutes at any given location. Therefore, noise impacts from haul trucks associated with the Project construction would be less than significant.

Comment #7 –

Page IV.H-26-27 implies that outdoor noise levels of 78 dB CNEL will occur on private balconies with a freeway view, but no land use/noise incompatibility would exist. The fact that levels exceeding 75 dB CNEL are designated as "clearly unacceptable" for residential use in the General Plan is completely ignored. The implication arises from the statement that "there are no City's [sic] noise limits applicable to the private balconies." Figure IV.H-1 on page IV.H-2 shows that 78 dB is close to the sound generated by a garbage disposal or a person shouting from 3 feet away. Standard or no standard, one cannot possibly conclude that sitting or standing on one's balcony with an ambient noise comparable to standing next to a continuously running garbage disposal is not an incompatible land use.

Response to Comment #7 –

See Response to Comment #2 (above) with respect to the land use compatibility comment. It should be noted that the Project estimated 78 dB CNEL at the exterior of the future balcony of the proposed residential use is the 24-hour average noise level (with adjustment factors applied to the evening and nighttime hours, page IV.H-4.) The actual noise levels that would be heard at the exterior of the balcony would be lower than the estimated CNEL level, approximately 4 dBA lower (based on the ambient noise measurements at project noise monitoring locations R1 and R2). Therefore, the ambient noise levels at the balcony would be approximately 74 dBA L_{eq}. Furthermore, comparison of the background traffic noise level to that of a garbage disposal or a person shouting, as noted by the Comment is inaccurate, as these are different types of noises with a different pitches and tonal contents.

The EIR appropriately did not apply the noise significance threshold to the project's balconies. In general, outdoor balconies are exempt from exterior noise standards. The City of Los Angeles Municipal Code does not regulate noise exposure levels at balconies, and therefore these areas are not considered a noise sensitive use under the Code. Typically, Caltrans' primary consideration for traffic noise abatement is given to exterior areas where "frequent human use" occurs, an area where people are exposed to traffic noise for an extended period of time in a regular basis.[2] Private balconies are generally not considered to be a noise sensitive use with

[2] Caltrans Traffic Noise Analysis Protocol, May 2011.

respect to exterior noise because of the infrequent use (i.e., people are not expected to be out on the balcony for an extended of time).[3]

Comment #8 –

Page IV.H-29, Mitigation Measure H-1, suggests that an 8-foot high wood fence would provide a 10 dBA construction equipment noise reduction. Because noise sources such as exhaust stacks on heavy equipment are elevated, an 8-foot high wall would not come close to a 10 dB benefit. Furthermore, at least the 777 Motor Inn is multi-storied such that upstairs motel windows will have a direct line of sight of the equipment with or without such a wall.

Response to Comment #8 –

Mitigation Measure H-1 requires that the noise mitigation in the form of sound barrier shall provide a minimum 10 dBA noise reduction and that the barrier shall be a minimum of 8 feet in height. The Project recommended barrier height is provided as a minimum height with the goal of providing minimum10 dBA noise reduction performance. Generally, the 8 feet high sound barrier would provide 10 dBA noise reduction for noise sources that are up to 5 feet high (e.g., for medium size construction equipment, such as small bulldozer, generators, and compressors). Larger construction equipment, such as large bulldozer, would require a noise barrier of approximately 10 feet in height. Therefore, the 10 dBA noise reduction performance requirement is required in Mitigation Measure H-1, as well as the minimum 8 foot height of the barrier. As described in the Draft EIR (page IV.H-30), the temporary construction noise barrier would only be effective where the line-of-sight between the equipment and the receptors will be interrupted, i.e., at the ground level. The noise barrier would not be effective for receptors at the upper levels at the 777 Motor Inn with direct line-of-sight to the construction site. The EIR therefore concluded that temporary noise impacts to the 777 Motor Inn would remain significant and unavoidable.

Comment #9 –

Page IV.H-31 references a Mitigation Measure H-7. The Draft EIR posted on-line, however, does not contain any Mitigation Measure H-7.

Response to Comment #9 –

The reference to Mitigation Measure H-7 on page IV.H-31 of the Draft EIR is incorrect. The reference regarding noise associated with on-site recreational areas should instead refer to the project design feature on page IV.H-19 of the Draft EIR that specifically states that "Courtyard

[3] County of Alameda Eden Area General Plan, 2005; City of La Mesa 2012 General Plan Update, 2012; City of Escondido General Plan, 2012; City of Pleasanton General Plan, 2005.

areas and pool facility would be developed such that off-site noise sensitive receptors would be shielded from these uses by the project buildings."

Amir Yazdanniyaz, P.E.,
Principal

AES
ACOUSTICAL ENGINEERING SERVICES

PAPERS & PUBLICATIONS

"A Review of Noise Issues in Semiconductor Clean Rooms", Noise-Con, 1990

"Noise Prediction and Control in Microelectronics Clean Rooms", Inter-Noise, 1989

PAPERS & PUBLICATIONS

- Lincoln Place MND, Los Angeles, California – Noise impact study for the proposed residential development, including rehabilitation of 696 existing apartment units and construction of 99 new apartment units.
- Carson Marketplace, Carson, California – Technical vibration study for constructions activities (pile driving and deep dynamic compaction) for a new mixed-used development.
- Forest Lawn Memorial Park-Hollywood Hills Master Plan EIR, Los Angeles, California - Noise impact study for the Forest Lawn 40-year master plan.
- Entrada Office Tower EIR, Culver City, California* - Technical noise and vibration impact analysis for the proposed office tower.
- Westfield Century City EIR* – Noise and vibration impact study for a mixed-use residential development. Performed baseline ambient noise and vibration measurements at sensitive receptors.
- I-405/Avalon Boulevard Interchange IS/MND, Carson, California* - Noise study for a new/reconfigure freeway ramps. Analysis included construction noise and vibration impacts to adjacent residences.
- Ontario Great Park Specific Plan EIR, Ontario, California* - Noise impact analysis for the proposed development, which include development of up to 1,326 residential units, schools, parks, and trails in the City of Ontario.
- West Hollywood Pavilions, West Hollywood, California* - Noise study for a renovated Pavilions. Analysis addressed potential noise and vibration impacts from loading dock/delivery trucks to adjacent residences.
- Otay Ranch Eastern Urban Center Sectional Planning Area EIR, Chula Vista, California* - Noise impact study for the proposed development of 3,000 multi-family residential units, 3.5 million square feet of commercial floor area, an elementary school, library, fire station, and neighborhood parks.
- Sunset Millennium EIR, West Hollywood, California* - Managed the acoustic works for the vibration impact study of the proposed project. Acoustic works included evaluation of potential vibration impact due to project-related activities to adjacent property and review of construction related vibration impact.
- Hidden Ridge Development, Hidden Hills, California* - Noise impact study for the proposed development of luxury homes. Managed the noise study which included evaluation of potential noise impacts due to project site grading.
- Canyon Hills Residential Development EIR, Los Angeles, California* - Noise impact study for a proposed 280 homes development in the Verdugo Mountain in Los Angeles.

**Performed services prior to forming AES*

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Amir Yazdanniyaz, P.E.,
Principal

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QUALIFICATIONS & CERTIFICATIONS

B.S., Mechanical Engineering, Kansas State University

B.S., Civil Engineering, Kansas State University

Registered Professional Engineer (P.E.), State of California, #M26982

PROFESSIONAL HISTORY

Principal, Acoustical Engineering Services, 2009 - Present

Director of Acoustics, Associate Principal, PCR Services Corporation, 2006 - 2009

Associate Principal, Arup Acoustics/ Ove Arup, 1992 - 2006

Senior Consultant, Bolt Beranek & Newman/Acentech, 1986 - 1992

Consultant, Coffeen Anderson Fricke & Associates, 1984 - 1986

PROFESSIONAL AFFILIATIONS- MEMBER

Acoustical Society of America

Institute of Noise Control Engineering

American Society of Heating, Refrigerating and Air-Conditioning Engineers

National Council of Acoustical Consultants

PAPERS & PUBLICATIONS

"Deep Dynamic Compaction Ground-borne Vibration Generation", Noise-Con, 2010

"Mechanical Systems Noise Issues - Case Studies," Presented at the Buildings for Advanced Technology Workshop II, 2005

"Design of Vibration Sensitive Laboratory Floors," Architectural Engineering, 2003

"Noise Control in Research Laboratories," Noise-Con, 1994

"Railroad Track Noise and Vibration Impact Study and Soundwall Design," Transportation Research Board, 1993

"Aircraft Sound Insulation Study of a School Building," Sound and Vibration, 1993

PROFESSIONAL EXPERIENCE

Amir Yazdanniyaz has 28 years' experience consulting in California and throughout the United States as well Hong Kong, and the United Kingdom. During his career, Mr. Yazdanniyaz has demonstrated experience in all aspects of building acoustics, noise control, environmental assessment, and transportation analysis. In addition, he has developed a particular expertise in designing noise and vibration control measures for building services mechanical equipment.

Mr. Yazdanniyaz has managed numerous environmental noise impact studies involving complex noise issues. He has participated in public presentations of noise assessment documents on behalf of community groups, facility owners and environmental consultants. In addition, Mr. Yazdanniyaz has managed noise impact studies for various types of mixed-use/hotels developments throughout Southern California.

REPRESENTATIVE PROJECTS

- Wilshire Grand Redevelopment EIR, Los Angeles, California – Technical noise impact study for the proposed mixed-used development, including office spaces, hotel and residential uses.
- Convention and Event Center EIR, Los Angles, California – Technical noise study for a proposed 72,000-seat multi-purpose Event Center (Farmers Field), renovation/construction of approx. 500,000 square feet of convention spaces, and parking structures.
- USC Development Plan EIR, Los Angeles, California – Technical noise impact analysis for the proposed development, including academic and university uses, commercial/retails, hotel and residential uses.
- The Village at Westfield Topanga EIR, Los Angeles, California - Noise impact analysis for a mixed-use commercial/hotel development, including shopping and dining, hotel, and community/cultural center.
- Columbia Square Project EIR, Hollywood, California – Technical noise impact study for the proposed mixed-used development, including hotel, office spaces, and residential uses.
- Century City Mixed Use Development EIR, Los Angeles, California - Technical noise study for a mixed-use residential/commercial development, including hotel and residential development.
- Il Villaggio Toscano Project, Sherman Oaks, California – Technical noise study in support of the EIR for the proposed mixed use development.
- Boyle Heights Mixed-Use Community EIR, Los Angeles, California – Noise impact study for the proposed project, which includes 4,400 residential units, 325,000 square feet of retail, office and civic uses.

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Appendix C

Crain & Associates Response to Arthur Kassan and Bradly Torgan

CRAIN & ASSOCIATES
Transportation Planning / Traffic Engineering

VIA EMAIL

March 1, 2013

Ms. Stephanie Eyestone-Jones
President
Matrix Environmental
6701 Center Drive West, Suite 900
Los Angeles, CA 90045

RE: Responses to Arthur Kassan and Bradly Torgan Comments on Il Villaggio Toscano EIR and Entitlements, ENV-2004-6000-EIR, SCH No. 2004111068, CPC 2010-3152, VTT 61216

Dear Ms. Eyestone-Jones,

Crain & Associates prepared the traffic study and analyses for the Il Villaggio Toscano project (the "Project"), which are contained in the Project EIR.

Bradly Torgan, the attorney representing Sherman Oaks Residents for a Safe Environment ("SORSE"), submitted a letter, dated February 14, 2013, regarding the Project in which he commented on and objected to the EIR, the proposed entitlements, and the Project itself ("Torgan Letter"). Attached to the Torgan letter was a letter, dated February 12, 2013, from Arthur Kassan, Consulting Traffic Engineer, commenting on transportation/traffic issues pertaining to the EIR and the Project ("Kassan Letter"). We have prepared responses below according to the order of the comments in the Kassan Letter, as well as to the Torgan Letter.

Responses to Kassan Letter

1. Related Projects Database

The project's traffic analysis is conservative, contains an expansive related projects list and has been updated twice since 2008 to include additional ambient growth. The 2008 related projects database in the traffic study and EIR was large and extensive, analyzing 51 related projects within an approximate 3.5-mile radius of the Project site. A radius of 1.5 - 2.0 miles is typically

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used in most traffic studies. As a result, the traffic study conservatively assumed higher traffic volumes from related projects. While it is expected that some of the related projects have not proceeded or have been downscaled due to the economic recession that began in 2008, the trips from all of these projects were still included in the analysis of future traffic volumes. In addition, a generous ambient traffic growth factor of two percent per year was used at the time of the original traffic study, accounting for potential projects not yet proposed at the time the related projects database was developed.

As noted by the commenter, in 2010, the traffic study was updated to reflect a revised buildout year for the Project and, as part of that update, additional ambient growth again was added to the counted traffic volumes, consistent with LADOT-approved methodologies for traffic study updates. Using the same related projects list and adding ambient growth is a conservative approach in that (i) the ambient growth itself generally accounts for traffic volume increases attributable to development projects in an area, and (ii) no related projects were removed from the list. As discussed in Response 3 below, an additional update to the traffic study has been prepared reflecting the current assumed buildout of the project in 2015, which again incorporates additional ambient growth into the counted traffic volumes, without removing any related projects. Therefore, the future traffic volumes at the study intersections have not been underestimated.

2. Future Study Year; Traffic Counts; Related Projects Database

Reduction of the size of the project does not necessitate a new traffic study, and the traffic study has been updated since its preparation in 2008 in accordance with all LADOT policies and procedures.

First, the reduction of the size of the project does not invalidate the Project's traffic study or require that it be revised, since the traffic study's use of a larger Project provides more conservative impact conclusions. Moreover, as noted in Response 3 below, the traffic study has now been updated to reflect the reduced size of the Project, as well as an updated buildout year of 2015.

Second, use of traffic counts from 2008 was done in accordance with LADOT policies and procedures, and these traffic volumes have been adjusted through two updates to the traffic study to account for additional ambient growth. Per standard LADOT policy, the study year for a traffic study is the year a project is expected to be completed, which is called out in the LADOT Memorandum of Understanding form used in the scoping of requirements and methodology for a traffic study. Consistent with that policy, the Project's initial estimated year of completion of 2010 was used as the future year in the traffic analysis.

It should also be noted that traffic count volumes have generally remained the same, or in some cases, decreased in much of the region over the last several years. For example, for the 101

Freeway between Van Nuys Boulevard and the 405 Freeway, Caltrans reported average daily traffic volumes (ADTs) of 305,000 in 2008 and 304,000 in 2011. For the 405 Freeway between Burbank Boulevard and the 101 Freeway, Caltrans reported ADTs of 219,000 in 2008 and 213,000 in 2011. Both examples, near the Project site, show traffic volume decreases. Based on currently available count information from LADOT's website, examples of ADT decreases or little change on surface streets in the San Fernando Valley include Reseda Boulevard south of Sherman Way with ADTs of 32,237 in 2006 and 32,820 in 2010; Balboa Boulevard south of Sherman Way with ADTs of 31,478 in 2006 and 30,088 in 2010; Vanowen Street east of Firmament Avenue with ADTs of 36,732 in 2007 and 31,516 in 2010; and Ventura Boulevard west of Laurel Canyon Boulevard with ADTs of 38,369 in 2007 and 35,893 in 2010.

As noted above, the initial related projects database and the generous ambient traffic growth factor that were used in the Project traffic analysis and traffic study updates provided adequate estimates of future traffic volumes. It should also be noted that while the comment asserts that a large number of substantial projects have been proposed and approved for the vicinity over the past five years, no evidence regarding those projects has been provided, including whether any of these projects were already accounted for by the related projects list for the Project analysis.

3. Updated Future Study Year

Due to the lengthy environmental and entitlement process, Crain & Associates has prepared an updated traffic analysis for the Final EIR Project comprised of 399 dwelling units, a grocery store of 45,000 square feet and 7,000 square feet of retail use. This updated analysis, which is for the year 2015 based on an approximate two-year construction duration, has reached the same conclusions for the Project as in the Final EIR. In particular, the updated traffic analysis concludes the Project would result in the same significantly impacted locations for the year 2015, without and with mitigation, as determined for the year 2013. This updated traffic analysis is included in the overall 2015 update of the environmental documentation that has been prepared.

4. Project Driveway Access

The Project vehicular access on Sepulveda Boulevard is a private driveway/fire lane, as described in the traffic study and EIR. Due to this being a private, dual-purpose facility extending from Sepulveda Boulevard to Camarillo Street along the backside of the site, it was not specifically called out as just a driveway or just a fire lane. Although the descriptors used for this access point and facility may have been inconsistent, Project traffic using this private driveway/fire lane was analyzed and incorporated in the traffic analysis, as discussed below.

Reference is made to Figures 4(a) and 4(b) in the Traffic Study, Appendix H-2 of the Draft EIR, which depict the Project trip percentages. The inbound Project trip percentage southbound on Sepulveda Boulevard and approaching the site is shown, without parentheses, just north of the

private driveway/fire lane access point. Between this access point and Camarillo Street, a southbound percentage is shown, with parentheses, indicating that it is an outbound percentage. No southbound percentage, without parentheses, is shown between this access point and Camarillo Street. This means that the inbound percentage north of the access point made a right turn into the access point, and that the outbound percentage between the access point and Camarillo Street is from right turns exiting the access point onto Sepulveda Boulevard. These figures also show that all inbound Project trips approaching the site on northbound Sepulveda Boulevard turn left onto Camarillo Street. No inbound percentage on northbound Sepulveda Boulevard goes past Camarillo Street, so there are no inbound left turns into the private driveway/fire lane. Lastly, as can be seen from these figures, the left-turn outbound percentage from Camarillo Street onto northbound Sepulveda Boulevard is the same as the outbound percentage heading north near the 101 Freeway eastbound on-ramp. This indicates that no exiting left turns were assumed from the private driveway/fire lane. Were this not the case, the outbound percentage heading north near the 101 Freeway eastbound on-ramp would be higher than the left-turn outbound percentage from Camarillo Street. Thus, both inbound and outbound Project trips relating to this access point were appropriately analyzed and incorporated in the analysis.

Based on the percentages in Figures 4(a) and 4(b) above, for the Final EIR Reduced Project, the right-turning volumes at the private driveway/fire lane would be44 inbound and 50 outbound trips during the AM peak hour, and 130 inbound and 73 outbound during the PM peak hour. It should be noted that these traffic volumes would not be at the Project's critical access location, which is located to the south through the intersection of Camarillo Street and Sepulveda Boulevard. It should also be noted that since they are right-turn-only volumes, both inbound and outbound, they are much less conflicting than left-turn and through movement volumes. Accordingly, the private driveway/fire lane volumes were not required for analysis by LADOT and, therefore, were not depicted diagrammatically in the traffic study or EIR. By analyzing impacts at the Camarillo Street/Sepulveda Boulevard intersection, the EIR did analyze impacts to site access in accordance with the City of Los Angeles CEQA Thresholds Guide.

5. Driveway Criteria

While the commenter has requested additional detail regarding the precise widths and locations of Project driveways beyond that already provided in the EIR, the absence of such building-permit level detail in the EIR does not render the analysis insufficient. The EIR provided substantial diagrammatic information regarding the location of Project driveways and their interrelation with neighboring uses to meet the disclosure requirements of CEQA.

Figure II-1 in the Final EIR is a conceptual Project site plan and for illustrative purposes. The exact locations, widths and design of the Project driveways and access points, along with parking

control gates and other related details, are not known at this stage. While LADOT has recommended driveway widths for different types of development and driveway operation, its design principles also recognize that driveway recommendations may vary, depending on site constraints, location and usage, and that narrower driveway widths may be considered where it may be more appropriate or field conditions preclude use of recommended widths.

The critical driveway volumes are those that collectively use the west leg of Camarillo Street approaching Sepulveda Boulevard, which amount to an estimated 62 to 75 percent of the Project trips, depending on the use and inbound/outbound directionality. These volumes were presented and analyzed at this location in the traffic study and EIR. Also, as previously noted, the EIR did analyze impacts to site access in accordance with the City's CEQA Thresholds Guide by analyzing the intersection closest to the Project's primary access point.

The Camarillo Street/Sepulveda Boulevard intersection is projected to operate at LOS E during the PM peak hour, which, based on the City's significance threshold for access, would result in a significant impact with respect to access. However, the Project mitigation for this intersection would improve the LOS to C, taking into account the Project's contribution to additional traffic on Camarillo Street. This mitigation would also mitigate access impacts to a level that is less than significant.

The comment speculates about possible impacts to driveways, without citing any supporting facts for its assertions. To the extent commenter is raising concerns about vehicles seeking to make turning movements on Camarillo Street causing a back-up into the Camarillo Street/Sepulveda Boulevard intersection, it should be noted that the California Vehicle Code prohibits unsafe turn movements at intersections and motorists are assumed to abide by the law and make turns only when safe.

For pedestrians, the network of sidewalks, crosswalks and "Walk" signal indications adjacent to the site will be maintained and enhanced by the Project. As with motorists, there are regulations in the Vehicle Code for pedestrians using the public right-of-way, which pedestrians are assumed to obey for their own safety and to walk responsibly in order to avoid or minimize conflicts with motorists.

6. Camarillo Street Access

The traffic study was prepared in accordance with LADOT policies and procedures. The comment speculates about potential significant impacts to driveways near the project and safety hazards at the Camarillo Street/Sepulveda Boulevard intersection. Standard engineering principles, in conjunction with LADOT practice, were applied to ensure safety. The comment posits safety concerns without providing any evidence that the Project would result in such impacts or specifying what criteria has been applied to reach such conclusive and speculative conclusions.

If driveway access becomes impeded along the cited segment of Camarillo Street, the City may choose to install "Keep Clear" or "Do Not Block" pavement markings on Camarillo Street, such as at the alley intersection. These marking would create an opening that would allow vehicles to make left turns into the alley. In addition, motorists experiencing delay while attempting to make left turns into access points along the south side of Camarillo Street can continue westerly to the terminus of Camarillo Street, a relatively short distance, make a U-turn, and proceed easterly and make a right turn into their access point.

The proximity of the residential guest parking driveway, the residential drop-off area, and the private driveway/fire lane are not expected to affect traffic flow on Camarillo Street, as they are toward the end of the street where traffic volumes would be decreased. It is estimated that guest traffic usage would be low during much of the day, with the early evening hours experiencing higher usage. It is anticipated that the guest traffic volumes would be readily accommodated and also not adversely impact the Galleria driveways. LADOT review of the Project driveways and access points would be undertaken as part of the building permit process, according to appropriate safety and ingress/egress criteria.

The purpose of the traffic study was to analyze impacts to critical intersections that are part of the overall street system, which it did. The main factors affecting conditions on the public street system are the conditions at signalized intersections. The analysis of individual driveways and access points of individual properties is beyond the scope of the of the traffic study. While the operations of driveways need to be maintained at adequate levels set by the City, these driveways are typical of those operating in developed urban areas and do not require specialized analysis. Such specialized analysis also was not requested by LADOT during the traffic study scoping process, during the Notice of Preparation scoping process for the preparation of the Draft EIR, or during the Draft EIR public comment period. The owners of the properties where the referenced driveways are located have not commented that the project presents any potential circulation or traffic impacts to their uses. The EIR did analyze Project access in accordance with LADOT procedures, as well as the City's CEQA Thresholds Guide, which has screening criteria and then requirements for the analysis of impacts at intersections nearest a project's access points. Furthermore, the detailed design review will be conducted as part of the standard City building permit procedures, which take into account safety for all elements, including access and circulation.

7. Galleria Lane

The traffic study appropriately did not assume usage of Galleria Lane by the Project. Galleria Lane is the private street that runs along the west side of the Galleria. In the scoping of the traffic study with LADOT, LADOT indicated that Project trips should be assigned to public streets, rather than assume or include private roadways not under the control of the Project

developer. This is because it would be reasonable to expect that public streets would remain and be available to regular traffic, but there is no such assurance for a private street under the control of another property owner, which could become restricted and function in a different manner at some point in the future. Project usage of Galleria Lane and the volume of such usage are therefore speculative. The traffic study's methodology is consistent with the City's CEQA Thresholds Guide, which does not contain any adopted thresholds for impacts on private streets and therefore does not require such analysis. Accordingly, no Project usage was assumed for Galleria Lane. Lastly, the comment does not present any evidence of a significant impact, but rather speculates about potential impacts based on some assumed, but unsupported, level of usage.

8. <u>On-Street Parking Removal</u>

The EIR did disclose that the removal of on-street parking in connection with the implementation of mitigation measures could have an effect on parking in the area, although this impact is not concluded to be significant. (See DEIR Section VI, p. VI-12). The basis for this conclusion is that in the vicinity of the Camarillo Street/Sepulveda Boulevard intersection, there is metered on-street parking available along the east side of Sepulveda Boulevard between Camarillo Street and Moorpark Street, along the south side of Moorpark Street between Sepulveda Boulevard and Columbus Avenue, and along both sides of Columbus Avenue between Moorpark Street and Ventura Boulevard. Off-street parking is also available in the Galleria parking structure. In the vicinity of the Ventura Boulevard/Beverly Glen intersection, there is metered on-street parking available along both sides of Ventura Boulevard between Beverly Glen Boulevard and Van Nuys Boulevard. In light of other available on-street and off-street parking within reasonable walking distance, i.e., approximately 1/4-mile, the on-street parking removals that would result from the project were not concluded to be a significant impact. Moreover, the commenter presents no evidence to support the claim that removal of these spaces would result in spillover parking into adjacent residential neighborhoods.

It is important to note that the amount of on-street parking removal that would result from the Project's mitigation measures has decreased since the preparation of the Draft EIR. For example, the mitigation measure approved by LADOT for the intersection of Camarillo Street and Sepulveda Boulevard involved the removal of approximately 14 parking spaces along the north and south sides of Camarillo Street west of Sepulveda Boulevard. However, during the last few years, the City has prohibited all parking along the south side of the street, removing the three spaces that had been available there. As a result, the mitigation measure would actually result in the removal of fewer parking spaces, approximately 11 spaces along the north side of Camarillo Street. It should be further noted that in reality, some of these remaining spaces have also been removed from use due to the long-term "Temporary No Parking" signs that are still in place along that segment.

The Camarillo Street/Sepulveda Boulevard mitigation plan also involved the prohibition of parking along the west side of Sepulveda Boulevard 7:00AM - 10:00 AM, Monday through Friday. However, the City has already prohibited parking along this segment for an even longer period of time, 7:00 AM - 7:00 PM, Monday through Friday. This action by the City again means less on-street parking removal would actually be necessary when the mitigation measure is implemented.

It should also be noted that nearly all of the streets within the neighborhood east of Sepulveda Boulevard have parking restrictions of some sort, including no parking, two-hour limitations or residential permit parking only. Therefore, considering all of these factors, no substantial parking spillover into this neighborhood is expected to result from the implementation of the Camarillo Street/Sepulveda Boulevard mitigation measure.

The mitigation measure for the intersection of Ventura Boulevard and Beverly Glen Boulevard involved the removal of up to approximately three parking spaces along the south side of Ventura Boulevard west of Beverly Glen Boulevard, to allow for the implementation of an eastbound right-turn-only lane. LADOT has subsequently determined that only two spaces might need to be removed. There is also on-street parking available on the opposite side of Ventura Boulevard. In addition, the buildings along the south side of this block of Ventura Boulevard have on-site parking in the back. Therefore, with the implementation of the Ventura Boulevard/Beverly Glen Boulevard mitigation measure, any parking spillover south of Ventura Boulevard or elsewhere is expected to be minimal.

9. Neighborhood Traffic Analysis

Project traffic impacts to the residential neighborhood east of Sepulveda Boulevard were not ignored. These impacts were analyzed in accordance with the standard policies and procedures of LADOT. The traffic study and EIR disclosed impacts at all study intersections, including those along Sepulveda Boulevard and Kester Avenue. These two streets run along the western and eastern boundaries of the broader residential neighborhood referenced in the comment. Four such intersections were analyzed, which included three residential streets, namely, La Maida Street, Camarillo Street and Moorpark Street. Significant, unavoidable impacts were determined for the intersections of La Maida Street and Sepulveda Boulevard, and Moorpark Street and Sepulveda Boulevard, as noted in the comment.

However, considering the many all-way Stop sign controls and speed humps installed in this neighborhood to discourage cut-through traffic, LADOT did not assume Project traffic cutting through this neighborhood. Due to the local-serving nature of the Project grocery store and retail uses, it was estimated that approximately two percent of their trips would use neighborhood streets. These trips were estimated to be generated by residents within this general

neighborhood. The 45,000 square-foot grocery store and 7,000 square feet of retail uses in the Final EIR Project would generate approximately 2,888 net trips per day. Applying two percent to these trips amounts to 58 trips per day. Numerically speaking only, based on the LADOT criteria below, the 58 daily trips would not be sufficient to result in a significant residential street impact.

The current LADOT Traffic Study Policies and Procedures (May 2012) states that a local residential street shall be deemed significantly impacted based on an increase in the average daily traffic volume (ADT) as follows:

Final ADT With Project	Project Increase in ADT
0 to 999	120 or more
1,000 - 1,999	12% or more of Final ADT
2,000 - 2,999	10% or more of final ADT
3,000 or more	8% or more of final ADT

While, as noted above, it was reasonable for the EIR to assume that the Project would not result in a significant contribution to cut through traffic, in response to the comment, a neighborhood traffic intrusion analysis has been performed, based on the above LADOT criteria.

This traffic intrusion analysis assumed that the two residential streets in this neighborhood likely to experience much or most of the cut-through traffic would be Camarillo Street and Moorpark Street, both of which intersect Sepulveda Boulevard. La Maida Street also intersects Sepulveda Boulevard; however, given its closeness to the 101 Freeway eastbound on-ramp and the heavy volumes on Sepulveda Boulevard, it is difficult to travel across Sepulveda Boulevard at that location and, therefore, would be expected to be used by negligible Project traffic, which would not result in a significant residential street impact.

Based on the Future (2013) Without Project AM and PM peak-hour volumes in the Final EIR updated analysis, it is estimated that the baseline ADTs are approximately 4,500 on Camarillo Street and 2,700 on Moorpark Street[1]. As depicted in Figures 4(a) and 4(b) in Appendix H-2 of the Draft EIR, it was estimated that 12 percent of the Project residential trips and 17 percent of Project retail trips use the intersection of Ventura Boulevard and Sepulveda Boulevard to travel to and from the east. It has been assumed for this analysis that due to worsening congestion at the intersection of Ventura Boulevard and Sepulveda Boulevard, up to approximately one-fourth of those trips might be induced to cut through this residential neighborhood to avoid this intersection. This would amount to three percent of the residential trips and 4.25 percent of the retail trips. For the Final EIR project of 399 dwelling units, 45,000 square-foot grocery store and 7,000 square feet of retail use, 2,169 net daily trips would be generated by the residential

[1] Absent atypical conditions or circumstances, approximately 20 percent of a roadway's daily traffic volume occurs during the AM and PM peak hours. Based on this relationship, the sum of the AM and PM peak-hour volumes traveling in both directions can be multiplied by 5 to estimate the roadway's daily volume near that location.

component and, as previously discussed, 2,888 net daily trips by the retail component. Multiplying these daily trips amounts by three percent and 4.25 percent, respectively, results in 65 residential trips and 123 retail trips. This represents a total of 188 Project trips potentially cutting through this neighborhood. Based on roughly the proportion of their baseline ADTs to each other, it is estimated that approximately 65 percent of these trips, i.e., 122 trips, would largely use Camarillo Street to access the Sepulveda Boulevard and the Project site, and approximately 35 percent, i.e., 66 trips would use Moorpark Street for the same purpose.

Adding the 122 Project daily trips to the estimated 4,500 ADT for Camarillo Street yields a Final ADT of 4,622 for this street. Similarly, adding the 66 Project daily trips to 2,700 ADT estimated for Moorpark Street results in a Final ADT of 2,766. Based on the above LADOT criteria, the Project's relative ADT increases would be 2.6 percent (i.e., 122 ÷ 4,622) on Camarillo Street and 2.4 percent (i.e., 66 ÷ 2,766) on Moorpark Street. Applying the above LADOT residential street intrusion criteria, these Project trips would not result in a significant impact on either street.

Increasing congestion may also induce additional cut-through traffic from other sources. Such additional traffic would exacerbate conditions in this neighborhood. However, even with the additional cut-through traffic due to others, the Project's portion would still not be expected to be significant.

10. Alternatives Analysis

The Draft EIR is correct in stating that the original Project would need to be reduced by 86 percent in order to eliminate the significant, unavoidable intersection impacts of the Project. This amount of reduction was based on a uniform reduction of the Project's component uses. It should be noted that there are numerous combinations and permutations of component uses that could be analyzed to achieve the same result.

The comment is made that a Project mix of 136 dwelling units and the same 55,000 square feet of commercial uses analyzed in the Draft EIR would reduce traffic impacts to less than significant levels with mitigation. No evidence has been provided supporting this result. Crain & Associates has analyzed the mix of uses described in the comment and determined that there would still be two remaining significant, unavoidable impacts at the intersections of Ventura Boulevard and Sepulveda Boulevard, and Moorpark Street and Sepulveda Boulevard.

The All Residential Use Alternative would result in significant, unavoidable impacts at the three intersections cited in the comment. However, at the intersection of 405 Freeway Northbound Ramps-Greenleaf Street and Sepulveda Boulevard, the impact would occur during both peak hours, not just the PM peak hour mentioned in the comment.

11. All Residential Use Alternative

The commenter disagrees with the Project objectives in the EIR related to creating a mixed-use, pedestrian-oriented Project, expressing skepticism that the Project's commercial components will enhance the pedestrian realm. The commenter asserts that the internal trip credit of 5 percent and the absence of walk-in trips from nearby uses assumed in the traffic study is evidence that the commercial component of the Project is not necessary. CEQA requires that an EIR employ a conservative analysis of worst possible case scenarios. Therefore, to provide the most conservative analysis of the Project's potential transportation impacts, a higher internal trip credit, as well as credit for walk-in trips, was not assumed by LADOT. Moreover, even if the actual percentages for these credits are not substantially higher than what was assumed, the amount of pedestrian trips generated by the Project's commercial uses would substantially increase the level of pedestrian activity in the area, compared to existing conditions, creating a more pedestrian-oriented environment.

