



## Division of Land / Environmental Review

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



# **FINAL ENVIRONMENTAL IMPACT REPORT**

## ***Il Villaggio Toscano Project***

**ENV-2004-6000-EIR**

**State Clearinghouse No. 2004111068**

**Council District 4**

**THIS DOCUMENT COMPRISES THE SECOND AND FINAL PART OF THE ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PROJECT DESCRIBED. THE DRAFT EIR, WHICH WAS PREVIOUSLY CIRCULATED FOR PUBLIC REVIEW AND COMMENT, COMPRISES THE FIRST PART.**

**Project Address:** 4827 North Sepulveda Boulevard, Sherman Oaks

**Project Description:** The project applicant, M. David Paul Development LLC, proposes the Il Villaggio Toscano Project (the proposed project) that would provide a mix of residential and commercial uses in the Sherman Oaks Community of the City of Los Angeles. The proposed project would include the development of a maximum of 399 multi-family residential units and approximately 52,000 gross square feet of neighborhood-serving commercial uses on a 5.05-acre site (including street dedications and vacations) located on Sepulveda Boulevard between the US-101 Freeway and Camarillo Street. The proposed project's residential uses would be provided within several buildings, located on top of a structural podium. The podium would include ground level, neighborhood-serving commercial uses fronting Sepulveda Boulevard and Camarillo Street and four levels of parking within an enclosed parking podium that would be internal to the site. The maximum height of the proposed buildings would range from approximately 45 feet to approximately 100 feet. Project construction would require approximately 165,000 cubic yards of grading and soil export.

**APPLICANT:**

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**PREPARED FOR:**  
Environmental Review Section  
Los Angeles City Planning Department

**January 2013**

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- Appendix FEIR-A     Draft EIR Comment Letters
- Appendix FEIR-B     Revised Traffic Assessment
- Appendix FEIR-C     Duration of Residence in the Rental Housing Market
- Appendix FEIR-D     Evaluation of Revised Building Elevations

## **Revised Draft EIR Appendices**

- Appendix B-5         Revised Pollutant Exposure Assessment

## **Added Draft EIR Appendices**

- Appendix C-3         Addendum II—Update of Geotechnical Engineering Investigation
- Appendix C-4         City of Los Angeles Grading Division Approval Letter
- Appendix C-5         Addendum III—Confirmation of Previous Analyses

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# I. Executive Summary

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# I. Executive Summary

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this Environmental Impact Report (EIR) contains a brief summary of the proposed actions and consequences of Il Villaggio Toscano Project (proposed project). More detailed information regarding the proposed project and its potential environmental effects are provided in the following sections of this Final EIR.

As described in Sections 15089 and 15132 of the Guidelines for the California Environmental Quality Act (CEQA Guidelines), the lead agency must prepare a Final EIR before approving a project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies. Pursuant to CEQA Guidelines Section 15132, this Final EIR includes a revised summary, corrections and additions to the Draft EIR, a list of persons, organizations, and agencies that provided comments on the Draft EIR, responses to comments, and a Mitigation Monitoring and Reporting Program.

This Final EIR is intended to be a companion to the December 2010 Draft EIR, which is incorporated by reference and bound separately. (Refer to Volumes I through III of the Draft EIR). This Final EIR is organized into five main sections as follows:

**Section I. Executive Summary**—This section provides an overview and background of the proposed project and its potential impacts.

**Section II. Corrections and Additions to the Draft EIR**—This section provides a list of revisions that have been made to the Draft EIR, based on comments received from the public and agencies, and other items requiring updating and/or corrections.

**Section III. Responses to Comments**—This section presents a matrix of the parties that commented on the Draft EIR and the issues that they raised. This matrix is followed by each comment within the comment letter with a corresponding response.

**Section IV. Mitigation Monitoring and Reporting Program (MMRP)**—This section provides the full MMRP for the proposed project. The MMRP lists all of the proposed mitigation measures by environmental topic, and identifies for each of the

measures the applicable enforcement agency, monitoring agency, monitoring phase, monitoring frequency, and action indicating compliance.

In addition, the following appendices are included as part of this Final EIR:

**Appendix FEIR-A. Draft EIR Comment Letters**—This appendix to the Final EIR includes copies of all written comments received on the Draft EIR.

**Appendix FEIR-B. Revised Traffic Assessment**—This appendix to the Final EIR includes the City of Los Angeles Department of Transportation’s recommended revisions to paragraph 2 of Section H of the Traffic Assessment, which outlines City of Los Angeles Department of Transportation requirements for implementation of a Special Parking Congestion Zone including new on- and off-street parking technology in City-operated spaces in the vicinity of Sepulveda Boulevard and Ventura Boulevard.

**Appendix FEIR-C. Duration of Residence in the Rental Housing Market**—This appendix to the Final EIR analyzes the duration of residence in rental housing.

**Appendix FEIR-D. Evaluation of Revised Building Elevations**—This appendix to the Final EIR identifies discrete heating, ventilation and air conditioning (HVAC) requirements for the proposed project based upon consideration of revised residential building setbacks and elevations above local terrain and more refined specifications for the location of air filtration systems.

As discussed in Section II, Corrections and Additions, of this Final EIR, the following appendix to the Draft EIR has been revised. The revised appendix is appended to this Final EIR:

- Appendix B-5 Revised Pollutant Exposure Assessment

As discussed in Section II, Corrections and Additions, of this Final EIR, the following appendices have been added to the Draft EIR. The added appendices are appended to this Final EIR:

- Appendix C-3 Addendum II—Update of Geotechnical Engineering Investigation
- Appendix C-4 City of Los Angeles Grading Division Approval Letter
- Appendix C-5 Addendum III—Confirmation of Previous Analyses

# 1. Proposed Project

The Il Villaggio Toscano project would transform an existing, mostly graded, underutilized site to a community-based urban living environment that would include a mix of residential and commercial uses. The proposed project as evaluated in the Draft EIR included the development of a maximum of 500 multi-family residential units and approximately 55,000 square feet of neighborhood-serving commercial uses. The combined floor area for the residential and neighborhood-serving commercial uses for the proposed project totaled approximately 708,659 square feet, with a floor area ratio (FAR) of 3.3:1.

The residential buildings would be arranged around a main central courtyard, with multiple-themed gardens (e.g., a maze garden, herb garden, orchard garden, poplar garden), on the plaza level. The courtyards and gardens would be articulated at the ground level by stairs leading up to the plaza level (i.e., podium) above. Other recreational amenities associated with the residential uses would include a large pool facility, spa, gym, community rooms, a bocce court, and lobbies. In addition, residential units would include private balconies. In total, approximately 106,013 square feet of common and private open space would be provided on-site.

The proposed project's neighborhood-serving commercial uses would be located on the ground level, fronting Sepulveda Boulevard and Camarillo Street. It is anticipated that a neighborhood specialty grocery store, which would comprise up to approximately 45,000 of the 55,000 square feet of the neighborhood-serving commercial space, would serve as the project's anchor tenant. The commercial storefronts and adjacent street frontages would be landscaped and enhanced with amenities (i.e., paving, seating, decorative light posts) to create a pedestrian-friendly urban setting. Additionally, a small piazzetta (i.e., small, Italian-style plaza) would be located on the ground level on Sepulveda Boulevard.

The proposed project, as evaluated in the Draft EIR, included a total parking supply of approximately 1,470 parking spaces, consisting of an estimated 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for retail visitors. Parking would be provided within a parking structure that would include two subterranean levels, one ground level, and one mezzanine level. Primary access to the parking structure would be provided via a new private two-way roadway along the back side of the site, (i.e., along the northern/western frontage) extending from Sepulveda Boulevard to Camarillo Street. This private roadway would provide two driveway access points to the parking structure along its length and would also serve as emergency access to the back of the site. In addition, a two-way retail-only driveway, a porte-cochere type

driveway for residential drop-off/pick-up, and two two-way residential-only driveways on Camarillo Street are proposed. No driveways on Sepulveda Boulevard would be proposed.

The proposed project would be designed to achieve a silver rating under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) green building program. To achieve the LEED® silver rating, sustainability measures that address transportation, water efficiency, and energy efficiency would be incorporated as part of the project.

Project construction would require approximately 165,000 cubic yards of grading and soil export. Construction would require approximately 20 to 23 months to complete.

## **A. Proposed Revisions to Il Villaggio Toscano Project**

In response to public comments received regarding the Draft EIR, the Applicant has proposed to reduce the number of residential units from 500 units to 399 units. In addition, to accommodate an expanded publicly accessible plaza, the proposed project's 55,000 square feet of neighborhood serving retail has been reduced by 3,000 square feet to 52,000 square feet of retail. Furthermore, the building heights along Sepulveda Boulevard have been proposed to be reduced based on distance from the Sepulveda Boulevard property line. Additional changes proposed to the project in response to public comments provide for the inclusion of an 18-inch setback on Camarillo Street and along portions of Sepulveda Boulevard, the inclusion of a pedestrian entrance to the retail uses from the ground level parking along Camarillo Street, the inclusion of an open air colonnade along Sepulveda Boulevard, and the inclusion of landscaped gardens that extend from the interior residential levels to Sepulveda Boulevard. In addition, the Applicant has proposed to expand the size of the publicly accessible ground level plaza up to approximately 13,000 square feet along the Sepulveda Boulevard frontage, which would exceed the front yard setback of 10 feet along this portion of the Sepulveda Boulevard frontage. The plaza is envisioned to include tables, chairs, benches, and planters with native landscaped vegetation.

With the proposed reduction in residential units and neighborhood-serving commercial uses, the proposed project's parking supply would be reduced from approximately 1,470 parking spaces to approximately 1,206 parking spaces, including 798 parking spaces for project residents, 200 parking spaces for residential guests, and 208 parking spaces for retail visitors. Also in connection with the reduction in the number of residential units, the amount of open space within the project site for residents would be reduced from approximately 106,013 square feet to approximately 93,500 square feet. However, as discussed above, the publicly accessible ground level plaza is proposed to be increased from 2,300 square feet to 13,000 square feet.

Based on the modifications to the project proposed by the Applicant, several of the requested Specific Plan exceptions set forth in the Draft EIR have been revised or are no longer applicable. Specifically, with the proposed reduction in residential units and commercial uses, the Applicant has reduced the proposed project's floor area ratio of 3.3:1 to 2.75:1. Accordingly, the Applicant's request for exception from Specific Plan Section 6.B.4 has been revised to reflect the proposed project's reduction in floor area ratio from 3.3:1 to 2.75:1. With this modification, the combined floor area for the proposed project's residential and neighborhood-serving commercial uses would be reduced from approximately 708,659 square feet to approximately 582,359 square feet. In addition, with the inclusion of an 18-inch setback on Camarillo Street and along portions of Sepulveda Boulevard, the request for exception from Specific Plan Section 7.A.2.a is no longer required. However, in order to accommodate an expanded publicly accessible ground level plaza along Sepulveda Boulevard, the Applicant is requesting an exception from Specific Plan Section 7.A.2.a to exceed the front yard setback along a portion of the Sepulveda Boulevard frontage. Furthermore, the request for exception from Specific Plan Section 7.B.1 has been revised to reduce the lot coverage of 83 percent at grade to a maximum lot coverage of 78.5 percent at grade. Finally, with the revision to fully enclose the parking structure along Camarillo Street, the request for exception from Specific Plan Section 7.D.2.b would be eliminated. These proposed changes reduce the overall environmental impacts of the proposed project.

As described in more detail in Section II, Corrections and Additions of this Final EIR, these proposed modifications would not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR. Rather, for many issue areas, the proposed modifications would reduce impacts set forth in the Draft EIR.

## **2. Background of the Proposed Project**

With the exception of a 1,040-square-foot single-family residence located at 4804 Peach Avenue (northeast corner of Peach Avenue and Camarillo Street), the project site is currently vacant and graded. The 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. Existing landscaping on the project site consists of four non-native elm (*Ulmus* sp.) trees. An approximately 26-foot-high masonry sound wall serves as a barrier between the project site and the elevated I-405 and US-101 freeway interchange.

The project site is designated for Regional Center land uses by the General Plan framework and Regional Commercial by the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan (Community Plan). In addition, the project site is within

the Ventura–Cahuenga Boulevard Corridor Specific Plan (Specific Plan) area and is designated for Regional Commercial land uses by the Specific Plan. The portion of the project site located along east of Peach Avenue is zoned [Q]CR-1L (Limited Commercial), R3-1L (Multiple Dwelling), R1-1L (Single-Family), and [Q]P-1L (Automobile Parking), and the portion of the project site located west of Peach Avenue is zoned R1-1L.

### **3. Areas of Controversy/Issues to be Resolved**

Potential areas of controversy and issues to be resolved by the City include issues known to be of concern to the community and issues raised in the response to the project's Notice of Preparation (NOP). Issues known to be of concern/controversy to the community include traffic, land use compatibility, aesthetics, views, shade/shadow, and construction-related air quality and noise impacts.

### **4. Public Review Process**

The City circulated an NOP for the proposed project on November 12, 2004, for a 30-day comment period. In addition, a public scoping meeting was held on November 30, 2004, to receive written and verbal comments on the scope and content of the Draft EIR. The Initial Study, NOP, and comment letters received during the NOP comment period are included in Appendix A of the Draft EIR.

The Draft EIR was circulated from December 16, 2010, to February 7, 2011. In addition, in response to requests from the public, the comment period was extended to March 7, 2011. Thus, the public review period exceeded the 45-day public comment period required by CEQA.<sup>1</sup> Following the Draft EIR public comment period, this Final EIR has been prepared that includes responses to the comments raised regarding the Draft EIR. As described above, in response to public comments, the proposed project has been modified to include a reduction in the number of residential units and building heights, as well as other modifications that reduce the overall environmental impact of the proposed project.

### **5. Summary of Alternatives**

The Draft EIR examined four alternatives to the proposed project: the No Project/No Build Alternative; the Development in Accordance with Existing Plans/Regional Commercial Use Alternative; the All Residential Use Alternative; and the Alternative Site Alternative.

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<sup>1</sup> *Public Resources Code Section 21091.*

## **Alternative A: No Project/No Build Alternative**

The No Project/No Build Alternative assumes that the proposed project would not be approved and no new development would occur within the project site. Thus, the physical conditions of the project site would remain as they are today. No new buildings would be constructed, the single-family residence located on-site would remain, and the rest of the project site would continue to be vacant and graded.

## **Alternative B: Development in Accordance with Existing Plans/Regional Commercial Use Alternative**

The Development in Accordance with Existing Plans/Regional Commercial Use Alternative represents reasonably foreseeable development based on the site's current General Plan land use designation of Regional Commercial. This assumes that the site would be redeveloped with regional commercial uses, consistent with the Ventura–Cahuenga Boulevard Corridor Specific Plan land use designation for the site. Under this alternative, a maximum of approximately 333,000 square feet of regional commercial uses would be developed on the project site based on the permitted floor area ratio of 1.5:1 per the land use designation.

## **Alternative C: All Residential Use Alternative**

The All Residential Use Alternative includes the residential development of the proposed project but none of the retail development. The alternative would include 500 multi-family residential units with on-site recreation and site amenities that are similar to the proposed project. It is assumed that the site design (e.g., access, building layout, configuration) would be similar to that of the proposed project, with residential development located within the former commercial areas, offering a somewhat lower building profile.

## **Alternative D: Alternative Site Alternative**

The Alternative Site Alternative would consist of 500 multi-family residential units and approximately 55,000 square feet of neighborhood commercial uses. Specific criteria in determining the acceptability of an alternative location include existing land uses and zoning designations in the area that would be consistent with the proposed scale of development and number of residential units.

## **6. Summary of Environmental Impacts and Mitigation Measures**

Section IV of the Draft EIR provides analyses of the potential environmental impacts of the proposed project. Table I-1 on page I-9 provides a summary of the project impacts, mitigation measures, and conclusions by environmental topic as set forth in the Draft EIR. Further discussion of the impacts is also provided below.

**Table I-1  
Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
<b>A. Aesthetics</b>			
<i>Aesthetics/Visual Quality</i>			
–Short-Term Construction	Less Than Significant	None	Less Than Significant
–Operation	Less Than Significant	None	Less Than Significant
Views	Less Than Significant	None	Less Than Significant
Light and Glare	Less Than Significant	None	Less Than Significant
Shading	Less Than Significant	None	Less Than Significant
Consistency with Applicable Policies	Less Than Significant	None	Less Than Significant
<b>B. Air Quality</b>			
<i>Construction</i>			
–Regional Construction Impacts	Significant (cumulative impact also significant)	<p><b>Mitigation Measure B-1:</b> In addition to SCAQMD Rule 403 (Fugitive Dust) requirements, the Project applicant will implement the following measures:</p> <ul style="list-style-type: none"> <li>• Water three times daily or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.</li> <li>• Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;</li> <li>• All trucks hauling dirt, sand, soil, or other loose materials are to be covered;</li> <li>• Replace ground cover in disturbed areas as quickly as possible;</li> <li>• Pave road and road shoulders;</li> <li>• Traffic speeds on all unpaved roads to be reduced to</li> </ul>	Significant and Unavoidable

**Table I-1 (Continued)  
Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		<p>15 mph or less;</p> <ul style="list-style-type: none"> <li>• Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph; and</li> <li>• Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM<sub>10</sub> generation.</li> </ul> <p><b>Mitigation Measure B-2:</b> Streets shall be swept as needed during construction with sweepers using reclaimed water, where available, but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.</p> <p><b>Mitigation Measure B-3:</b> All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.</p> <p><b>Mitigation Measure B-4:</b> General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, all trucks and vehicles will have their engines turned off when not in use or idling will be limited to five (5) minutes or less, to reduce vehicle emissions. Ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449. Construction activities should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.</p> <p><b>Mitigation Measure B-5:</b> To the extent possible, petroleum powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.</p> <p><b>Mitigation Measure B-6:</b> The project representative</p>	

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		<p>shall make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the mass grading phase of project construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided on-site at the time of mobilization of each applicable unit of equipment. Off-road diesel-powered construction equipment shall meet the Tier standards based on the following schedule:<sup>2</sup></p> <ul style="list-style-type: none"> <li>• January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</li> <li>• Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted</li> </ul>	

<sup>2</sup> Construction equipment standards based on the April 1, 2010, to December 31, 2011, schedule have expired and, as such, are no longer applicable to the proposed project. All construction equipment utilized during construction of the proposed project would conform to the standards set forth under the January 1, 2012, to December 31, 2014, and Post-January 1, 2015, schedules, as applicable.