Although there are two existing markets in the general vicinity, it is expected that the Project grocery store would be competitive and able to attract a large number of patrons, including some from the other two markets. The amount of patrons walking to the Project has not been estimated or credited in the analysis, but with the plaza and pedestrian-oriented environment, it is anticipated that pedestrian patronage would increase over time. A core objective of the Project is to create some synergy and enhance the pedestrian character of the neighborhood, and the EIR analysis supports that inclusion of commercial uses in the Project as a fundamental component of achieving that objective. Satisfaction of this objective does not require that most patrons of the grocery store arrive by foot, as is suggested by the commenter, but that additional pedestrian activity is generated to help create a more pedestrian friendly environment.

Responses to Torgan Letter

VII.A. - Alley West of Sepulveda: Please see Response 6 above.

VII.B. - Internal Circulation Pattern: Please see Responses 4 and 6 above. Regarding truck traffic accessing the Project grocery store, as shown in Figure II-1 of the Final EIR, the loading dock is angled to the northeast. This configuration would require large trucks to exit to and turn right onto Sepulveda Boulevard. They would not use Camarillo Street to exit the site. If these trucks desire to head northbound, presumably via the 405 Freeway, they can travel south on Sepulveda Boulevard to access the 405 Freeway northbound on-ramp opposite Greenleaf Street. To minimize disruptions on-site, truck deliveries generally would be scheduled for off-peak periods.

VII.C. - Impact on Parking: Please see Response 8 above. It should be noted that contrary to the comment, Mitigation Measure K-14 for the intersection of Ventura Boulevard and Haskell Avenue (North) does not include any parking removal or new restrictions. As the City has

already prohibited parking along Peach Avenue and most of La Maida Street from 8:00 AM to 6:00 PM, Monday through Friday, the vacation of these two streets is not expected to result in a significant parking loss in the future.

VII.D. - Traffic Spillover Effects: Please see Responses 8 and 9 above. Regarding the signalized intersection of Galleria Gateway (private street) and Sepulveda Boulevard, this was not assumed to be a capacity constraint location by LADOT and was not further analyzed.

VII.E. - Underestimation of Project Trips: The Project trip generation was determined according to standard LADOT policy and methodology. Trip credits are allowed for existing uses removed within two years of the approval of the traffic study Memorandum of Understanding, which was approved in 2008. The existing residential units were removed from the site in 2007, which is within the two-year time frame. Even if no trip credits were allowed for the removal of the existing residential uses, the impact conclusions would not change.

VII.F. - Future Study Year: Please see Response 3 above.

IX. - Inadequacy of Cumulative Impacts Analysis: Regarding the 405 Freeway Improvement Project, this is a construction project that is temporary in nature and with short-term construction effects. Once completed, the 405 Freeway Improvement Project is expected to improve capacity along the Sepulveda Pass corridor and have long-term transportation benefits. For purposes of a conservative analysis, no capacity improvement or other similar credit attributable to this freeway project was assumed in traffic study or EIR.

It should be noted that the 405 Freeway Improvement Project will not have a capacity impact at any of the study intersections and, therefore, will not change Project impacts at any of the study intersections. Furthermore, the EIR concluded that the Project would not significantly impact the 405 or 101 Freeways under year 2013 conditions. This is the same conclusion for the Project as indicated in the updated 2015 analysis, as discussed in Response 3. Since the freeway project is currently scheduled for completion in mid-2014, the operational impacts of the Project will not be within the construction time frame of the freeway project

Although the worksites for the two projects are not contiguous, the Project will coordinate its construction activities with the construction activities of the freeway project. The goal will be to mitigate as much as feasible potential cumulative disruptions to transportation mobility and to each other's project, such as due to temporary lane or street closures, detours, truck access patterns and unanticipated roadway conditions. The Project coordination effort will include Caltrans, Metro, LADOT, transit operators, law enforcement, and other appropriate transportation entities. This coordination effort will also be in concert with the provisions of the Construction Management Plan, as required in Mitigation Measure K-3.

X.D. - Scaled-Back Project Per Existing Plans: The comment is made that a mixed-use alternative that does not require exceptions to existing plans should be analyzed. Crain & Associates has analyzed such an alternative, one that is within the 1.5:1 Floor Area Ratio permitted for the site under the Ventura - Cahuenga Boulevard Corridor Specific Plan. This alternative consists of 277 multiple-family dwelling units, 45,000 square feet for a grocery store and 7,000 square feet of retail use, and would generate 4,237 net trips per day, including 204 AM and 405 PM peak-hour trips.

Prior to mitigation, this alternative would result in significant impacts at 10 of the 11 study intersections that would be significantly impacted by the Final EIR Project of 399 dwelling units, 45,000 square-foot grocery store and 7,000 square feet of retail use. With mitigation, this alternative would result in significant, unavoidable impacts at the same five intersections that would be subject to significant, unavoidable impacts under the Final EIR Project.

In conclusion, we have examined the claims and concerns of Mr. Kassan and Mr. Torgan. The issues they raise are outside the appropriate transportation-related environmental issues. The concerns they raise are outside the scope for a typical project being reviewed by City of Los Angeles decision-makers. The Los Angeles Department of Transportation has determined the appropriate issues of environmental concern and the type and level of analysis to be used for such projects, as set forth in the LADOT Traffic Study Policies and Procedures current at the time of the original December 2008 traffic study. Those policies and procedures were diligently followed, as concurred with by LADOT and Crain & Associates. The typical, localized sorts of issues raised by Mr. Kassan and Mr. Torgan that are not based on false or misleading assumptions and analyses, will be addressed at the administrative level (such as during the building permit review process).

Please contact me if you have any questions.

Sincerely

Roy Nakamura, TR 445
Senior Transportation Engineer

RN:n
C20824
attachment

Curriculum Vitae

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EMPLOYMENT HISTORY

1986 to Present	Senior Transportation Engineer, Crain & Associates
1971 to 1986	Traffic Engineering Assistant, Transportation Engineering Associate, and Transportation Engineer, City of Los Angeles Department of Transportation

EDUCATION

B.S. in Civil Engineering (Transportation), University of California, Los Angeles - 1968

PROFESSIONAL QUALIFICATIONS

State of California Registered Professional Traffic Engineer 1976 - Number 445

SPECIALIZED PROFESSIONAL COMPETENCE

- Over 40 years of traffic engineering and transportation planning experience, with particular emphasis on traffic and parking analyses, as well as traffic mitigation analyses.
- Experience includes preparation of studies for large master plan and specific plan projects throughout Los Angeles County. Responsible for analyses of traffic and parking impacts, project alternatives, construction traffic, and mitigation measures and phasing and coordination with other environmental documentation.
- Skilled in site plan evaluation including access, parking layouts, internal circulation, queuing and delivery/service loading facilities.
- Skilled in analyzing Specific Plans, Plan amendments and Development Agreements relative to traffic, parking and roadway improvement considerations and implications.

CRAIN & ASSOCIATES PROJECT EXPERIENCE HIGHLIGHTS

- 2000 Avenue of the Stars Office, Century City
- Amgen Specific Plan, Thousand Oaks
- Beverly Hills Unified School District Projects
- BLVD 6200, Hollywood
- Buckley School, Sherman Oaks
- Douglas Park Specific Plan (260 acres), Long Beach
- Entrada Office Project, Culver City
- Equinox, Beverly Hills
- Forest Lawn Hollywood Hills Master Plan, North Hollywood
- Fox Studios Master Plan, Century City

- Harvard Westlake Middle School Expansion, Bel Air
- Hollywood & Cahuenga Hotel, Hollywood
- Hollywood Center Studios, Los Angeles
- Howard Hughes Center Master Plan, Los Angeles
- Il Villaggio Toscano, Sherman Oaks
- LA Fitness, Beverly Hills
- Metro Red Line Station-adjacent mixed-use projects, North Hollywood
- Metropolis Mixed Use Downtown Development, Los Angeles
- Museum Square, Los Angeles
- Next Century Development (Century Plaza Hotel site), Century City
- Oak Creek School District Projects
- Olympic & Broadway, Mixed Use
- One Santa Fe Mixed-Use, Los Angeles
- Port Hueneme General Plan Update
- Saks Fifth Avenue Parcels, Beverly Hills
- St. Vincent Medical Center, Los Angeles
- Toyota Sports Center, El Segundo
- Valley Plaza/Laurel Plaza Redevelopment, North Hollywood
- Various “big box” stores in Southern California, including Costco and Home Depot
- Water Garden, Santa Monica
- Westfield Shoppingtown Topanga Plaza Expansion, Los Angeles

Appendix D

Response Regarding Extended Horizon Year

Response Regarding Extended Horizon Year

Il Villaggio Toscano Project

A. Background and Introduction

In compliance with California Environmental Quality Act (CEQA) Section 21080.4, a Notice of Preparation (NOP) for the Il Villaggio Toscano Project (proposed project) was prepared by the City of Los Angeles Planning Department and distributed for public comment on November 12, 2004. Subsequently, a Draft Environmental Impact Report (EIR) for the proposed project was prepared and published in accordance with CEQA and the associated CEQA Guidelines.[1] The Draft EIR was initially circulated from December 16, 2010, to February 7, 2011. In response to requests from the public, the comment period was extended to March 7, 2011. A Final EIR was subsequently prepared and distributed in January 2013.

Given the time that has passed since publication of the Draft EIR, the anticipated timing of construction and buildout year for the proposed project have changed. Specifically, the Draft EIR anticipated a buildout year of 2013 that is now anticipated to occur in 2015. As such, the analysis herein has been prepared to address the extended buildout year of 2015 to determine whether the extended buildout year would result in any new significant impacts or a substantial increase in a significant impact previously identified in the EIR.

The EIR evaluated potential environmental impacts associated with aesthetics, air quality, biological resources, geology, hazards, hydrology/water quality, land use, noise, population/housing/employment, public services, traffic and parking, and utilities. Of these analyses, the environmental analyses that have the potential to be affected by a change in buildout year include air quality, noise, traffic and utilities. This is because the analysis of impacts for these topics, unlike the other areas analyzed in the EIR, is reliant in part upon the buildout year of the project. As such, the analysis provided below focuses on these environmental topics. As demonstrated by the analyses provided below, implementation of

[1] *City of Los Angeles Environmental Case No. ENV-2004-6000-EIR, State Clearinghouse No. 2004111068.*

the proposed project under the modified buildout year would not result in any new or increased significant environmental impacts beyond those already set forth in the EIR.

B. Air Quality

1. Construction

Daily regional emissions during construction were forecasted in the Draft EIR by assuming a conservative start date (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile-source and fugitive dust emissions factors derived from the SCAQMD recommended Urban Emissions (URBEMIS) model. The calculations reflect the types and quantities of construction equipment that would be used to remove existing structures and pavement; grade and excavate the project site; construct the proposed buildings, structures and related improvements; and plant new landscaping within the project site. Construction tasks were aggregated to reflect overlapping tasks and identify the maximum construction emissions occurring over the course of project construction.

Based on the criteria set forth in the SCAQMD Handbook, the project would have a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the daily pound per day significance thresholds. The analysis conservatively did not net out pollutant emissions from current existing operational sources that would cease during construction and assumes the earliest possible construction schedule.

Emission forecasts provided in the Draft EIR reflect a specific set of conservative assumptions in which the entire project would be built out over an approximate two year time frame, using equipment subject only to current, less-stringent emission standards than those applicable in future years. Because of these conservative assumptions, the emissions levels in Table IV.B-4 on page IV.B-45 in Section IV.B, Air Quality,of the Draft EIR represent the highest daily emissions projected to occur on any one day, and an extended build-out year (2015) would result in a reduction in construction emissions since the construction equipment fleet mix would be cleaner.[2] However, impacts would remain significant and unavoidable for regional NO_X emissions.

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[2] *The South Coast Air Quality Management District's Surplus Off-Road Opt-In for NOx (SOON) Program provides funding assistance to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NO_X emissions from in-use off-road diesel vehicles. In 2008, the AQMD Board approved setting aside funding for this purpose. The AQMD is currently seeking off-road engine repower or vehicle replacement projects under the SOON Program.*

The conservative estimate of maximum on-site daily emissions for CO, NO_X, PM_{10}, and $PM_{2.5}$ in the Draft EIR was compiled for each phase of construction and considered the potential for overlapping activities. Localized effects from the on-site construction emissions were analyzed in the Draft EIR using the SCAQMD-approved model, ISCST3, as recommended by the Localized Significance Threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and distance to the nearest sensitive receptor. As presented in Table IV.B-2 of Section IV.B, Air Quality of the Draft EIR, air quality monitoring data for 2007–2009 for the project area, was used to establish the background ambient pollutant concentrations. Although the trend shown in Table IV.B-2 demonstrates that ambient air quality is improving in the area, the localized construction analysis presented in Section IV.B, Air Quality, of the Draft EIR conservatively did not apply a reduction in background pollutant concentrations for subsequent years (e.g., project build-out (2013) or extended build-out (2015)). By doing so, the allowable pollutant increment that does not exceed an ambient air quality standard is smaller and more conservative. Impacts would remain significant and unavoidable for localized NO_2 and PM_{10} with an extended build-out (2015) and localized impacts presented in Section IV.B, Air Quality, of the Draft EIR would represent the upper-end of potential air quality impacts.

2. Operation

(a) Regional Air Quality Impacts

Consistent with the analysis of daily operational emissions presented in the Draft EIR, an extended build-out year (2015) analysis was prepared utilizing the URBEMIS 2007 computer model used within the Draft EIR. The URBEMIS 2007 air quality model is a land-use based model that generates air emissions based on the type and density of the proposed land uses, and is influenced by other factors such as analysis year, trip generation rates, proximity to mass transit, and the extent of pedestrian friendly amenities. The results of these calculations for the extended build-out year (2015), and associated SCAQMD thresholds, are presented in Table 1 on page 4. As shown in Table 1, the net overall operational emissions associated with the extended build-out year (2015) would decrease in comparison to project build-out (2013) emissions provided in Section IV.B, Air Quality, of the Draft EIR. As shown in Table 1, the extended build-out year (2015) condition would result in less than significant regional operational impacts and would avoid the regional VOC and NO_X operational impacts identified in Section IV.B, Air Quality, of the Draft EIR. It is also important to note that the 2015 analysis is conservative as it does not account for the reduction in residential units or neighborhood-retail square footage proposed by the Applicant during preparation of the Final EIR. These reductions would

Table 1
Unmitigated Regional Operational Emissions (2015)
(pounds per day)

Emission Source	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing						
Mobile	1.7	2.5	18.4	<0.1	4.6	0.9
Area	1.9	0.4	0.2	<0.1	<0.1	<0.1
Stationary	<0.1	0.6	0.1	<0.1	<0.1	<0.1
Total	**3.6**	**3.5**	**18.7**	**0.1**	**4.7**	**0.9**
Project						
Mobile	29.2	38.6	315.3	0.4	68.4	13.3
Area	12.2	2.7	6.0	<0.1	<0.1	<0.1
Stationary	0.1	16.8	2.9	1.8	0.6	0.6
Total	**41.6**	**58.2**	**324.3**	**2.2**	**69.0**	**13.9**
Incremental Difference	38.0	54.7	305.6	2.1	64.3	12.9
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(17.0)	(0.3)	(244.4)	(147.9)	(85.7)	(42.1)
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Comparison of Extended Build-Out (2015) to Project Build-Out (2013) (Table IV.B-7, Section IV.B of the Draft EIR)						
Year 2013 Project Increment	71	84	504	2	97	19
Year 2015 Project Increment	38	55	306	2	64	13
Difference (2013 increment – 2015 increment)	(33)	(29)	(98)	(<1)	(33)	(6)
Change in Significance Conclusion	**Yes**	**Yes**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.
Source: Matrix Environmental, 2013.

further reduce the regional air quality emissions associated with operation of the proposed project.

(b) Local Air Quality Impacts

The SCAQMD recommends an evaluation of potential localized CO impacts when a project causes the level of service (LOS) at a study street intersection to worsen from C to D, or if a project increases the volume-to-capacity (V/C) ratio at any street intersection rated D or worse by 2 percent or more. Eight intersections met these criteria and were analyzed in Section IV.B, Air Quality, of the Draft EIR.

The local CO hotspot analysis presented in Table IV.B-8 of the Draft EIR showed a maximum CO concentration of 10.8 parts per million (ppm) for the 1-hour CO concentration (approximately 46 percent below the 20 ppm standard) and 8.6 ppm for the 8-hour concentration (approximately 5 percent below the 9.0 ppm standard), of which the project contribution was less than 0.2 ppm for the 1-hour pollutant averaging time and 0.1 ppm for the 8-hour averaging time. It should be noted that these pollutant concentrations included a background concentration of 6.6 ppm for the 1-hour averaging time and 6.5 ppm for the 8-hour averaging time. Subsequent to completion of the Draft EIR, ambient CO concentrations have substantially decreased.[3] Based on the most recent available data provided by SCAQMD from 2011, ambient CO concentrations in the project area have decreased to 3.0 for the 1-hour averaging time and 2.4 ppm for the 8-hour averaging time. Thus, correcting for the latest ambient monitoring data, Table IV.B-8 of the Draft EIR would show a maximum CO concentration of 7.2 parts per million (ppm) for the 1-hour CO concentration (approximately 64 percent below the 20 ppm standard) and 4.6 ppm for the 8-hour concentration (approximately 51 percent below the 9.0 ppm standard).

As shown below in Table 2 on page 9, the same intersections under the extended build-out year (2015) scenario would meet the criteria for local CO analysis. Although the overall V/C ratios would result in a slight increase in comparison to the levels analyzed in the Draft EIR (indicating a slight increase in overall traffic levels) due to ambient growth, project-related trip generation would be reduced as a result in the reduction in residential units and retail uses proposed by the Applicant subsequent to preparation of the Draft EIR. Since CO concentrations were predicted to be between 51 percent and 64 percent below the significance thresholds and the project represented between 2 and 3 percent of the overall pollutant concentration, CO concentrations under the extended build-out year (2015) scenario would be well below the SCAQMD significance thresholds. Localized CO impacts presented in Section IV.B, Air Quality, of the Draft EIR would represent the upper-end of potential air quality impacts.

(c) Health Risk Impacts

Potential impacts to on-site residential uses within 500 feet of the 101 Freeway from carcinogenic risk, PM_{10}, and $PM_{2.5}$ were concluded in the Draft EIR to be less than significant with incorporation of mitigation measures. As demonstrated above for regional operational impacts, mobile source emissions decrease with subsequent years as a result of cleaner engine technologies. Therefore, an extended build-out year (2015) would further reduce these less than significant health risk impacts.

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[3] *South Coast Air Quality Management District. Smog Data. Website www.aqmd.gov/smog/historical/AQ11card.pdf, accessed February 13, 2013.*

(d) Greenhouse Gas Impacts

Section IV.B, Air Quality, of the Draft EIR provided an analysis of GHG emissions based on demonstrating consistency with the Assembly Bill 32. The analysis provided in the Draft EIR took into account project features (e.g., achieve a "Silver" rating from the USGBC's LEED green building program and close proximity to public transportation and local serving retail uses) to demonstrate that the proposed project would reduce GHG emissions in comparison to "business-as-usual" by 38.6 percent. A change in build-year would not result in a change in the percent reduction since changes in emission factors (e.g., cleaner engines in subsequent years) would be reflected in both the "business-as-usual" and proposed project scenarios. Since no changes in project features would be anticipated with the extended build-out year scenario, no changes would be anticipated in the percent reduction comparison to "business-as-usual." Overall GHG emissions would be reduced with an extended build-out year (2015) due to cleaner engines and the reduction in residential units and retail uses proposed by the Applicant subsequent to preparation of the Draft EIR. Therefore, GHG impacts presented in Section IV.B, Air Quality, of the Draft EIR would represent the upper-end of potential air quality impacts.

C. Noise

1. Construction

The project construction noise and vibration impacts as analyzed in Section IV.H, Noise, of the Draft EIR, were evaluated based on the existing ambient noise conditions. As described in the Draft EIR, the proposed project would generate noise and vibration from on-site construction activities, as well as off-site noise from construction vehicles traveling to and from the project site. Although the project construction build-out year in the Draft EIR was anticipated to be 2013, the noise impacts were evaluated based on the existing noise conditions. This approach is conservative since existing ambient noise levels in the vicinity of the project site may increase due to the general growth in the area that would occur between existing conditions and the build-out year. Thus, an extended buildout year of 2015 would not change the impact conclusions for construction noise set forth in the Draft EIR.

2. Operation

(a) On-Site Noise Sources

As discussed in Section IV.H, Noise, of the Draft EIR, the noise impacts due to on-site noise sources (i.e., building mechanical equipment, parking facility, loading dock, and outdoor spaces), were also evaluated against the existing ambient noise conditions

and/or the presumed ambient noise levels set forth in the City's current noise regulations. Thus, the operational noise impact analysis for the project is also conservative since existing ambient noise levels in the vicinity of the project site may increase due to the general growth in the area that may occur through the buildout year. Thus, an extended buildout year of 2015 would not change the impact conclusions for operational noise set forth in the Draft EIR.

(b) Off-Site Mobile Noise Sources

The roadway traffic noise analysis in Section IV.H, Noise, of the Draft EIR, was based on the incremental increase in the traffic noise levels attributable to "future with project" and "future without the project" conditions. As shown in Table IV.H-8 of the Draft EIR, project-generated traffic would result in a maximum increase in traffic noise levels of approximately 1.8 dBA along Camarillo Street west of Sepulveda Boulevard. In general, roadway volumes have to double to produce an audible 3 dBA change in roadway noise. An extended build-out year (2015) would not result in a change in project-generated traffic provided in the Draft EIR. Furthermore, the decrease in residential units and retail square footage would reduce traffic and associated traffic noise generated by the project. As shown below in Table 2 on page 9, due to ambient growth, the extended buildout year (2015) scenario shows a slight increase in the V/C ratios which would generally indicate a slight increase in background traffic in comparison the levels analyzed in the Draft EIR even though project-related trip generation would decrease. Thus, while overall traffic noise levels could slightly increase as a result of the background traffic, the project's contribution to these noise levels would decrease. As such, the incremental traffic noise impact associated with the project would continue to remain below 3 dBA and such impacts would be less than significant.

D. Transportation and Circulation

To evaluate the potential for traffic impacts associated with an extended buildout year, Crain and Associates reviewed the traffic conditions for a buildout year of 2015 as part of the Traffic Memorandum summarized below and included as Attachment A. As detailed in the Traffic Memorandum, the analysis included the proposed reduction of residential units from 500 to 399 units and the reduction in neighborhood serving retail from 55,000 square feet to 52,000 square feet.

As described in the Draft EIR, under the future (2013) "Without Project" conditions, 10 of the 26 study intersections would operate at a level of service (LOS) E or F during one of both peak hours. As shown in Table 2 on page 9, under the future (2013) "With Project" conditions, 13 of the 26 study intersections would operate at LOS E or F during one or both peak hours. Based on the City's criteria for evaluating traffic impacts, the Draft EIR

identified significant traffic impacts at the following 11 study intersections during one or both peak hours, prior to mitigation:

9. 101 Freeway EB On-Ramp and Sepulveda Boulevard (P.M. peak hour);

10. La Maida Street and Sepulveda Boulevard (P.M. peak hour);

11. Camarillo Street and Sepulveda Boulevard (both peak hours);

13. Ventura Boulevard and Haskell Avenue (North) (P.M. peak hour);

15. Ventura Boulevard/I-405 Freeway Southbound On-Ramp/Sherman Oaks Avenue (P.M. peak hour);

16. Ventura Boulevard and Sepulveda Boulevard (both peak hours);

18. Ventura Boulevard and Kester Avenue (South) (P.M. peak hour);

19. Ventura Boulevard and Van Nuys Boulevard (P.M. peak hour);

20. Ventura Boulevard and Beverly Glen Boulevard (P.M. peak hour);

23. I-405 Freeway Northbound Ramps/Greenleaf Street and Sepulveda Boulevard (both peak hours); and

26. Moorpark Street and Sepulveda Boulevard (both peak hours).

As shown in Table 2 on page 9, implementation of the mitigation measures set forth in the EIR would reduce traffic impacts at six of the 11 significantly impacted intersections to less than significant levels under future (2013) “With Project” conditions. However, even with implementation of mitigation, a significant impact would remain at the intersection of Ventura Boulevard and Sepulveda Boulevard (Intersection No. 16) during the P.M. peak hour. No feasible mitigation measures were identified in the EIR for the following intersections:

10. La Maida Street and Sepulveda Boulevard; (a CMP monitoring intersection);

18. Kester Avenue (South) and Ventura Boulevard;

23. I-405 Freeway Northbound On-/Off-Ramps/Greenleaf Street and Sepulveda Boulevard; and

26. Moorpark Street and Sepulveda Boulevard.

Table 2
Level of Service (LOS) Summary
Comparison of Future With Project Traffic Conditions for Buildout Years 2013 and 2015

No.	Intersection	Peak Hour	2013 With Project				2015 Without Project		2015 With Project			
			CMA	LOS	Impact	With Mitigation	CMA	LOS	CMA	LOS	Impact	With Mitigation
1.	Oxnard Street	A.M.	0.759	C	0.004		0.755	C	0.758	C	0.003	
	Sepulveda Boulevard	P.M.	1.113	F	0.004		1.108	F	1.112	F	0.004	
2.	Burbank Boulevard and	A.M.	0.835	D	0.003		0.832	D	0.835	D	0.003	
	405 Freeway SB Ramps	P.M.	0.878	D	0.010		0.867	D	0.876	D	0.009	
3.	Burbank Boulevard and	A.M.	0.808	D	0.001		0.807	D	0.808	D	0.001	
	405 Freeway NB Ramps	P.M.	0.901	E	0.002		0.899	D	0.900	D	0.001	
4.	Burbank Boulevard and	A.M.	1.011	F	0.008		1.003	F	1.009	F	0.006	
	Sepulveda Boulevard	P.M.	1.147	F	0.003		1.144	F	1.146	F	0.002	
5.	Burbank Boulevard and	A.M.	0.835	D	0.002		0.832	D	0.834	D	0.002	
	Kester Avenue	P.M.	0.812	D	0.005		0.807	D	0.812	D	0.005	
6.	Magnolia Boulevard and	A.M.	0.784	C	0.005		0.779	C	0.783	C	0.004	
	Sepulveda Boulevard	P.M.	0.831	D	0.011		0.820	D	0.830	D	0.010	
7.	Magnolia Boulevard and	A.M.	0.736	C	0.000		0.735	C	0.736	C	0.001	
	Kester Avenue	P.M.	0.777	C	0.002		0.775	C	0.776	C	0.001	
8.	101 Freeway WB Off-Ramp	A.M.	0.706	C	0.009		0.696	B	0.705	C	0.009	
	and Sepulveda Boulevard	P.M.	0.672	B	0.021		0.650	B	0.669	B	0.019	
9.	101 Freeway EB On-Ramp	A.M.	0.747	C	0.010	-0.240	0.737	C	0.745	C	0.008	-0.240
	and Sepulveda Boulevard	P.M.	0.934	E	0.018*	-0.269	0.915	E	0.932	E	0.017*	-0.268

Table 2 (Continued)
Level of Service (LOS) Summary
Comparison of Future With Project Traffic Conditions for Buildout Years 2013 and 2015

No.	Intersection	Peak Hour	2013 With Project				2015 Without Project		2015 With Project			
			CMA	LOS	Impact	With Mitigation	CMA	LOS	CMA	LOS	Impact	With Mitigation
10.	La Maida Street and	A.M.	0.729	C	0.017		0.712	C	0.726	C	0.014	
	Sepulveda Boulevard	P.M.	0.850	D	0.026*		0.824	D	0.848	D	0.024*	
11.	Camarillo Street and	A.M.	0.777	C	0.119*	-0.029	0.657	B	0.761	C	0.104*	-0.045
	Sepulveda Boulevard	P.M.	0.907	E	0.063*	-0.078	0.844	D	0.902	E	0.058*	-0.080
12.	Camarillo Street and	A.M.	0.809	D	0.000		0.808	D	0.808	D	0.000	
	Kester Avenue	P.M.	0.588	A	0.000		0.588	A	0.588	A	0.000	
13.	Ventura Boulevard and	A.M.	0.890	D	0.011	-0.057	0.879	D	0.887	D	0.008	-0.057
	Haskell Avenue (North)	P.M.	0.917	E	0.012*	-0.070	0.905	E	0.916	E	0.011*	-0.070
14.	Ventura Boulevard and	A.M.	0.679	B	0.004		0.675	B	0.679	B	0.004	
	Haskell Avenue (South)	P.M.	0.773	C	0.012		0.761	C	0.772	C	0.011	
15.	Ventura Boulevard and	A.M.	0.797	C	0.021	-0.033	0.776	C	0.794	C	0.018	-0.038
	101 Freeway EB Off-Ramp/ 405 Freeway SB On-Ramp/ Sherman Oaks Avenue	P.M.	0.889	D	0.028*	-0.039	0.861	D	0885	D	0.024*	-0.042
16.	Ventura Boulevard and	A.M.	1.090	F	0.019*	-0.018	1.071	F	1.086	F	0.015*	-0.021
	Sepulveda Boulevard	P.M.	1.218	F	0.075*	0.075*	1.142	F	1.208	F	0.066*	0.066*
17.	Ventura Boulevard and	A.M.	1.103	F	0.003		1.100	F	1.103	F	0.003	
	Kester Avenue (North)	P.M.	0.855	D	0.012		0.843	D	0.853	D	0.010	
18.	Ventura Boulevard and	A.M.	0.887	D	0.010		0.877	D	0.885	D	0.008	
	Kester Avenue (South)	P.M.	0.920	E	0.012*		0.908	E	0.919	E	0.011*	
19.	Ventura Boulevard and	A.M.	0.891	D	0.005	-0.001	0.885	D	0.890	D	0.005	-0.001
	Van Nuys Boulevard	P.M.	1.243	F	0.014*	-0.078	1.229	F	1.241	F	0.012*	-0.081
20.	Ventura Boulevard	A.M.	0.635	B	0.007	0.004	0.628	B	0.633	B	0.005	0.003
	Beverly Glen Boulevard	P.M.	1.049	F	0.014*	-0.015	1.035	F	1.046	F	0.011*	-0.017

Table 2 (Continued)
Level of Service (LOS) Summary
Comparison of Future With Project Traffic Conditions for Buildout Years 2013 and 2015

No.	Intersection	Peak Hour	2013 With Project				2015 Without Project		2015 With Project			
			CMA	LOS	Impact	With Mitigation	CMA	LOS	CMA	LOS	Impact	With Mitigation
21.	Ventura Boulevard	A.M.	0.658	B	0.003		0.655	B	0.657	B	0.002	
	Hazeltine Avenue (North)	P.M.	0.805	D	0.008		0.796	C	0.803	D	0.007	
22.	Dickens Street/Saugus Avenue and Sepulveda Boulevard	A.M.	0.724	C	0.012		0.712	C	0.721	C	0.009	
		P.M.	0.887	D	0.016		0.870	D	0.883	D	0.013	
23.	405 Freeway NB Ramps/Greenleaf Street and Sepulveda Boulevard	A.M.	1.118	F	0.012*		1.106	F	1.115	F	0.009	
		P.M.	0.961	E	0.020*		0.941	E	0.957	E	0.016*	
24.	Valley Vista Boulevard	A.M.	0.881	D	0.005		0.875	D	0.879	D	0.004	
	Sepulveda Boulevard	P.M.	0.550	A	0.009		0.540	A	0.549	A	0.009	
25.	Ventura Boulevard and Dickens Street	A.M.	0.718	C	0.022		0.696	B	0.713	C	0.017	
		P.M.	0.711	C	0.022		0.689	B	0.708	C	0.019	
26.	Moorpark Street and Sepulveda Boulevard	A.M.	0.771	C	0.051*		0.719	C	0.762	C	0.043*	
		P.M.	0.936	E	0.088*		0.848	D	0.924	E	0.076*	

**Indicates significant impact*

Source: Crain and Associates, 2013.

Based on the above, under future (2013) "With Project" conditions, the proposed project would result in significant and unavoidable impacts at five intersections if all of the mitigation measures provided in the EIR are determined to be feasible or alternative measures of equivalent effectiveness are provided.

As shown in Table 2 on page 9, under the future (2015) "Without Project" conditions, 10 of the 26 study intersections would operate at a LOS E or F. Under the future (2015) "With Project" conditions, 12 of the 26 study intersections would operate at LOS E or F. As illustrated in Table 2, the same 11 study intersections significantly impacted by the proposed project under the future (2013) "With Project" conditions, would be impacted under the future (2015) "With Project" conditions. With implementation of the same mitigation measures set forth in the EIR, impacts at the same six intersections identified in the Draft EIR and included in Table 2 would be reduced to less than significant levels under the 2015 "With Project" conditions. However, as with 2013 "With Project" conditions, even with implementation of mitigation, a significant impact would remain at Intersection No. 16, Ventura Boulevard and Sepulveda Boulevard, during the P.M. peak hour under the 2015 buildout year. In addition, as no feasible mitigation measures are available, impacts at Intersection Nos. 10, 18, 23, and 26 would also remain significant and unavoidable.

Additionally, impacts on the surrounding freeway segments would continue to be less than significant under the 2015 "With Project" conditions. Further, the Congestion Management Program monitoring intersection of Ventura Boulevard and Sepulveda Boulevard, which is also a study intersection (Intersection No. 16), would continue to be significantly impacted. Lastly, with implementation of mitigation, construction impacts at the intersection of Camarillo Street and Sepulveda Boulevard would also be reduced to a less than significant level under 2015 "With Project" conditions.

As demonstrated in the analysis above, the extended buildout year would not result in a new significant traffic impact or increase significant traffic impacts beyond those set forth in the EIR.

E. Utilities

1. Water Supply

In accordance with the Urban Water Management Planning Act, the Los Angeles Department of Water and Power (LADWP), as the water provider within the City of Los Angeles, is required to prepare and adopt an Urban Water Management Plan every five years. At the time of preparation of the Draft EIR for the proposed project, LADWP's 2005 Urban Water Management Plan was in effect. Since publication of the Draft EIR, LADWP has released its 2010 Urban Water Management Plan.