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.	
–Localized Construction Impacts	Significant	See above mitigation measures.	Significant and Unavoidable
–Toxic Air Contaminants	Less Than Significant	None	Less Than Significant
–Odors	Less Than Significant	None	Less Than Significant
<i>Operations</i>			
–Regional Operations Impacts	Significant (cumulative impact also significant)	<p><b>Mitigation Measure B-7:</b> Light-colored roof materials to deflect heat and reduce energy demand for building cooling purposes shall be used.</p> <p><b>Mitigation Measure B-8:</b> Double-paned windows shall be used to reduce thermal loss and reduce energy demand for temperature control purposes.</p> <p><b>Mitigation Measure B-9:</b> The project shall be designed and operated to conserve energy as required by the Southern California Edison, Southern California Gas Company, and/or other appropriate agencies.</p>	Significant and Unavoidable
–Localized Operation Impacts	Less Than Significant	None	Less Than Significant
–Toxic Air Contaminants (on-site and off-site sources)	Potentially Significant	<p><b>Mitigation Measure B-10:</b> The project shall include heating, ventilation and air conditioning (HVAC) control systems that service residential occupancies consistent with the minimum specifications per floor and building location included in Attachment A of Appendix FEIR-D. At a minimum, residential units shall include HVAC control systems with particulate filters that have a minimum efficiency reporting value (MERV) of 15 as</p>	Less Than Significant with Mitigation

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		<p>indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2. The air handling systems shall be maintained on a regular basis per manufacturer's recommendations by a qualified technician employed or contracted by the project proponent or successor. Operation and maintenance of the system shall ensure that it performs in compliance with the manufacturers' specified reporting value.</p> <p><b>Mitigation Measure B-11:</b> To minimize exposure to diesel exhaust and the reentrainment of paved roadway dust, the proposed project shall: (1) install inoperable windows facing the freeway; (2) place actively and passively utilized outdoor areas as far away from the roadway as possible; and (3) include landscaping along the property perimeter nearest the freeway with a dense mixture of shrubs and trees to maximize passive filtration of particulate air contaminants.</p>	
–Odors	Less Than Significant	None	Less Than Significant
–Global Climate Change	Less Than Significant	None	Less Than Significant

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
<b>C. Biological Resources</b>			
Raptor Species	Less Than Significant	<b>Mitigation Measure C-1:</b> If vegetation removal occurs between February 15 and August 31, a biological survey shall be conducted by a qualified biologist prior to the removal of the vegetation to determine if nesting birds are occurring on site. In the event nesting is observed, the biologist shall recommend a buffer area with a specified radius to be established (buffer may range between 50 and 300 feet as determined by the monitoring biologist), within which no disturbance or intrusion shall be allowed until the young had fledged and left the nest or it is determined by the monitoring biologist that the nest has failed. If no nesting is observed, no further action shall be warranted.	Less Than Significant
Protected Trees and Street Trees	Less Than Significant	<b>Mitigation Measure C-2:</b> Prior to the issuance of a grading permit, a plot plan prepared by a reputable tree expert, indicating the location, size, type, and condition of all existing trees on the project site, shall be submitted for approval by the Department of City Planning and the Bureau of Street Services—Street Tree Division. All trees in the public right-of-way shall be treated in accordance with the current Street Tree Division standards and all conditions of approval shall be met.	Less Than Significant
<b>D. Geology/Soils</b>			
Soil Conditions	Less Than Significant	None	Less Than Significant
<b>Seismic Hazards</b>			
–Faulting and Groundshaking	Potentially Significant Without Mitigation	<b>Mitigation Measure D-1:</b> The Applicant or its contractor shall incorporate the recommendations detailed in the geotechnical investigation prepared for the proposed project, as approved by the City of Los Angeles. (Geotechnical recommendations regarding pile or drill caissons, footings, slabs, fill, shoring, retaining walls,	Less Than Significant with Mitigation

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

<b>Environmental Issue</b>	<b>Impact Prior to Mitigation</b>	<b>Mitigation Measures</b>	<b>Conclusion</b>
		and site drainage are provided within the Geotechnical Engineering Investigation (geotechnical report) dated June 6, 2002, and Addendum I, Additional Exploration, dated March 17, 2003, both prepared by Geotechnologies, Inc. provided in Appendix C of the Draft EIR.)	
-Liquefaction	Less Than Significant	None	Less Than Significant
-Inundation by Seiches and Dam Failures	Less Than Significant	None	Less Than Significant
<b>E. Hazards and Hazardous Materials</b>			
Release of Hazardous Materials	Less Than Significant	None	Less Than Significant
Asbestos Containing Materials	Less Than Significant	None	Less Than Significant
Lead-Based Paint	Less Than Significant	None	Less Than Significant
Underground Storage Tanks	Less Than Significant	None	Less Than Significant
Oil and Gas	Less Than Significant	None	Less Than Significant
Groundwater	Less Than Significant	None	Less Than Significant
<b>F. Hydrology and Water Quality</b>			
<i>Construction</i>			
-Hydrology	Less Than Significant	<p><b>Mitigation Measure F-1:</b> The project shall provide on-site storm drain improvements to detain peak storm water flows to the satisfaction of the City of Los Angeles Department of Public Works.</p> <p><b>Mitigation Measure F-2:</b> The project shall comply with the requirements of the applicable NPDES permit for storm water discharge and with all applicable requirements of the RWQCB, EPA and local agencies including the City of Los Angeles regarding water</p>	Less Than Significant

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		<p>quality.</p> <p><b>Mitigation Measure F-3:</b> The project shall implement Best Management Practices (BMPs) to detain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be provided.</p> <p><b>Mitigation Measure F-4:</b> All storm drain inlets and catch basins within the Project area shall be stenciled with prohibitive language (such as “NO DUMPING—DRAINS TO OCEAN”) and/or graphical icons to discourage illegal dumping.</p> <p><b>Mitigation Measure F-5:</b> The legibility of signs and stencils discouraging illegal dumping shall be maintained.</p> <p><b>Mitigation Measure F-6:</b> Materials used on site with the potential to contaminate storm water shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar storm water conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.</p>	
–Water Quality	Less Than Significant	See above mitigation measures.	Less Than Significant
<i>Operation</i>			
–Hydrology	Less Than Significant	See above mitigation measures.	Less Than Significant
–Water Quality	Less Than Significant	See above mitigation measures.	Less Than Significant

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
<b>G. Land Use</b>			
Consistency with Plans and Applicable Policies	Less Than Significant	None	Less Than Significant
Land Use Compatibility	Less Than Significant	None	Less Than Significant
<b>H. Noise</b>			
<i>Construction</i>			
-Noise	Significant	<p><b>Mitigation Measure H-1:</b> A temporary sound barrier, capable of providing a minimum 10 dBA reduction (e.g., solid wood fence) and minimum height of 8 feet, shall be erected along the project's east property line along Sepulveda Boulevard for the entire length of the project site as well as between the project site and the 777 Motor Inn.</p> <p><b>Mitigation Measure H-2:</b> To the extent feasible, construction activities shall be scheduled so as to avoid operating several pieces of heavy equipment simultaneously, which causes high noise levels.</p> <p><b>Mitigation Measure H-3:</b> Engine idling from construction equipment such as bulldozers and haul trucks shall be limited, to the extent feasible. Idling of haul trucks shall be limited to 5 minutes at any given location as established by the South Coast Air Quality Management District. Signs that limit engine idling shall be posted on the project site during construction.</p> <p><b>Mitigation Measure H-4:</b> The construction staging area shall be located as far as feasible from sensitive receptors.</p>	Significant and Unavoidable
-Ground-Borne Vibration	Less Than Significant	None	Less Than Significant