As detailed in the 2005 Urban Water Management Plan, during average year hydrological conditions, the City's water demand was forecasted to be approximately 776,000 acre-feet per year in 2030. Based on new requirements of the Urban Water Management Planning Act, such as addressing California's mandate of reducing per capita water use by 20 percent by the year 2020, the 2010 Urban Water Management Plan forecasts that during average year hydrological conditions the City's water demand would be reduced to approximately 710,800 acre-feet per year in 2035. Both the 2005 and the 2010 Urban Water Management Plans demonstrated that adequate water supplies would be available to its service area under normal, single-dry, and multiple-dry year conditions.

Based on correspondence with the LADWP, as provided in the Draft EIR, the water demand for the proposed project was accounted for in the 2005 Urban Water Management Plan. Thus, as evaluated in the Water Supply Assessment prepared for the proposed project, LADWP determined that the proposed project's net increase of approximately 100 acre-feet per year over pre-existing conditions and the net increase of approximately 122 acre-feet per year over existing conditions would be within the available and projected water supplies for normal, single-dry, and multiple-dry years through the 2030 water demand projections of LADWP's 2005 Urban Water Management Plan.

As discussed above, with the exception of changes in the construction schedule, the proposed project, as described in the EIR, has not been modified such that an increase in the demand for water would result. Rather, as noted in the Final EIR, with the reduction of residential units from 500 to 399 units and the reduction in neighborhood serving retail from 55,000 square feet to 52,000 square feet proposed by the Applicant, the demand for water generated by the proposed project as evaluated in the Draft EIR would be reduced. Therefore, while the proposed project is now anticipated to be completed in the year 2015, as set forth in LADWP's 2010 Urban Water Management Plan, LADWP would provide adequate water supplies to its service area, inclusive of the proposed project, under normal, single-dry, and multiple-dry year conditions through 2035, as well as the intervening years (i.e., 2015). As such, operational impacts on water supply would continue to be less than significant, consistent with the analysis set forth in the Draft EIR.

2. Wastewater

In 2006, the City of Los Angeles adopted its Integrated Resources Plan, a facilities plan that integrates water supply, water conservation, water recycling, runoff management, and wastewater facilities planning through the year 2020. Since publication of the Draft EIR, the City has released a 5-Year Review of the Integrated Resources Plan. As discussed in the Integrated Resources Plan 5-Year Review, due to new programs and new information since the adoption of the Integrated Resources Plan as well as a reduction of the City's dependence on imported water supplies through using more recycled water,

managing more runoff for beneficial uses, and continuing to conserve drinking water, the City has been able to defer some of the recommended projects, including expansion of treatment facilities. Thus, the existing total capacity of 550 million gallons per day within the Hyperion Service Area, as used in the Draft EIR, continues to be adequate to serve projected wastewater flows through the year 2020.

As evaluated in Section IV.L.2, Wastewater, of the Draft EIR, based on the proposed project's wastewater generation and the forecasted available treatment capacity of the Hyperion Service Area through 2020, the proposed project's wastewater generation could be accommodated within the Hyperion Service Area. As discussed above, with the exception of changes in the construction schedule, the proposed project, as described in the EIR, has not been modified such that an increase in wastewater generation would result. Rather, with the reduction of residential units from 500 to 399 units and the reduction in neighborhood serving retail from 55,000 square feet to 52,000 square feet proposed by the Applicant, wastewater generated by the proposed project as provided in the Draft EIR would be reduced. Therefore, while the proposed project is now anticipated to be completed in the year 2015, the proposed project would continue to be within the growth projections of the Integrated Resources Plan, which spans through the year 2020. In addition, as stated above, the existing total capacity of 550 million gallons per day within the Hyperion Service Area, as used in the Draft EIR, would continue to be adequate to serve projected wastewater flows through the year 2020. As such, potential impacts associated with wastewater treatment facilities would continue to be less than significant, consistent with the analysis set forth in the Draft EIR.

3. Solid Waste

Demand for landfill capacity is continually evaluated by the Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. At the time of preparation of the Draft EIR, the 2007 County Integrated Waste Management Plan Annual Report was in effect. Since publication of the Draft EIR, the Los Angeles County has completed the 2011 County Integrated Waste Management Plan Annual Report.

As discussed in Section IV.L.3, Solid Waste, of the Draft EIR, based on the information provided in the 2007 County Integrated Waste Management Plan Annual Report, the remaining disposal capacity for the County's Class III landfills was estimated at approximately 161.279 million tons. Of the available remaining Class III landfill capacity in the County of Los Angeles, approximately 123.17 million tons was open to the City of Los Angeles. Based on the information provided in the 2011 County Integrated Waste Management Plan Annual Report, as of December 31, 2011, the latest year for which data is available, the remaining disposal capacity for the County's Class III landfills was

estimated at approximately 127 million tons. The remaining disposal capacity for County Class III landfills open to the City of Los Angeles as of December 31, 2011, was estimated at approximately 103.69 million tons.[4] In 2011, the City of Los Angeles disposed of approximately 2.99 million tons of solid waste at the County's Class III landfills and approximately 68,330 tons at transformation facilities. The amount disposed of at the County's Class III landfills accounted for only approximately 2.8 percent of the total remaining capacity for the County's Class III landfills open to the City.

As discussed in the 2011 Annual Report, with the implementation of one of the scenarios described in the 2011 Annual Report, future disposal needs can be adequately met through 2026. In addition, unclassified landfills serving the County would continue to have adequate long-term capacity. As discussed above, with the exception of changes in the construction schedule, the proposed project, as described in the EIR, has not been modified such that an increase in the generation of solid waste would result. Rather, as noted in the Final EIR, with the reduction of residential units from 500 to 399 units and the reduction in neighborhood serving retail from 55,000 square feet to 52,000 square feet proposed by the Applicant, solid waste generated by the proposed project as provided in the Draft EIR would be reduced. Therefore, as future disposal needs can be adequately met through 2026, the available capacity of the existing and/or planned landfills would not be exceeded, and impacts on solid waste generation from project operations would continue to be less than significant.

F. Conclusion

As demonstrated by the analyses above, potential impacts associated with the changes in the timing of construction and buildout year would be similar to or less than the impacts addressed in the Draft EIR. Thus, the extended buildout year would not result in a new significant impact or increase significant environmental impacts beyond those already set forth in the EIR.

[4] *Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Puente Hills, Scholl Canyon, Whittier, Burbank, Pebbly Beach, San Clemente, Calabasas). Total also excludes the additional expansion that may be provided by the Antelope Valley Recycling and Disposal Facility Expansion and the Chiquita Canyon Landfill Expansion.*

Attachment A

Traffic Memorandum

IL VILLAGGIO TOSCANO PROJECT
YEAR 2015 TRAFFIC CONDITIONS RESPONSE

The Final EIR analyzed future traffic conditions for the Il Villaggio Toscano project (the "Project") for the year 2013. However, due to the lengthy environmental review and entitlement process, which is still ongoing, this updated analysis has been prepared for the future year of 2015. The Project in this updated analysis is the reduced project consisting of 399 dwelling units, 45,000 square feet of grocery store and 7,000 square feet of specialty retail (Reduced Project), which was analyzed in the Final EIR.

Analyzing the 2015 Without Project condition, 10 of the 26 study intersections would be operating at Level of Service (LOS) E or F. Three of those intersections would be at LOS E or F in both peak hours. Under the 2015 With Project condition, it is expected that 12 study intersections would be operating at LOS E or F, with the same three intersection at LOS E or F in both peak hours, prior to mitigation.

The Final EIR found that for 2013 future conditions, the Reduced Project would result in significant impacts to the following 11 study intersections, prior to mitigation:

1. 101 Freeway Eastbound On-Ramp & Sepulveda Boulevard
2. La Maida Street & Sepulveda Boulevard
3. Camarillo Street & Sepulveda Boulevard
4. Ventura Boulevard & Haskell Avenue (North)
5. Ventura Boulevard & 101 Freeway Eastbound Off-Ramp/405 Freeway Southbound On-Ramp - Sherman Oaks Avenue
6. Ventura Boulevard & Sepulveda Boulevard
7. Ventura Boulevard & Kester Avenue (South)
8. Ventura Boulevard & Van Nuys Boulevard
9. Ventura Boulevard & Beverly Glen Boulevard
10. 405 Freeway Northbound On-/Off-Ramps - Greenleaf Street & Sepulveda Boulevard
11. Moorpark Street & Sepulveda Boulevard

This updated analysis has determined that the same 11 study intersections would be significantly impacted by the Reduced Project, prior to mitigation, under 2015 conditions. The traffic mitigation measures recommended in the Final EIR would adequately mitigate the project impacts at six of the 11 intersections, the same six intersections identified in the Final EIR. As

under 2013 conditions, intersections 2, 6, 7, 10, and 11 above would remain with unavoidable significant impacts under 2015 conditions, for which no feasible mitigation measures could be found.

Similarly, as under 2013 conditions, the Reduced Project would not result in a significant Congestion Management Program (CMP) impact on any of the surrounding freeway segments under 2015 conditions. Under both 2013 and 2015 conditions, the CMP monitoring intersection of Ventura Boulevard & Sepulveda Boulevard, which is also a study intersection, would be significantly impacted by the Reduced Project, for which only partial mitigation would be provided.

Lastly, the Final EIR determined that the Reduced Project would have temporary but significant construction traffic impacts at the intersection of Camarillo Street & Sepulveda under 2013 conditions. Following the same analysis methodology, this temporary but significant construction traffic impact would also occur under 2015 conditions. The mitigation measure in the Final EIR would adequately mitigate this impact to a less than significant level under 2015 conditions. No other significant construction traffic impacts have been determined for 2015 conditions.

Attached are the following updated items pertaining to the 2015 traffic analyses described above:

Attachment A - Reduced Project Trip Generation Table

Attachment B - Intersections Level of Service and Reduced Project Impact Table

Attachments C-1 & C-2 - CMP Freeway Segments Volume and Impact Analysis Tables

Attachment D - Intersections Level of Service and Construction Traffic Summary Table

Attachment E - Level of Service Worksheets Including Impacts of Reduced Project / Update Methodology

ATTACHMENTS A – E

ATTACHMENT A
IL VILLAGGIO TOSCANO
REDUCED PROJECT TRIP GENERATION

Crain & Associates
March 1, 2013

				AM Peak Hour			PM Peak Hour		
Proposed Uses	**Size**		**Daily**	**I/B**	**O/B**	**Total**	**I/B**	**O/B**	**Total**
Apartment	399	du	2,681	41	162	203	161	86	247
Grocery Store	45,000	gsf	4,601	89	57	146	240	230	470
Specialty Retail	7,000	gsf	310	5	3	8	8	11	19
Subtotal [A]			7,592	135	222	357	409	327	736
Internal Trip Reductions									
Grocery Store, 5%			(230)	(4)	(3)	(7)	(12)	(12)	(24)
Apartment			(230)	(3)	(4)	(7)	(12)	(12)	(24)
Specialty Retail, 5%			(16)	0	0	0	0	(1)	(1)
Apartment			(16)	0	0	0	(1)	0	(1)
Subtotal [B]			(492)	(7)	(7)	(14)	(25)	(25)	(50)
Pass-by Trip Adjustments									
Grocery Store, 40%			(1,748)	(34)	(22)	(56)	(91)	(87)	(178)
Specialty Retail, 10%			(29)	(1)	0	(1)	(1)	(1)	(2)
Subtotal [C]			(1,777)	(35)	(22)	(57)	(92)	(88)	(180)
Existing Uses Removed									
Apartment	24	du	(161)	(2)	(10)	(12)	(10)	(5)	(15)
Single-Family Housing	11	du	(105)	(2)	(6)	(8)	(7)	(4)	(11)
Office	52,452	gsf	0	0	0	0	0	0	0
Subtotal [D]			(266)	(4)	(16)	(20)	(17)	(9)	(26)
Project Trips at Driveways & Adjacent I/S, [A]+[B]+[D]			**6,834**	**124**	**199**	**323**	**367**	**293**	**660**
Net Project Trips, [A]+[B]+[C]+[D]			**5,057**	**89**	**177**	**266**	**275**	**205**	**480**

ATTACHMENT B
INTERSECTION LEVEL OF SERVICE & REDUCED PROJECT IMPACT SUMMARY

No.	Intersection	Peak Hour	Without Project		With Project				With Project+Mitigation			
			CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact	
1	Oxnard Street and	AM	0.755	C	0.758	C	0.003					
	Sepulveda Boulevard	PM	1.108	F	1.112	F	0.004					
2	Burbank Boulevard and	AM	0.832	D	0.835	D	0.003					
	405 Freeway SB Ramps	PM	0.867	D	0.876	D	0.009					
3	Burbank Boulevard and	AM	0.807	D	0.808	D	0.001					
	405 Freeway NB Ramps	PM	0.899	D	0.900	D	0.001					
4	Burbank Boulevard and	AM	1.003	F	1.009	F	0.006					
	Sepulveda Boulevard	PM	1.144	F	1.146	F	0.002					
5	Burbank Boulevard and	AM	0.832	D	0.834	D	0.002					
	Kester Avenue	PM	0.807	D	0.812	D	0.005					
6	Magnolia Boulevard and	AM	0.779	C	0.783	C	0.004					
	Sepulveda Boulevard	PM	0.820	D	0.830	D	0.010					
7	Magnolia Boulevard and	AM	0.735	C	0.736	C	0.001					
	Kester Avenue	PM	0.775	C	0.776	C	0.001					
8	101 Freeway WB Off-Ramp and	AM	0.696	B	0.705	C	0.009					
	Sepulveda Boulevard	PM	0.650	B	0.669	B	0.019					
9	101 Freeway EB On-Ramp and	AM	0.737	C	0.745	C	0.008		0.497	A	-0.240	
	Sepulveda Boulevard	PM	0.915	E	0.932	E	0.017	*	0.647	B	-0.268	
10	La Maida Street and	AM	0.712	C	0.726	C	0.014					
	Sepulveda Boulevard	PM	0.824	D	0.848	D	0.024	*				
11	Camarillo Street and	AM	0.657	B	0.761	C	0.104	*	0.612	B	-0.045	
	Sepulveda Boulevard	PM	0.844	D	0.902	E	0.058	*	0.764	C	-0.080	
12	Camarillo Street and	AM	0.808	D	0.808	D	0.000					
	Kester Avenue	PM	0.588	A	0.588	A	0.000					
13	Ventura Boulevard and	AM	0.879	D	0.887	D	0.008		0.822	D	-0.057	
	Haskell Avenue (North)	PM	0.905	E	0.916	E	0.011	*	0.835	D	-0.070	

ATTACHMENT B
INTERSECTION LEVEL OF SERVICE & REDUCED PROJECT IMPACT SUMMARY

No.	Intersection	Peak Hour	Without Project		With Project				With Project+Mitigation			
			CMA	LOS	CMA	LOS	Impact		CMA	LOS	Impact	
14	Ventura Boulevard and	AM	0.675	B	0.679	B	0.004					
	Haskell Avenue (South)	PM	0.761	C	0.772	C	0.011					
15	Ventura Boulevard and	AM	0.776	C	0.794	C	0.018		0.738	C	-0.038	
	101 Freeway EB Off-Ramp/405 Freeway SB On-Ramp/Sherman Oaks Avenue	PM	0.861	D	0.885	D	0.024	*	0.819	D	-0.042	
16	Ventura Boulevard and	AM	1.071	F	1.086	F	0.015	*	1.050	F	-0.021	
	Sepulveda Boulevard	PM	1.142	F	1.208	F	0.066	*	1.208	F	0.066	*
17	Ventura Boulevard and	AM	1.100	F	1.103	F	0.003					
	Kester Avenue (North)	PM	0.843	D	0.853	D	0.010					
18	Ventura Boulevard and	AM	0.877	D	0.885	D	0.008					
	Kester Avenue (South)	PM	0.908	E	0.919	E	0.011	*				
19	Ventura Boulevard and	AM	0.885	D	0.890	D	0.005		0.884	D	-0.001	
	Van Nuys Boulevard	PM	1.229	F	1.241	F	0.012	*	1.148	F	-0.081	
20	Ventura Boulevard and	AM	0.628	B	0.633	B	0.005		0.631	B	0.003	
	Beverly Glen Boulevard	PM	1.035	F	1.046	F	0.011	*	1.018	F	-0.017	
21	Ventura Boulevard and	AM	0.655	B	0.657	B	0.002					
	Hazeltine Avenue (North)	PM	0.796	C	0.803	D	0.007					
22	Dickens Street/Saugus Avenue and	AM	0.712	C	0.721	C	0.009					
	Sepulveda Boulevard	PM	0.870	D	0.883	D	0.013					
23	405 Freeway NB Ramps/Greenleaf Street and	AM	1.106	F	1.115	F	0.009					
	Sepulveda Boulevard	PM	0.941	E	0.957	E	0.016	*				
24	Valley Vista Boulevard and	AM	0.875	D	0.879	D	0.004					
	Sepulveda Boulevard	PM	0.540	A	0.549	A	0.009					
25	Ventura Boulevard and	AM	0.696	B	0.713	C	0.017					
	Dickens Street	PM	0.689	B	0.708	C	0.019					
26	Moorpark Street and	AM	0.719	C	0.762	C	0.043	*				
	Sepulveda Boulevard	PM	0.848	D	0.924	E	0.076	*				

* Indicates significant project impact.

ATTACHMENT C-1
CMP FREEWAY SEGMENTS VOLUME SUMMARY

			AM Peak Hour				
Freeway	**Segment**	**Direction**	**Existing (2008) Freeway Volume**	**Related Projects Traffic Volume**	**Future (2015) Without Project**	**Project Traffic Volume**	**Future (2015) With Project**
Ventura Freeway (I-101)	between Van Nuys Boulevard &	NB	9,151	33	10,133	12	10,145
	San Diego Freeway	SB	10,168	31	11,253	30	11,283
	between San Diego Freeway &	NB	9,032	244	10,212	14	10,226
	Havenhurst Avenue	SB	11,057	184	12,387	11	12,398
San Diego Freeway (I-405)	between Burbank Boulevard &	NB	4,287	75	4,806	21	4,827
	Ventura Freeway	SB	8,642	66	9,604	0	9,604
	between Ventura Freeway &	NB	5,389	16	5,964	9	5,973
	Mulholland Drive	SB	10,662	14	11,781	28	11,809

			PM Peak Hour				
Freeway	**Segment**	**Direction**	**Existing (2008) Freeway Volume**	**Related Projects Traffic Volume**	**Future (2015) Without Project**	**Project Traffic Volume**	**Future (2015) With Project**
Ventura Freeway (I-101)	between Van Nuys Boulevard &	NB	10,587	24	11,708	38	11,746
	San Diego Freeway	SB	9,113	18	10,076	26	10,102
	between San Diego Freeway &	NB	11,016	108	12,266	16	12,282
	Havenhurst Avenue	SB	10,067	125	11,236	31	11,267
San Diego Freeway (I-405)	between Burbank Boulevard &	NB	8,919	139	9,983	19	10,002
	Ventura Freeway	SB	8,199	120	9,169	0	9,169
	between Ventura Freeway &	NB	10,067	8	11,119	31	11,150
	Mulholland Drive	SB	9,148	15	10,111	19	10,130

All data based on CALTRANS 2007 released freeway counts.

ATTACHMENT C-2
CMP FREEWAY SEGMENTS VOLUME/CAPACITY SUMMARY

AM Peak Hour

				Existing (2008)		Future (2015) Without Project		Future (2015) With Project		
Freeway	**Segment**	**Direction**	**Capacity**	**V/C**	**LOS**	**V/C**	**LOS**	**V/C**	**LOS**	**Impact**
Ventura Freeway (I-101)	between Van Nuys Boulevard & San Diego Freeway	NB	10,000	0.915	E	1.013	F(0)	1.015	F(0)	0.001
		SB	10,000	1.017	F(0)	1.125	F(0)	1.128	F(0)	0.003
	between San Diego Freeway & Havenhurst Avenue	NB	10,000	0.903	E	1.021	F(0)	1.023	F(0)	0.001
		SB	10,000	1.106	F(0)	1.239	F(0)	1.240	F(0)	0.001
San Diego Freeway (I-405)	between Burbank Boulevard & Ventura Freeway	NB	8,000	0.536	A	0.601	B	0.603	B	0.003
		SB	8,000	1.080	F(0)	1.201	F(0)	1.201	F(0)	0.000
	between Ventura Freeway & Mulholland Drive	NB	8,000	0.674	B	0.746	C	0.747	C	0.001
		SB	8,000	1.333	F(1)	1.473	F(3)	1.476	F(3)	0.003

PM Peak Hour

				Existing (2008)		Future (2015) Without Project		Future (2015) With Project		
Freeway	**Segment**	**Direction**	**Capacity**	**V/C**	**LOS**	**V/C**	**LOS**	**V/C**	**LOS**	**Impact**
Ventura Freeway (I-101)	between Van Nuys Boulevard & San Diego Freeway	NB	10,000	1.059	F(0)	1.171	F(0)	1.175	F(0)	0.004
		SB	10,000	0.911	E	1.008	F(0)	1.010	F(0)	0.003
	between San Diego Freeway & Havenhurst Avenue	NB	10,000	1.102	F(0)	1.227	F(0)	1.228	F(0)	0.002
		SB	10,000	1.007	F(0)	1.124	F(0)	1.127	F(0)	0.003
San Diego Freeway (I-405)	between Burbank Boulevard & Ventura Freeway	NB	8,000	1.115	F(0)	1.248	F(0)	1.250	F(0)	0.002
		SB	8,000	1.025	F(0)	1.146	F(0)	1.146	F(0)	0.000
	between Ventura Freeway & Mulholland Drive	NB	8,000	1.258	F(1)	1.390	F(2)	1.394	F(2)	0.004
		SB	8,000	1.144	F(0)	1.264	F(1)	1.266	F(1)	0.002

Note: F(0) = V/C > 1.00-1.25; F(1) = V/C > 1.25-1.35; F(2) = V/C > 1.35-1.45; and F(3) = V/C > 1.45.

ATTACHMENT D
INTERSECTION LEVEL OF SERVICE & CONSTRUCTION IMPACT ANALYSIS
FUTURE (2015) WITHOUT AND WITH PROJECT CONSTRUCTION TRAFFIC CONDITIONS

No.	Intersection	Peak Hour	Construction Period	Without Construction Traffic		With Construction Traffic			With Mitigation		
				CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
1	OXNARD ST. & SEPULVEDA BLVD.	AM	Months 1-2	0.755	C	0.755	C	0.000			
		PM		1.108	F	1.108	F	0.000			
		AM	Months 3-4	0.754	C	0.754	C	0.000			
		PM		1.106	F	1.106	F	0.000			
		AM	Month 8	0.754	C	0.754	C	0.000			
		PM		1.106	F	1.106	F	0.000			
2	BURBANK BLVD. & 405 FREEWAY SB RAMPS	AM	Months 1-2	0.832	D	0.832	D	0.000			
		PM		0.867	D	0.867	D	0.000			
		AM	Months 3-4	0.830	D	0.831	D	0.001			
		PM		0.866	D	0.866	D	0.000			
		AM	Month 8	0.830	D	0.832	D	0.002			
		PM		0.866	D	0.866	D	0.000			
3	BURBANK BLVD. & 405 FREEWAY NB RAMPS	AM	Months 1-2	0.807	D	0.807	D	0.000			
		PM		0.899	D	0.899	D	0.000			
		AM	Months 3-4	0.806	D	0.806	D	0.000			
		PM		0.898	D	0.898	D	0.000			
		AM	Month 8	0.806	D	0.806	D	0.000			
		PM		0.898	D	0.898	D	0.000			
4	BURBANK BLVD. & SEPULVEDA BLVD.	AM	Months 1-2	1.003	F	1.003	F	0.000			
		PM		1.144	F	1.144	F	0.000			
		AM	Months 3-4	1.001	F	1.003	F	0.002			
		PM		1.142	F	1.142	F	0.000			
		AM	Month 8	1.001	F	1.003	F	0.002			
		PM		1.142	F	1.142	F	0.000			
5	BURBANK BLVD. & KESTER AVE.	AM	Months 1-2	0.832	D	0.832	D	0.000			
		PM		0.807	D	0.807	D	0.000			
		AM	Months 3-4	0.831	D	0.831	D	0.000			
		PM		0.806	D	0.806	D	0.000			
		AM	Month 8	0.831	D	0.831	D	0.000			
		PM		0.806	D	0.806	D	0.000			
6	MAGNOLIA BLVD. & SEPULVEDA BLVD.	AM	Months 1-2	0.779	C	0.779	C	0.000			
		PM		0.820	D	0.820	D	0.000			
		AM	Months 3-4	0.778	C	0.778	C	0.000			
		PM		0.819	D	0.819	D	0.000			
		AM	Month 8	0.778	C	0.779	C	0.001			
		PM		0.819	D	0.819	D	0.000			
7	MAGNOLIA BLVD. & KESTER AVE.	AM	Months 1-2	0.735	C	0.735	C	0.000			
		PM		0.775	C	0.775	C	0.000			
		AM	Months 3-4	0.734	C	0.734	C	0.000			
		PM		0.774	C	0.774	C	0.000			
		AM	Month 8	0.734	C	0.734	C	0.000			
		PM		0.774	C	0.774	C	0.000			

ATTACHMENT D
INTERSECTION LEVEL OF SERVICE & CONSTRUCTION IMPACT ANALYSIS
FUTURE (2015) WITHOUT AND WITH PROJECT CONSTRUCTION TRAFFIC CONDITIONS

No.	Intersection	Peak Hour	Construction Period	Without Construction Traffic		With Construction Traffic			With Mitigation		
				CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
8	101 FREEWAY WB OFF-RAMP & SEPULVEDA BLVD.	AM	Months 1-2	0.696	B	0.713	C	0.017			
		PM		0.650	B	0.650	B	0.000			
		AM	Months 3-4	0.695	B	0.714	C	0.019			
		PM		0.649	B	0.649	B	0.000			
		AM	Month 8	0.695	B	0.698	B	0.003			
		PM		0.649	B	0.649	B	0.000			
9	101 FREEWAY EB ON-RAMP & SEPULVEDA BLVD.	AM	Months 1-2	0.737	C	0.752	C	0.015			
		PM		0.915	E	0.915	E	0.000			
		AM	Months 3-4	0.736	C	0.753	C	0.017			
		PM		0.914	E	0.914	E	0.000			
		AM	Month 8	0.736	C	0.738	C	0.002			
		PM		0.914	E	0.914	E	0.000			
10	LA MAIDA ST. & SEPULVEDA BLVD.	AM	Months 1-2	0.712	C	0.727	C	0.015			
		PM		0.824	D	0.824	D	0.000			
		AM	Months 3-4	0.711	C	0.728	C	0.017			
		PM		0.823	D	0.823	D	0.000			
		AM	Month 8	0.711	C	0.713	B	0.002			
		PM		0.823	D	0.823	C	0.000			
11	CAMARILLO ST. & SEPULVEDA BLVD.	AM	Months 1-2	0.657	B	0.707	C	0.050 *	0.553	A	-0.104
		PM		0.844	D	0.844	D	0.000	0.844	D	0.000
		AM	Months 3-4	0.656	B	0.715	C	0.059 *	0.559	A	-0.097
		PM		0.843	D	0.843	D	0.000	0.843	D	0.000
		AM	Month 8	0.656	B	0.668	B	0.012	0.525	B	-0.131
		PM		0.843	D	0.843	D	0.000	0.844	D	0.001
12	CAMARILLO ST. & KESTER AVE.	AM	Months 1-2	0.808	D	0.808	D	0.000			
		PM		0.588	A	0.588	A	0.000			
		AM	Months 3-4	0.807	D	0.807	D	0.000			
		PM		0.587	A	0.587	A	0.000			
		AM	Month 8	0.807	D	0.807	D	0.000			
		PM		0.587	A	0.587	A	0.000			
13	VENTURA BLVD. & HASKELL AVE. (NORTH)	AM	Months 1-2	0.879	D	0.879	D	0.000			
		PM		0.905	E	0.905	E	0.000			
		AM	Months 3-4	0.878	D	0.878	D	0.000			
		PM		0.903	E	0.903	E	0.000			
		AM	Month 8	0.878	D	0.878	D	0.000			
		PM		0.903	E	0.903	E	0.000			
14	VENTURA BLVD. & HASKELL AVE. (SOUTH)	AM	Months 1-2	0.675	B	0.675	B	0.000			
		PM		0.761	C	0.761	C	0.000			
		AM	Months 3-4	0.674	B	0.674	B	0.000			
		PM		0.760	C	0.760	C	0.000			
		AM	Month 8	0.674	B	0.674	B	0.000			
		PM		0.760	C	0.760	C	0.000			

ATTACHMENT D
INTERSECTION LEVEL OF SERVICE & CONSTRUCTION IMPACT ANALYSIS
FUTURE (2015) WITHOUT AND WITH PROJECT CONSTRUCTION TRAFFIC CONDITIONS

No.	Intersection	Peak Hour	Construction Period	Without Construction Traffic		With Construction Traffic			With Mitigation		
				CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
15	VENTURA BLVD. & 101 FREEWAY EB OFF-/405 FREEWAY SB ON-RAMP/SHERMAN OAKS AVE.	AM	Months 1-2	0.776	C	0.776	C	0.000			
		PM		0.861	D	0.861	D	0.000			
		AM	Months 3-4	0.775	C	0.776	C	0.001			
		PM		0.860	D	0.860	D	0.000			
		AM	Month 8	0.775	C	0.776	C	0.001			
		PM		0.860	D	0.860	D	0.000			
16	VENTURA BLVD. & SEPULVEDA BLVD.	AM	Months 1-2	1.071	F	1.071	F	0.000			
		PM		1.142	F	1.142	F	0.000			
		AM	Months 3-4	1.070	F	1.070	F	0.000			
		PM		1.141	F	1.141	F	0.000			
		AM	Month 8	1.070	F	1.070	F	0.000			
		PM		1.141	F	1.141	F	0.000			
17	VENTURA BLVD. & KESTER AVE. (NORTH)	AM	Months 1-2	1.100	F	1.100	F	0.000			
		PM		0.843	D	0.843	D	0.000			
		AM	Months 3-4	1.098	F	1.098	F	0.000			
		PM		0.842	D	0.842	D	0.000			
		AM	Month 8	1.098	F	1.098	F	0.000			
		PM		0.842	D	0.842	D	0.000			
18	VENTURA BLVD. & KESTER AVE. (SOUTH)	AM	Months 1-2	0.877	D	0.877	D	0.000			
		PM		0.908	E	0.908	E	0.000			
		AM	Months 3-4	0.876	D	0.876	D	0.000			
		PM		0.907	E	0.907	E	0.000			
		AM	Month 8	0.876	D	0.876	D	0.000			
		PM		0.907	E	0.907	E	0.000			
19	VENTURA BLVD. & VAN NUYS BLVD.	AM	Months 1-2	0.885	D	0.885	D	0.000			
		PM		1.229	F	1.229	F	0.000			
		AM	Months 3-4	0.884	D	0.884	D	0.000			
		PM		1.227	F	1.227	F	0.000			
		AM	Month 8	0.884	D	0.884	D	0.000			
		PM		1.227	F	1.227	F	0.000			
20	VENTURA BLVD. & BEVERLY GLEN BLVD.	AM	Months 1-2	0.628	B	0.628	B	0.000			
		PM		1.035	F	1.035	F	0.000			
		AM	Months 3-4	0.627	B	0.627	B	0.000			
		PM		1.034	F	1.034	F	0.000			
		AM	Month 8	0.627	B	0.627	B	0.000			
		PM		1.034	F	1.034	F	0.000			
21	VENTURA BLVD. & HAZELTINE AVE. (NORTH)	AM	Months 1-2	0.655	B	0.655	B	0.000			
		PM		0.796	C	0.796	C	0.000			
		AM	Months 3-4	0.654	B	0.654	B	0.000			
		PM		0.795	C	0.795	C	0.000			
		AM	Month 8	0.654	B	0.654	B	0.000			
		PM		0.795	C	0.795	C	0.000			

ATTACHMENT D
INTERSECTION LEVEL OF SERVICE & CONSTRUCTION IMPACT ANALYSIS
FUTURE (2015) WITHOUT AND WITH PROJECT CONSTRUCTION TRAFFIC CONDITIONS

No.	Intersection	Peak Hour	Construction Period	Without Construction Traffic		With Construction Traffic			With Mitigation		
				CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
22	DICKENS ST./SAUGUS AVE. & SEPULVEDA BLVD.	AM	Months 1-2	0.712	C	0.712	C	0.000			
		PM		0.870	D	0.871	D	0.001			
		AM	Months 3-4	0.712	C	0.713	C	0.001			
		PM		0.870	D	0.870	D	0.000			
		AM	Month 8	0.712	C	0.713	C	0.001			
		PM		0.870	D	0.870	D	0.000			
23	405 FREEWAY NB RAMPS-GREENLEAF ST SEPULVEDA BLVD.	AM	Months 1-2	1.106	F	1.106	F	0.000			
		PM		0.941	E	0.941	E	0.000			
		AM	Months 3-4	1.104	F	1.105	F	0.001			
		PM		0.940	E	0.940	E	0.000			
		AM	Month 8	1.104	F	1.105	F	0.001			
		PM		0.940	E	0.940	E	0.000			
24	VALLEY VISTA BLVD & SEPULVEDA BLVD	AM	Months 1-2	0.875	D	0.875	D	0.000			
		PM		0.540	A	0.540	A	0.000			
		AM	Months 3-4	0.874	D	0.874	D	0.000			
		PM		0.539	A	0.539	A	0.000			
		AM	Month 8	0.874	D	0.874	D	0.000			
		PM		0.539	A	0.539	A	0.000			
25	VENTURA BLVD. & DICKENS ST.	AM	Months 1-2	0.696	B	0.696	B	0.000			
		PM		0.689	B	0.689	B	0.000			
		AM	Months 3-4	0.695	B	0.695	B	0.000			
		PM		0.688	B	0.688	B	0.000			
		AM	Month 8	0.695	B	0.695	B	0.000			
		PM		0.688	B	0.688	B	0.000			
26	MOORPARK ST. & SEPULVEDA BLVD.	AM	Months 1-2	0.719	C	0.719	C	0.000			
		PM		0.848	D	0.848	D	0.000			
		AM	Months 3-4	0.719	C	0.721	C	0.002			
		PM		0.847	D	0.847	D	0.000			
		AM	Month 8	0.719	C	0.721	C	0.002			
		PM		0.847	D	0.847	D	0.000			

* Indicates a significant construction traffic impact .

ATTACHMENT E

CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 1		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
North/South Street:		Critical Phases:	3		Ambient Growth		Critical Phases:	3		☐ Adjacent		In	Out	Total			Critical Phases:	3	
Sepulveda Boulevard		Capacity:	1425		from:	2008	Capacity:	1425		Trip	AM	34	142	176			Capacity:	1425	
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3	
Oxnard Street		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%	
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0	
AM Peak:	7:30 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume	
Northbound	Left	17	1	17	2	0	19	1	19	0%	0	19	1	19	0	19	1	19	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	676	2	**282**	70	94	840	2	**344**	(5%)	10	850	2	**347**	0	850	2	**347**	
	Th-Rt		1	**282**				1	**344**	(8%)			1	**347**			1	**347**	
	Right	170	0	0	18	3	191	0	0	(1%)	1	192	0	0	0	192	0	0	
	Shared		0	0				0	0	(1%)			0	0			0	0	
Southbound	Left	461	1	**461**	48	1	510	1	**510**	0%	0	510	1	**510**	0	510	1	**510**	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	1469	2	507	152	87	1708	2	589	5%	6	1714	2	591	0	1714	2	591	
	Th-Rt		1	507				1	589	8%			1	591			1	591	
	Right	53	0	0	5	1	59	0	0	0%	0	59	0	0	0	59	0	0	
	Shared		0	0				0	0	0%			0	0			0	0	
Eastbound	Left	18	0	0	2	1	21	0	0	0%	0	21	0	0	0	21	0	0	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	20	0	0	2	0	22	0	0	0%	0	22	0	0	0	22	0	0	
	Th-Rt		0	0				0	0	0%			0	0			0	0	
	Right	18	0	0	2	0	20	0	0	0%	0	20	0	0	0	20	0	0	
	Shared		1	**56**				1	**63**	0%			1	**63**			1	**63**	
Westbound	Left	270	1	**270**	28	4	302	1	**302**	1%	1	303	1	**303**	0	303	1	**303**	
	Lt-Th		0	0				0	0	1%			0	0			0	0	
	Thru	34	1	34	4	0	38	1	38	0%	0	38	1	38	0	38	1	38	
	Th-Rt		0	0				0	0	0%			0	0			0	0	
	Right	443	1	213	46	3	492	1	237	0%	0	492	1	237	0	492	1	237	
	Shared		0	0				0	0	0%			0	0			0	0	
N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																			
S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																			
E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																			
W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																			
Shared: Green W CC left																			
Critical Volumes:		North-South:		743			North-South:		853			North-South:		857			North-South:		857
		East-West:		326			East-West:		365			East-West:		366			East-West:		366
		Total:		1069			Total:		1218			Total:		1223			Total:		1223
Volume/capacity (*v/c*) ratio:				0.750					0.855					0.858					0.858
v/c less ATSAC adjustment:				0.650					0.755					0.758					0.758
Level of Service (LOS):				**B**					**C**					**C**					**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.003 — Significantly impacted? NO

Δ*v/c* after mitigation: 0.003 — Fully mitigated? N/A

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Developed 2005-2007 by Ken Aitchison

CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 1		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
North/South Street:		Critical Phases:	3		Ambient Growth		Critical Phases:	3		☐ Adjacent		In	Out	Total			Critical Phases:	3	
Sepulveda Boulevard		Capacity:	1425		from:	2008	Capacity:	1425		Trip	AM	34	142	176			Capacity:	1425	
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3	
Oxnard Street		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%	
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0	
PM Peak:	5:00 PM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume	
Northbound	Left	13	1	13	1	0	14	1	14	0%	0	14	1	14	0	14	1	14	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	1553	2	**596**	161	98	1812	2	**691**	(5%)	14	1826	2	**696**	0	1826	2	**696**	
	Th-Rt		1	**596**				1	**691**	(8%)			1	**696**			1	**696**	
	Right	235	0	0	24	2	261	0	0	(1%)	2	263	0	0	0	263	0	0	
	Shared		0	0				0	0	(1%)			0	0			0	0	
Southbound	Left	317	1	**317**	33	5	355	1	**355**	0%	0	355	1	**355**	0	355	1	**355**	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	1205	2	408	125	117	1447	2	490	5%	19	1466	2	497	0	1466	2	497	
	Th-Rt		1	408				1	490	8%			1	497			1	497	
	Right	20	0	0	2	2	24	0	0	0%	0	24	0	0	0	24	0	0	
	Shared		0	0				0	0	0%			0	0			0	0	
Eastbound	Left	47	0	0	5	2	54	0	0	0%	0	54	0	0	0	54	0	0	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	56	0	0	6	0	62	0	0	0%	0	62	0	0	0	62	0	0	
	Th-Rt		0	0				0	0	0%			0	0			0	0	
	Right	26	0	0	3	0	29	0	0	0%	0	29	0	0	0	29	0	0	
	Shared		1	**129**				1	**144**	0%			1	**144**			1	**144**	
Westbound	Left	349	1	349	36	1	386	1	386	1%	2	388	1	388	0	388	1	388	
	Lt-Th		0	0				0	0	1%			0	0			0	0	
	Thru	27	1	27	3	0	30	1	30	0%	0	30	1	30	0	30	1	30	
	Th-Rt		0	0				0	0	0%			0	0			0	0	
	Right	640	1	**482**	66	2	708	1	**531**	0%	0	708	1	**531**	0	708	1	**531**	
	Shared		0	0				0	0	0%			0	0			0	0	
N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																			
S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																			
E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																			
W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																			
Critical Volumes:		North-South:	913				North-South:	1046				North-South:	1051				North-South:	1051	
		East-West:	611				East-West:	676				East-West:	676				East-West:	676	
		Total:	1524				Total:	1722				Total:	1727				Total:	1727	
Volume/capacity (*v/c*) ratio:			1.069					1.208					1.212					1.212	
v/c less ATSAC adjustment:			0.969					1.108					1.112					1.112	
Level of Service (LOS):			**E**					**F**					**F**					**F**	

PROJECT IMPACT

Change in *v/c* due to project: 0.004 — *Δv/c* after mitigation: 0.004

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 2		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	3		Ambient Growth		Critical Phases:	3		☐ Adjacent		In	Out	Total			Critical Phases:	3
405 Freeway SB Ramps		Capacity:	1425		from:	2008	Capacity:	1425		Trip	AM	34	142	176			Capacity:	1425
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3
Burbank Boulevard		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0
AM Peak:	7:30 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	415	1	228	43	60	518	1	**285**	9%	6	524	1	**288**	0	524	1	**288**
	Lt-Th		1	189				1	235	5%			1	238			1	238
	Thru	2	0	0	0	0	2	0	0	0%	0	2	0	0	0	2	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	233	1	**233**	24	0	257	1	257	0%	0	257	1	257	0	257	1	257
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1578	2	**643**	164	95	1837	2	**742**	2%	3	1840	2	**743**	0	1840	2	**743**
	Th-Rt		1	**643**				1	**742**	3%			1	**743**			1	**743**
	Right	352	0	0	36	0	388	0	0	0%	0	388	0	0	0	388	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	436	2	**240**	45	66	547	2	**301**	0%	0	547	2	**301**	0	547	2	**301**
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1282	3	427	133	99	1514	3	505	(2%)	4	1518	3	506	0	1518	3	506
	Th-Rt		0	0				0	0	(3%)			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		233			North-South:		285			North-South:		288		North-South:		288
		East-West:		883			East-West:		1043			East-West:		1044		East-West:		1044
		Total:		1116			Total:		1328			Total:		1332		Total:		1332
Volume/capacity (*v/c*) ratio:				0.783					0.932					0.935				0.935
v/c less ATSAC adjustment:				0.683					0.832					0.835				0.835
Level of Service (LOS):				**B**					**D**					**D**				**D**

N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

PROJECT IMPACT

Change in *v/c* due to project: 0.003 — *Δv/c* after mitigation: 0.003

Significantly impacted? NO — Fully mitigated? N/A

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Developed 2005-2007 by Ken Aitchison

CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 2	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **405 Freeway SB Ramps**	Critical Phases: 3	Ambient Growth — Critical Phases: 3	☐ Adjacent	Critical Phases: 3
	Capacity: 1425	from: 2008 — Capacity: 1425	Trip AM: In 34, Out 142, Total 176	Capacity: 1425
East/West Street: **Burbank Boulevard**	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 3
Analysis Date: 03/01/2013	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 10%
PM Peak: 4:45 PM	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0

		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	776	1	**427**	80	127	983	1	**541**	9%	19	1002	1	**551**	0	1002	1	**551**
	Lt-Th		1	351				1	445	5%			1	453			1	453
	Thru	2	0	0	0	0	2	0	0	0%	0	2	0	0	0	2	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	310	1	310	32	0	342	1	342	0%	0	342	1	342	0	342	1	342
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	963	2	**346**	100	156	1219	2	**434**	2%	7	1226	2	**436**	0	1226	2	**436**
	Th-Rt		1	**346**				1	**434**	3%			1	**436**			1	**436**
	Right	75	0	0	8	0	83	0	0	0%	0	83	0	0	0	83	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	556	2	**306**	58	120	734	2	**404**	0%	0	734	2	**404**	0	734	2	**404**
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1667	3	556	173	148	1988	3	663	(2%)	5	1993	3	664	0	1993	3	664
	Th-Rt		0	0				0	0	(3%)			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		427			North-South:		541			North-South:		551			North-South:		551
		East-West:		652			East-West:		837			East-West:		840			East-West:		840
		Total:		1079			Total:		1378			Total:		1391			Total:		1391
Volume/capacity (*v/c*) ratio:				0.757					0.967					0.976					0.976
v/c less ATSAC adjustment:				0.657					0.867					0.876					0.876
Level of Service (LOS):				**B**					**D**					**D**					**D**

N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

PROJECT IMPACT

Change in *v/c* due to project: 0.009 — *Δv/c* after mitigation: 0.009

Significantly impacted? NO — Fully mitigated? N/A

Filename: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\LADOT CMACalc 3.9\Future Year 2015\1% Ambie

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 3		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE				2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases: 3			Ambient Growth		Critical Phases: 3		☐ Adjacent		In	Out	Total			Critical Phases: 3	
405 Freeway NB Ramps		Capacity: 1425			from: 2008		Capacity: 1425		Trip	AM	34	142	176			Capacity: 1425	
East/West Street:		Signal System: 3			to: 2015		Signal System: 3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System: 3	
Burbank Boulevard		v/c reduction: 10%			at: 1.4%		v/c reduction: 10%		Trip	AM	55	35	90			v/c reduction: 10%	
Analysis Date: 03/01/2013		Opposed Phasing: 0					Opposed Phasing: 0		Gen 2	PM	144	140	284			Opposed Phasing: 0	
AM Peak: 7:30 AM		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	167	1	92	17	0	184	1	101	0%	0	184	1	101	0	184	1	101
	Lt-Th	N/B RTOR:	0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt	Projected: 50%	0	0				0	0	0%			0	0			0	0
	Right	Mitigated: 50%	315	1	173	33	52	400	1	220	0%	0	400	1	220	0	400	1	220
	Shared			1	**217**				1	**263**	0%			1	**263**			1	**263**
Southbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th	S/B RTOR:	0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt	Projected: 50%	0	0				0	0	0%			0	0			0	0
	Right	Mitigated: 50%	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared			0	0				0	0	0%			0	0			0	0
Eastbound	Left	273	1	**273**	28	0	301	1	**301**	0%	0	301	1	**301**	0	301	1	**301**
	Lt-Th	E/B RTOR:	0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	1703	3	568	177	157	2037	3	679	11%	8	2045	3	682	0	2045	3	682
	Th-Rt	Projected: 50%		0	0				0	0	8%			0	0			0	0
	Right	Mitigated: 50%	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared			0	0				0	0	0%			0	0			0	0
Westbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th	W/B RTOR:	0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	1533	2	**603**	159	163	1855	2	**728**	(2%)	4	1859	2	**729**	0	1859	2	**729**
	Th-Rt	Projected: 50%		1	**603**				1	**728**	(3%)			1	**729**			1	**729**
	Right	Mitigated: 50%	611	1	336	63	58	732	1	403	0%	0	732	1	403	0	732	1	403
	Shared			0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		217			North-South:		263			North-South:		263			North-South:		263
		East-West:		876			East-West:		1029			East-West:		1031			East-West:		1031
		Total:		1093			Total:		1292			Total:		1294			Total:		1294
Volume/capacity (*v/c*) ratio:				0.767					0.907					0.908					0.908
v/c less ATSAC adjustment:				0.667					0.807					0.808					0.808
Level of Service (LOS):				**B**					**D**					**D**					**D**

PROJECT IMPACT

Change in *v/c* due to project: 0.001 — *Δv/c* after mitigation: 0.001

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 3		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT						2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	3		Ambient Growth		Critical Phases:	3		☐ Adjacent		In	Out	Total			Critical Phases:	3	
405 Freeway NB Ramps		Capacity:	1425		from:	2008	Capacity:	1425		Trip	AM	34	142	176			Capacity:	1425	
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3	
Burbank Boulevard		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%	
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0	
PM Peak:	5:00 PM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume			+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	437	1	240	45	0	482	1	265	0%	0	482	1	265	0	482	1	265	
	Lt-Th	N/B RTOR:	0	0				0	0	0%			0	0			0	0	
	Thru	Existing: 50%	0	0	0	0	3	0	0	0%	0	3	0	0	0	3	0	0	
	Th-Rt	Projected: 50%	0	0				0	0	0%			0	0			0	0	
	Right	Mitigated: 50%	1	255	48	125	636	1	350	0%	0	636	1	350	0	636	1	350	
	Shared		1	**408**				1	**507**	0%			1	**507**			1	**507**	
Southbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Lt-Th	S/B RTOR:	0	0				0	0	0%			0	0			0	0	
	Thru	Existing: 50%	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Th-Rt	Projected: 50%	0	0				0	0	0%			0	0			0	0	
	Right	Mitigated: 50%	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Shared		0	0				0	0	0%			0	0			0	0	
Eastbound	Left	48	1	**48**	5	0	53	1	**53**	0%	0	53	1	**53**	0	53	1	**53**	
	Lt-Th	E/B RTOR:	0	0				0	0	0%			0	0			0	0	
	Thru	Existing: 50%	3	550	171	284	2106	3	702	11%	26	2132	3	711	0	2132	3	711	
	Th-Rt	Projected: 50%	0	0				0	0	8%			0	0			0	0	
	Right	Mitigated: 50%	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Shared		0	0				0	0	0%			0	0			0	0	
Westbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Lt-Th	W/B RTOR:	0	0				0	0	0%			0	0			0	0	
	Thru	Existing: 50%	2	**687**	191	266	2304	2	**864**	(2%)	5	2309	2	**865**	0	2309	2	**865**	
	Th-Rt	Projected: 50%	1	**687**				1	**864**	(3%)			1	**865**			1	**865**	
	Right	Mitigated: 50%	1	261	49	114	637	1	350	0%	0	637	1	350	0	637	1	350	
	Shared		0	0				0	0	0%			0	0			0	0	
Critical Volumes:		North-South:		408			North-South:		507				North-South:	507			North-South:	507	
		East-West:		735			East-West:		917				East-West:	918			East-West:	918	
		Total:		1143			Total:		1423				Total:	1425			Total:	1425	
Volume/capacity (*v/c*) ratio:				0.802					0.999					1.000				1.000	
v/c less ATSAC adjustment:				0.702					0.899					0.900				0.900	
Level of Service (LOS):				**C**					**D**					**D**				**D**	

PROJECT IMPACT

Change in *v/c* due to project: 0.001 — Δ*v/c* after mitigation: 0.001

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 4		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT						2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	4		Ambient Growth		Critical Phases:	4		☐ Adjacent		In	Out	Total			Critical Phases:	4	
Sepulveda Boulevard		Capacity:	1375		from:	2008	Capacity:	1375		Trip	AM	34	142	176			Capacity:	1375	
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3	
Burbank Boulevard		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%	
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0	
AM Peak:	7:45 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume	
Northbound	Left	439	2	**241**	46	49	534	2	**293**	(2%)	4	538	2	**296**	0	538	2	**296**	
	Lt-Th		0	0				0	0	(3%)			0	0			0	0	
	Thru	343	2	141	36	80	459	2	185	(6%)	12	471	2	191	0	471	2	191	
	Th-Rt		1	141				1	185	(9%)			1	191			1	191	
	Right	79	0	0	8	10	97	0	0	(3%)	5	102	0	0	0	102	0	0	
	Shared		0	0				0	0	(4%)			0	0			0	0	
Southbound	Left	202	2	111	21	28	251	2	138	0%	0	251	2	138	0	251	2	138	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	1103	3	**368**	114	87	1304	3	**435**	6%	7	1311	3	**437**	0	1311	3	**437**	
	Th-Rt		0	0				0	0	9%			0	0			0	0	
	Right	526	1	350	55	22	603	1	400	0%	0	603	1	400	0	603	1	400	
	Shared		0	0				0	0	0%			0	0			0	0	
Eastbound	Left	353	2	194	37	16	406	2	223	0%	0	406	2	223	0	406	2	223	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	1181	2	**582**	122	130	1433	2	**705**	0%	0	1433	2	**708**	0	1433	2	**708**	
	Th-Rt		1	**582**				1	**705**	0%			1	**708**			1	**708**	
	Right	565	0	0	59	58	682	0	0	11%	8	690	0	0	0	690	0	0	
	Shared		0	0				0	0	8%			0	0			0	0	
Westbound	Left	127	2	**70**	13	11	151	2	**83**	3%	3	154	2	**85**	0	154	2	**85**	
	Lt-Th		0	0				0	0	4%			0	0			0	0	
	Thru	1172	2	422	121	147	1440	2	523	0%	0	1440	2	523	0	1440	2	523	
	Th-Rt		1	422				1	523	0%			1	523			1	523	
	Right	95	0	0	10	23	128	0	0	0%	0	128	0	0	0	128	0	0	
	Shared		0	0				0	0	0%			0	0			0	0	
N/B RTOR:	Existing: 50%																		
	Projected: 50%																		
	Mitigated: 50%																		
S/B RTOR:	Existing: 50%																		
	Projected: 50%																		
	Mitigated: 50%																		
E/B RTOR:	Existing: 50%																		
	Projected: 50%																		
	Mitigated: 50%																		
W/B RTOR:	Existing: 50%																		
	Projected: 50%																		
	Mitigated: 50%																		
Critical Volumes:		North-South:		609			North-South:		728			North-South:		733		North-South:		733	
		East-West:		652			East-West:		788			East-West:		792		East-West:		792	
		Total:		1261			Total:		1516			Total:		1525		Total:		1525	
Volume/capacity (*v/c*) ratio:				0.917					1.103					1.109				1.109	
v/c less ATSAC adjustment:				0.817					1.003					1.009				1.009	
Level of Service (LOS):				**D**					**F**					**F**				**F**	

PROJECT IMPACT

Change in *v/c* due to project: 0.006 — Δ*v/c* after mitigation: 0.006

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 4		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
North/South Street: Sepulveda Boulevard		Critical Phases: 4			Ambient Growth		Critical Phases: 4			☐ Adjacent		In	Out	Total			Critical Phases: 4		
		Capacity: 1375			from: 2008		Capacity: 1375			Trip	AM	34	142	176			Capacity: 1375		
East/West Street: Burbank Boulevard		Signal System: 3			to: 2015		Signal System: 3			Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System: 3		
Analysis Date: 03/01/2013		v/c reduction: 10%			at: 1.4%		v/c reduction: 10%			Trip	AM	55	35	90			v/c reduction: 10%		
PM Peak: 5:00 PM		Opposed Phasing: 0					Opposed Phasing: 0			Gen 2	PM	144	140	284			Opposed Phasing: 0		
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume	+ Project Volume		Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume	
Northbound	Left	523	2	288	54	36	613	2	337	(2%)	5	618	2	340	0	618	2	340	
	Lt-Th		0	0				0	0	(3%)			0	0			0	0	
	Thru	1198	2	449	124	85	1407	2	528	(6%)	17	1424	2	536	0	1424	2	536	
	Th-Rt		1	449				1	528	(9%)			1	536			1	536	
	Right	150	0	0	16	11	177	0	0	(3%)	8	185	0	0	0	185	0	0	
	Shared		0	0				0	0	(4%)			0	0			0	0	
Southbound	Left	240	2	132	25	38	303	2	167	0%	0	303	2	167	0	303	2	167	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	700	3	233	73	85	858	3	286	6%	21	879	3	293	0	879	3	293	
	Th-Rt		0	0				0	0	9%			0	0			0	0	
	Right	608	1	412	63	19	690	1	463	0%	0	690	1	463	0	690	1	463	
	Shared		0	0				0	0	0%			0	0			0	0	
Eastbound	Left	392	2	216	41	21	454	2	250	0%	0	454	2	250	0	454	2	250	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	1306	2	580	135	335	1776	2	767	0%	0	1776	2	775	0	1776	2	775	
	Th-Rt		1	580				1	767	0%			1	775			1	775	
	Right	433	0	0	45	46	524	0	0	11%	26	550	0	0	0	550	0	0	
	Shared		0	0				0	0	8%			0	0			0	0	
Westbound	Left	161	2	89	17	10	188	2	103	3%	10	198	2	109	0	198	2	109	
	Lt-Th		0	0				0	0	4%			0	0			0	0	
	Thru	1206	2	492	125	317	1648	2	661	0%	0	1648	2	661	0	1648	2	661	
	Th-Rt		1	492				1	661	0%			1	661			1	661	
	Right	270	0	0	28	36	334	0	0	0%	0	334	0	0	0	334	0	0	
	Shared		0	0				0	0	0%			0	0			0	0	
Critical Volumes:		North-South:		700			North-South:		800			North-South:		803			North-South:		803
		East-West:		708			East-West:		910			East-West:		910			East-West:		910
		Total:		1407			Total:		1710			Total:		1713			Total:		1713
Volume/capacity (*v/c*) ratio:				1.023					1.244					1.246					1.246
v/c less ATSAC adjustment:				0.923					1.144					1.146					1.146
Level of Service (LOS):				**E**					**F**					**F**					**F**

PROJECT IMPACT

Change in *v/c* due to project: 0.002 — Significantly impacted? NO

Δv/c after mitigation: 0.002 — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 5		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	2		Ambient Growth		Critical Phases:	2		☐ Adjacent		In	Out	Total			Critical Phases:	2
Kester Avenue		Capacity:	1500		from:	2008	Capacity:	1500		Trip	AM	34	142	176			Capacity:	1500
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3
Burbank Boulevard		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0
AM Peak:	7:45 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	121	1	**121**	13	3	137	1	**137**	0%	0	137	1	**137**	0	137	1	**137**
	Lt-Th	N/B RTOR:	0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	1	293	53	16	579	1	333	0%	0	579	1	333	0	579	1	333
	Th-Rt	Projected: 50%	1	293				1	333	0%			1	333			1	333
	Right	Mitigated: 50%	0	0	8	3	87	0	0	0%	0	87	0	0	0	87	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	149	1	149	15	0	164	1	164	0%	0	164	1	164	0	164	1	164
	Lt-Th	S/B RTOR:	0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	1	**501**	94	19	1019	1	**563**	0%	0	1019	1	**563**	0	1019	1	**563**
	Th-Rt	Projected: 50%	1	**501**				1	**563**	0%			1	**563**			1	**563**
	Right	Mitigated: 50%	0	0	10	2	107	0	0	0%	1	108	0	0	0	108	0	0
	Shared		0	0				0	0	2%			0	0			0	0
Eastbound	Left	85	1	85	9	3	97	1	97	0%	1	98	1	98	0	98	1	98
	Lt-Th	E/B RTOR:	0	0				0	0	(2%)			0	0			0	0
	Thru	Existing: 50%	2	**468**	119	164	1434	2	**572**	(3%)	5	1439	2	**573**	0	1439	2	**573**
	Th-Rt	Projected: 50%	1	**468**				1	**572**	(2%)			1	**573**			1	**573**
	Right	Mitigated: 50%	0	0	26	1	280	0	0	0%	0	280	0	0	0	280	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	113	1	**113**	12	3	128	1	**128**	0%	0	128	1	**128**	0	128	1	**128**
	Lt-Th	W/B RTOR:	0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	2	404	118	176	1428	2	505	3%	2	1430	2	505	0	1430	2	505
	Th-Rt	Projected: 50%	1	404				1	505	2%			1	505			1	505
	Right	Mitigated: 50%	0	0	8	0	86	0	0	0%	0	86	0	0	0	86	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		622			North-South:		699			North-South:		700		North-South:		700
		East-West:		581			East-West:		699			East-West:		701		East-West:		701
		Total:		1203			Total:		1399			Total:		1401		Total:		1401
Volume/capacity (*v/c*) ratio:				0.802					0.932					0.934				0.934
v/c less ATSAC adjustment:				0.702					0.832					0.834				0.834
Level of Service (LOS):				**C**					**D**					**D**				**D**

PROJECT IMPACT

Change in *v/c* due to project: 0.002 — *Δv/c* after mitigation: 0.002

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 5

North/South Street: **Kester Avenue**

East/West Street: **Burbank Boulevard**

Analysis Date: 03/01/2013

PM Peak: 4:45 PM

	2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
				Ambient Growth					☐ Adjacent		In	Out	Total					
	Critical Phases: 2			from: 2008		Critical Phases: 2			Trip AM		34	142	176	Critical Phases: 2				
	Capacity: 1500			to: 2015		Capacity: 1500			Gen 1 PM		131	65	196	☐ Use Dist 2? Capacity: 1500				
	Signal System: 3			at: 1.4%		Signal System: 3			Trip AM		55	35	90	Signal System: 3				
	v/c reduction: 10%					v/c reduction: 10%			Gen 2 PM		144	140	284	v/c reduction: 10%				
	Opposed Phasing: 0					Opposed Phasing: 0								Opposed Phasing: 0				
	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound																	
Left	161	1	**161**	17	1	179	1	**179**	0%	0	179	1	**179**	0	179	1	**179**
Lt-Th (N/B RTOR:)		0	0				0	0	0%			0	0			0	0
Thru (Existing: 50%)	518	1	317	54	11	583	1	356	0%	0	583	1	356	0	583	1	356
Th-Rt (Projected: 50%)		1	317				1	356	0%			1	356			1	356
Right (Mitigated: 50%)	116	0	0	12	2	130	0	0	0%	0	130	0	0	0	130	0	0
Shared		0	0				0	0	0%			0	0			0	0
Southbound																	
Left	130	1	130	13	0	143	1	143	0%	0	143	1	143	0	143	1	143
Lt-Th (S/B RTOR:)		0	0				0	0	0%			0	0			0	0
Thru (Existing: 50%)	618	1	**342**	64	16	698	1	**387**	0%	0	698	1	**388**	0	698	1	**388**
Th-Rt (Projected: 50%)		1	**342**				1	**387**	0%			1	**388**			1	**388**
Right (Mitigated: 50%)	66	0	0	7	3	76	0	0	0%	3	79	0	0	0	79	0	0
Shared		0	0				0	0	2%			0	0			0	0
Eastbound																	
Left	122	1	**122**	13	2	137	1	**137**	0%	3	140	1	**140**	0	140	1	**140**
Lt-Th (E/B RTOR:)		0	0				0	0	(2%)			0	0			0	0
Thru (Existing: 50%)	1311	2	488	136	379	1826	2	666	(3%)	5	1831	2	668	0	1831	2	668
Th-Rt (Projected: 50%)		1	488				1	666	(2%)			1	668			1	668
Right (Mitigated: 50%)	154	0	0	16	3	173	0	0	0%	0	173	0	0	0	173	0	0
Shared		0	0				0	0	0%			0	0			0	0
Westbound																	
Left	83	1	83	9	2	94	1	94	0%	0	94	1	94	0	94	1	94
Lt-Th (W/B RTOR:)		0	0				0	0	0%			0	0			0	0
Thru (Existing: 50%)	1302	2	**488**	135	358	1795	2	**658**	3%	7	1802	2	**661**	0	1802	2	**661**
Th-Rt (Projected: 50%)		1	**488**				1	**658**	2%			1	**661**			1	**661**
Right (Mitigated: 50%)	163	0	0	17	0	180	0	0	0%	0	180	0	0	0	180	0	0
Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:	North-South:		503			North-South:		566			North-South:		567		North-South:		567
	East-West:		610			East-West:		795			East-West:		800		East-West:		800
	Total:		1113			Total:		1361			Total:		1367		Total:		1367
Volume/capacity (*v/c*) ratio:			0.742					0.907					0.912				0.912
v/c less ATSAC adjustment:			0.642					0.807					0.812				0.812
Level of Service (LOS):			**B**					**D**					**D**				**D**

PROJECT IMPACT

Change in *v/c* due to project: 0.005 — *Δv/c* after mitigation: 0.005

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 6		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT						2015, WITH TRAFFIC MITIGATION			
North/South Street: Sepulveda Boulevard		Critical Phases: 3			Ambient Growth		Critical Phases: 3			☐ Adjacent		In	Out	Total		Critical Phases: 3			
		Capacity: 1425			from: 2008		Capacity: 1425			Trip	AM	34	142	176		Capacity: 1425			
East/West Street: Magnolia Boulevard		Signal System: 3			to: 2015		Signal System: 3			Gen 1	PM	131	65	196	☐ Use Dist 2?	Signal System: 3			
		v/c reduction: 10%			at: 1.4%		v/c reduction: 10%			Trip	AM	55	35	90		v/c reduction: 10%			
Analysis Date: 03/01/2013		Opposed Phasing: 0					Opposed Phasing: 0			Gen 2	PM	144	140	284		Opposed Phasing: 0			
AM Peak: 7:30 AM		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume			+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	109	1	**109**	11	34	154	1	**154**	0%	0	154	154	1	**154**	0	154	1	**154**
	Lt-Th	N/B RTOR:	0	0				0	0	0%				0	0			0	0
	Thru	Existing: 50%	3	134	42	66	511	3	170	(11%)	22	533	3	178		533	3	178
	Th-Rt	Projected: 50%	0	0				0	0	(16%)			0	0	0		0	0	
	Right	Mitigated: 50%	1	51	25	16	281	1	65	0%	1	282	1	65		282	1	65
	Shared		0	0				0	0	(3%)			0	0	0		0	0	
Southbound	Left	249	1	249	26	5	280	1	280	0%	0	280	1	280		280	1	280	
	Lt-Th	S/B RTOR:	0	0				0	0	0%			0	0	0		0	0	
	Thru	Existing: 50%	3	**456**	142	83	1592	3	**531**	20%	19	1611	3	**537**		1611	3	**537**	
	Th-Rt	Projected: 50%	0	0				0	0	21%			0	0	0		0	0	
	Right	Mitigated: 50%	1	86	14	58	211	1	120	0%	0	211	1	120		211	1	120	
	Shared		0	0				0	0	0%			0	0	0		0	0	
Eastbound	Left	106	0	0	11	65	182	0	0	0%	0	182	0	0		182	0	0	
	Lt-Th	E/B RTOR:	1	**235**				1	**345**	0%			1	**345**	0		1	**345**	
	Thru	Existing: 50%	0	0	13	21	163	0	0	0%	0	163	0	0		163	0	0	
	Th-Rt	Projected: 50%	0	0				0	0	0%			0	0	0		0	0	
	Right	Mitigated: 50%	1	0	4	38	79	1	2	0%	0	79	1	2		79	1	2	
	Shared		0	0				0	0	0%			0	0	0		0	0	
Westbound	Left	378	1	378	39	15	432	1	432	0%	2	434	1	434		434	1	434	
	Lt-Th	W/B RTOR:	0	0				0	0	3%			0	0	0		0	0	
	Thru	Existing: 50%	1	**185**	19	18	222	1	**222**	0%	0	222	1	**222**		222	1	**222**	
	Th-Rt	Projected: 50%	0	0				0	0	0%			0	0	0		0	0	
	Right	Mitigated: 50%	1	160	29	5	318	1	178	0%	0	318	1	178		318	1	178	
	Shared	Green W CC left	0	0				0	0	0%			0	0	0		0	0	
Critical Volumes:		North-South:		565			North-South:		685			North-South:		691			North-South:		691
		East-West:		420			East-West:		568			East-West:		568			East-West:		568
		Total:		985			Total:		1252			Total:		1259			Total:		1259
Volume/capacity (*v/c*) ratio:				0.691					0.879					0.883					0.883
v/c less ATSAC adjustment:				0.591					0.779					0.783					0.783
Level of Service (LOS):				**A**					**C**					**C**					**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.004 — Δ*v/c* after mitigation: 0.004

Significantly impacted? NO — Fully mitigated? N/A

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Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 6		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT						2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	3		Ambient Growth		Critical Phases:	3		☐ Adjacent		In	Out	Total			Critical Phases:	3	
Sepulveda Boulevard		Capacity:	1425		from:	2008	Capacity:	1425		Trip	AM	34	142	176			Capacity:	1425	
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3	
Magnolia Boulevard		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%	
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0	
PM Peak:	5:00 PM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume	
Northbound	Left	35	1	35	4	24	63	1	63	0%	0	63	1	63	0	63	1	63	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	1534	3	**511**	159	68	1761	3	**587**	(11%)	29	1790	3	**597**	0	1790	3	**597**	
	Th-Rt		0	0				0	0	(16%)			0	0			0	0	
	Right	504	1	358	52	18	574	1	405	0%	4	578	1	407	0	578	1	407	
	Shared		0	0				0	0	(3%)			0	0			0	0	
Southbound	Left	306	1	**306**	32	15	353	1	**353**	0%	0	353	1	**353**	0	353	1	**353**	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	883	3	294	92	73	1048	3	349	20%	56	1104	3	368	0	1104	3	368	
	Th-Rt		0	0				0	0	21%			0	0			0	0	
	Right	50	1	26	5	42	97	1	52	0%	0	97	1	52	0	97	1	52	
	Shared		0	0				0	0	0%			0	0			0	0	
Eastbound	Left	49	0	0	5	36	90	0	0	0%	0	90	0	0	0	90	0	0	
	Lt-Th		1	98				1	156	0%			1	156			1	156	
	Thru	49	0	0	5	12	66	0	0	0%	0	66	0	0	0	66	0	0	
	Th-Rt		0	0				0	0	0%			0	0			0	0	
	Right	38	1	**20**	4	22	64	1	**33**	0%	0	64	1	**33**	0	64	1	**33**	
	Shared		0	0				0	0	0%			0	0			0	0	
Westbound	Left	293	1	**293**	30	15	338	1	**338**	0%	4	342	1	**342**	0	342	1	**342**	
	Lt-Th		0	0				0	0	3%			0	0			0	0	
	Thru	41	1	41	4	13	58	1	58	0%	0	58	1	58	0	58	1	58	
	Th-Rt		0	0				0	0	0%			0	0			0	0	
	Right	252	1	99	26	15	293	1	117	0%	0	293	1	117	0	293	1	117	
	Shared		0	0				0	0	0%			0	0			0	0	
Critical Volumes:		North-South:		817			North-South:		940			North-South:		949		North-South:		949	
		East-West:		313			East-West:		371			East-West:		375		East-West:		375	
		Total:		1130			Total:		1311			Total:		1325		Total:		1325	
Volume/capacity (*v/c*) ratio:				0.793					0.920					0.930				0.930	
v/c less ATSAC adjustment:				0.693					0.820					0.830				0.830	
Level of Service (LOS):				**B**					**D**					**D**				**D**	