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

<b>Environmental Issue</b>	<b>Impact Prior to Mitigation</b>	<b>Mitigation Measures</b>	<b>Conclusion</b>
<i>Operation</i>			
–Off-Site Roadway (Mobile) Noise	Less Than Significant	None	Less Than Significant
–On-Site Stationary Noise	Less Than Significant	None	Less Than Significant
–Site Compatibility (Proposed Residential Uses)	Potentially Significant Without Mitigation	<p><b>Mitigation Measure H-5:</b> An acoustical analysis of the architectural plans of the proposed residential building façade constructions shall be prepared by a qualified acoustical engineer, prior to issuance of building permits, to ensure that the building construction (i.e., exterior wall, window and door) will provide adequate sound insulation to meet the acceptable interior noise level of 45 dBA CNEL.</p> <p><b>Mitigation Measure H-6:</b> The Applicant shall retain services of an acoustical consulting engineer experienced in mechanical noise analysis and during plan check provide the City with an acoustical report indicating that the project mechanical design meets the City’s noise ordinance (i.e., maximum 5 dBA above ambient noise levels).</p>	Less Than Significant with Mitigation
–Ground-Borne Vibration	Less Than Significant	None	Less Than Significant
<b>I. Population and Housing</b>			
<i>Construction</i>	Less Than Significant	None	Less Than Significant
<i>Operation</i>			
–Population	Less Than Significant	None	Less Than Significant
–Housing	Less Than Significant	None	Less Than Significant
–Employment	Less Than Significant	None	Less Than Significant
–Jobs/Housing Ratio	Less Than Significant	None	Less Than Significant
Consistency with Regulatory Framework	Less Than Significant	None	Less Than Significant

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
<b>J.1. Police Protection</b>			
Construction	Less Than Significant	None	Less Than Significant
Operation	Potentially Significant Without Mitigation	<p><b>Mitigation Measure J-1:</b> Prior to the issuance of the building permit, the Applicant shall consult with the LAPD's Crime Prevention Unit, regarding on-site crime prevention features appropriate for the design of the property. These features may include the following elements:</p> <ul style="list-style-type: none"> <li>• Designing entryways, elevators, lobbies and parking areas with lighting that eliminates areas of concealment;</li> <li>• Eliminating areas of dead space;</li> <li>• Providing solid core doors with deadbolt locks to all residential units and commercial uses; and</li> <li>• Providing parking within an enclosed parking podium that would be internal to the site.</li> </ul> <p><b>Mitigation Measure J-2:</b> Prior to the issuance of any building permits, the Applicant shall provide the commanding officer at the Van Nuys Community Police Station with a diagram of each portion of the property, including access routes and additional information which may facilitate a police response.</p>	Less Than Significant with Mitigation
<b>J.2. Fire Protection</b>			
Construction	Less Than Significant	None	Less Than Significant
<i>Operation</i>			
-Capability of Existing Fire Services	Less Than Significant	<p><b>Mitigation Measure J-3:</b> Project building plans including a plot plan shall be submitted for approval by the Los Angeles Fire Department either prior to the recordation of the final map or the approval of a building permit.</p>	Less Than Significant

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

<b>Environmental Issue</b>	<b>Impact Prior to Mitigation</b>	<b>Mitigation Measures</b>	<b>Conclusion</b>
		<p><b>Mitigation Measure J-4:</b> Prior to the issuance of a building permit, the Applicant shall consult with the Los Angeles Fire Department and design the project to meet on-site fire flow requirements and incorporate fire prevention and suppression features and other life-saving equipment.</p> <p><b>Mitigation Measure J-5:</b> The project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles, unless otherwise approved.</p>	
–Fire Safety, Access, and Fire Flow Requirements	Less Than Significant	See above mitigation measures.	Less Than Significant
–Emergency Response Times	Less Than Significant	See above mitigation measures.	Less Than Significant
<b>J.3. Public Schools</b>			
Public School Facilities and Services	Less Than Significant	<b>Mitigation Measure J-6:</b> Pursuant to California Government Code Section 65995, the Project Applicant shall pay developer fees to Los Angeles Unified School District prior to the issuance of building permits.	Less Than Significant
<b>J.4. Parks and Recreation</b>			
Impacts on Existing Facilities	Less Than Significant	See Mitigation Measure J-7.	Less Than Significant
Consistency with Regulations	Potentially Significant Without Mitigation	<b>Mitigation Measure J-7:</b> In consultation with the City of Los Angeles Department of Recreation and Parks, 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) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value	Less Than Significant with Mitigation

**Table I-1 (Continued)  
Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		to said in-lieu fees.	
<b>J.5. Libraries</b>			
Library Facilities and Services	Less Than Significant	None	Less Than Significant
<b>K. Transportation and Circulation</b>			
<i>Construction</i>	Significant	<p><b>Mitigation Measure K-1:</b> Prohibit parking along the west side of Sepulveda Boulevard from the northern site boundary to Camarillo Street and restripe to provide a southbound right-turn-only lane. For this short-term condition, it is proposed that the restriping be limited to the segment of Sepulveda Boulevard approximately from Camarillo Street to La Maida Street, that the existing southbound left-turn lane approaching Camarillo Street be temporarily reduced in width to 9 feet, and that the proposed southbound right-turn-only lane be 10 feet wide.</p> <p><b>Mitigation Measure K-2:</b> Whenever feasible during construction, sidewalk access along Sepulveda Boulevard and Camarillo Street shall be provided to maintain pedestrian access.</p> <p><b>Mitigation Measure K-3:</b> A Construction Management Plan or Worksite Traffic Control Plan shall be prepared by the Applicant and approved by the Department of Transportation and Department of Public Works and shall contain, at minimum, the following:</p> <ul style="list-style-type: none"> <li>• The name and telephone number of a construction manager who can be reached 24 hours a day;</li> <li>• An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local</li> </ul>	Less Than Significant with Mitigation

**Table I-1 (Continued)  
Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		<p>police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the proposed project area and maps showing access to and within the area and to adjacent properties;</p> <ul style="list-style-type: none"> <li>• Procedures for the training of traffic safety personnel (flaggers) to assist in emergency response; and</li> <li>• The location, times, and estimated duration of any roadway or sidewalk closures, traffic detours, use of protective devices, warning signs, and queuing areas.</li> <li>• Configure construction parking to minimize traffic interference;</li> <li>• Provide dedicated turn lanes for movement of construction trucks and equipment, where space is available and would not result in a safety concern for pedestrians and motorists; and</li> <li>• Reroute construction trucks away from congested streets or sensitive receptor areas, where the resultant trip length would not substantially increase.</li> </ul> <p><b>Mitigation Measure K-4:</b> Flaggers shall be provided as necessary to minimize impact to traffic flow and to ensure safe movement into and out of the project site.</p> <p><b>Mitigation Measure K-5:</b> Heavy-duty construction trucks shall arrive at the site no earlier than 7:00 A.M. and depart no later than 3:30 P.M.</p> <p><b>Mitigation Measure K-6:</b> Construction vehicles shall not be permitted to queue where they would interfere with traffic movement or block access to adjacent businesses or residences.</p> <p><b>Mitigation Measure K-7:</b> All construction-related vehicles shall be parked on-site or in off-site parking</p>	

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		facilities, pursuant to a Temporary Parking Plan. On-street parking of construction-related vehicles shall be prohibited on nearby local streets.	
<i>Operation</i>			
–Study Intersections	Significant (including cumulative impacts)	<p><b>Mitigation Measure K-8:</b> Camarillo Street and Sepulveda Boulevard: Dedicate an additional 6 feet and widen by 4 feet along the north side of Camarillo Street between Sepulveda Boulevard and the westerly site boundary. In order to implement this measure, on-street parking along both sides of this segment of Camarillo Street shall be removed and this leg of the intersection shall be restriped to provide an eastbound left-turn only lane, shared eastbound through and left-turn lane, and eastbound right-turn only lane. Modify the existing traffic signal to install eastbound protected-permissive phasing. In addition, on-street parking shall be removed during the A.M. peak period (approximately 7:00 A.M. to 10:00 A.M.) along the west side of Sepulveda Boulevard from the northerly site boundary to Galleria Gateway. The southbound approach shall be restriped to provide a fourth southbound through lane from north of Camarillo Street to north of Ventura Boulevard during the A.M. peak period.</p> <p><b>Mitigation Measure K-9:</b> Ventura Boulevard/405 Freeway Southbound On-Ramp—Sherman Oaks Avenue: Widen by 5 feet the south side of Ventura Boulevard from Sherman Oaks Avenue to approximately 270 feet westerly, as measured from the centerline of Sherman Oaks Avenue. Additionally, widen by 2 feet both sides of Ventura Boulevard from US-101 Freeway eastbound off-ramp/I-405 Freeway southbound on-ramp—Sherman Oaks Avenue to approximately 230 feet easterly as measured from the centerlines of the freeway ramps and Sherman Oaks Avenue; and restripe</p>	Significant and Unavoidable