PROJECT IMPACT

Change in *v/c* due to project: 0.010 — *Δv/c* after mitigation: 0.010

Significantly impacted? NO — Fully mitigated? N/A

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Bureau of Planning and Land Use Development

Intersection No. 7		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
North/South Street:		Critical Phases:	2		Ambient Growth		Critical Phases:	2		☐ Adjacent		In	Out	Total			Critical Phases:	2	
Kester Avenue		Capacity:	1500		from:	2008	Capacity:	1500		Trip	AM	34	142	176			Capacity:	1500	
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3	
Magnolia Boulevard		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%	
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0	
AM Peak:	7:45 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume	
Northbound	Left	148	1	**148**	15	0	163	1	**163**	0%	0	163	1	**163**	0	163	1	**163**	
	Lt-Th	N/B RTOR:	0	0				0	0	0%			0	0			0	0	
	Thru	Existing: 50%	2	306	63	13	687	2	344	0%	0	687	2	344	0	687	2	344	
	Th-Rt	Projected: 50%	611	0				0	0	0%			0	0			0	0	
	Right	Mitigated: 50%	1	189	28	3	298	1	210	0%	0	298	1	210	0	298	1	210	
	Shared		267	0	0			0	0	0%			0	0			0	0	
Southbound	Left		1	159	16	2	177	1	177	0%	0	177	1	177	0	177	1	177	
	Lt-Th	S/B RTOR:	159	0	0			0	0	0%			0	0			0	0	
	Thru	Existing: 50%	1	**487**	93	20	1009	1	**548**	0%	0	1009	1	**548**	0	1009	1	**548**	
	Th-Rt	Projected: 50%	896	1	**487**			1	**548**	0%			1	**548**			1	**548**	
	Right	Mitigated: 50%	0	0	8	2	87	0	0	0%	1	88	0	0	0	88	0	0	
	Shared		77	0	0			0	0	1%			0	0			0	0	
Eastbound	Left		1	69	7	3	79	1	79	0%	0	79	1	79	0	79	1	79	
	Lt-Th	E/B RTOR:	69	0	0			0	0	(1%)			0	0			0	0	
	Thru	Existing: 50%	1	**314**	60	39	675	1	**366**	0%	1	676	1	**366**	0	676	1	**366**	
	Th-Rt	Projected: 50%	576	1	**314**			1	**366**	(2%)			1	**366**			1	**366**	
	Right	Mitigated: 50%	0	0	5	0	56	0	0	0%	0	56	0	0	0	56	0	0	
	Shared		51	0	0			0	0	0%			0	0			0	0	
Westbound	Left		1	**157**	16	3	176	1	**176**	0%	0	176	1	**176**	0	176	1	**176**	
	Lt-Th	W/B RTOR:	157	0	0			0	0	0%			0	0			0	0	
	Thru	Existing: 50%	2	311	64	36	722	2	361	0%	1	723	2	362	0	723	2	362	
	Th-Rt	Projected: 50%	622	0	0			0	0	2%			0	0			0	0	
	Right	Mitigated: 50%	1	76	16	0	172	1	83	0%	0	172	1	83	0	172	1	83	
	Shared		156	0	0			0	0	0%			0	0			0	0	
Critical Volumes:		North-South:		635			North-South:		711			North-South:		712			North-South:		712
		East-West:		471			East-West:		542			East-West:		542			East-West:		542
		Total:		1105			Total:		1253			Total:		1254			Total:		1254
Volume/capacity (*v/c*) ratio:				0.737					0.835					0.836					0.836
v/c less ATSAC adjustment:				0.637					0.735					0.736					0.736
Level of Service (LOS):				**B**					**C**					**C**					**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.001 — *Δv/c* after mitigation: 0.001

Significantly impacted? NO — Fully mitigated? N/A

Filename: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\LADOT CMACalc 3.9\Future Year 2015\1% Ambie

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 7	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Kester Avenue**	Critical Phases: 2	Ambient Growth — Critical Phases: 2	☐ Adjacent	In / Out / Total	Critical Phases: 2
	Capacity: 1500	from: 2008 — Capacity: 1500	Trip AM: 34 / 142 / 176	Capacity: 1500
East/West Street: **Magnolia Boulevard**	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: 131 / 65 / 196	☐ Use Dist 2? — Signal System: 3
	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: 55 / 35 / 90	v/c reduction: 10%
Analysis Date: 03/01/2013	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: 144 / 140 / 284	Opposed Phasing: 0
PM Peak: 4:30 PM				

		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	83	1	**83**	9	0	92	1	**92**	0%	0	92	1	**92**	0	92	1	**92**
	Lt-Th (N/B RTOR: Existing: 50%, Projected: 50%, Mitigated: 50%)		0	0				0	0	0%			0	0			0	0
	Thru	543	2	272	56	12	611	2	306	0%	0	611	2	306	0	611	2	306
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	141	1	11	15	2	158	1	14	0%	0	158	1	14	0	158	1	14
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	178	1	178	18	1	197	1	197	0%	0	197	1	197	0	197	1	197
	Lt-Th (S/B RTOR: Existing: 50%, Projected: 50%, Mitigated: 50%)		0	0				0	0	0%			0	0			0	0
	Thru	713	1	**386**	74	14	801	1	**433**	0%	0	801	1	**434**	0	801	1	**434**
	Th-Rt		1	**386**				1	**433**	0%			1	**434**			1	**434**
	Right	58	0	0	6	2	66	0	0	0%	1	67	0	0	0	67	0	0
	Shared		0	0				0	0	1%			0	0			0	0
Eastbound	Left	32	1	32	3	1	36	1	36	0%	1	37	1	37	0	37	1	37
	Lt-Th (E/B RTOR: Existing: 50%, Projected: 50%, Mitigated: 50%)		0	0				0	0	(1%)			0	0			0	0
	Thru	725	1	**433**	75	43	843	1	**499**	0%	3	846	1	**501**	0	846	1	**501**
	Th-Rt		1	**433**				1	**499**	(2%)			1	**501**			1	**501**
	Right	141	0	0	15	0	156	0	0	0%	0	156	0	0	0	156	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	259	1	**259**	27	2	288	1	**288**	0%	0	288	1	**288**	0	288	1	**288**
	Lt-Th (W/B RTOR: Existing: 50%, Projected: 50%, Mitigated: 50%)		0	0				0	0	0%			0	0			0	0
	Thru	534	2	267	55	41	630	2	315	0%	3	633	2	317	0	633	2	317
	Th-Rt		0	0				0	0	2%			0	0			0	0
	Right	101	1	12	10	2	113	1	14	0%	0	113	1	14	0	113	1	14
	Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		469			North-South:		525			North-South:		526		North-South:		526
		East-West:		692			East-West:		787			East-West:		789		East-West:		789
		Total:		1161			Total:		1312			Total:		1314		Total:		1314
Volume/capacity (*v/c*) ratio:				0.774					0.875					0.876				0.876
v/c less ATSAC adjustment:				0.674					0.775					0.776				0.776
Level of Service (LOS):				**B**					**C**					**C**				**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.001 — Δ*v/c* after mitigation: 0.001

Significantly impacted? NO — Fully mitigated? N/A

Filename: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\LADOT CMACalc 3.9\Future Year 2015\1% Ambie

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 8		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	2		Ambient Growth		Critical Phases:	2		☐ Adjacent		In	Out	Total			Critical Phases:	2
Sepulveda Boulevard		Capacity:	1500		from:	2008	Capacity:	1500		Trip	AM	34	142	176			Capacity:	1500
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3
101 Freeway WB Off-Ramp		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0
AM Peak:	8:00 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	729	2	243	76	109	914	2	305	(11%)	23	937	2	312	0	937	2	312
	Th-Rt		1	243				1	305	(19%)			1	312			1	312
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1706	3	**569**	177	150	2033	3	**678**	20%	20	2053	3	**684**	0	2053	3	**684**
	Th-Rt		0	0				0	0	24%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	758	1	417	79	15	852	1	468	18%	12	864	1	475	0	864	1	475
	Lt-Th		0	0				0	0	10%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	105	0	0	11	18	134	0	0	0%	0	134	0	0	0	134	0	0
	Shared		1	**446**				1	**517**	0%			1	**522**			1	**522**
Critical Volumes:		North-South:		569			North-South:		678			North-South:		684			North-South:	684
		East-West:		446			East-West:		517			East-West:		522			East-West:	522
		Total:		1015			Total:		1195			Total:		1207			Total:	1207
Volume/capacity (*v/c*) ratio:				0.677					0.796					0.805				0.805
v/c less ATSAC adjustment:				0.577					0.696					0.705				0.705
Level of Service (LOS):				**A**					**B**					**C**				**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.009 — *Δv/c* after mitigation: 0.009

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 8		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
North/South Street:		Critical Phases:	2		Ambient Growth		Critical Phases:	2		☐ Adjacent		In	Out	Total			Critical Phases:	2	
Sepulveda Boulevard		Capacity:	1500		from:	2008	Capacity:	1500		Trip	AM	34	142	176			Capacity:	1500	
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3	
101 Freeway WB Off-Ramp		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%	
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0	
PM Peak:	5:00 PM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume	
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	1955	2	**652**	203	100	2258	2	**753**	(11%)	34	2292	2	**764**	0	2292	2	**764**	
	Th-Rt		1	**652**				1	**753**	(19%)			1	**764**			1	**764**	
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Shared		0	0				0	0	0%			0	0			0	0	
Southbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	1171	3	390	121	119	1411	3	470	20%	61	1472	3	491	0	1472	3	491	
	Th-Rt		0	0				0	0	24%			0	0			0	0	
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Shared		0	0				0	0	0%			0	0			0	0	
Eastbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Lt-Th		0	0				0	0	0%			0	0			0	0	
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Th-Rt		0	0				0	0	0%			0	0			0	0	
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Shared		0	0				0	0	0%			0	0			0	0	
Westbound	Left	286	1	157	30	5	321	1	176	18%	38	359	1	197	0	359	1	197	
	Lt-Th		0	0				0	0	10%			0	0			0	0	
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	
	Th-Rt		0	0				0	0	0%			0	0			0	0	
	Right	190	0	0	20	19	229	0	0	0%	0	229	0	0	0	229	0	0	
	Shared		1	**319**				1	**373**	0%			1	**390**			1	**390**	
Critical Volumes:		North-South:		652			North-South:		753			North-South:		764			North-South:		764
		East-West:		319			East-West:		373			East-West:		390			East-West:		390
		Total:		970			Total:		1126			Total:		1154			Total:		1154
Volume/capacity (*v/c*) ratio:				0.647					0.750					0.769					0.769
v/c less ATSAC adjustment:				0.547					0.650					0.669					0.669
Level of Service (LOS):				**A**					**B**					**B**					**B**

PROJECT IMPACT

Change in *v/c* due to project: 0.019 — *Δv/c* after mitigation: 0.019

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 9		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	0		Ambient Growth		Critical Phases:	0		☐ Adjacent		In	Out	Total			Critical Phases:	2
Sepulveda Boulevard		Capacity:	1200		from:	2008	Capacity:	1200		Trip	AM	34	142	176			Capacity:	1500
East/West Street:		Signal System:	1		to:	2015	Signal System:	1		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3
101 Freeway EB On-Ramp		v/c reduction:	0%		at:	1.4%	v/c reduction:	0%		Trip	AM	55	35	90			v/c reduction:	10%
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0
AM Peak:	8:00 AM	Counts Volume		Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume		Lane Volume		+ Project Volume	= Total Volume		Lane Volume	Adjusted Volume	Total Volume		Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	735	2	314	76	109	920	2	387	(11%)	23	943	2	404	0	943	2	404
	Th-Rt		1	314				1	387	(19%)			1	404			1	404
	Right	207	0	0	21	11	239	0	0	(18%)	30	269	0	0	0	269	0	0
	Shared		0	0				0	0	(10%)			0	0			0	0
Southbound	Left	163	1	163	17	20	200	1	200	0%	0	200	1	200	0	200	1	200
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	2274	3	**758**	236	142	2652	3	**884**	38%	32	2684	3	**895**	0	2684	3	**895**
	Th-Rt		0	0				0	0	34%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
Critical Volumes:		North-South:		758			North-South:		884			North-South:		895			North-South:	895
		East-West:		0			East-West:		0			East-West:		0			East-West:	0
		Total:		758			Total:		884			Total:		895			Total:	895
Volume/capacity (*v/c*) ratio:				0.632					0.737					0.745				0.596
v/c less ATSAC adjustment:				0.632					0.737					0.745				0.496
Level of Service (LOS):				**B**					**C**					**C**				**A**

PROJECT IMPACT

Change in *v/c* due to project: 0.008 — Significantly impacted? NO

Δ*v/c* after mitigation: -0.241 — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 9		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	0		Ambient Growth		Critical Phases:	0		☐ Adjacent		In	Out	Total			Critical Phases:	2
Sepulveda Boulevard		Capacity:	1200		from:	2008	Capacity:	1200		Trip	AM	34	142	176			Capacity:	1500
East/West Street:		Signal System:	1		to:	2015	Signal System:	1		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3
101 Freeway EB On-Ramp		v/c reduction:	0%		at:	1.4%	v/c reduction:	0%		Trip	AM	55	35	90			v/c reduction:	10%
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0
PM Peak:	5:00 PM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume			+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0				0
	Thru	1989	2	**799**	206	100	2295	2	**918**	(11%)	34	2329	2	**938**	0	2329	2	**938**
	Th-Rt		1	**799**				1	**918**	(19%)			1	**938**			1	**938**
	Right	409	0	0	42	6	457	0	0	(18%)	26	483	0	0	0	483	0	0
	Shared		0	0				0	0	(10%)			0	0			0	0
Southbound	Left	153	1	**153**	16	12	181	1	**181**	0%	0	181	1	**181**	0	181	1	**181**
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1291	3	430	134	106	1531	3	510	38%	99	1630	3	543	0	1630	3	543
	Th-Rt		0	0				0	0	34%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
N/B RTOR:	Existing: 50%																	
	Projected: 50%																	
	Mitigated: 50%																	
S/B RTOR:	Existing: 50%																	
	Projected: 50%																	
	Mitigated: 50%																	
E/B RTOR:	Existing: 50%																	
	Projected: 50%																	
	Mitigated: 50%																	
W/B RTOR:	Existing: 50%																	
	Projected: 50%																	
	Mitigated: 50%																	
Critical Volumes:		North-South:	952				North-South:	1098				North-South:	1118				North-South:	1118
		East-West:	0				East-West:	0				East-West:	0				East-West:	0
		Total:	952				Total:	1098				Total:	1118				Total:	1118
Volume/capacity (*v/c*) ratio:			0.794					0.915					0.932					0.746
v/c less ATSAC adjustment:			0.794					0.915					0.932					0.646
Level of Service (LOS):			**C**					**E**					**E**					**B**

PROJECT IMPACT

Change in *v/c* due to project: 0.017 — Significantly impacted? YES

Δ*v/c* after mitigation: -0.269 — Fully mitigated? YES

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 10		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	0		Ambient Growth		Critical Phases:	0		☑ Adjacent		In	Out	Total			Critical Phases:	0
Sepulveda Boulevard		Capacity:	1200		from:	2008	Capacity:	1200		Trip	AM	34	142	176			Capacity:	1200
East/West Street:		Signal System:	1		to:	2015	Signal System:	1		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	1
La Maida Street		v/c reduction:	0%		at:	1.4%	v/c reduction:	0%		Trip	AM	90	57	147			v/c reduction:	0%
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	236	228	464			Opposed Phasing:	0
AM Peak:	8:00 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume			+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0				0
	Thru	925	2	311	96	120	1141	2	383	(29%)	58	1199	2	402	0	1199	2	402
	Th-Rt		1	311				1	383	(29%)			1	402			1	402
	Right	7	0	0	1	0	8	0	0	0%	0	8	0	0	0	8	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	210	1	210	22	0	232	1	232	0%	0	232	1	232	0	232	1	232
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	2091	3	**697**	217	142	2450	3	**817**	(25%)	50	2500	3	**833**	0	2500	3	**833**
	Th-Rt		0	0				0	0	(25%)			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	5	0	0	1	0	6	0	0	0%	0	6	0	0	0	6	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	29	0	0	3	0	32	0	0	0%	0	32	0	0	0	32	0	0
	Shared		1	**34**				1	**38**	0%			1	**38**			1	**38**
Critical Volumes:		North-South:		697			North-South:		817			North-South:		833		North-South:		833
		East-West:		34			East-West:		38			East-West:		38		East-West:		38
		Total:		731			Total:		854			Total:		871		Total:		871
Volume/capacity (*v/c*) ratio:				0.609					0.712					0.726				0.726
v/c less ATSAC adjustment:				0.609					0.712					0.726				0.726
Level of Service (LOS):				**B**					**C**					**C**				**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.014 — Significantly impacted? NO

Δ*v/c* after mitigation: 0.014 — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 10	2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street: Sepulveda Boulevard	Critical Phases: 0			Ambient Growth	Critical Phases: 0				☑ Adjacent		In	Out	Total	Critical Phases: 0			
	Capacity: 1200			from: 2008	Capacity: 1200				Trip AM		34	142	176	Capacity: 1200			
East/West Street: La Maida Street	Signal System: 1			to: 2015	Signal System: 1				Gen 1 PM		131	65	196	☐ Use Dist 2? Signal System: 1			
	v/c reduction: 0%			at: 1.4%	v/c reduction: 0%				Trip AM		90	57	147	v/c reduction: 0%			
Analysis Date: 03/01/2013	Opposed Phasing: 0				Opposed Phasing: 0				Gen 2 PM		236	228	464	Opposed Phasing: 0			
PM Peak: 5:00 PM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
Northbound Lt-Th (N/B RTOR:)		0	0				0	0	0%			0	0			0	0
Northbound Thru (Existing: 50%)	2378	2	**796**	246	106	2730	2	**914**	(29%)	85	2815	2	**942**	0	2815	2	**942**
Northbound Th-Rt (Projected: 50%)		1	**796**				1	**914**	(29%)			1	**942**			1	**942**
Northbound Right (Mitigated: 50%)	10	0	0	1	0	11	0	0	0%	0	11	0	0	0	11	0	0
Northbound Shared		0	0				0	0	0%			0	0			0	0
Southbound Left	21	1	**21**	2	0	23	1	23	0%	0	23	1	23	0	23	1	23
Southbound Lt-Th (S/B RTOR:)		0	0				0	0	0%			0	0			0	0
Southbound Thru (Existing: 50%)	1248	3	416	129	106	1483	3	494	(25%)	73	1556	3	519	0	1556	3	519
Southbound Th-Rt (Projected: 50%)		0	0				0	0	(25%)			0	0			0	0
Southbound Right (Mitigated: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
Southbound Shared		0	0				0	0	0%			0	0			0	0
Eastbound Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
Eastbound Lt-Th (E/B RTOR:)		0	0				0	0	0%			0	0			0	0
Eastbound Thru (Existing: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
Eastbound Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
Eastbound Right (Mitigated: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
Eastbound Shared		0	0				0	0	0%			0	0			0	0
Westbound Left	7	0	0	1	0	8	0	0	0%	0	8	0	0	0	8	0	0
Westbound Lt-Th (W/B RTOR:)		0	0				0	0	0%			0	0			0	0
Westbound Thru (Existing: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
Westbound Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
Westbound Right (Mitigated: 50%)	40	0	0	4	0	44	0	0	0%	0	44	0	0	0	44	0	0
Westbound Shared		1	**47**				1	**52**	0%			1	**52**			1	**52**
Critical Volumes:	North-South:		817			North-South:		937			North-South:		965		North-South:		965
	East-West:		47			East-West:		52			East-West:		52		East-West:		52
	Total:		864			Total:		989			Total:		1017		Total:		1017
Volume/capacity (*v/c*) ratio:			0.720					0.824					0.848				0.848
v/c less ATSAC adjustment:			0.720					0.824					0.848				0.848
Level of Service (LOS):			**C**					**D**					**D**				**D**

PROJECT IMPACT

Change in *v/c* due to project: 0.024 — *Δv/c* after mitigation: 0.024

Significantly impacted? YES — Fully mitigated? NO

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 11		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
North/South Street:		Critical Phases:	2		Ambient Growth		Critical Phases:	2		☑ Adjacent		In	Out	Total			Critical Phases:	3	
Sepulveda Boulevard		Capacity:	1500		from:	2008	Capacity:	1500		Trip	AM	34	142	176			Capacity:	1425	
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3	
Camarillo Street		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	90	57	147			v/c reduction:	10%	
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	236	228	464			Opposed Phasing:	0	
AM Peak:	8:00 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume			+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	78	1	**78**	8	0	86	1	**86**	62%	80	166	1	**166**	0	166	1	**166**
	Lt-Th		0	0				0	0	65%			0	0			0	0
	Thru	640	2	224	66	120	826	2	287	0%	0	826	2	287	0	826	2	287
	Th-Rt		1	224				1	287	0%			1	287			1	287
	Right	31	0	0	3	0	34	0	0	0%	0	34	0	0	0	34	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	127	1	127	13	0	140	1	140	0%	0	140	1	140	0	140	1	140
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1547	2	**709**	160	142	1849	2	**830**	(25%)	50	1899	2	**846**	0	1899	**3**	633
	Th-Rt		1	**709**				1	**830**	(25%)			1	**846**			1	**640**
	Right	580	0	0	60	0	640	0	0	0%	0	640	0	0	0	640	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	125	0	0	13	0	138	0	0	(29%)	58	196	0	0	0	196	**1**	108
	Lt-Th		1	**165**				1	**182**	(29%)			1	**241**			1	133
	Thru	40	0	0	4	0	44	0	0	0%	1	45	0	0	0	45	0	0
	Th-Rt		0	0				0	0	(1%)			0	0			0	0
	Right	56	1	17	6	0	62	1	19	(46%)	91	153	1	70	0	153	1	**70**
	Shared		0	0				0	0	(45%)			0	0			0	0
Westbound	Left	37	0	0	4	0	41	0	0	0%	0	41	0	0	0	41	0	0
	Lt-Th		1	125				1	138	0%			1	139			1	**139**
	Thru	88	0	0	9	0	97	0	0	0%	1	98	0	0	0	98	0	0
	Th-Rt		0	0				0	0	1%			0	0			0	0
	Right	98	1	**34**	10	0	108	1	**38**	0%	0	108	1	**38**	0	108	1	38
	Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		787			North-South:		916			North-South:		1013			North-South:		806
		East-West:		199			East-West:		220			East-West:		279			East-West:		209
		Total:		986			Total:		1136			Total:		1292			Total:		1015
Volume/capacity (*v/c*) ratio:				0.657					0.757					0.861					0.712
v/c less ATSAC adjustment:				0.557					0.657					0.761					0.612
Level of Service (LOS):				**A**					**B**					**C**					**B**

N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

PROJECT IMPACT

Change in *v/c* due to project: 0.104 — Significantly impacted? YES

Δ*v/c* after mitigation: -0.045 — Fully mitigated? YES

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 11	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Sepulveda Boulevard**	Critical Phases: 2	Ambient Growth — Critical Phases: 2	☑ Adjacent	Critical Phases: **3**
	Capacity: 1500	from: 2008 — Capacity: 1500	Trip AM In 34 Out 142 Total 176	Capacity: 1425
East/West Street: **Camarillo Street**	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM 131 65 196	☐ Use Dist 2? Signal System: 3
	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM 90 57 147	v/c reduction: 10%
Analysis Date: 03/01/2013	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM 236 228 464	Opposed Phasing: 0
PM Peak: 5:00 PM				

		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume	+ Project Volume		Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	49	1	49	5	0	54	1	54	62%	234	288	1	288	0	288	1	288
	Lt-Th		0	0				0	0	65%			0	0			0	0
	Thru	1953	2	**672**	202	106	2261	2	**777**	0%	0	2261	2	**777**	0	2261	2	**777**
	Th-Rt		1	**672**				1	**777**	0%			1	**777**			1	**777**
	Right	63	0	0	7	0	70	0	0	0%	0	70	0	0	0	70	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	74	1	**74**	8	0	82	1	**82**	0%	0	82	1	**82**	0	82	1	**82**
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1022	2	404	106	106	1234	2	481	(25%)	73	1307	2	506	0	1307	2	506
	Th-Rt		1	404				1	481	(25%)			1	506			1	506
	Right	190	0	0	20	0	210	0	0	0%	0	210	0	0	0	210	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	371	0	0	38	0	409	0	0	(29%)	85	494	0	0	0	494	**1**	272
	Lt-Th		1	**437**				1	**482**	(29%)			1	**569**			1	**297**
	Thru	66	0	0	7	0	73	0	0	0%	2	75	0	0	0	75	0	0
	Th-Rt		0	0				0	0	(1%)			0	0			0	0
	Right	137	1	113	14	0	151	1	124	(46%)	133	284	1	140	0	284	1	140
	Shared		0	0				0	0	(45%)			0	0			0	0
Westbound	Left	47	0	0	5	0	52	0	0	0%	0	52	0	0	0	52	0	0
	Lt-Th		1	94				1	104	0%			1	106			1	106
	Thru	47	0	0	5	0	52	0	0	0%	2	54	0	0	0	54	0	0
	Th-Rt		0	0				0	0	1%			0	0			0	0
	Right	105	1	**68**	11	0	116	1	75	0%	0	116	1	**75**	0	116	1	**75**
	Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		746			North-South:		859			North-South:		859			North-South:	859
		East-West:		505			East-West:		557			East-West:		644			East-West:	372
		Total:		1251			Total:		1416			Total:		1503			Total:	1231
Volume/capacity (*v/c*) ratio:				0.834					0.944					1.002				0.864
v/c less ATSAC adjustment:				0.734					0.844					0.902				0.764
Level of Service (LOS):				**C**					**D**					**E**				**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.058 — Significantly impacted? YES

Δ*v/c* after mitigation: -0.080 — Fully mitigated? YES

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 12		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street: Kester Avenue		Critical Phases: 2			Ambient Growth		Critical Phases: 2			☐ Adjacent		In	Out	Total			Critical Phases: 2	
East/West Street: Camarillo Street		Capacity: 1500			from: 2008		Capacity: 1500			Trip	AM	34	142	176			Capacity: 1500	
Analysis Date: 03/01/2013		Signal System: 3			to: 2015		Signal System: 3			Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System: 3	
AM Peak: 7:45 AM		v/c reduction: 10%			at: 1.4%		v/c reduction: 10%			Trip	AM	55	35	90			v/c reduction: 10%	
		Opposed Phasing: 0					Opposed Phasing: 0			Gen 2	PM	144	140	284			Opposed Phasing: 0	
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	59	0	0	6	0	65	0	0	0%	0	65	0	0	0	65	0	0
	Lt-Th		1	72				1	87	0%			1	87			1	87
	Thru	377	0	0	39	16	432	0	0	0%	0	432	0	0	0	432	0	0
	Th-Rt		1	**367**				1	**413**	0%			1	**413**			1	**413**
	Right	3	0	0	0	0	3	0	0	0%	0	3	0	0	0	3	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	2	0	0	0	0	2	0	0	0%	0	2	0	0	0	2	0	0
	Lt-Th		1	**703**				1	**787**	0%			1	**787**			1	**787**
	Thru	1406	1	705	146	23	1575	1	790	0%	0	1575	1	790	0	1575	1	790
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	24	1	0	2	0	26	1	0	0%	0	26	1	0	0	26	1	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	97	0	97	10	0	107	0	107	0%	0	107	0	107	0	107	0	107
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	37	0	37	4	0	41	0	41	0%	0	41	0	41	0	41	0	41
	Shared		1	134				1	148	0%			1	148			1	148
Westbound	Left	8	0	8	1	0	9	0	9	0%	0	9	0	9	0	9	0	9
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	2	0	0	0	0	2	0	0	0%	0	2	0	0	0	2	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	13	0	**13**	1	0	14	0	**14**	0%	0	14	0	**14**	0	14	0	**14**
	Shared		1	23				1	25	0%			1	25			1	25
N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
Critical Volumes:		North-South:		1070			North-South:		1200			North-South:		1200			North-South:	1200
		East-West:		147			East-West:		162			East-West:		162			East-West:	162
		Total:		1217			Total:		1363			Total:		1363			Total:	1363
Volume/capacity (*v/c*) ratio:				0.811					0.908					0.908				0.908
v/c less ATSAC adjustment:				0.711					0.808					0.808				0.808
Level of Service (LOS):				**C**					**D**					**D**				**D**

PROJECT IMPACT

Change in *v/c* due to project: 0.000 — Δ*v/c* after mitigation: 0.000

Significantly impacted? NO — Fully mitigated? N/A

Filename: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\LADOT CMACalc 3.9\Future Year 2015\1% Ambie

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 12		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases: 2			Ambient Growth		Critical Phases: 2			☐ Adjacent		In	Out	Total			Critical Phases: 2	
Kester Avenue		Capacity: 1500			from: 2008		Capacity: 1500			Trip	AM	34	142	176			Capacity: 1500	
East/West Street:		Signal System: 3			to: 2015		Signal System: 3			Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System: 3	
Camarillo Street		v/c reduction: 10%			at: 1.4%		v/c reduction: 10%			Trip	AM	55	35	90			v/c reduction: 10%	
Analysis Date: 03/01/2013		Opposed Phasing: 0					Opposed Phasing: 0			Gen 2	PM	144	140	284			Opposed Phasing: 0	
PM Peak: 4:45 PM		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume			+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	19	0	0	2	0	21	0	0	0%	0	21	0	0	0	21	0	0
	Lt-Th		1	**328**				1	348	0%			1	348			1	348
	Thru	641	0	0	66	14	721	0	0	0%	0	721	0	0	0	721	0	0
	Th-Rt		1	347				1	**411**	0%			1	**411**			1	**411**
	Right	15	0	0	2	0	17	0	0	0%	0	17	0	0	0	17	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	17	0	0	2	0	19	0	0	0%	0	19	0	0	0	19	0	0
	Lt-Th		1	257				1	**291**	0%			1	**291**			1	**291**
	Thru	548	1	**308**	57	14	619	1	347	0%	0	619	1	347	0	619	1	347
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	94	1	0	10	0	104	1	0	0%	0	104	1	0	0	104	1	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	254	0	254	26	0	280	0	280	0%	0	280	0	280	0	280	0	280
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	2	0	0	0	0	2	0	0	0%	0	2	0	0	0	2	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	40	0	40	4	0	44	0	44	0%	0	44	0	44	0	44	0	44
	Shared		1	296				1	327	0%			1	327			1	327
Westbound	Left	1	0	1	0	0	1	0	1	0%	0	1	0	1	0	1	0	1
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	3	0	0	0	0	3	0	0	0%	0	3	0	0	0	3	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	3	0	**3**	0	0	3	0	**3**	0%	0	3	0	**3**	0	3	0	**3**
	Shared		1	7				1	8	0%			1	8			1	8
N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
Critical Volumes:		North-South:		636			North-South:		702			North-South:		702			North-South:	702
		East-West:		299			East-West:		330			East-West:		330			East-West:	330
		Total:		935			Total:		1032			Total:		1032			Total:	1032
Volume/capacity (*v/c*) ratio:				0.623					0.688					0.688				0.688
v/c less ATSAC adjustment:				0.523					0.588					0.588				0.588
Level of Service (LOS):				**A**					**A**					**A**				**A**

PROJECT IMPACT

Change in *v/c* due to project: 0.000 — Δ*v/c* after mitigation: 0.000

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 13	2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street: **Haskell Avenue (North)**	Critical Phases: 3			Ambient Growth		Critical Phases: 3			☐ Adjacent		In	Out	Total			Critical Phases: 3	
	Capacity: 1425			from: 2008		Capacity: 1425			Trip AM		34	142	176			Capacity: 1425	
East/West Street: **Ventura Boulevard**	Signal System: 3			to: 2015		Signal System: 3			Gen 1 PM		131	65	196	☐ Use Dist 2?		Signal System: 3	
	v/c reduction: 10%			at: 1.4%		v/c reduction: 10%			Trip AM		55	35	90			v/c reduction: 10%	
Analysis Date: 03/01/2013	Opposed Phasing: 0					Opposed Phasing: 0			Gen 2 PM		144	140	284			Opposed Phasing: 0	
AM Peak: 7:45 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound Left	24	0	24	2	0	26	0	26	0%	0	26	0	26	0	26	0	26
Northbound Lt-Th (N/B RTOR:)		0	0				0	0	0%			0	0			0	0
Northbound Thru (Existing: 50%)	2	0	0	0	0	2	0	0	0%	0	2	0	0	0	2	0	0
Northbound Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
Northbound Right (Mitigated: 50%)	50	0	**50**	5	0	55	0	55	0%	0	55	0	55	0	55	0	55
Northbound Shared		1	76				1	84	0%			1	84			1	84
Southbound Left	484	1	266	50	101	635	1	349	0%	1	636	1	350	0	636	1	350
Southbound Lt-Th (S/B RTOR:)		0	0				0	0	1%			0	0			0	0
Southbound Thru (Existing: 50%)	20	0	0	2	0	22	0	0	0%	0	22	0	0	0	22	0	0
Southbound Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
Southbound Right (Mitigated: 50%)	196	0	196	20	73	289	0	289	0%	0	289	0	289	0	289	0	289
Southbound Shared		1	434				1	597	0%			1	598			1	598
Eastbound Left	46	1	46	5	104	155	1	**155**	0%	0	155	1	**155**	0	155	1	**155**
Eastbound Lt-Th (E/B RTOR:)		0	0				0	0	0%			0	0			0	0
Eastbound Thru (Existing: 50%)	1490	2	**498**	154	145	1789	2	598	10%	12	1801	2	602	0	1801	2	602
Eastbound Th-Rt (Projected: 50%)		1	**498**				1	598	17%			1	602			1	602
Eastbound Right (Mitigated: 50%)	5	0	0	1	0	6	0	0	0%	0	6	0	0	0	6	0	0
Eastbound Shared		0	0				0	0	0%			0	0			0	0
Westbound Left	25	1	25	3	0	28	1	28	0%	0	28	1	28	0	28	1	28
Westbound Lt-Th (W/B RTOR:)		0	0				0	0	0%			0	0			0	0
Westbound Thru (Existing: 50%)	1216	2	445	126	150	1492	2	**588**	(10%)	20	1512	2	**599**	0	1512	3	**504**
Westbound Th-Rt (Projected: 50%)		1	445				1	**588**	(17%)			1	**599**			0	0
Westbound Right (Mitigated: 50%)	120	0	0	12	140	272	0	0	(8%)	14	286	0	0	0	286	1	0
Westbound Shared		0	0				0	0	(8%)			0	0			0	0
Critical Volumes:	North-South:		484			North-South:		652			North-South:		653			North-South:	653
	East-West:		523			East-West:		743			East-West:		754			East-West:	659
	Total:		1007			Total:		1395			Total:		1407			Total:	1312
Volume/capacity (*v/c*) ratio:			0.707					0.979					0.987				0.920
v/c less ATSAC adjustment:			0.607					0.879					0.887				0.820
Level of Service (LOS):			**B**					**D**					**D**				**D**

PROJECT IMPACT

Change in *v/c* due to project: 0.008 — *Δv/c* after mitigation: -0.059

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 13	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Haskell Avenue (North)**	Critical Phases: 3	Ambient Growth — Critical Phases: 3	☐ Adjacent	Critical Phases: 3
	Capacity: 1425	from: 2008 — Capacity: 1425	Trip AM: In 34, Out 142, Total 176	Capacity: 1425
East/West Street: **Ventura Boulevard**	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 3
Analysis Date: 03/01/2013	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 10%
PM Peak: 4:45 PM	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0

		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume	+ Project Volume		Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	26	0	26	3	0	29	0	29	0%	0	29	0	29	0	29	0	29
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	5	0	0	1	0	6	0	0	0%	0	6	0	0	0	6	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	56	0	**56**	6	0	62	0	**62**	0%	0	62	0	**62**	0	62	0	**62**
	Shared		1	87				1	96	0%			1	96			1	96
Southbound	Left	229	1	126	24	44	297	1	163	0%	1	298	1	164	0	298	1	164
	Lt-Th		0	0				0	0	1%			0	0			0	0
	Thru	15	0	0	2	0	17	0	0	0%	0	17	0	0	0	17	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	156	0	156	16	57	229	0	229	0%	0	229	0	229	0	229	0	229
	Shared		1	274				1	379	0%			1	380			1	380
Eastbound	Left	95	1	**95**	10	42	147	1	**147**	0%	0	147	1	**147**	0	147	1	**147**
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1873	2	627	194	223	2290	2	766	10%	37	2327	2	779	0	2327	2	779
	Th-Rt		1	627				1	766	17%			1	779			1	779
	Right	8	0	0	1	0	9	0	0	0%	0	9	0	0	0	9	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	26	1	26	3	0	29	1	29	0%	0	29	1	29	0	29	1	29
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1828	2	**690**	189	179	2196	2	**844**	(10%)	31	2227	2	**859**	0	2227	**3**	**742**
	Th-Rt		1	**690**				1	**844**	(17%)			1	**859**			**0**	0
	Right	243	0	0	25	66	334	0	0	(8%)	16	350	0	0	0	350	**1**	201
	Shared		0	0				0	0	(8%)			0	0			0	0
Critical Volumes:		North-South:		330			North-South:		441			North-South:		442		North-South:		442
		East-West:		785			East-West:		990			East-West:		1006		East-West:		889
		Total:		1115			Total:		1431			Total:		1448		Total:		1331
Volume/capacity (*v/c*) ratio:				0.783					1.005					1.016				0.934
v/c less ATSAC adjustment:				0.683					0.905					0.916				0.834
Level of Service (LOS):				**B**					**E**					**E**				**D**

PROJECT IMPACT

Change in *v/c* due to project: 0.011 YES — Significantly impacted?