**Table I-1 (Continued)  
Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		<p>to provide an exclusive westbound right-turn-only lane at the intersection. Modify the existing traffic signal to accommodate restriping.</p> <p><b>Mitigation Measure K-10:</b> Ventura Boulevard and Van Nuys Boulevard: Restripe to add a second southbound left-turn lane at Ventura Boulevard. Modify the existing traffic signal to install southbound protected left-turn phasing.</p> <p><b>Mitigation Measure K-11:</b> Ventura Boulevard and Beverly Glen Boulevard: Widen by 3 feet the south side of Ventura Boulevard from Beverly Glen Boulevard to approximately 160 feet westerly, as measured from the centerline of Beverly Glen Boulevard. Restrict parking on south side of Ventura Boulevard and restripe the eastbound approach to provide an eastbound right-turn-only lane at Beverly Glen Boulevard.</p> <p><b>Mitigation Measure K-12:</b> Ventura Boulevard and Sepulveda Boulevard—Convert the southbound optional through-right-turn lane on Sepulveda Boulevard at Ventura Boulevard to a through lane.</p> <p><b>Mitigation Measure K-13:</b> US-101 Freeway Eastbound On-Ramp &amp; Sepulveda Boulevard: Install a new traffic signal to control this intersection, including southbound left-turn phasing and the ATSAC/ATCS upgrade. This signal would provide improved capacity and reduce conflicts between the southbound left-turning traffic accessing the on-ramp and the heavy northbound through traffic on Sepulveda Boulevard.</p> <p><b>Mitigation Measure K-14:</b> Ventura Boulevard &amp; Haskell Avenue (North): Widen the north side of Ventura Boulevard from the north leg of Haskell Avenue to approximately 190 feet easterly, as measured from the centerline of that leg, and restripe to provide a</p>	

**Table I-1 (Continued)  
Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		<p>westbound right-turn-only lane.</p> <p><b>Mitigation Measure K-15:</b> The project applicant will contribute \$300,000 to a fund for the identification and implementation of local parking, transportation and circulation improvements in the following areas: the area bounded clockwise by Haskell Avenue beginning at Valley Vista Boulevard and extending northerly to SR-101 (on the west), from that point extending easterly along SR-101 to I-405, and from that point extending northerly along I-405 freeway to westernmost prolongation of Magnolia Boulevard, and from that point extending easterly on Magnolia Boulevard prolongation to Kester Avenue, and from that point extending southerly along Kester Avenue to the prolongation of Moorpark Street, from that point extending easterly along the prolongation of Moorpark Street to Beverly Glen Boulevard-Tyrone Avenue, from that point extending southerly along Beverly Glen Boulevard-Tyrone Avenue to Dickens Street, from that point extending westerly along Dickens Street to Kester Avenue, from that point extending southerly along Kester Avenue to Valley Vista Boulevard, and from that point extending westerly back to Haskell Avenue. The \$300,000 payment will be guaranteed through cash, bond or irrevocable letter of credit, payable to DOT. The fund will be used for measures that include but are not limited to parking improvements intended to increase parking availability, reduce search times and relieve traffic congestion; neighborhood traffic calming; transit-related improvements and amenities; bicycle-related improvements and amenities; pedestrian-related improvements and amenities; and streetscape improvements and amenities.</p> <p><b>Mitigation Measure K-16:</b> Bicycle rack parking that is</p>	

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		secure, convenient, and easily accessible, shall be added on-site and within the public right of way with the approval of Bureau of Street Services, Department of Public Works through their A Permit process. The copy of the A Permit will be submitted to Department of Building and Safety prior to approval of Certificate of Occupancy. Bicycle parking spaces shall be provided at the rate of two percent of the number of automobile parking spaces required for non-residential uses.	
–Freeway Segments	Less Than Significant	None	Less Than Significant
–Public Transit	Less Than Significant	None	Less Than Significant
–Parking	Less Than Significant	None	Less Than Significant
–Access	Significant	See Mitigation Measure K-8.	Less Than Significant with Mitigation
–Pedestrian/Bicycle	Less Than Significant	See Mitigation Measure K-17.	Less Than Significant
–Consistency with Plans	Less Than Significant	None	Less Than Significant
<b>L.1. Water Supply</b>			
Construction	Less Than Significant	None	Less Than Significant
<i>Operation</i>			
	Less Than Significant	<p><b>Mitigation Measure L-1:</b> For the commercial uses on the project site, the applicant shall (unless otherwise required and to the satisfaction of the Department of Building and Safety):</p> <ul style="list-style-type: none"> <li>• Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.</li> </ul>	Less Than Significant

**Table I-1 (Continued)  
Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		<ul style="list-style-type: none"> <li>• Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.</li> </ul> <p><b>Mitigation Measure L-2:</b> Unless otherwise required, all restroom faucets for the commercial uses on the project site shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.</p> <p><b>Mitigation Measure L-3:</b> For the residential uses on the project site, the applicant shall (unless otherwise required and to the satisfaction of the Department of Building and Safety):</p> <ul style="list-style-type: none"> <li>• Install a demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwelling(s).</li> <li>• Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.</li> <li>• Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.</li> <li>• Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.</li> </ul> <p><b>Mitigation Measure L-4:</b> In addition to the requirements</p>	

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

Environmental Issue	Impact Prior to Mitigation	Mitigation Measures	Conclusion
		<p>of the Landscape Ordinance, the landscape plan for the proposed project shall incorporate the following:</p> <ul style="list-style-type: none"> <li>• Weather-based irrigation controller with rain shutoff;</li> <li>• Matched precipitation (flow) rates for sprinkler heads;</li> <li>• Drip/microspray/subsurface irrigation where appropriate;</li> <li>• Minimum irrigation system distribution uniformity of 75 percent;</li> <li>• Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials;</li> <li>• Use of landscape contouring to minimize precipitation runoff; and</li> <li>• A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 square feet and greater, to the satisfaction of the Department of Building and Safety.</li> </ul> <p><b>Mitigation Measure L-5:</b> Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment; e.g., vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)</p>	
<b>L.2. Wastewater</b>			
Construction	Less Than Significant	None	Less Than Significant
<i>Operation</i>			
–Wastewater Generation	Less Than Significant	None	Less Than Significant

**Table I-1 (Continued)**  
**Summary of the Project Impacts**

<b>Environmental Issue</b>	<b>Impact Prior to Mitigation</b>	<b>Mitigation Measures</b>	<b>Conclusion</b>
and Infrastructure			
–Wastewater Treatment	Less Than Significant	None	Less Than Significant
<b>L.3. Solid Waste</b>			
Construction	Less Than Significant (with significant cumulative impacts)	<p><b>Mitigation Measure L-6:</b> The construction contractor shall only contract for waste disposal services with a company that recycles demolition and construction-related wastes. The contract specifying recycled waste service shall be presented to the Department of Building and Safety prior to approval of the demolition and building permits for the proposed project.</p> <p><b>Mitigation Measure L-7:</b> To facilitate on-site separation and recycling of demolition and construction-related wastes, the construction contractor should provide temporary waste separation bins on-site during demolition and construction of the proposed project.</p>	Less Than Significant with Mitigation
Operation	Less Than Significant (with significant cumulative impacts)	<p><b>Mitigation Measure L-8:</b> Recycling bins shall be provided at appropriate locations on the project site to promote recycling of paper, metal, glass, and other recyclable materials.</p> <p><b>Mitigation Measure L-9:</b> All residential and commercial uses established within the project site shall be permanently provided with clearly marked, durable, source sorted recyclable bins at all times to facilitate the separation and deposit of recyclable materials.</p>	Less Than Significant with Mitigation
<hr/> <p>Source: Matrix Environmental, 2012.</p>			

## A. Aesthetics

### (1) Environmental Impacts

#### *(a) Aesthetics/Visual Quality*

##### *(i) Short-Term Construction*

During construction of the proposed project, the project site's visual appearance would be altered due to site preparation activities and the construction of project buildings. Additionally, construction equipment and materials as well as temporary facilities, may be located on-site. Construction activities for the project would be visible to occupants of adjacent land uses, pedestrians and motorists on Sepulveda Boulevard and Camarillo Street, and motorists on the I-405 and US-101 Freeways. However, temporary fencing would be placed along the periphery of the project site to screen views of the construction activity from the ground level.

Project construction activities may require the removal of several mature street trees bordering the site along Sepulveda Boulevard and Camarillo Street, thereby temporarily reducing the visual quality of these streets adjacent to the project site. However, the project's proposed landscaping plan would replace all street trees that would be removed and would incorporate street frontage improvements such as decorative paving on the sidewalks and the planting of new trees, shrubs, and turf. Since the loss of street trees would be temporary and such trees would ultimately be replaced, the removal of street trees during construction would not result in a significant impact.