Δ*v/c* after mitigation: -0.071 YES — Fully mitigated?

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 14		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	3		Ambient Growth		Critical Phases:	3		☐ Adjacent		In	Out	Total			Critical Phases:	3
Haskell Avenue (South)		Capacity:	1425		from:	2008	Capacity:	1425		Trip	AM	34	142	176			Capacity:	1425
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3
Ventura Boulevard		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0
AM Peak:	7:45 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	90	0	90	9	1	100	0	100	0%	0	100	0	100	0	100	0	100
	Lt-Th	N/B RTOR:	0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt	Projected: 50%	0	0				0	0	0%			0	0			0	0
	Right	Mitigated: 50%	0	117	12	0	129	0	129	0%	1	130	0	130	0	130	0	130
	Shared	117	1	**207**				1	**229**	1%			1	**230**			1	**230**
Southbound	Left	1	0	**1**	0	0	1	0	1	0%	0	1	0	1	0	1	0	1
	Lt-Th	S/B RTOR:	0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt	Projected: 50%	0	0				0	0	0%			0	0			0	0
	Right	Mitigated: 50%	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared	0	1	**1**				1	1	0%			1	1			1	1
Eastbound	Left	1	1	1	0	0	1	1	1	0%	0	1	1	1	0	1	1	1
	Lt-Th	E/B RTOR:	0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	2	**687**	192	245	2285	2	**841**	10%	13	2298	2	**845**	0	2298	2	**845**
	Th-Rt	Projected: 50%	1	**687**				1	**841**	18%			1	**845**			1	**845**
	Right	Mitigated: 50%	0	0	22	1	237	0	0	0%	0	237	0	0	0	237	0	0
	Shared	214	0	0				0	0	0%			0	0			0	0
Westbound	Left	30	1	**30**	3	0	33	1	**33**	0%	0	33	1	**33**	0	33	1	**33**
	Lt-Th	W/B RTOR:	0	0				0	0	(1%)			0	0			0	0
	Thru	Existing: 50%	2	430	134	289	1713	2	571	(18%)	35	1748	2	583	0	1748	2	583
	Th-Rt	Projected: 50%	1	430				1	571	(25%)			1	583			1	583
	Right	Mitigated: 50%	0	0	0	0	1	0	0	0%	0	1	0	0	0	1	0	0
	Shared	1	0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		208			North-South:		231			North-South:		232			North-South:	232
		East-West:		717			East-West:		874			East-West:		878			East-West:	878
		Total:		925			Total:		1104			Total:		1110			Total:	1110
Volume/capacity (*v/c*) ratio:				0.649					0.775					0.779				0.779
v/c less ATSAC adjustment:				0.549					0.675					0.679				0.679
Level of Service (LOS):				**A**					**B**					**B**				**B**

PROJECT IMPACT

Change in *v/c* due to project: 0.004 — Δ*v/c* after mitigation: 0.004

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Intersection No. 14	2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street: **Haskell Avenue (South)**	Critical Phases: 3			Ambient Growth	Critical Phases: 3				☐ Adjacent		In	Out	Total		Critical Phases: 3		
East/West Street: **Ventura Boulevard**	Capacity: 1425			from: 2008	Capacity: 1425				Trip AM		34	142	176		Capacity: 1425		
Analysis Date: 03/01/2013	Signal System: 3			to: 2015	Signal System: 3				Gen 1 PM		131	65	196	☐ Use Dist 2?	Signal System: 3		
PM Peak: 4:45 PM	v/c reduction: 10%			at: 1.4%	v/c reduction: 10%				Trip AM		55	35	90		v/c reduction: 10%		
	Opposed Phasing: 0				Opposed Phasing: 0				Gen 2 PM		144	140	284		Opposed Phasing: 0		

		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume	+ Project Volume		Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	152	0	152	16	6	174	0	174	0%	0	174	0	174	0	174	0	174
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	4	0	0	0	0	4	0	0	0%	0	4	0	0	0	4	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	101	0	101	10	0	111	0	111	0%	1	112	0	112	0	112	0	112
	Shared		1	257				1	290	1%			1	291			1	291
Southbound	Left	4	0	4	0	0	4	0	4	0%	0	4	0	4	0	4	0	4
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	2	0	0	0	0	2	0	0	0%	0	2	0	0	0	2	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	13	0	**13**	1	0	14	0	**14**	0%	0	14	0	**14**	0	14	0	**14**
	Shared		1	19				1	21	0%			1	21			1	21
Eastbound	Left	7	1	7	1	0	8	1	8	0%	0	8	1	8	0	8	1	8
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	2005	2	**700**	208	261	2474	2	**861**	10%	39	2513	2	**874**	0	2513	2	**874**
	Th-Rt		1	**700**				1	**861**	18%			1	**874**			1	**874**
	Right	94	0	0	10	6	110	0	0	0%	0	110	0	0	0	110	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	56	1	**56**	6	0	62	1	**62**	0%	1	63	1	**63**	0	63	1	**63**
	Lt-Th		0	0				0	0	(1%)			0	0			0	0
	Thru	1952	2	656	202	239	2393	2	804	(18%)	47	2440	2	819	0	2440	2	819
	Th-Rt		1	656				1	804	(25%)			1	819			1	819
	Right	16	0	0	2	0	18	0	0	0%	0	18	0	0	0	18	0	0
	Shared		0	0				0	0	0%			0	0			0	0

Critical Volumes:	North-South:	270	North-South:	304	North-South:	305	North-South: 305
	East-West:	756	East-West:	923	East-West:	937	East-West: 937
	Total:	1026	Total:	1227	Total:	1242	Total: 1242
Volume/capacity (*v/c*) ratio:		0.720		0.861		0.872	0.872
v/c less ATSAC adjustment:		0.620		0.761		0.772	0.772
Level of Service (LOS):		**B**		**C**		**C**	**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.011 — Δ*v/c* after mitigation: 0.011

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 15

North/South Street: 101 EB Off-/405 SB On-/Sherman Oaks Ave.

East/West Street: **Ventura Boulevard**

Analysis Date: 03/01/2013

AM Peak: 7:45 AM

		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume	+ Project Volume		= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	54	1	54	6	1	61	1	61	0%	0	61	1	61	0	61	1	61
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	76	1	76	8	0	84	1	84	0%	0	84	1	84	0	84	1	84
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	133	1	**89**	14	0	147	1	**98**	0%	1	148	1	**99**	0	148	1	**99**
	Shared		0	0				0	0	1%			0	0			0	0
Southbound	Left	167	1	92	17	7	191	1	105	12%	10	201	1	111	0	201	1	111
	Lt-Th		0	0				0	0	10%			0	0			0	0
	Thru	53	0	0	5	0	58	0	0	0%	0	58	0	0	0	58	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	4	0	0	0	3	7	0	0	0%	0	7	0	0	0	7	0	0
	Shared		1	**132**				1	**152**	0%			1	**157**			1	**157**
Eastbound	Left	216	1	**216**	22	12	250	1	**250**	0%	0	250	1	**250**	0	250	1	**250**
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1464	2	594	152	232	1848	2	734	10%	13	1861	2	738	0	1861	2	738
	Th-Rt		1	594				1	734	19%			1	738			1	738
	Right	319	0	0	33	1	353	0	0	0%	0	353	0	0	0	353	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	89	1	89	9	0	98	1	98	0%	0	98	1	98	0	98	1	98
	Lt-Th		0	0				0	0	(1%)			0	0			0	0
	Thru	1298	2	649	135	286	1719	2	**814**	(18%)	35	1754	2	**835**	0	1754	**3**	585
	Th-Rt		1	**653**				1	**814**	(26%)			1	**835**			**0**	0
	Right	653	0	0	68	2	723	0	0	(18%)	28	751	0	0	0	751	**1**	**751**
	Shared		0	0				0	0	(5%)			0	0			0	0
Critical Volumes:		North-South:		221			North-South:		250			North-South:		255			North-South:	255
		East-West:		869			East-West:		1064			East-West:		1085			East-West:	1001
		Total:		1090			Total:		1314			Total:		1340			Total:	1256
Volume/capacity (*v/c*) ratio:				0.727					0.876					0.894				0.838
v/c less ATSAC adjustment:				0.627					0.776					0.794				0.738
Level of Service (LOS):				**B**					**C**					**C**				**C**

	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
N/B RTOR:	Existing: 50%	Projected: 50%	Mitigated: 50%	
S/B RTOR:	Existing: 50%	Projected: 50%	Mitigated: 50%	
E/B RTOR:	Existing: 50%	Projected: 50%	Mitigated: 50%	
W/B RTOR:	Existing: 0%	Projected: 0%	Mitigated: 0%	NROR

☐ Adjacent

		In	Out	Total
Trip	AM	34	142	176
Gen 1	PM	131	65	196
Trip	AM	55	35	90
Gen 2	PM	144	140	284

☐ Use Dist 2?

Ambient Growth from: 2008 to: 2015 at: 1.4%

Critical Phases: 2 | Capacity: 1500 | Signal System: 3 | v/c reduction: 10% | Opposed Phasing: 0

PROJECT IMPACT

Change in *v/c* due to project: 0.018 — *Δv/c* after mitigation: -0.038

Significantly impacted? NO — Fully mitigated? N/A

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Intersection No. 15	2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street: 101 EB Off-/405 SB On-/Sherman Oaks Ave.	Critical Phases: 2			Ambient Growth	Critical Phases: 2				☐ Adjacent		In	Out	Total		Critical Phases: 2		
East/West Street: **Ventura Boulevard**	Capacity: 1500			from: 2008	Capacity: 1500				Trip AM		34	142	176		Capacity: 1500		
Analysis Date: 03/01/2013	Signal System: 3			to: 2015	Signal System: 3				Gen 1 PM		131	65	196	☐ Use Dist 2?	Signal System: 3		
PM Peak: 4:45 PM	v/c reduction: 10%			at: 1.4%	v/c reduction: 10%				Trip AM		55	35	90		v/c reduction: 10%		
	Opposed Phasing: 0				Opposed Phasing: 0				Gen 2 PM		144	140	284		Opposed Phasing: 0		
	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound Left	142	1	142	15	5	162	1	162	0%	0	162	1	162	0	162	1	162
Northbound Lt-Th		0	0				0	0	0%			0	0			0	0
Northbound Thru	33	1	33	3	0	36	1	36	0%	0	36	1	36	0	36	1	36
Northbound Th-Rt		0	0				0	0	0%			0	0			0	0
Northbound Right	217	1	**189**	22	0	239	1	**208**	0%	1	240	1	**208**	0	240	1	**208**
Northbound Shared		0	0				0	0	1%			0	0			0	0
Southbound Left	288	1	**158**	30	7	325	1	179	12%	30	355	1	195	0	355	1	195
Southbound Lt-Th		0	0				0	0	10%			0	0			0	0
Southbound Thru	13	0	0	1	0	14	0	0	0%	0	14	0	0	0	14	0	0
Southbound Th-Rt		0	0				0	0	0%			0	0			0	0
Southbound Right	12	0	0	1	17	30	0	0	0%	0	30	0	0	0	30	0	0
Southbound Shared		1	155				1	**191**	0%			1	**204**			1	**204**
Eastbound Left	167	1	**167**	17	13	197	1	**197**	0%	0	197	1	**197**	0	197	1	**197**
Eastbound Lt-Th		0	0				0	0	0%			0	0			0	0
Eastbound Thru	1792	2	624	186	244	2222	2	771	10%	40	2262	2	785	0	2262	2	785
Eastbound Th-Rt		1	624				1	771	19%			1	785			1	785
Eastbound Right	80	0	0	8	4	92	0	0	0%	0	92	0	0	0	92	0	0
Eastbound Shared		0	0				0	0	0%			0	0			0	0
Westbound Left	57	1	57	6	0	63	1	63	0%	1	64	1	64	0	64	1	64
Westbound Lt-Th		0	0				0	0	(1%)			0	0			0	0
Westbound Thru	1844	2	**698**	191	223	2258	2	**845**	(18%)	48	2306	2	**867**	0	2306	3	**769**
Westbound Th-Rt		1	**698**				1	**845**	(26%)			1	**867**			0	0
Westbound Right	249	0	0	26	2	277	0	0	(18%)	19	296	0	0	0	296	1	119
Westbound Shared		0	0				0	0	(5%)			0	0			0	0
Critical Volumes:	North-South:		347			North-South:		399			North-South:		413		North-South:		413
	East-West:		865			East-West:		1042			East-West:		1065		East-West:		966
	Total:		1212			Total:		1442			Total:		1477		Total:		1379
Volume/capacity (*v/c*) ratio:			0.808					0.961					0.985				0.919
v/c less ATSAC adjustment:			0.708					0.861					0.885				0.819
Level of Service (LOS):			**C**					**D**					**D**				**D**

Northbound: N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

Southbound: S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

Eastbound: E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

Westbound: W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

PROJECT IMPACT

Change in *v/c* due to project: 0.024 — *Δv/c* after mitigation: -0.042

Significantly impacted? YES — Fully mitigated? YES

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 16	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Sepulveda Boulevard**	Critical Phases: 4	Ambient Growth — Critical Phases: 4	☐ Adjacent	Critical Phases: 4
	Capacity: 1375	from: 2008 — Capacity: 1375	Trip AM: In 34, Out 142, Total 176	Capacity: 1375
East/West Street: **Ventura Boulevard**	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 3
Analysis Date: 03/01/2013	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 10%
AM Peak: 7:45 AM	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0

		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	334	2	**184**	35	46	415	2	**228**	0%	0	415	2	**228**	0	415	2	**228**
	Lt-Th (N/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	346	2	173	36	30	412	2	206	28%	19	431	2	215	0	431	2	215
	Th-Rt (Projected: 50%)		1	259				1	297	17%			1	297			1	297
	Right (Mitigated: 50%)	259	0	0	27	11	297	0	0	0%	0	297	0	0	0	297	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	151	2	83	16	25	192	2	105	(12%)	23	215	2	118	0	215	2	118
	Lt-Th (S/B RTOR:)		0	0				0	0	(17%)			0	0			0	0
	Thru (Existing: 50%)	1068	2	**387**	111	37	1216	2	**447**	(23%)	40	1256	2	**468**	0	1256	**3**	**419**
	Th-Rt (Projected: 50%)		1	**387**				1	**447**	(20%)			1	**468**			**0**	0
	Right (Mitigated: 50%)	397	1	113	41	83	521	1	154	(36%)	62	583	1	181	0	583	1	329
	Shared (Green W CC left)		0	0				0	0	(32%)			0	0			0	0
Eastbound	Left	382	2	210	40	62	484	2	266	22%	24	508	2	279	0	508	2	279
	Lt-Th (E/B RTOR:)		0	0				0	0	30%			0	0			0	0
	Thru (Existing: 50%)	953	2	**477**	99	139	1191	2	**595**	0%	0	1191	2	**595**	0	1191	2	**595**
	Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
	Right (Mitigated: 50%)	350	1	183	36	0	386	1	179	0%	0	386	1	179	0	386	1	179
	Shared (Green W CC left)		0	0				0	0	0%			0	0			0	0
Westbound	Left	545	2	**300**	56	16	617	2	**340**	0%	0	617	2	**340**	0	617	2	**340**
	Lt-Th (W/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	1297	2	448	134	160	1591	2	557	0%	0	1591	2	561	0	1591	2	561
	Th-Rt (Projected: 50%)		1	448				1	557	0%			1	561			1	561
	Right (Mitigated: 50%)	48	0	0	5	27	80	0	0	12%	13	93	0	0	0	93	0	0
	Shared		0	0				0	0	17%			0	0			0	0
Critical Volumes:	North-South:	571					675					696				647		
	East-West:	776					935					935				935		
	Total:	1347					1610					1631				1582		
Volume/capacity (*v/c*) ratio:		0.980					1.171					1.186				1.150		
v/c less ATSAC adjustment:		0.880					1.071					1.086				1.050		
Level of Service (LOS):		**D**					**F**					**F**				**F**		

PROJECT IMPACT

Change in *v/c* due to project: 0.015 — Significantly impacted? YES

Δ*v/c* after mitigation: -0.021 — Fully mitigated? YES

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CMACalc - Critical Movement Analysis Calculator

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Intersection No. 16	2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street: **Sepulveda Boulevard**	Critical Phases: 4			Ambient Growth	Critical Phases: 4				☐ Adjacent		In	Out	Total	Critical Phases: 4			
	Capacity: 1375			from: 2008	Capacity: 1375				Trip AM		34	142	176	Capacity: 1375			
East/West Street: **Ventura Boulevard**	Signal System: 3			to: 2015	Signal System: 3				Gen 1 PM		131	65	196	☐ Use Dist 2? Signal System: 3			
	v/c reduction: 10%			at: 1.4%	v/c reduction: 10%				Trip AM		55	35	90	v/c reduction: 10%			
Analysis Date: 03/01/2013	Opposed Phasing: 0				Opposed Phasing: 0				Gen 2 PM		144	140	284	Opposed Phasing: 0			
PM Peak: 5:00 PM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound Left	316	2	174	33	18	367	2	202	0%	0	367	2	202	0	367	2	202
Northbound Lt-Th (N/B RTOR:)		0	0				0	0	0%			0	0			0	0
Northbound Thru (Existing: 50%)	1242	2	**507**	129	34	1405	2	**577**	28%	61	1466	2	**597**	0	1466	2	**597**
Northbound Th-Rt (Projected: 50%)		1	**507**				1	**577**	17%			1	**597**			1	**597**
Northbound Right (Mitigated: 50%)	279	0	0	29	18	326	0	0	0%	0	326	0	0	0	326	0	0
Northbound Shared		0	0				0	0	0%			0	0			0	0
Southbound Left	248	2	**136**	26	30	304	2	**167**	(12%)	32	336	2	**185**	0	336	2	**185**
Southbound Lt-Th (S/B RTOR:)		0	0				0	0	(17%)			0	0			0	0
Southbound Thru (Existing: 50%)	523	2	209	54	37	614	2	245	(23%)	43	657	2	264	0	657	**3**	219
Southbound Th-Rt (Projected: 50%)		1	209				1	245	(20%)			1	264			**0**	0
Southbound Right (Mitigated: 50%)	529	1	126	55	40	624	1	148	(36%)	68	692	1	165	0	692	1	301
Southbound Shared		0	0				0	0	(32%)			0	0			0	0
Eastbound Left	601	2	**331**	62	47	710	2	**391**	22%	72	782	2	**430**	0	782	2	**430**
Eastbound Lt-Th (E/B RTOR:)		0	0				0	0	30%			0	0			0	0
Eastbound Thru (Existing: 50%)	1195	2	598	124	175	1494	2	747	0%	0	1494	2	747	0	1494	2	747
Eastbound Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
Eastbound Right (Mitigated: 50%)	264	1	106	27	0	291	1	108	0%	0	291	1	108	0	291	1	108
Eastbound Shared		0	0				0	0	0%			0	0			0	0
Westbound Left	311	2	171	32	17	360	2	198	0%	0	360	2	198	0	360	2	198
Westbound Lt-Th (W/B RTOR:)		0	0				0	0	0%			0	0			0	0
Westbound Thru (Existing: 50%)	1207	2	**463**	125	163	1495	2	**573**	0%	0	1495	2	**587**	0	1495	2	**587**
Westbound Th-Rt (Projected: 50%)		1	**463**				1	**573**	0%			1	**587**			1	**587**
Westbound Right (Mitigated: 50%)	181	0	0	19	25	225	0	0	12%	40	265	0	0	0	265	0	0
Westbound Shared		0	0				0	0	17%			0	0			0	0
Critical Volumes:	North-South:		643			North-South:		744			North-South:		782		North-South:		782
	East-West:		793			East-West:		964			East-West:		1017		East-West:		1017
	Total:		1437			Total:		1708			Total:		1799		Total:		1799
Volume/capacity (*v/c*) ratio:			1.045					1.242					1.308				1.308
v/c less ATSAC adjustment:			0.945					1.142					1.208				1.208
Level of Service (LOS):			**E**					**F**					**F**				**F**

PROJECT IMPACT

Change in *v/c* due to project: 0.066 — Δ*v/c* after mitigation: 0.066

Significantly impacted? YES — Fully mitigated? NO

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Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 17	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Kester Avenue (North)**	Critical Phases: 3	Ambient Growth — Critical Phases: 3	☐ Adjacent	Critical Phases: 3
East/West Street: **Ventura Boulevard**	Capacity: 1425	from: 2008 — Capacity: 1425	Trip AM: In 34, Out 142, Total 176	Capacity: 1425
Analysis Date: 03/01/2013	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 3
AM Peak: 7:45 AM	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 10%
	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0

N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume	+ Project Volume		= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		1	0				1	0	0%			1	0			1	0
Southbound	Left	675	1	371	70	6	751	1	413	0%	0	751	1	413	0	751	1	413
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	509	0	509	53	16	578	0	578	0%	0	578	0	578	0	578	0	578
	Shared		1	**813**				1	**916**	0%			1	**916**			1	**916**
Eastbound	Left	88	1	**88**	9	12	109	1	**109**	0%	0	109	1	**109**	0	109	1	**109**
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1160	1	583	120	166	1446	1	726	(12%)	23	1469	1	737	0	1469	1	737
	Th-Rt		1	583				1	726	(16%)			1	737			1	737
	Right	5	0	0	1	0	6	0	0	0%	0	6	0	0	0	6	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	3	1	3	0	0	3	1	3	0%	0	3	1	3	0	3	1	3
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1473	2	**566**	153	175	1801	2	**685**	12%	13	1814	2	**689**	0	1814	2	**689**
	Th-Rt		1	**566**				1	**685**	16%			1	**689**			1	**689**
	Right	226	0	0	23	4	253	0	0	0%	0	253	0	0	0	253	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		813			North-South:		916			North-South:		916			North-South:	916
		East-West:		654			East-West:		794			East-West:		798			East-West:	798
		Total:		1467			Total:		1710			Total:		1714			Total:	1714
Volume/capacity (*v/c*) ratio:				1.030					1.200					1.203				1.203
v/c less ATSAC adjustment:				0.930					1.100					1.103				1.103
Level of Service (LOS):				**E**					**F**					**F**				**F**

PROJECT IMPACT

Change in *v/c* due to project: 0.003 — Significantly impacted? NO

Δ*v/c* after mitigation: 0.003 — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 17	2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street: **Kester Avenue (North)**	Critical Phases: 3			Ambient Growth		Critical Phases: 3			☐ Adjacent		In	Out	Total			Critical Phases: 3	
	Capacity: 1425			from: 2008		Capacity: 1425			Trip AM		34	142	176			Capacity: 1425	
East/West Street: **Ventura Boulevard**	Signal System: 3			to: 2015		Signal System: 3			Gen 1 PM		131	65	196	☐ Use Dist 2?		Signal System: 3	
	v/c reduction: 10%			at: 1.4%		v/c reduction: 10%			Trip AM		55	35	90			v/c reduction: 10%	
Analysis Date: 03/01/2013	Opposed Phasing: 0					Opposed Phasing: 0			Gen 2 PM		144	140	284			Opposed Phasing: 0	
PM Peak: 5:00 PM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound Left	4	0	4	0	0	4	0	4	0%	0	4	0	4	0	4	0	4
Northbound Lt-Th (N/B RTOR:)		0	0				0	0	0%			0	0			0	0
Northbound Thru (Existing: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
Northbound Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
Northbound Right (Mitigated: 50%)	8	0	**8**	1	0	9	0	9	0%	0	9	0	9	0	9	0	9
Northbound Shared		1	12				1	13	0%			1	13			1	13
Southbound Left	338	1	186	35	4	377	1	207	0%	0	377	1	207	0	377	1	207
Southbound Lt-Th (S/B RTOR:)		0	0				0	0	0%			0	0			0	0
Southbound Thru (Existing: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
Southbound Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
Southbound Right (Mitigated: 50%)	212	0	212	22	10	244	0	244	0%	0	244	0	244	0	244	0	244
Southbound Shared		1	364				1	414	0%			1	414			1	414
Eastbound Left	128	1	128	13	11	152	1	152	0%	0	152	1	152	0	152	1	152
Eastbound Lt-Th (E/B RTOR:)		0	0				0	0	0%			0	0			0	0
Eastbound Thru (Existing: 50%)	1472	1	**738**	153	203	1828	1	**915**	(12%)	30	1858	1	**930**	0	1858	1	**930**
Eastbound Th-Rt (Projected: 50%)		1	**738**				1	**915**	(16%)			1	**930**			1	**930**
Eastbound Right (Mitigated: 50%)	3	0	0	0	0	3	0	0	0%	0	3	0	0	0	3	0	0
Eastbound Shared		0	0				0	0	0%			0	0			0	0
Westbound Left	5	1	**5**	1	0	6	1	6	0%	0	6	1	6	0	6	1	6
Westbound Lt-Th (W/B RTOR:)		0	0				0	0	0%			0	0			0	0
Westbound Thru (Existing: 50%)	1371	2	591	142	191	1704	2	717	12%	39	1743	2	730	0	1743	2	730
Westbound Th-Rt (Projected: 50%)		1	591				1	717	16%			1	730			1	730
Westbound Right (Mitigated: 50%)	403	0	0	42	2	447	0	0	0%	0	447	0	0	0	447	0	0
Westbound Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:	North-South:		372			North-South:		422			North-South:		422		North-South:		422
	East-West:		743			East-West:		921			East-West:		936		East-West:		936
	Total:		1115			Total:		1343			Total:		1358		Total:		1358
Volume/capacity (*v/c*) ratio:			0.782					0.943					0.953				0.953
v/c less ATSAC adjustment:			0.682					0.843					0.853				0.853
Level of Service (LOS):			**B**					**D**					**D**				**D**

PROJECT IMPACT

Change in *v/c* due to project: 0.010 — *Δv/c* after mitigation: 0.010

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 18	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Kester Avenue (South)**	Critical Phases: 3	Ambient Growth — Critical Phases: 3	☐ Adjacent	Critical Phases: 3
East/West Street: **Ventura Boulevard**	Capacity: 1425	from: 2008 — Capacity: 1425	Trip AM In 34 Out 142 Total 176	Capacity: 1425
Analysis Date: 03/01/2013	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM In 131 Out 65 Total 196	☐ Use Dist 2? Signal System: 3
AM Peak: 7:45 AM	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM In 55 Out 35 Total 90	v/c reduction: 10%
	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM In 144 Out 140 Total 284	Opposed Phasing: 0

		N/B RTOR: / S/B RTOR: / E/B RTOR: / W/B RTOR:	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume	+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left		154	0	**154**	16	0	170	0	**170**	0%	1	171	0	**171**	0	171	0	**171**
	Lt-Th			1	196				1	216	1%			1	217			1	217
	Thru		42	0	0	4	0	46	0	0	0%	0	46	0	0	0	46	0	0
	Th-Rt			0	0				0	0	0%			0	0			0	0
	Right		146	1	50	15	0	161	1	54	0%	0	161	1	54	0	161	1	54
	Shared			0	0				0	0	0%			0	0			0	0
Southbound	Left		47	0	0	5	0	52	0	0	0%	0	52	0	0	0	52	0	0
	Lt-Th			0	0				0	0	0%			0	0			0	0
	Thru		58	0	0	6	0	64	0	0	0%	0	64	0	0	0	64	0	0
	Th-Rt			0	0				0	0	0%			0	0			0	0
	Right		27	0	0	3	0	30	0	0	0%	0	30	0	0	0	30	0	0
	Shared			1	132				1	146	0%			1	146			1	146
Eastbound	Left		20	1	20	2	0	22	1	22	0%	0	22	1	22	0	22	1	22
	Lt-Th			0	0				0	0	0%			0	0			0	0
	Thru		1408	2	**704**	146	171	1725	2	**862**	(12%)	22	1747	2	**873**	0	1747	2	**873**
	Th-Rt			0	0				0	0	(15%)			0	0			0	0
	Right		385	1	308	40	0	425	1	340	0%	0	425	1	340	0	425	1	340
	Shared			0	0				0	0	(1%)			0	0			0	0
Westbound	Left		192	1	**192**	20	2	214	1	**214**	0%	0	214	1	**214**	0	214	1	**214**
	Lt-Th			0	0				0	0	0%			0	0			0	0
	Thru		1502	2	751	156	179	1837	2	918	12%	12	1849	2	924	0	1849	2	924
	Th-Rt			0	0				0	0	15%			0	0			0	0
	Right		44	1	20	5	0	49	1	23	0%	0	49	1	23	0	49	1	23
	Shared			0	0				0	0	0%			0	0			0	0
Critical Volumes:			North-South:		286			North-South:		316			North-South:		317			North-South:	317
			East-West:		896			East-West:		1076			East-West:		1087			East-West:	1087
			Total:		1182			Total:		1392			Total:		1404			Total:	1404
Volume/capacity (*v/c*) ratio:					0.829					0.977					0.985				0.985
v/c less ATSAC adjustment:					0.729					0.877					0.885				0.885
Level of Service (LOS):					**C**					**D**					**D**				**D**

N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%

PROJECT IMPACT

Change in *v/c* due to project: 0.008 — Δ*v/c* after mitigation: 0.008

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 18	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Kester Avenue (South)**	Critical Phases: 3	Ambient Growth — Critical Phases: 3	☐ Adjacent	Critical Phases: 3
East/West Street: **Ventura Boulevard**	Capacity: 1425	from: 2008 — Capacity: 1425	Trip AM: In 34, Out 142, Total 176	Capacity: 1425
Analysis Date: 03/01/2013	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 3
PM Peak: 5:00 PM	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 10%
	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0