Visible construction activities would also include truck traffic to and from the site. However, the impact of construction trucking would not significantly impact the visual quality of the area, since major roadways are intended to accommodate a range of vehicle types, including trucks incidental to construction and deliveries. Furthermore, construction-related visual impacts would only occur on a short-term basis. The project would not substantially alter, degrade or eliminate the existing visual character of the area. Thus, construction-related visual quality impacts would be less than significant.

##### *(ii) Operation*

The project site is currently graded and vacant with the exception of a single-family residence located at 4804 Peach Avenue. Existing landscaping on-site consists of four non-native elm trees. The existing structure on the project site is an aging residence, which does not possess notable aesthetic features nor contribute to a high visual quality of the surrounding area. Implementation of the proposed project would remove and replace

the existing on-site residence with a series of six-story, 100-foot-high buildings and associated landscape improvements.<sup>3</sup> These new structures would be designed and oriented to provide variations in massing throughout the project site. More specifically, the proposed residential buildings would provide a contemporary architectural style, exhibiting multi-faceted massing building forms, roof forms, differing elevations, and a mix of colors reminiscent of Italian villages. In addition, signage would be integrated into the architecture of the project buildings and rooftop equipment would be screened from view from adjacent uses.

Although the project would develop new buildings up to 100 feet in height, the proposed building heights would not present a sharp contrast with surrounding developments, particularly given the diversity of building heights in the area. Surrounding development consists predominantly of low- to mid-rise buildings with high-rise structures present along Sepulveda Boulevard and throughout the Ventura Boulevard commercial corridor. With such variations in building heights in the surrounding locale, the project's building heights would visually blend into the urban environment.<sup>4</sup> The proposed project would be only marginally taller than the adjacent parking and residential structures to the immediate south, and substantially shorter than the office tower further to the south. Furthermore, although the project would be taller than the one to three story residential and commercial uses to the east, project building heights would generally be buffered by the six lanes of Sepulveda Boulevard. Lastly, the elevated I-405 and US-101 interchange, would buffer the project's building heights from off-site land uses located to the west and north. Overall, the project would contribute to the diversity of building heights and would not detract from the existing valued aesthetic quality of the project area. Thus, project implementation would alter the existing visual character of the project site from an underutilized property with blighting influences (i.e., graffiti) to a new, contemporary development providing a cohesive mix of residential and neighborhood-serving commercial uses.

The residential buildings would be arranged around a main central courtyard, with gardens, on the plaza level, creating new open space areas and passive recreational uses for the enjoyment of project residents. The courtyards and gardens would be articulated at the ground level by an outdoor piazzetta and stairs leading up to the plaza level (i.e., podium) above. A colonnade along Sepulveda Boulevard would be included to enhance

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<sup>3</sup> *In response to public comments, the Applicant has proposed to reduce the 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.*

<sup>4</sup> *Ibid.*

the architectural façade. Project implementation would require the removal of the four existing non-native on-site trees and street trees; however, the project would introduce new trees, and other landscaping elements such as plantings and groundcover to create an aesthetically attractive setting. To further increase the visual quality of the proposed project, the landscaped gardens would extend from the interior residential level to Sepulveda Boulevard so they are visible to the public. Trees and appropriate landscaping would also be provided along Sepulveda Boulevard and Camarillo Street to foster a pedestrian-friendly environment. Street trees removed along Sepulveda Boulevard and Camarillo Street would be replaced in accordance with City requirements.

Overall, the project would not alter, degrade, or eliminate the existing valued visual character of the area. Specifically, the project would not remove or alter existing features or elements that substantially contribute to the area's valued visual character nor convert a large area of visible natural open space. Furthermore, the project would not introduce inappropriate contrast between the proposed project elements and existing features that embody the surrounding area's valued aesthetic image. Therefore, the project would not substantially detract from the existing style or image of the Sherman Oaks community. Rather, the project would provide an aesthetically integrated site with open space and would contribute to the area's appearance. Project impacts on visual quality would be less than significant.

*(b) Views*

The project site currently does not contain any scenic resources. Views of the project site consist of a primarily vacant and graded site with one aging single family residence. Project buildings would offer variations in colors, massing, and roof forms, thus creating visual interest. Although subject to interpretation, views of the project site would generally be considered improved due to the development of new, architecturally articulated structures, an enhanced pedestrian environment, and abundant landscaping.

Due to the site's relatively flat topography, its adjacency to the elevated I-405 and US-101 interchange, and the presence of existing low- to mid-rise buildings along Sepulveda Boulevard and Camarillo Street, the project site does not offer any valued views or occupy a substantial portion of any scenic viewshed. Additionally, most long-range views in the surrounding project area are obstructed or at least partially obstructed by existing development and/or the surrounding freeway infrastructure. Views are thus, limited to the immediate urban built environment. Therefore, development of the project with buildings up to 100 feet in height would not result in the obstruction of valued views on-site or off-site since such views are not currently available.

The project would not have a substantial effect on a scenic vista or alter views from a designated scenic highway, and would not substantially obstruct an existing view of a

prominent, valued visual resource. Therefore, project impacts to views would be less than significant.

*(c) Light and Glare*

Due to the heavily urbanized character of the area, particularly along the active commercial corridor of Sepulveda Boulevard, the project area exhibits medium to high ambient nighttime lighting levels. The proposed project would introduce new illumination sources including interior and exterior lighting for wayfinding, security, parking, signage, architectural highlighting, and landscaping purposes. Lighting introduced along the eastern façade of the proposed buildings on Sepulveda Boulevard would be designed to minimize light spillover to residences located across Sepulveda Boulevard through the use of shielding, cut-off fixtures, or similar measures. In addition, all exterior project lighting would comply with applicable regulations contained within the LAMC and the Sherman Oaks Streetscape Plan and Design Guidelines. Any streetlights installed along the street frontages would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties. Furthermore, given the degree of ambient lighting that currently exists in the project area, the project's proposed lighting levels would not substantially increase the existing ambient nighttime light levels.

Glare is currently generated by existing buildings, vehicle windows, and other reflective surfaces in the area. The façades of the buildings would include plaster siding and would not contain highly reflective materials. Windows consisting of low-reflectivity glass would be utilized to minimize off-site glare. As vehicular parking on the site would be enclosed within a parking facility, automobile-related glare impacts to any off-site sensitive uses would not occur. Thus, any potential glare effects would be limited.

Overall, the proposed project would not create a new source of substantial light or glare that would adversely affect adjacent light-sensitive areas or a new source of glare that would substantially affect day or nighttime views in the area. Therefore, project impacts associated with light and glare would be less than significant.

*(d) Shading*

The nearest shadow sensitive receptors to the project site are the residential uses located to the east of the project site across Sepulveda Boulevard. Worst-case scenario shade/shadow simulations for the winter solstice, spring equinox, summer solstice, and fall equinox indicate that the greatest off-site shading would occur during the winter solstice. However, project shading on sensitive uses during the winter would not occur for more than the significance threshold of three hours between the time frame of 9:00 A.M. and 3:00 P.M. During the spring equinox and summer solstice, respectively, shading on the residential

uses to the east would be very limited. During the fall equinox, noticeable shading would be experienced by the first row of residential properties to the east between the hours of 2:00 P.M. and 5:00 P.M. However, the project's shading impacts on shadow sensitive uses during the fall would not occur for more than the significance threshold of four hours between the timeframe of 9:00 A.M. and 5:00 P.M. In summary, based on the shading simulations for the four seasons which are provided in Figures IV.A-11 through IV.A-14 in Section IV.A, Aesthetics, the project would result in less than significant shading impacts.

*(e) Consistency with Applicable Policies*

The design of the project would generally be consistent with the Community Plan. The project would also be consistent with applicable design policies of the Sherman Oaks Streetscape Plan and Design Guidelines. With regard to consistency with the Specific Plan, the project would require Specific Plan exceptions to: (1) exceed the 1.5:1 FAR to allow a project with a 3.3:1 FAR; (2) exceed the permitted height limit of 75 feet to develop buildings up to 100 feet in height; (3) eliminate the maximum lot coverage requirement of 75 percent; (4) reduce the required landscape buffer of 10 feet around the surface perimeter of parking structures to 5 feet; and (5) reduce the required 18-inch setback along the front lot line.<sup>5</sup> The Specific Plan includes express provisions for granting exceptions to the Specific Plan. Therefore, seeking exceptions to the Specific Plan would not be inconsistent with the Specific Plan. Additionally, granting of the Specific Plan exceptions would be consistent with the Specific Plan's procedural requirements.

Prior to the granting of the Specific Plan exceptions, the floor area, lot coverage, height limits, and front yard setback elements of the proposed project would be inconsistent with the associated requirements of the Specific Plan. However, with the granting of the Specific Plan exceptions, the project would be consistent with the Specific Plan.