		N/B RTOR: / S/B RTOR: / E/B RTOR: / W/B RTOR:	2008 Counts Volume	2008 Lanes	2008 Lane Volume	+ Amb. Growth	+ Area Projects	= 2015 Total Volume	2015 Lanes	2015 Lane Volume	+ Project Volume		2015 Total Volume	2015 Lanes	2015 Lane Volume	Adjusted Volume	2015 Total Volume	2015 Lanes	2015 Lane Volume
Northbound	Left		240	0	**240**	25	0	265	0	**265**	0%	1	266	0	**266**	0	266	0	**266**
	Lt-Th			1	292				1	322	1%			1	323			1	323
	Thru	Existing: 50%	52	0	0	5	0	57	0	0	0%	0	57	0	0	0	57	0	0
	Th-Rt	Projected: 50%		0	0				0	0	0%			0	0			0	0
	Right	Mitigated: 50%	131	1	93	14	2	147	1	105	0%	0	147	1	105	0	147	1	105
	Shared			0	0				0	0	0%			0	0			0	0
Southbound	Left		43	0	0	4	0	47	0	0	0%	0	47	0	0	0	47	0	0
	Lt-Th			0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	27	0	0	3	0	30	0	0	0%	0	30	0	0	0	30	0	0
	Th-Rt	Projected: 50%		0	0				0	0	0%			0	0			0	0
	Right	Mitigated: 50%	30	0	0	3	0	33	0	0	0%	0	33	0	0	0	33	0	0
	Shared			1	100				1	110	0%			1	110			1	110
Eastbound	Left		44	1	44	5	0	49	1	49	0%	0	49	1	49	0	49	1	49
	Lt-Th			0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	1581	2	**791**	164	207	1952	2	**976**	(12%)	29	1981	2	**990**	0	1981	2	**990**
	Th-Rt	Projected: 50%		0	0				0	0	(15%)			0	0			0	0
	Right	Mitigated: 50%	150	1	30	16	0	166	1	34	0%	1	167	1	34	0	167	1	34
	Shared			0	0				0	0	(1%)			0	0			0	0
Westbound	Left		76	1	**76**	8	1	85	1	85	0%	0	85	1	85	0	85	1	85
	Lt-Th			0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	1477	2	739	153	194	1824	2	912	12%	38	1862	2	931	0	1862	2	931
	Th-Rt	Projected: 50%		0	0				0	0	15%			0	0			0	0
	Right	Mitigated: 50%	65	1	43	7	0	72	1	48	0%	0	72	1	48	0	72	1	48
	Shared			0	0				0	0	0%			0	0			0	0
Critical Volumes:			North-South:		340			North-South:		375			North-South:		376			North-South:	376
			East-West:		867			East-West:		1061			East-West:		1075			East-West:	1075
			Total:		1207			Total:		1436			Total:		1452			Total:	1452
Volume/capacity (*v/c*) ratio:					0.847					1.008					1.019				1.019
v/c less ATSAC adjustment:					0.747					0.908					0.919				0.919
Level of Service (LOS):					**C**					**E**					**E**				**E**

PROJECT IMPACT

Change in *v/c* due to project: 0.011 — Significantly impacted? YES

Δ*v/c* after mitigation: 0.011 — Fully mitigated? NO

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 19		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	4		Ambient Growth		Critical Phases:	4		☐ Adjacent		In	Out	Total			Critical Phases:	4
Van Nuys Boulevard		Capacity:	1375		from:	2008	Capacity:	1375		Trip	AM	34	142	176			Capacity:	1375
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3
Ventura Boulevard		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0
AM Peak:	7:45 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	37	1	**37**	4	0	41	1	41	0%	1	42	1	42	0	42	1	**42**
	Lt-Th		0	0				0	0	2%			0	0			0	0
	Thru	393	1	235	41	15	449	1	**266**	0%	0	449	1	**266**	0	449	1	266
	Th-Rt		1	235				1	**266**	0%			1	**266**			1	266
	Right	76	0	0	8	0	84	0	0	0%	0	84	0	0	0	84	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	175	1	175	18	30	223	1	**223**	0%	0	223	1	**223**	0	223	**2**	123
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	378	1	378	39	22	439	1	439	0%	0	439	1	439	0	439	1	**439**
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	531	1	**379**	55	35	621	1	439	2%	2	623	1	439	0	623	1	439
	Shared		0	0				0	0	2%			0	0			0	0
Eastbound	Left	305	2	**168**	32	27	364	2	**200**	(2%)	4	368	2	**202**	0	368	2	**202**
	Lt-Th		0	0				0	0	(2%)			0	0			0	0
	Thru	1020	2	510	106	145	1271	2	635	(10%)	18	1289	2	644	0	1289	2	644
	Th-Rt		0	0				0	0	(11%)			0	0			0	0
	Right	141	1	123	15	0	156	1	136	0%	1	157	1	136	0	157	1	136
	Shared		0	0				0	0	(2%)			0	0			0	0
Westbound	Left	101	1	101	10	0	111	1	111	0%	0	111	1	111	0	111	1	111
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1073	2	**537**	111	147	1331	2	**666**	10%	9	1340	2	**670**	0	1340	2	**670**
	Th-Rt		0	0				0	0	11%			0	0			0	0
	Right	127	1	39	13	20	160	1	48	0%	0	160	1	48	0	160	1	48
	Shared		0	0				0	0	0%			0	0			0	0
N/B RTOR:	Existing: 50%																	
	Projected: 50%																	
	Mitigated: 50%																	
S/B RTOR:	Existing: 50%																	
	Projected: 50%																	
	Mitigated: 50%																	
	Green W CC left																	
E/B RTOR:	Existing: 50%																	
	Projected: 50%																	
	Mitigated: 50%																	
W/B RTOR:	Existing: 50%																	
	Projected: 50%																	
	Mitigated: 50%																	
Critical Volumes:		North-South:		416			North-South:		489			North-South:		489			North-South:	481
		East-West:		704			East-West:		866			East-West:		872			East-West:	872
		Total:		1120			Total:		1355			Total:		1362			Total:	1353
Volume/capacity (*v/c*) ratio:				0.815					0.985					0.990				0.984
v/c less ATSAC adjustment:				0.715					0.885					0.890				0.884
Level of Service (LOS):				**C**					**D**					**D**				**D**

PROJECT IMPACT

Change in *v/c* due to project: 0.005 — *Δv/c* after mitigation: -0.001

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 19	2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street: **Van Nuys Boulevard**	Critical Phases: 4			Ambient Growth	Critical Phases: 4				☐ Adjacent		In	Out	Total	Critical Phases: 4			
	Capacity: 1375			from: 2008	Capacity: 1375				Trip AM		34	142	176	Capacity: 1375			
East/West Street: **Ventura Boulevard**	Signal System: 3			to: 2015	Signal System: 3				Gen 1 PM		131	65	196	☐ Use Dist 2? Signal System: 3			
	v/c reduction: 10%			at: 1.4%	v/c reduction: 10%				Trip AM		55	35	90	v/c reduction: 10%			
Analysis Date: 03/01/2013	Opposed Phasing: 0				Opposed Phasing: 0				Gen 2 PM		144	140	284	Opposed Phasing: 0			
PM Peak: 5:00 PM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound Left	83	1	83	9	0	92	1	92	0%	3	95	1	95	0	95	1	**95**
Northbound Lt-Th (N/B RTOR:)		0	0				0	0	2%			0	0			0	0
Northbound Thru (Existing: 50%)	629	1	**356**	65	53	747	1	**419**	0%	0	747	1	**419**	0	747	1	419
Northbound Th-Rt (Projected: 50%)		1	**356**				1	**419**	0%			1	**419**			1	419
Northbound Right (Mitigated: 50%)	82	0	0	8	0	90	0	0	0%	0	90	0	0	0	90	0	0
Northbound Shared		0	0				0	0	0%			0	0			0	0
Southbound Left	223	1	**223**	23	63	309	1	**309**	0%	0	309	1	**309**	0	309	**2**	170
Southbound Lt-Th (S/B RTOR:)		0	0				0	0	0%			0	0			0	0
Southbound Thru (Existing: 50%)	412	1	412	43	51	506	1	506	0%	0	506	1	506	0	506	1	**506**
Southbound Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
Southbound Right (Mitigated: 50%)	400	1	112	41	54	495	1	149	2%	6	501	1	153	0	501	1	153
Southbound Shared		0	0				0	0	2%			0	0			0	0
Eastbound Left	576	2	**317**	60	56	692	2	**380**	(2%)	4	696	2	**383**	0	696	2	**383**
Eastbound Lt-Th (E/B RTOR:)		0	0				0	0	(2%)			0	0			0	0
Eastbound Thru (Existing: 50%)	1120	2	560	116	153	1389	2	695	(10%)	22	1411	2	706	0	1411	2	706
Eastbound Th-Rt (Projected: 50%)		0	0				0	0	(11%)			0	0			0	0
Eastbound Right (Mitigated: 50%)	95	1	53	10	0	105	1	59	0%	3	108	1	61	0	108	1	61
Eastbound Shared		0	0				0	0	(2%)			0	0			0	0
Westbound Left	88	1	88	9	0	97	1	97	0%	0	97	1	97	0	97	1	97
Westbound Lt-Th (W/B RTOR:)		0	0				0	0	0%			0	0			0	0
Westbound Thru (Existing: 50%)	1175	2	**588**	122	141	1438	2	**719**	10%	29	1467	2	**733**	0	1467	2	**733**
Westbound Th-Rt (Projected: 50%)		0	0				0	0	11%			0	0			0	0
Westbound Right (Mitigated: 50%)	307	1	195	32	60	399	1	244	0%	0	399	1	244	0	399	1	244
Westbound Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:	North-South:		579			North-South:		728			North-South:		728		North-South:		600
	East-West:		904			East-West:		1099			East-West:		1116		East-West:		1116
	Total:		1483			Total:		1827			Total:		1844		Total:		1716
Volume/capacity (*v/c*) ratio:			1.078					1.329					1.341				1.248
v/c less ATSAC adjustment:			0.978					1.229					1.241				1.148
Level of Service (LOS):			**E**					**F**					**F**				**F**

PROJECT IMPACT

Change in *v/c* due to project: 0.012 — Significantly impacted? YES

Δ*v/c* after mitigation: -0.081 — Fully mitigated? YES

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 20	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Beverly Glen Boulevard**	Critical Phases: 2	Ambient Growth — Critical Phases: 2	☐ Adjacent	Critical Phases: 2
East/West Street: **Ventura Boulevard**	Capacity: 1500	from: 2008 — Capacity: 1500	Trip AM: In 34, Out 142, Total 176	Capacity: 1500
Analysis Date: 03/01/2013	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 3
AM Peak: 7:30 AM	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 10%
	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0

		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	88	1	**88**	9	16	113	1	**113**	3%	2	115	1	**115**	0	115	1	**115**
	Lt-Th (N/B RTOR:)		0	0				0	0	2%			0	0			0	0
	Thru (Existing: 50%)	151	1	117	16	24	191	1	143	0%	0	191	1	143	0	191	1	143
	Th-Rt (Projected: 50%)		1	117				1	143	0%			1	143			1	143
	Right (Mitigated: 50%)	83	0	0	9	4	96	0	0	0%	0	96	0	0	0	96	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	20	1	20	2	2	24	1	24	0%	0	24	1	24	0	24	1	24
	Lt-Th (S/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	154	1	**154**	16	19	189	1	**189**	0%	0	189	1	**189**	0	189	1	**189**
	Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
	Right (Mitigated: 50%)	181	1	148	19	24	224	1	171	0%	1	225	1	172	0	225	1	172
	Shared		0	0				0	0	1%			0	0			0	0
Eastbound	Left	66	1	66	7	33	106	1	**106**	0%	0	106	1	106	0	106	1	**106**
	Lt-Th (E/B RTOR:)		0	0				0	0	(1%)			0	0			0	0
	Thru (Existing: 50%)	974	1	**553**	101	125	1200	1	681	(7%)	13	1213	1	**690**	0	1213	2	606
	Th-Rt (Projected: 50%)		1	**553**				1	681	(8%)			1	**690**			0	0
	Right (Mitigated: 50%)	131	0	0	14	17	162	0	0	(3%)	5	167	0	0	0	167	1	109
	Shared		0	0				0	0	(2%)			0	0			0	0
Westbound	Left	88	1	**88**	9	8	105	1	105	0%	0	105	1	**105**	0	105	1	105
	Lt-Th (W/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	1115	1	563	116	127	1358	1	**684**	7%	6	1364	1	687	0	1364	1	**687**
	Th-Rt (Projected: 50%)		1	563				1	**684**	8%			1	687			1	**687**
	Right (Mitigated: 50%)	10	0	0	1	0	11	0	0	0%	0	11	0	0	0	11	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		242			North-South:		302			North-South:		304		North-South:		304
		East-West:		641			East-West:		790			East-West:		795		East-West:		793
		Total:		883			Total:		1092			Total:		1099		Total:		1097
Volume/capacity (*v/c*) ratio:				0.588					0.728					0.733				0.731
v/c less ATSAC adjustment:				0.488					0.628					0.633				0.631
Level of Service (LOS):				**A**					**B**					**B**				**B**

PROJECT IMPACT

Change in *v/c* due to project: 0.005 — Δ*v/c* after mitigation: 0.003

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 20	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Beverly Glen Boulevard**	Critical Phases: 2	Ambient Growth — Critical Phases: 2	☐ Adjacent	Critical Phases: 2
East/West Street: **Ventura Boulevard**	Capacity: 1500	from: 2008 — Capacity: 1500	Trip AM: In 34, Out 142, Total 176	Capacity: 1500
Analysis Date: 03/01/2013	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 3
PM Peak: 4:45 PM	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 10%
	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0

		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume	+ Project Volume		Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	218	1	**218**	23	27	268	1	**268**	3%	7	275	1	**275**	0	275	1	**275**
	Lt-Th		0	0				0	0	2%			0	0			0	0
	Thru	514	1	327	53	58	625	1	394	0%	0	625	1	394	0	625	1	394
	Th-Rt		1	327				1	394	0%			1	394			1	394
	Right	139	0	0	14	9	162	0	0	0%	0	162	0	0	0	162	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	32	1	32	3	1	36	1	36	0%	0	36	1	36	0	36	1	36
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	334	1	**334**	35	65	434	1	**434**	0%	0	434	1	**434**	0	434	1	**434**
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	80	1	28	8	12	100	1	32	0%	1	101	1	33	0	101	1	33
	Shared		0	0				0	0	1%			0	0			0	0
Eastbound	Left	105	1	105	11	20	136	1	136	0%	1	137	1	137	0	137	1	**137**
	Lt-Th		0	0				0	0	(1%)			0	0			0	0
	Thru	1261	1	**678**	131	172	1564	1	**847**	(7%)	16	1580	1	**858**	0	1580	2	790
	Th-Rt		1	**678**				1	**847**	(8%)			1	**858**			0	0
	Right	94	0	0	10	27	131	0	0	(3%)	5	136	0	0	0	136	1	0
	Shared		0	0				0	0	(2%)			0	0			0	0
Westbound	Left	133	1	**133**	14	7	154	1	**154**	0%	0	154	1	**154**	0	154	1	154
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1287	1	672	133	160	1580	1	822	7%	21	1601	1	832	0	1601	1	**832**
	Th-Rt		1	672				1	822	8%			1	832			1	**832**
	Right	56	0	0	6	1	63	0	0	0%	0	63	0	0	0	63	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		552			North-South:		701			North-South:		708		North-South:		708
		East-West:		811			East-West:		1001			East-West:		1012		East-West:		969
		Total:		1363			Total:		1702			Total:		1720		Total:		1677
Volume/capacity (*v/c*) ratio:				0.908					1.135					1.146				1.118
v/c less ATSAC adjustment:				0.808					1.035					1.046				1.018
Level of Service (LOS):				**D**					**F**					**F**				**F**

PROJECT IMPACT

Change in *v/c* due to project: 0.011 YES — Significantly impacted?

Δ*v/c* after mitigation: -0.017 YES — Fully mitigated?

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 21	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Hazeltine Avenue (North)**	Critical Phases: 2	Ambient Growth — Critical Phases: 2	☐ Adjacent	Critical Phases: 2
	Capacity: 1500	from: 2008 — Capacity: 1500	Trip AM: In 34, Out 142, Total 176	Capacity: 1500
East/West Street: **Ventura Boulevard**	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 3
	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 10%
Analysis Date: 03/01/2013	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0
AM Peak: 7:45 AM				

		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume	+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0			0	0
Southbound	Left	255	2	140	26	27	308	2	170	0%	0	308	2	170	0	308	2	170
	Lt-Th		0	0				0	0	0%			0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0			0	0
	Right	335	1	**277**	35	31	401	1	**321**	0%	1	402	1	**322**	0	402	1	**322**
	Shared		0	0				0	0	1%			0			0	0
Eastbound	Left	115	1	**115**	12	34	161	1	**161**	0%	0	161	1	**161**	0	161	1	**161**
	Lt-Th		0	0				0	0	(1%)			0			0	0
	Thru	1034	2	517	107	92	1233	2	617	(7%)	12	1245	2	623	0	1245	2	623
	Th-Rt		0	0				0	0	(7%)			0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0			0	0
Westbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0			0	0
	Thru	939	1	**535**	97	99	1135	1	**650**	7%	6	1141	1	**653**	0	1141	1	**653**
	Th-Rt		1	**535**				1	**650**	7%			1	**653**			1	**653**
	Right	131	0	0	14	21	166	0	0	0%	0	166	0	0	0	166	0	0
	Shared		0	0				0	0	0%			0			0	0
N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
Critical Volumes:	North-South:			277					321				322				322
	East-West:			650					811				814				814
	Total:			927					1132				1136				1136
Volume/capacity (*v/c*) ratio:				0.618					0.755				0.757				0.757
v/c less ATSAC adjustment:				0.518					0.655				0.657				0.657
Level of Service (LOS):				**A**					**B**				**B**				**B**

PROJECT IMPACT

Change in *v/c* due to project: 0.002 — Δ*v/c* after mitigation: 0.002

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 21	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Hazeltine Avenue (North)**	Critical Phases: 2	Ambient Growth — Critical Phases: 2	☐ Adjacent	Critical Phases: 2
East/West Street: **Ventura Boulevard**	Capacity: 1500	from: 2008 — Capacity: 1500	Trip AM: In 34, Out 142, Total 176	Capacity: 1500
Analysis Date: 03/01/2013	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 3
PM Peak: 4:45 PM	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 10%
	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0

		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	174	2	**96**	18	20	212	2	**117**	0%	0	212	2	**117**	0	212	2	**117**
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	191	1	74	20	39	250	1	93	0%	1	251	1	94	0	251	1	94
	Shared		0	0				0	0	1%			0	0			0	0
Eastbound	Left	234	1	**234**	24	55	313	1	**313**	0%	1	314	1	**314**	0	314	1	**314**
	Lt-Th		0	0				0	0	(1%)			0	0			0	0
	Thru	1223	2	612	127	128	1478	2	739	(7%)	15	1493	2	746	0	1493	2	746
	Th-Rt		0	0				0	0	(7%)			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1249	1	**756**	129	123	1501	1	**915**	7%	19	1520	1	**924**	0	1520	1	**924**
	Th-Rt		1	**756**				1	**915**	7%			1	**924**			1	**924**
	Right	262	0	0	27	39	328	0	0	0%	0	328	0	0	0	328	0	0
	Shared		0	0				0	0	0%			0	0			0	0
N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
Critical Volumes:	North-South:	96					117					117				117		
	East-West:	990					1228					1239				1239		
	Total:	1085					1345					1355				1355		
Volume/capacity (*v/c*) ratio:		0.723					0.896					0.903				0.903		
v/c less ATSAC adjustment:		0.623					0.796					0.803				0.803		
Level of Service (LOS):		**B**					**C**					**D**				**D**		

PROJECT IMPACT

Change in *v/c* due to project: 0.007 — Δ*v/c* after mitigation: 0.007

Significantly impacted? NO — Fully mitigated? N/A

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CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, DICKENS ST./SAUGUS AVE. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: AM PEAK HOUR
CASE: EXISTING (2008)

** INPUT VOLUMES **

APPROACH	LEFT	THROUGH	** RIGHT TURNS MIN ON GREEN	MAX ON RED **
WESTBOUND	190	9	0	129
EASTBOUND	4	70	223	6
NORTHBOUND	12	758	35	0
SOUTHBOUND	210	1671	22	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	1	0	0	1	0	2
EASTBOUND	0	0	0	0	1	1	2
NORTHBOUND	1	0	2	1	0	0	4
SOUTHBOUND	1	0	2	1	0	0	4

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	199	N/A	N/A	0	N/A
EASTBOUND	N/A	N/A	N/A	N/A	148	148
NORTHBOUND	12	N/A	264	264	N/A	N/A
SOUTHBOUND	210	N/A	564	564	N/A	N/A

EAST-WEST CRITICAL VOLUMES 338
NORTH-SOUTH CRITICAL VOLUMES 576

THE SUM OF CRITICAL VOLUMES 914

NUMBER OF CRITICAL CLEARANCE INTERVALS 3*

CMA VALUE 0.541
0.071**
0.612

LEVEL OF SERVICE ..... B

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* Includes CMA value decreased due to ATCS Implementation.
** See next page for CMA calculation.

CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, SAUGUS AVE. AT DICKENS ST. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: AM PEAK HOUR
CASE: EXISTING (2008)

** INPUT VOLUMES **

APPROACH	LEFT	THROUGH	** RIGHT TURNS MIN ON GREEN	MAX ON RED **
WESTBOUND	0	0	0	0
EASTBOUND	0	0	0	0
NORTHBOUND	19	77	5	0
SOUTHBOUND	0	0	0	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	0	0	0	0	0	0
EASTBOUND	0	0	0	0	0	0	0
NORTHBOUND	0	0	0	0	0	1	1
SOUTHBOUND	0	0	0	0	0	0	0

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
EASTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
NORTHBOUND	N/A	N/A	N/A	N/A	N/A	101
SOUTHBOUND	N/A	N/A	N/A	N/A	N/A	N/A

EAST-WEST CRITICAL VOLUMES 0
NORTH-SOUTH CRITICAL VOLUMES 101

THE SUM OF CRITICAL VOLUMES 101

NUMBER OF CRITICAL CLEARANCE INTERVALS 3

CMA VALUE 0.071

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CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, DICKENS ST./SAUGUS AVE. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: PM PEAK HOUR
CASE: EXISTING (2008)

** INPUT VOLUMES **

APPROACH	LEFT	THROUGH	** RIGHT TURNS MIN ON GREEN	MAX ON RED **
WESTBOUND	201	9	14	188
EASTBOUND	35	63	224	195
NORTHBOUND	14	1429	71	0
SOUTHBOUND	188	870	25	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	1	0	0	1	0	2
EASTBOUND	0	0	0	0	1	1	2
NORTHBOUND	1	0	2	1	0	0	4
SOUTHBOUND	1	0	2	1	0	0	4

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	210	N/A	N/A	14	N/A
EASTBOUND	N/A	N/A	N/A	N/A	161	161
NORTHBOUND	14	N/A	500	500	N/A	N/A
SOUTHBOUND	188	N/A	298	298	N/A	N/A

EAST-WEST CRITICAL VOLUMES	362
NORTH-SOUTH CRITICAL VOLUMES	688
THE SUM OF CRITICAL VOLUMES	1050
NUMBER OF CRITICAL CLEARANCE INTERVALS	3*
CMA VALUE	0.637
	0.121**
	0.758
LEVEL OF SERVICE	C

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* Includes CMA value decreased due to ATCS Implementation.
** See next page for CMA calculation.

File: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\Icap7\Future Year 2015\IVT Total 2-09 399 Apt. 2015 Future Year.xls, Worksheet: Total (2015)1%am, Row: 4
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CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, SAUGUS AVE. AT DICKENS ST. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: PM PEAK HOUR
CASE: EXISTING (2008)

** INPUT VOLUMES **

APPROACH	LEFT	THROUGH	** RIGHT TURNS MIN ON GREEN	MAX ON RED **
WESTBOUND	0	0	0	0
EASTBOUND	0	0	0	0
NORTHBOUND	6	144	23	0
SOUTHBOUND	0	0	0	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	0	0	0	0	0	0
EASTBOUND	0	0	0	0	0	0	0
NORTHBOUND	0	0	0	0	0	1	1
SOUTHBOUND	0	0	0	0	0	0	0

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
EASTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
NORTHBOUND	N/A	N/A	N/A	N/A	N/A	173
SOUTHBOUND	N/A	N/A	N/A	N/A	N/A	N/A

EAST-WEST CRITICAL VOLUMES 0
NORTH-SOUTH CRITICAL VOLUMES 173

THE SUM OF CRITICAL VOLUMES 173

NUMBER OF CRITICAL CLEARANCE INTERVALS 3

CMA VALUE 0.121

File: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\Icap7\Future Year 2015\IVT Total 2-09 399 Apt. 2015 Future Year.xls, Worksheet: Total (2015)1%am, Row: 5
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CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, DICKENS ST./SAUGUS AVE. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: AM PEAK HOUR
CASE: FUTURE (2015) WITHOUT PROJECT

** INPUT VOLUMES **

APPROACH	LEFT	THROUGH	** RIGHT TURNS MIN ON GREEN	MAX ON RED **
WESTBOUND	210	10	0	142
EASTBOUND	4	77	283	6
NORTHBOUND	13	924	39	0
SOUTHBOUND	232	1896	24	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	1	0	0	1	0	2
EASTBOUND	0	0	0	0	1	1	2
NORTHBOUND	1	0	2	1	0	0	4
SOUTHBOUND	1	0	2	1	0	0	4

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	220	N/A	N/A	0	N/A
EASTBOUND	N/A	N/A	N/A	N/A	182	182
NORTHBOUND	13	N/A	321	321	N/A	N/A
SOUTHBOUND	232	N/A	640	640	N/A	N/A

EAST-WEST CRITICAL VOLUMES	392
NORTH-SOUTH CRITICAL VOLUMES	653
THE SUM OF CRITICAL VOLUMES	1045
NUMBER OF CRITICAL CLEARANCE INTERVALS	3*
CMA VALUE	0.633
	0.079**
	0.712
LEVEL OF SERVICE	C

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* Includes CMA value decreased due to ATCS Implementation.
** See next page for CMA calculation.

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CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, SAUGUS AVE. AT DICKENS ST. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: AM PEAK HOUR
CASE: FUTURE (2015) WITHOUT PROJECT

** INPUT VOLUMES **

APPROACH	LEFT	THROUGH	** RIGHT TURNS ** MIN ON GREEN	MAX ON RED
WESTBOUND	0	0	0	0
EASTBOUND	0	0	0	0
NORTHBOUND	21	85	6	0
SOUTHBOUND	0	0	0	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	0	0	0	0	0	0
EASTBOUND	0	0	0	0	0	0	0
NORTHBOUND	0	0	0	0	0	1	1
SOUTHBOUND	0	0	0	0	0	0	0

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
EASTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
NORTHBOUND	N/A	N/A	N/A	N/A	N/A	112
SOUTHBOUND	N/A	N/A	N/A	N/A	N/A	N/A

EAST-WEST CRITICAL VOLUMES 0
NORTH-SOUTH CRITICAL VOLUMES 112
THE SUM OF CRITICAL VOLUMES 112

NUMBER OF CRITICAL CLEARANCE INTERVALS 3

CMA VALUE 0.079

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CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, DICKENS ST./SAUGUS AVE. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: PM PEAK HOUR
CASE: FUTURE (2015) WITHOUT PROJECT

** INPUT VOLUMES **

APPROACH	LEFT	THROUGH	** RIGHT TURNS MIN ON GREEN	MAX ON RED **
WESTBOUND	222	10	16	207
EASTBOUND	39	70	267	216
NORTHBOUND	15	1645	78	0
SOUTHBOUND	207	1018	28	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	1	0	0	1	0	2
EASTBOUND	0	0	0	0	1	1	2
NORTHBOUND	1	0	2	1	0	0	4
SOUTHBOUND	1	0	2	1	0	0	4

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	232	N/A	N/A	16	N/A
EASTBOUND	N/A	N/A	N/A	N/A	188	188
NORTHBOUND	15	N/A	574	574	N/A	N/A
SOUTHBOUND	207	N/A	349	349	N/A	N/A

EAST-WEST CRITICAL VOLUMES	410
NORTH-SOUTH CRITICAL VOLUMES	781
THE SUM OF CRITICAL VOLUMES	1191
NUMBER OF CRITICAL CLEARANCE INTERVALS	3*
CMA VALUE	0.736
	0.134**
	0.870
LEVEL OF SERVICE	D

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* Includes CMA value decreased due to ATCS Implementation.
** See next page for CMA calculation.

File: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\Icap7\Future Year 2015\IVT Total 2-09 399 Apt. 2015 Future Year.xls, Worksheet: Total (2015)1%am, Row: 8
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CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, SAUGUS AVE. AT DICKENS ST. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: PM PEAK HOUR
CASE: FUTURE (2015) WITHOUT PROJECT

** INPUT VOLUMES **

APPROACH			** RIGHT TURNS	**
	LEFT	THROUGH	MIN ON GREEN	MAX ON RED
WESTBOUND	0	0	0	0
EASTBOUND	0	0	0	0
NORTHBOUND	7	159	25	0
SOUTHBOUND	0	0	0	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	0	0	0	0	0	0
EASTBOUND	0	0	0	0	0	0	0
NORTHBOUND	0	0	0	0	0	1	1
SOUTHBOUND	0	0	0	0	0	0	0

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
EASTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
NORTHBOUND	N/A	N/A	N/A	N/A	N/A	191
SOUTHBOUND	N/A	N/A	N/A	N/A	N/A	N/A

EAST-WEST CRITICAL VOLUMES 0
NORTH-SOUTH CRITICAL VOLUMES 191

THE SUM OF CRITICAL VOLUMES 191

NUMBER OF CRITICAL CLEARANCE INTERVALS 3

CMA VALUE 0.134

CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, DICKENS ST./SAUGUS AVE. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: AM PEAK HOUR
CASE: FUTURE (2015) WITH PROJECT

** INPUT VOLUMES **

APPROACH	LEFT	THROUGH	** RIGHT TURNS MIN ON GREEN	MAX ON RED **
WESTBOUND	210	10	0	142
EASTBOUND	4	77	283	6
NORTHBOUND	13	943	39	0
SOUTHBOUND	232	1936	24	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	1	0	0	1	0	2
EASTBOUND	0	0	0	0	1	1	2
NORTHBOUND	1	0	2	1	0	0	4
SOUTHBOUND	1	0	2	1	0	0	4

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	220	N/A	N/A	0	N/A
EASTBOUND	N/A	N/A	N/A	N/A	182	182
NORTHBOUND	13	N/A	327	327	N/A	N/A
SOUTHBOUND	232	N/A	653	653	N/A	N/A

EAST-WEST CRITICAL VOLUMES	392
NORTH-SOUTH CRITICAL VOLUMES	666
THE SUM OF CRITICAL VOLUMES	1058
NUMBER OF CRITICAL CLEARANCE INTERVALS	3*
CMA VALUE	0.642
	0.079**
	0.721
LEVEL OF SERVICE	C

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* Includes CMA value decreased due to ATCS Implementation.
** See next page for CMA calculation.

File: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\Icap7\Future Year 2015\IVT Total 2-09 399 Apt. 2015 Future Year.xls, Worksheet: Total (2015)1%am, Row: 10
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CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, SAUGUS AVE. AT DICKENS ST. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: AM PEAK HOUR
CASE: FUTURE (2015) WITH PROJECT

** INPUT VOLUMES **

APPROACH			** RIGHT TURNS **	
	LEFT	THROUGH	MIN ON GREEN	MAX ON RED
WESTBOUND	0	0	0	0
EASTBOUND	0	0	0	0
NORTHBOUND	21	85	6	0
SOUTHBOUND	0	0	0	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	0	0	0	0	0	0
EASTBOUND	0	0	0	0	0	0	0
NORTHBOUND	0	0	0	0	0	1	1
SOUTHBOUND	0	0	0	0	0	0	0

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
EASTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
NORTHBOUND	N/A	N/A	N/A	N/A	N/A	112
SOUTHBOUND	N/A	N/A	N/A	N/A	N/A	N/A

EAST-WEST CRITICAL VOLUMES 0
NORTH-SOUTH CRITICAL VOLUMES 112

THE SUM OF CRITICAL VOLUMES 112

NUMBER OF CRITICAL CLEARANCE INTERVALS 3

CMA VALUE 0.079

File: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\Icap7\Future Year 2015\IVT Total 2-09 399 Apt. 2015 Future Year.xls, Worksheet: Total (2015)1%am, Row: 11
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CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, DICKENS ST./SAUGUS AVE. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: PM PEAK HOUR
CASE: FUTURE (2015) WITH PROJECT

** INPUT VOLUMES **

APPROACH	LEFT	THROUGH	** RIGHT TURNS MIN ON GREEN	MAX ON RED **
WESTBOUND	222	10	16	207
EASTBOUND	39	70	263	220
NORTHBOUND	15	1706	78	0
SOUTHBOUND	207	1061	28	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	1	0	0	1	0	2
EASTBOUND	0	0	0	0	1	1	2
NORTHBOUND	1	0	2	1	0	0	4
SOUTHBOUND	1	0	2	1	0	0	4

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	232	N/A	N/A	16	N/A
EASTBOUND	N/A	N/A	N/A	N/A	186	186
NORTHBOUND	15	N/A	595	595	N/A	N/A
SOUTHBOUND	207	N/A	363	363	N/A	N/A

EAST-WEST CRITICAL VOLUMES	408
NORTH-SOUTH CRITICAL VOLUMES	802
THE SUM OF CRITICAL VOLUMES	1210
NUMBER OF CRITICAL CLEARANCE INTERVALS	3*
CMA VALUE	0.749
	0.134**
	0.883
LEVEL OF SERVICE	D

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* Includes CMA value decreased due to ATCS Implementation.
** See next page for CMA calculation.

File: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\Icap7\Future Year 2015\IVT Total 2-09 399 Apt. 2015 Future Year.xls, Worksheet: Total (2015)1%am, Row: 12
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CRAIN & ASSOCIATES
CMA CALCULATIONS

INTERSECTION:22, SAUGUS AVE. AT DICKENS ST. & SEPULVEDA BLVD.
DATE: 3/1/2013 INITIALS: HS PERIOD: PM PEAK HOUR
CASE: FUTURE (2015) WITH PROJECT

** INPUT VOLUMES **

APPROACH			** RIGHT TURNS	**
	LEFT	THROUGH	MIN ON GREEN	MAX ON RED
WESTBOUND	0	0	0	0
EASTBOUND	0	0	0	0
NORTHBOUND	7	159	25	0
SOUTHBOUND	0	0	0	0

** NUMBER OF LANES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED	TOTAL LANES
WESTBOUND	0	0	0	0	0	0	0
EASTBOUND	0	0	0	0	0	0	0
NORTHBOUND	0	0	0	0	0	1	1
SOUTHBOUND	0	0	0	0	0	0	0

** ASSIGNED LANE VOLUMES **

APPROACH	LEFT ONLY	LEFT SHARED	THROUGH ONLY	RIGHT SHARED	RIGHT ONLY	L/T/R SHARED
WESTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
EASTBOUND	N/A	N/A	N/A	N/A	N/A	N/A
NORTHBOUND	N/A	N/A	N/A	N/A	N/A	191
SOUTHBOUND	N/A	N/A	N/A	N/A	N/A	N/A

EAST-WEST CRITICAL VOLUMES 0
NORTH-SOUTH CRITICAL VOLUMES 191

THE SUM OF CRITICAL VOLUMES 191

NUMBER OF CRITICAL CLEARANCE INTERVALS 3

CMA VALUE 0.134

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 23		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases: 4			Ambient Growth		Critical Phases: 4			☐ Adjacent		In	Out	Total			Critical Phases: 4	
Sepulveda Boulevard		Capacity: 1375			from: 2008		Capacity: 1375			Trip	AM	34	142	176			Capacity: 1375	
East/West Street:		Signal System: 3			to: 2015		Signal System: 3			Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System: 3	
405 NB Ramps/Greenleaf Street		v/c reduction: 10%			at: 1.4%		v/c reduction: 10%			Trip	AM	55	35	90			v/c reduction: 10%	
Analysis Date: 03/01/2013		Opposed Phasing: 2					Opposed Phasing: 2			Gen 2	PM	144	140	284			Opposed Phasing: 2	
AM Peak: 7:45 AM		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	261	1	**261**	27	0	288	1	**288**	0%	0	288	1	**288**	0	288	1	**288**
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	254	2	89	26	71	351	2	122	10%	10	361	2	125	0	361	2	125
	Th-Rt		1	89				1	122	12%			1	125			1	125
	Right	12	0	0	1	0	13	0	0	0%	0	13	0	0	0	13	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	3	1	3	0	0	3	1	3	0%	0	3	1	3	0	3	1	3
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1847	2	**617**	191	66	2104	2	**706**	(10%)	18	2122	2	**714**	0	2122	2	**714**
	Th-Rt		1	**617**				1	**706**	(12%)			1	**714**			1	**714**
	Right	294	1	7	30	23	347	1	15	(13%)	21	368	1	24	0	368	1	24
	Shared		0	0				0	0	(8%)			0	0			0	0
Eastbound	Left	565	1	311	59	16	640	1	352	18%	9	649	1	357	0	649	1	357
	Lt-Th		0	0				0	0	5%			0	0			0	0
	Thru	39	0	0	4	0	43	0	0	0%	0	43	0	0	0	43	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	103	0	0	11	0	114	0	0	0%	0	114	0	0	0	114	0	0
	Shared		1	**396**				1	**445**	0%			1	**449**			1	**449**
Westbound	Left	138	0	138	14	0	152	0	152	0%	0	152	0	152	0	152	0	152
	Lt-Th		1	172				1	190	0%			1	190			1	190
	Thru	223	0	0	23	0	246	0	0	0%	0	246	0	0	0	246	0	0
	Th-Rt		1	**199**				1	**220**	0%			1	**220**			1	**220**
	Right	10	0	10	1	0	11	0	11	0%	0	11	0	11	0	11	0	11
	Shared		0	0				0	0	0%			0	0			0	0
N/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
S/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
E/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
W/B RTOR: Existing: 50% Projected: 50% Mitigated: 50%																		
Critical Volumes:		North-South:		878			North-South:		994			North-South:		1002			North-South:	1002
		East-West:		596			East-West:		664			East-West:		669			East-West:	669
		Total:		1474			Total:		1658			Total:		1671			Total:	1671
Volume/capacity (*v/c*) ratio:				1.072					1.206					1.215				1.215
v/c less ATSAC adjustment:				0.972					1.106					1.115				1.115
Level of Service (LOS):				**E**					**F**					**F**				**F**

PROJECT IMPACT

Change in *v/c* due to project: 0.009 — Δ*v/c* after mitigation: 0.009

Significantly impacted? NO — Fully mitigated? N/A

Filename: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\LADOT CMACalc 3.9\Future Year 2015\1% Ambie

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 23	2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street: **Sepulveda Boulevard**	Critical Phases: 4			Ambient Growth	Critical Phases: 4				☐ Adjacent		In	Out	Total	Critical Phases: 4			
East/West Street: **405 NB Ramps/Greenleaf Street**	Capacity: 1375			from: 2008	Capacity: 1375				Trip AM		34	142	176	Capacity: 1375			
Analysis Date: 03/01/2013	Signal System: 3			to: 2015	Signal System: 3				Gen 1 PM		131	65	196	☐ Use Dist 2? Signal System: 3			
PM Peak: 4:45 PM	v/c reduction: 10%			at: 1.4%	v/c reduction: 10%				Trip AM		55	35	90	v/c reduction: 10%			
	Opposed Phasing: 2				Opposed Phasing: 2				Gen 2 PM		144	140	284	Opposed Phasing: 2			
	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound Left	371	1	**371**	38	0	409	1	**409**	0%	0	409	1	**409**	0	409	1	**409**
Northbound Lt-Th	N/B RTOR:	0	0				0	0	0%			0	0			0	0
Northbound Thru	Existing: 50%	**1**	493	96	59	1084	1	573	10%	30	1114	1	588	0	1114	1	588
Northbound Th-Rt	Projected: 50%	1	493				1	573	12%			1	588			1	588
Northbound Right	Mitigated: 50%	0	0	6	0	62	0	0	0%	0	62	0	0	0	62	0	0
Northbound Shared	929	0	0				0	0	0%			0	0			0	0
Southbound Left	8	1	8	1	0	9	1	9	0%	0	9	1	9	0	9	1	9
Southbound Lt-Th	S/B RTOR:	0	0				0	0	0%			0	0			0	0
Southbound Thru	Existing: 50%	2	**326**	80	63	915	2	**382**	(10%)	24	939	2	**391**	0	939	2	**391**
Southbound Th-Rt	Projected: 50%	1	**326**				1	**382**	(12%)			1	**391**			1	**391**
Southbound Right	Mitigated: 50%	1	252	76	14	820	1	284	(13%)	19	839	1	285	0	839	1	285
Southbound Shared	772	0	0				0	0	(8%)			0	0			0	0
Eastbound Left	544	1	299	56	8	608	1	335	18%	31	639	1	352	0	639	1	352
Eastbound Lt-Th	E/B RTOR:	0	0				0	0	5%			0	0			0	0
Eastbound Thru	Existing: 50%	0	0	10	0	106	0	0	0%	0	106	0	0	0	106	0	0
Eastbound Th-Rt	Projected: 50%	0	0				0	0	0%			0	0			0	0
Eastbound Right	Mitigated: 50%	0	0	8	0	83	0	0	0%	0	83	0	0	0	83	0	0
Eastbound Shared	96	1	**416**				1	**463**	0%			1	**476**			1	**476**
Westbound Left	54	0	54	6	0	60	0	60	0%	0	60	0	60	0	60	0	60
Westbound Lt-Th	W/B RTOR:	1	150				1	165	0%			1	165			1	165
Westbound Thru	Existing: 50%	0	0	25	0	264	0	0	0%	0	264	0	0	0	264	0	0
Westbound Th-Rt	Projected: 50%	1	**160**				1	**177**	0%			1	**177**			1	**177**
Westbound Right	Mitigated: 50%	0	17	2	0	19	0	19	0%	0	19	0	19	0	19	0	19
Westbound Shared	239	0	0				0	0	0%			0	0			0	0
Critical Volumes:	North-South:		697			North-South:		792			North-South:		800		North-South:		800
	East-West:		576			East-West:		640			East-West:		653		East-West:		653
	Total:		1273			Total:		1431			Total:		1454		Total:		1454
Volume/capacity (*v/c*) ratio:			0.926					1.041					1.057				1.057
v/c less ATSAC adjustment:			0.826					0.941					0.957				0.957
Level of Service (LOS):			**D**					**E**					**E**				**E**

PROJECT IMPACT

Change in *v/c* due to project: 0.016 — Δ*v/c* after mitigation: 0.016

Significantly impacted? YES — Fully mitigated? NO

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 24		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street:		Critical Phases:	3		Ambient Growth		Critical Phases:	3		☐ Adjacent		In	Out	Total			Critical Phases:	3
Sepulveda Boulevard		Capacity:	1425		from:	2008	Capacity:	1425		Trip	AM	34	142	176			Capacity:	1425
East/West Street:		Signal System:	3		to:	2015	Signal System:	3		Gen 1	PM	131	65	196	☐ Use Dist 2?		Signal System:	3
Valley Vista Boulevard		v/c reduction:	10%		at:	1.4%	v/c reduction:	10%		Trip	AM	55	35	90			v/c reduction:	10%
Analysis Date:	03/01/2013	Opposed Phasing:	0				Opposed Phasing:	0		Gen 2	PM	144	140	284			Opposed Phasing:	0
AM Peak:	7:30 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	1	0	0	0	0	1	0	0%	0	0	1	0	0	0	1	0
	Lt-Th (N/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	368	2	184	38	63	469	2	228	10%	9	478	2	231	0	478	2	231
	Th-Rt (Projected: 50%)		1	195				1	228	10%			1	231			1	231
	Right (Mitigated: 50%)	195	0	0	20	0	215	0	0	0%	0	215	0	0	0	215	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	101	1	101	10	6	117	1	117	0%	1	118	1	118	0	118	1	118
	Lt-Th (S/B RTOR:)		0	0				0	0	(2%)			0	0			0	0
	Thru (Existing: 50%)	2018	2	**673**	209	60	2287	2	**763**	(10%)	18	2305	2	**769**	0	2305	2	**769**
	Th-Rt (Projected: 50%)		1	**673**				1	**763**	(10%)			1	**769**			1	**769**
	Right (Mitigated: 50%)	1	0	0	0	0	1	0	0	0%	0	1	0	0	0	1	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	11	0	0	1	0	12	0	0	0%	0	12	0	0	0	12	0	0
	Lt-Th (E/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 0%)	4	0	0	0	0	4	0	0	0%	0	4	0	0	0	4	0	0
	Th-Rt (Projected: 0%)		0	0				0	0	0%			0	0			0	0
	Right (Mitigated: 0%)	2	0	0	0	0	2	0	0	0%	0	2	0	0	0	2	0	0
	Shared (NROR)		1	17				1	19	0%			1	19			1	19
Westbound	Left	551	0	**551**	57	0	608	0	**608**	0%	0	608	0	**608**	0	608	0	**608**
	Lt-Th (W/B RTOR:)		1	553				1	610	0%			1	610			1	610
	Thru (Existing: 50%)	2	0	0	0	0	2	0	0	0%	0	2	0	0	0	2	0	0
	Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
	Right (Mitigated: 50%)	125	1	75	13	8	146	1	87	0%	1	147	1	88	0	147	1	88
	Shared		0	0				0	0	2%			0	0			0	0
Critical Volumes:		North-South:		673			North-South:		763			North-South:		769		North-South:		769
		East-West:		568			East-West:		627			East-West:		627		East-West:		627
		Total:		1241			Total:		1390			Total:		1396		Total:		1396
Volume/capacity (*v/c*) ratio:				0.871					0.975					0.979				0.979
v/c less ATSAC adjustment:				0.771					0.875					0.879				0.879
Level of Service (LOS):				**C**					**D**					**D**				**D**

PROJECT IMPACT

Change in *v/c* due to project: 0.004 — *Δv/c* after mitigation: 0.004

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 24	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Sepulveda Boulevard**	Critical Phases: 3	Ambient Growth — Critical Phases: 3	☐ Adjacent	Critical Phases: 3
	Capacity: 1425	from: 2008 — Capacity: 1425	Trip AM: In 34, Out 142, Total 176	Capacity: 1425
East/West Street: **Valley Vista Boulevard**	Signal System: 3	to: 2015 — Signal System: 3	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 3
Analysis Date: 03/01/2013	v/c reduction: 10%	at: 1.4% — v/c reduction: 10%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 10%
PM Peak: 4:45 PM	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0

		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION				
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	2	1	2	0	0	2	1	2	0%	0	2	1	2	0	2	1	2
	Lt-Th (N/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	1063	2	**460**	110	57	1230	2	**526**	10%	27	1257	2	**535**	0	1257	2	**535**
	Th-Rt (Projected: 50%)		1	**460**				1	**526**	10%			1	**535**			1	**535**
	Right (Mitigated: 50%)	316	0	0	33	0	349	0	0	0%	0	349	0	0	0	349	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	95	1	95	10	2	107	1	**107**	0%	3	110	1	**110**	0	110	1	**110**
	Lt-Th (S/B RTOR:)		0	0				0	0	(2%)			0	0			0	0
	Thru (Existing: 50%)	781	2	261	81	61	923	2	308	(10%)	21	944	2	315	0	944	2	315
	Th-Rt (Projected: 50%)		1	261				1	308	(10%)			1	315			1	315
	Right (Mitigated: 50%)	1	0	0	0	0	1	0	0	0%	0	1	0	0	0	1	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	1	0	0	0	0	1	0	0	0%	0	1	0	0	0	1	0	0
	Lt-Th (E/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
	Right (Mitigated: 50%)	2	0	0	0	0	2	0	0	0%	0	2	0	0	0	2	0	0
	Shared		1	**3**				1	**3**	0%			1	**3**			1	**3**
Westbound	Left	250	0	**250**	26	0	276	0	**276**	0%	0	276	0	**276**	0	276	0	**276**
	Lt-Th (W/B RTOR:)		1	**250**				1	**276**	0%			1	**276**			1	**276**
	Thru (Existing: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
	Right (Mitigated: 50%)	254	1	206	26	2	282	1	229	0%	3	285	1	230	0	285	1	230
	Shared		0	0				0	0	2%			0	0			0	0
Critical Volumes:		North-South:		555			North-South:		633			North-South:		645		North-South:		645
		East-West:		253			East-West:		279			East-West:		279		East-West:		279
		Total:		808			Total:		912			Total:		924		Total:		924
Volume/capacity (*v/c*) ratio:				0.567					0.640					0.649				0.649
v/c less ATSAC adjustment:				0.467					0.540					0.549				0.549
Level of Service (LOS):				**A**					**A**					**A**				**A**

PROJECT IMPACT

Change in *v/c* due to project: 0.009 — Δ*v/c* after mitigation: 0.009

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 25	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Dickens Street**	Critical Phases: 0	Ambient Growth — Critical Phases: 0	☐ Adjacent	Critical Phases: 0
East/West Street: **Ventura Boulevard**	Capacity: 1200	from: 2008 — Capacity: 1200	Trip AM: In 34, Out 142, Total 176	Capacity: 1200
Analysis Date: 03/01/2013	Signal System: 1	to: 2015 — Signal System: 1	Gen 1 PM: In 131, Out 65, Total 196	☐ Use Dist 2? Signal System: 1
AM Peak: 7:30 AM	v/c reduction: 0%	at: 1.4% — v/c reduction: 0%	Trip AM: In 55, Out 35, Total 90	v/c reduction: 0%
	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: In 144, Out 140, Total 284	Opposed Phasing: 0

		2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th (N/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
	Right (Mitigated: 50%)	5	1	**5**	1	0	6	1	**6**	0%	0	6	1	**6**	0	6	1	**6**
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th (S/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
	Right (Mitigated: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th (E/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	1741	3	529	180	196	2117	3	642	22%	24	2141	3	648	0	2141	3	648
	Th-Rt (Projected: 50%)		1	529				1	642	30%			1	648			1	648
	Right (Mitigated: 50%)	375	0	0	39	36	450	0	0	0%	0	450	0	0	0	450	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th (W/B RTOR:)		0	0				0	0	0%			0	0			0	0
	Thru (Existing: 50%)	1996	3	**665**	207	285	2488	3	**829**	(36%)	62	2550	3	**850**	0	2550	3	**850**
	Th-Rt (Projected: 50%)		0	0				0	0	(32%)			0	0			0	0
	Right (Mitigated: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Critical Volumes:		North-South:		5			North-South:		6			North-South:		6			North-South:	6
		East-West:		665			East-West:		829			East-West:		850			East-West:	850
		Total:		670			Total:		835			Total:		855			Total:	855
Volume/capacity (*v/c*) ratio:				0.559					0.696					0.713				0.713
v/c less ATSAC adjustment:				0.559					0.696					0.713				0.713
Level of Service (LOS):				**A**					**B**					**C**				**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.017 — *Δv/c* after mitigation: 0.017

Significantly impacted? NO — Fully mitigated? N/A

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 25	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Dickens Street**	Critical Phases: 0	Ambient Growth — Critical Phases: 0	☐ Adjacent	Critical Phases: 0
East/West Street: **Ventura Boulevard**	Capacity: 1200	from: 2008 — Capacity: 1200		Capacity: 1200
Analysis Date: 03/01/2013	Signal System: 1	to: 2015 — Signal System: 1		☐ Use Dist 2? Signal System: 1
PM Peak: 4:30 PM	v/c reduction: 0%	at: 1.4% — v/c reduction: 0%		v/c reduction: 0%
	Opposed Phasing: 0	Opposed Phasing: 0		Opposed Phasing: 0

			Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left		0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th	N/B RTOR:		0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt	Projected: 50%		0	0				0	0	0%			0	0			0	0
	Right	Mitigated: 50%	7	1	**7**	1	0	8	1	**8**	0%	0	8	1	**8**	0	8	1	**8**
	Shared			0	0				0	0	0%			0	0			0	0
Southbound	Left		0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th	S/B RTOR:		0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt	Projected: 50%		0	0				0	0	0%			0	0			0	0
	Right	Mitigated: 50%	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared			0	0				0	0	0%			0	0			0	0
Eastbound	Left		0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th	E/B RTOR:		0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	1995	3	631	207	191	2393	3	750	22%	72	2465	3	768	0	2465	3	768
	Th-Rt	Projected: 50%		1	631				1	750	30%			1	768			1	768
	Right	Mitigated: 50%	527	0	0	55	25	607	0	0	0%	0	607	0	0	0	607	0	0
	Shared			0	0				0	0	0%			0	0			0	0
Westbound	Left		0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th	W/B RTOR:		0	0				0	0	0%			0	0			0	0
	Thru	Existing: 50%	2062	3	**687**	214	182	2458	3	**819**	(36%)	68	2526	3	**842**	0	2526	3	**842**
	Th-Rt	Projected: 50%		0	0				0	0	(32%)			0	0			0	0
	Right	Mitigated: 50%	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared			0	0				0	0	0%			0	0			0	0
Critical Volumes:			North-South:		7			North-South:		8			North-South:		8		North-South:		8
			East-West:		687			East-West:		819			East-West:		842		East-West:		842
			Total:		694			Total:		827			Total:		850		Total:		850
Volume/capacity (*v/c*) ratio:					0.579					0.689					0.708				0.708
v/c less ATSAC adjustment:					0.579					0.689					0.708				0.708
Level of Service (LOS):					**A**					**B**					**C**				**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.019 — *Δv/c* after mitigation: 0.019

Significantly impacted? NO — Fully mitigated? N/A

Filename: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\LADOT CMACalc 3.9\Future Year 2015\1% Ambie

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 26	2008, EXISTING			2015, PROJECTED CUMULATIVE BASE					2015, WITH PROJECT					2015, WITH TRAFFIC MITIGATION			
North/South Street: **Sepulveda Boulevard**	Critical Phases: 0			Ambient Growth	Critical Phases: 0				☐ Adjacent		In	Out	Total		Critical Phases: 0		
	Capacity: 1200			from: 2008	Capacity: 1200				Trip AM		34	142	176		Capacity: 1200		
East/West Street: **Moorpark Street**	Signal System: 1			to: 2015	Signal System: 1				Gen 1 PM		131	65	196	☐ Use Dist 2?	Signal System: 1		
	v/c reduction: 0%			at: 1.4%	v/c reduction: 0%				Trip AM		55	35	90		v/c reduction: 0%		
Analysis Date: 03/01/2013	Opposed Phasing: 0				Opposed Phasing: 0				Gen 2 PM		144	140	284		Opposed Phasing: 0		
AM Peak: 7:45 AM	Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume		+ Project Volume	= Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
Northbound Lt-Th (N/B RTOR:)		0	0				0	0	0%			0	0			0	0
Northbound Thru (Existing: 50%)	669	2	**246**	69	120	858	2	**312**	62%	56	914	2	**331**	0	914	2	**331**
Northbound Th-Rt (Projected: 50%)		1	**246**				1	**312**	64%			1	**331**			1	**331**
Northbound Right (Mitigated: 50%)	70	0	0	7	0	77	0	0	0%	0	77	0	0	0	77	0	0
Northbound Shared		0	0				0	0	0%			0	0			0	0
Southbound Left	34	0	0	4	0	38	0	0	0%	0	38	0	0	0	38	0	0
Southbound Lt-Th (S/B RTOR:)		1	**341**				1	**411**	(1%)			1	**443**			1	**443**
Southbound Thru (Existing: 50%)	1634	3	443	169	142	1945	3	524	(71%)	125	2070	3	555	0	2070	3	555
Southbound Th-Rt (Projected: 50%)		0	0				0	0	(69%)			0	0			0	0
Southbound Right (Mitigated: 50%)	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
Southbound Shared		0	0				0	0	0%			0	0			0	0
Eastbound Left	0	0	0	0		0	0	0	0%	0	0	0	0	0	0	0	0
Eastbound Lt-Th (E/B RTOR:)		0	0				0	0	0%			0	0			0	0
Eastbound Thru (Existing: 50%)	0	0	0	0		0	0	0	0%	0	0	0	0	0	0	0	0
Eastbound Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
Eastbound Right (Mitigated: 50%)	0	0	0	0		0	0	0	0%	0	0	0	0	0	0	0	0
Eastbound Shared		0	0				0	0	0%			0	0			0	0
Westbound Left	14	0	0	1		15	0	0	0%	0	15	0	0	0	15	0	0
Westbound Lt-Th (W/B RTOR:)		0	0				0	0	0%			0	0			0	0
Westbound Thru (Existing: 50%)	0	0	0	0		0	0	0	0%	0	0	0	0	0	0	0	0
Westbound Th-Rt (Projected: 50%)		0	0				0	0	0%			0	0			0	0
Westbound Right (Mitigated: 50%)	113	0	0	12		125	0	0	0%	1	126	0	0	0	126	0	0
Westbound Shared		1	**127**				1	**140**	1%			1	**141**			1	**141**
Critical Volumes:	North-South:		587			North-South:		723			North-South:		773			North-South:	773
	East-West:		127			East-West:		140			East-West:		141			East-West:	141
	Total:		714			Total:		863			Total:		914			Total:	914
Volume/capacity (*v/c*) ratio:			0.595					0.719					0.762				0.762
v/c less ATSAC adjustment:			0.595					0.719					0.762				0.762
Level of Service (LOS):			**A**					**C**					**C**				**C**

PROJECT IMPACT

Change in *v/c* due to project: 0.043 — Significantly impacted? YES

Δ*v/c* after mitigation: 0.043 — Fully mitigated? NO

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CMACalc - Critical Movement Analysis Calculator

Il Villaggio Toscano

Bureau of Planning and Land Use Development

Intersection No. 26	2008, EXISTING	2015, PROJECTED CUMULATIVE BASE	2015, WITH PROJECT	2015, WITH TRAFFIC MITIGATION
North/South Street: **Sepulveda Boulevard**	Critical Phases: 0	Ambient Growth — Critical Phases: 0	☐ Adjacent	In / Out / Total	Critical Phases: 0
	Capacity: 1200	from: 2008 — Capacity: 1200	Trip AM: 34 / 142 / 176	Capacity: 1200
East/West Street: **Moorpark Street**	Signal System: 1	to: 2015 — Signal System: 1	Gen 1 PM: 131 / 65 / 196	☐ Use Dist 2? Signal System: 1
	v/c reduction: 0%	at: 1.4% — v/c reduction: 0%	Trip AM: 55 / 35 / 90	v/c reduction: 0%
Analysis Date: 03/01/2013	Opposed Phasing: 0	Opposed Phasing: 0	Gen 2 PM: 144 / 140 / 284	Opposed Phasing: 0
PM Peak: 5:00 PM				

		Counts Volume	Lanes	Lane Volume	+ Amb. Growth	+ Area Projects	= Total Volume	Lanes	Lane Volume	+ Project Volume		Total Volume	Lanes	Lane Volume	Adjusted Volume	Total Volume	Lanes	Lane Volume
Northbound	Left	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	1918	2	**660**	199	104	2221	2	**763**	62%	173	2394	2	**821**	0	2394	2	**821**
	Th-Rt		1	**660**				1	**763**	64%			1	**821**			1	**821**
	Right	62	0	0	6	0	68	0	0	0%	0	68	0	0	0	68	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Southbound	Left	72	0	0	7	0	79	0	0	0%	1	80	0	0	0	80	0	0
	Lt-Th		1	**78**				1	**112**	(1%)			1	**145**			1	**145**
	Thru	1321	3	438	137	104	1562	3	510	(71%)	143	1705	3	547	0	1705	3	547
	Th-Rt		0	0				0	0	(69%)			0	0			0	0
	Right	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Eastbound	Left	0	0	0	0		0	0	0	0%	0	0	0	0	0	0	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0		0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	0	0	0	0		0	0	0	0%	0	0	0	0	0	0	0	0
	Shared		0	0				0	0	0%			0	0			0	0
Westbound	Left	5	0	0	1		6	0	0	0%	0	6	0	0	0	6	0	0
	Lt-Th		0	0				0	0	0%			0	0			0	0
	Thru	0	0	0	0		0	0	0	0%	0	0	0	0	0	0	0	0
	Th-Rt		0	0				0	0	0%			0	0			0	0
	Right	124	0	0	13		137	0	0	0%	1	138	0	0	0	138	0	0
	Shared		1	**129**				1	**142**	1%			1	**143**			1	**143**
Critical Volumes:			North-South:	738				North-South:	875				North-South:	965			North-South:	965
			East-West:	129				East-West:	142				East-West:	143			East-West:	143
			Total:	867				Total:	1018				Total:	1109			Total:	1109
Volume/capacity (*v/c*) ratio:				0.723					0.848					0.924				0.924
v/c less ATSAC adjustment:				0.723					0.848					0.924				0.924
Level of Service (LOS):				**C**					**D**					**E**				**E**

N/B RTOR: Existing: 50% / Projected: 50% / Mitigated: 50%

S/B RTOR: Existing: 50% / Projected: 50% / Mitigated: 50%

E/B RTOR: Existing: 50% / Projected: 50% / Mitigated: 50%

W/B RTOR: Existing: 50% / Projected: 50% / Mitigated: 50%

PROJECT IMPACT

Change in *v/c* due to project: 0.076 — *Δv/c* after mitigation: 0.076

Significantly impacted? YES — Fully mitigated? NO

Filename: I:\Crain Projects\Active Projects\Il Villaggio Toscano Sherman Oaks\Data\LADOT CMACalc 3.9\Future Year 2015\1% Ambie

Developed 2005-2007 by Ken Aitchison

UPDATE METHODOLOGY

The 2015 analysis is based on the same methodology and procedures, related projects database, and traffic count volumes contained in the Final EIR. However, the ambient traffic growth factor has been adjusted to more realistically reflect forecast traffic conditions.

The last time an updated traffic analysis for the Project was prepared was in March 2010 and approved by the Los Angeles Department of Transportation (LADOT) in April 2010. That analysis incorporated the ambient traffic growth factor of two percent per year contained in the Memorandum of Understanding (MOU) that had been scoped with LADOT for the original December 2008 traffic study for the Project.

Subsequent to April 2010, the Metropolitan Transportation Authority adopted the current Los Angeles County 2010 Congestion Management Program (CMP) on October 20, 2010. Based on regional transportation models, the CMP determined the following average annual traffic growth factor for the West San Fernando Valley traffic analysis zone that includes the Project study area:

2010 CMP: 2.7% growth over five-year period 2010 - 2015
Average annual growth = 0.54% per year.

In addition, on December 23, 2010, LADOT approved the traffic study MOU for The Village at Westfield Topanga (VWT) project, which is located within the West San Fernando Valley traffic analysis zone. That MOU recommended an ambient traffic growth factor of one percent per year, which was used in that traffic study. LADOT approved the VWT traffic study on February 9, 2011.

Considering these more recent and approved technical studies, there is strong evidence that the ambient growth factor of two percent per year previously applied in the last updated Project traffic analysis was unrealistically high for the study area, and that its continued application to the year 2015 would be inappropriate. While use of the 0.54 percent per year ambient growth factor, based on the 2010 CMP, would be reasonable for this latest updated analysis, to continue to provide a conservative analysis and maintain consistency with recent LADOT precedent, a one percent ambient growth factor was assumed. Together with the related projects traffic volumes, this ambient growth rate provides a conservative but more realistic analysis.

It should be noted that ambient traffic growth factors are used to account for the general effect of cumulative development traffic, which include related projects traffic. When traffic analyses, such as that prepared for the Project, include both ambient traffic growth-factored traffic

volumes and related projects traffic volumes, future traffic volumes become overstated, often by a large degree. When the ambient growth factor is also much higher than can be substantiated, the overstating of future volumes becomes exacerbated.

The one percent ambient growth factor was applied to baseline traffic volumes from the year 2011 to the year 2015. The two percent ambient growth factor that the original December 2008 traffic study used for the original 2011 buildout has been retained.[1] The existing condition analysis has not been reanalyzed as it has not changed.

[1] The 2013 baseline traffic volumes in the Final EIR were not used for the 2015 updating, since those volumes were based on the unrealistic ambient growth factor of two percent per year.

Appendix E

Air Quality Dynamics Response to SCAQMD Comments

February 27, 2013

Armbruster Goldsmith and Delvac LLP
11611 San Vicente Boulevard, Suite 900
Los Angeles, California 90049
Attn: David A. Goldberg, Esq.

Re: IL Villaggio Toscano – Response to SCAQMD Comments

Mr. Goldberg:

Per your request, Air Quality Dynamics has prepared a response to comments submitted by the South Coast Air Quality Management District (SCAQMD) in its letter dated February 19, 2013 on the Final EIR for the Il Villaggio Toscano Project. Specifically, SCAQMD expressed concern that the filtration control efficiencies identified in the pollution exposure assessment to mitigate diesel particulate exposures should be tested to ensure they are effective in controlling ultrafine particles (UFP's). The following provides a detailed response to SCAQMD's recommendation for filter verification.

Comment

(T)he proposed mitigation, installation of MERV 16 rated filters in the building's ventilation system appear to be a unique measure. SCAQMD staff is not aware of any other residential project with filters rated higher than MERV 13. The MERV scale does not test filter efficiency for particle sizes below 0.3 microns, yet the particles from freeway exhaust found to be of highest concern in recent research are ultrafine particles (<0.1 microns). Although some filters may be effective at these smaller size ranges, because of the unique demands of this project, SCAQMD recommends that specific filters required for this project go through a verification process to ensure that they will meet the specified requirements for all particle size ranges.

Response to Comment

The SCAQMD notes that they are unaware of the use of MERV 16 rated filters for residential projects. Comment noted. Notwithstanding, a number of manufactures provide air cleaning devices specifically designed for use in residential applications. For example, York manufactures a whole house hybrid electronic cleaner which provides exceptional performance (MERV 16 equivalent) by incorporating disposable filter media eliminating the use of traditional collector plates. This and similar devices were discussed as appropriate mitigation options for the proposed project and are incorporated into project design to reduce pollutant exposures below significance thresholds.

The filtration requirements, which were identified in the pollution exposure assessment[1] and subsequent evaluation of revised building elevations report[2], control known pollutants with defined standards and thresholds. The filtration requirements meet or exceed the levels necessary to mitigate pollutant impacts for particle sizes with known health effects (DPM, PM10 and PM2.5). Ultrafine particles (UFP's) are only now emerging as a focus for future research. No determination as to their health effects has been established. This fact is well documented in SCAQMD's 2012 Air Quality Management Plan (AQMP). As cited in the AQMP, SCAQMD notes recent findings in the U.S. Environmental Protection Agency Integrated Science Assessment for Particulate Matter[3] report, which states:

> (T)here is inadequate evidence linking long-term exposure of UFPs to health effects, including respiratory, developmental, cancer, and mortality. Overall, epidemiological studies of atmospheric PM suggest that cardiovascular effects are associated with smaller particles, but there are few reports that make a clear link between UFP exposures and increased mortality.

The SCAQMD continues by stating:

> New toxicological and epidemiological studies targeting exposure to controlled and uncontrolled emissions from gasoline and diesel vehicles are needed to better characterize the exposure-response relationships to UFPs and to help develop health guidelines and potential regulations. The health effects of inorganic (largely related to oil consumption ash constituents) UFP emissions from vehicles are only now starting to receive significant attention.

It is for these reasons that UFP's are currently not regulated by the SCAQMD, California Air Resources Board or U.S. Environmental Protection Agency. As such, the identified filtration mitigation measures for the proposed project are appropriate and verification of their effectiveness to control DPM, PM10 and PM2.5 is not required.

I can be reached at (818) 703-3294 should you have any questions or require additional information.

Sincerely,

Bill Piazza

[1] IL Villaggio Toscano Project – Pollutant Exposure Assessment, May 2011.
[2] Memorandum to David A. Goldberg, Esq. IL Villaggio Toscano Project – Evaluation of Revised Building Elevations, August 22, 2012.
[3] U.S. Environmental Protection Agency, December 2009. Integrated Science Assessment for Particulate Matter (EPA/600/R-08/139F.