Based on the above, with the granting of the aforementioned Specific Plan exceptions, implementation of the proposed project would not conflict with existing regulations or applicable plans addressing aesthetics. Therefore, with the granting of the

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<sup>5</sup> *With the proposed reduction in residential units and commercial uses proposed by the Applicant, the proposed project's floor area ratio of 3.3:1 would be reduced to 2.75:1. In addition, the Applicant has modified the site plan to fully enclose the parking structure along Camarillo Street. With this modification the request to reduce the required landscape buffer of 10 feet around the surface perimeter of parking structures to five feet would be eliminated. Additionally, the Applicant has proposed to modify the site plan to include 18-inch setbacks along Camarillo Street and along portions of Sepulveda Boulevard. With this modification, the request to reduce the required setback would be eliminated. The Applicant is also requesting an exception from Specific Plan Section 7.A.2.a to exceed the front yard setback along a portion of the Sepulveda Boulevard frontage to accommodate an expanded publicly accessible ground level plaza. For additional proposed revisions to the project's discretionary actions, refer to Section II, Corrections and Additions, of this Final EIR.*

aforementioned Specific Plan exceptions, project aesthetic impacts relative to consistency with applicable regulations or plans would be less than significant.

## (2) Cumulative Impacts

The cumulative analysis of aesthetics, views, light and glare, and shading considered 51 related projects. Similar to the proposed project, the related projects consist of infill development projects located in already urbanized areas. Of the related projects, the closest related project is Related Project No. 23, a mixed-use residential and commercial project located at 15212–15222 Ventura Boulevard located approximately 0.30 mile to the southeast of the project site. This related project would also be subject to the design standards and regulations of the Community Plan, Specific Plan, and Sherman Oaks Streetscape Plan and Design Guidelines. Therefore, it is not expected that this related project would remove or alter aesthetic elements that contribute to the valued character of the surrounding area or would contrast with the existing visual environment. Development of the other related projects would not cause cumulative aesthetic impacts as these related projects are not visible from the project area due to either distance and/or existing intervening development.

With regard to views, only Related Project No. 23 is located within the same viewshed as the project (i.e., along Sepulveda Boulevard) so as to contribute to cumulative impacts on views. However, valued views in the project area are not currently available due to existing intervening development. Therefore, development of Related Project No. 23 and the proposed project would not result in a significant impact on valued views.

Development of the proposed project as well as the other related projects would cumulatively introduce new or expanded sources of artificial light. As the project area is located in a highly urbanized area, the additional artificial light sources introduced by the related projects and the proposed project would not significantly alter the existing medium-high to high lighting environment. With regard to glare, it is anticipated that Related Project No. 23 within the vicinity of the project site would be subject to discretionary review to ensure that building materials to be utilized would not create significant glare impacts. Due to the distance of the related projects from the project, the lighting and glare of the project and these other related projects would not exceed the established thresholds of significance. As such, cumulative light and glare impacts are concluded to be less than significant.

None of the identified 51 related projects are located adjacent to the project site or within close proximity to the project site such that shading on the same sensitive uses would occur. Therefore, no cumulative shade/shadow impacts would occur relative to shadow sensitive uses.

### (3) Mitigation Measures

As the proposed project is not anticipated to result in any significant impacts related to aesthetics, views, light and glare, or shading, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Impacts related to aesthetics, views, light and glare, and shading would be less than significant. Therefore, no mitigation measures would be required.

## **B. Air Quality**

### (1) Environmental Impacts

#### *(a) Construction*

#### *(i) Regional Construction Impacts*

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the project site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily particulate matter (PM) and nitrogen oxides (NO<sub>x</sub>), would result from the use of construction equipment such as dozers, loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Project construction would require approximately 165,000 cubic yards of grading and soil export. Grading and site preparation for the proposed project would require the removal of the existing single-family residence. Construction would require approximately 20 to 23 months.

Construction-related daily maximum regional construction emissions would not exceed the South Coast Air Quality Management District (SCAQMD) daily significance thresholds for VOC, PM<sub>10</sub>, PM<sub>2.5</sub>, carbon monoxide (CO), or sulfur dioxide (SO<sub>x</sub>). However, NO<sub>x</sub> emissions would exceed the SCAQMD daily significance threshold during the site grading phase. Thus, regional construction emissions would result in a significant short-term air quality impact.

*(ii) Localized Construction Impacts*

Maximum localized construction emissions for off-site sensitive receptors would not exceed the localized screening thresholds for CO. However, localized NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions would exceed the applicable screening-level LST. Based on the dispersion modeling, NO<sub>x</sub> and PM<sub>10</sub> localized impacts would exceed the SCAQMD recommended thresholds. Therefore, with respect to localized emissions from construction activities, impacts would be significant and mitigation would be required.

*(iii) Toxic Air Contaminants*

The greatest potential for toxic air contaminants (TAC) emissions during construction would be related to diesel particulate emissions associated with heavy equipment operations for grading and excavation activities. The proposed project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. In addition, there would be no residual emissions after construction and corresponding individual cancer risk. As such, project-related toxic emission impacts during construction would be less than significant.

*(iv) Odors*

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors. Therefore, no construction-related odor impacts would occur and no mitigation measures would be required.

*(v) Construction Greenhouse Gas Impacts*

Construction emissions represent an episodic, temporary source of Greenhouse Gas (GHG) emissions. Emissions are associated with the operation of construction equipment and the disposal of construction waste. All GHG emissions were calculated on an annual basis as recommended by the California Climate Action Registry (CCAR) General Reporting Protocol (GRP). Maximum annual GHG emissions would represent approximately 0.0002 percent of California Air Resource Board's (CARB) estimated 2006 State-wide inventory, the latest year for which data are available. The GHG emissions estimates conservatively do not take into account the implementation of construction mitigation measures and requirements that will reduce GHG emissions. The construction mitigation measures and regulatory requirements, include requiring construction vehicles to meet strict emission standards and limiting construction vehicle idling. The implementation of these construction "best management practices" would reduce energy consumption and thus GHG emissions would represent an improvement above "business as usual." Accordingly, the project is consistent with the State's strategy to reduce GHG emissions.

*(b) Operations**(i) Regional Operation Impacts*

Regional air pollutant emissions associated with proposed project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) are classified by the SCAQMD as regional stationary source emissions. Electricity is considered an area source since it is produced at various locations within, as well as outside of, the Basin. Since it is not possible to isolate where electricity is produced, these emissions are conservatively considered to occur within the Basin and are regional in nature. Criteria pollutant emissions associated with the production and consumption of energy were calculated using emission factors from the SCAQMD's CEQA Air Quality Handbook (Appendix to Chapter 9).

Mobile-source emissions were calculated using the URBEMIS 2007 emissions inventory model, which multiplies an estimate of the increase in daily VMT by applicable EMFAC2007 emissions factors. Based on the model for calculating regional emissions, the increase in regional emissions resulting from operation of the project are expected to exceed the SCAQMD regional thresholds for VOC and NO<sub>x</sub>. Therefore, regional operational emissions would result in a significant air quality impact.

*(ii) Localized Operation Impacts*

Project-generated traffic volumes are forecasted to have a negligible effect on the projected 1-hour and 8-hour CO concentrations at the intersections studied. Since a significant impact would not occur at the intersections operating at the highest V/C ratio, no significant impacts would occur at any other analyzed roadway intersection as a result of project-generated traffic volumes. Thus, the proposed project would not cause any new or exacerbate any existing CO hotspots, and, as a result, impacts related to localized mobile-source CO emissions would be less than significant.

A freeway CO analysis was completed to ascertain potential impacts to the project site from the US-101/I-405 interchange. Sensitive receptors on the project site would be exposed to 1-hour and 8-hour CO levels of 7.4 and 7.0 ppm respectively. These levels are below the 1-hour and 8-hour CO standards and, therefore, the US-101 and the I-405 would not cause a local CO exceedance at the project site.

The proposed project may include the installation and operation of diesel-fired generators for emergency power generation. Compliance with SCAQMD Rules and Regulations regarding stationary-source combustion equipment would ensure that

contributions to localized PM<sub>10</sub> concentrations remain below the 2.5 µg/m<sup>3</sup> significance threshold. As such, any potential impacts would be less than significant.

*(iii) Toxic Air Contaminants*

(A) On-Site Sources

The greatest potential for TAC emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. The primary sources of potential air toxics associated with proposed project operations include diesel PM<sub>10</sub> from delivery trucks (e.g., truck traffic on local streets and on-site truck idling) and emergency backup generators. Potential localized air toxic impacts from on-site sources of diesel particulate emissions would be minimal since the proposed uses are not typically associated with heavy-duty trucks trips to the site. However, in the event that a small number of trucks access the project site, they would be required to limit idling to 5 minutes while on-site. Based on the limited activity of the toxic air contaminant sources, the proposed project would not warrant the need for a health risk assessment associated with on-site activities, and, in this regard, potential air toxic impacts would be less than significant.

Typical sources of acutely and chronically hazardous toxic air contaminants include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. The proposed project would not include any of these potential sources, although minimal emissions may result from the use of consumer products. As such, the proposed project would not release substantial amounts of toxic contaminants, and no significant impacts on human health would occur. Based on the limited activity of the toxic air contaminant sources, the proposed project does not warrant the need for a health risk assessment, and potential air toxic impacts would be less than significant.

(B) Off-Site Sources

For carcinogenic exposures, the summation of risk for the maximum exposed residential receptor totaled 1.1E-04 (1.1 in ten thousand) for the 30-year and 3.3E-05 (3.3 in one hundred thousand) for the 9-year exposure scenarios. The project would result in locating sensitive receptors within an area of cancer risk in excess of the SCAQMD significance threshold of 10 in one million and, therefore, the project would result in a significant impact without incorporation of mitigation measures. Particulate emissions from trucks and related diesel fueled vehicles contributed to more than 95 percent of the identified risk value.

To quantify non-carcinogenic impacts, the hazard index approach was used. The approach assumes that chronic sub-threshold exposures adversely affect a specific organ

or organ system (toxicological endpoint). For each discrete chemical exposure, target organs presented in regulatory guidance were utilized. To calculate the hazard index, each chemical's concentration or dose is divided by the appropriate toxicity value. For compounds affecting the same toxicological endpoint, this ratio is summed. Where the total is equal to or exceeds one, a health hazard is presumed to exist. The analysis for the proposed project resulted in a chronic hazard index for the maximum exposed receptors of 0.2, which is approximately 13 percent of the SCAQMD recommended threshold. For acute exposures, the hazard indices for the 1-hour and 8-hour averaging times did not exceed 1.0. Therefore, non-cancer health risks are not considered significant.

For criteria pollutants, the assessment revealed that PM<sub>10</sub> emissions generated from the adjacent freeway would result in PM<sub>10</sub> concentrations at the maximum exposed residential receptor of 51.72 µg/m<sup>3</sup> and 22.68 µg/m<sup>3</sup> for the 24-hour and annual averaging times, respectively. These values exceed the SCAQMD's PM<sub>10</sub> significance thresholds for the 24-hour averaging time of 2.5 µg/m<sup>3</sup> and the annual averaging time of 1.0 µg/m<sup>3</sup> without incorporation of mitigation measures. For PM<sub>2.5</sub>, a maximum 24-hour average concentration of 9.2 µg/m<sup>3</sup> was predicted. This value also exceeds the SCAQMD's PM<sub>2.5</sub> significance threshold of 2.5 µg/m<sup>3</sup> and warrants mitigation. For CO, the maximum predicted 1-hour concentration of 0.61 parts per million (ppm) and 8-hour value of 0.47 ppm, when added to existing background levels, do not cause an exceedance of the ambient air quality standards. For NO<sub>2</sub>, a maximum 1-hour concentration of 0.08 ppm was predicted. This concentration, when added to existing background levels, would also not cause an exceedance of the ambient air quality standards.

*(iv) Odors*

The proposed project does not include any uses identified by the SCAQMD as being associated with odors. Thus, potential odor impacts would be less than significant.

*(v) Global Climate Change*

The proposed project contains project features that would reduce the project's emissions profile and would represent improvements above what can be considered "business as usual." In addition, the very nature of the project, urban infill located in a transit rich area, further improves the project's GHG reducing potential. The project would be consistent with the goals set forth in AB32, as well as in CARB's scoping plan. The project's GHG emissions reductions compared to the BAU scenario constitute an equivalent or larger break from "business-as-usual" than has been determined by CARB to be necessary to meet Assembly Bill 32's goals. Therefore, the proposed project will not have a significant impact on the environment due to its greenhouse gas emissions.

*(vi) SCAQMD Handbook Policy Analysis*

While development of the project would result in short-term regional impacts, project development would not have a long-term impact on the region's ability to meet State and federal air quality standards. The project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. Also, the project would be consistent with the goals and policies of the Air Quality Management Plan (AQMP) for control of fugitive dust. The project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

*(vii) City of Los Angeles Policies*

It is concluded that the proposed project would be consistent with City of Los Angeles air quality policies as it implements the air quality goals and policies set forth in the City's General Plan. Development of the proposed project at the proposed site location offers the opportunity to provide residential uses within a highly urbanized regional employment center and adjacent to a regional shopping center. The project would support the reduction of air emissions via its use of existing infrastructure, proximity to existing regional and local transit facilities, the provision of pedestrian-scale street frontages, and location near existing commercial uses that would meet many of the needs of the project's future residents.

Overall, no significant impacts would occur as a result of project development with respect to compatibility with applicable air quality policies as set forth in the City's General Plan Air Quality Element.

## (2) Mitigation Measures

*(a) Construction*

**Mitigation Measure B-1:** In addition to SCAQMD Rule 403 (Fugitive Dust) requirements, the Project applicant will implement the following measures:

- Water three times daily or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;

- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Replace ground cover in disturbed areas as quickly as possible;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph; and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

**Mitigation Measure B-2:** Streets shall be swept as needed during construction with sweepers using reclaimed water, where available, but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.

**Mitigation Measure B-3:** All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

**Mitigation Measure B-4:** General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, all trucks and vehicles will have their engines turned off when not in use or idling will be limited to five (5) minutes or less, to reduce vehicle emissions. Ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449. Construction activities should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

**Mitigation Measure B-5:** To the extent possible, petroleum powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.

**Mitigation Measure B-6:** The project representative shall make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the mass grading phase of project construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided on-site at the time of mobilization of each applicable unit of equipment. Off-road diesel-

powered construction equipment shall meet the Tier standards based on the following schedule:<sup>6</sup>

- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

*(b) Operation*

**Mitigation Measure B-7:** Light-colored roof materials to deflect heat and reduce energy demand for building cooling purposes shall be used.

**Mitigation Measure B-8:** Double-paned windows shall be used to reduce thermal loss and reduce energy demand for temperature control purposes.

**Mitigation Measure B-9:** The project shall be designed and operated to conserve energy as required by the Southern California Edison, Southern California Gas Company, and/or other appropriate agencies.

**Mitigation Measure B-10:** The project shall include heating, ventilation and air conditioning (HVAC) control systems that service residential occupancies consistent with the minimum specifications per floor and building location included in Attachment A of Appendix FEIR-D. At a minimum, residential units shall include HVAC control systems with particulate filters that have a minimum efficiency reporting value (MERV) of 15 as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2. The air handling systems shall be maintained on a regular basis per manufacturer's recommendations by a qualified technician

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<sup>6</sup> Construction equipment standards based on the April 1, 2010, to December 31, 2011, schedule have expired and, as such, are no longer applicable to the proposed project. All construction equipment utilized during construction of the proposed project would conform to the standards set forth under the January 1, 2012, to December 31, 2014, and Post-January 1, 2015, schedules, as applicable.

employed or contracted by the project proponent or successor. Operation and maintenance of the system shall ensure that it performs in compliance with the manufacturers' specified minimum reporting value.

**Mitigation Measure B-11:** To minimize exposure to diesel exhaust and the reentrainment of paved roadway dust, the proposed project shall: (1) install inoperable windows facing the freeway; (2) place actively and passively utilized outdoor areas as far away from the roadway as possible; and (3) include landscaping along the property perimeter nearest the freeway with a dense mixture of shrubs and trees to maximize passive filtration of particulate air contaminants.

### (3) Level of Significance After Mitigation

#### *(a) Construction*

Regional construction activities would still exceed the SCAQMD daily emission thresholds for regional NO<sub>x</sub> after implementation of all feasible mitigation measures. Therefore, construction of the project would have a significant and unavoidable impact on regional air quality.

With regard to localized emissions, construction activities would still exceed the SCAQMD daily emission threshold for NO<sub>x</sub> and PM<sub>10</sub> after implementation of all feasible mitigation measures. As such, project construction would continue to result in a significant localized impact even with incorporation of all feasible mitigation measures.

No notable impacts related to TAC emissions during construction are anticipated to occur for the proposed project. As such, potential impacts would be less than significant. The proposed project is not anticipated to generate a substantial amount of objectionable odor emissions during construction.

Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed that would create objectionable odors. As such, potential impacts would be less than significant.

#### *(b) Operation*

Regional operational emissions would still exceed the SCAQMD daily emission threshold for regional VOC and NO<sub>x</sub> after implementation of all feasible mitigation measures. Therefore, operation of the project would have a significant and unavoidable impact on regional air quality.

With respect to potential to on-site residential uses, the improvements to the air handling systems would substantially reduce particulate exposures from diesel exhaust and the reentrainment of paved roadway dust. Pollutant concentrations within residential buildings are best reduced by installing an air cleaning system to reduce the concentration of particulates associated with the infiltration of outside air. With incorporation of mitigation measures recommended by the City of Los Angeles and Air Quality Dynamics, carcinogenic risk, PM<sub>10</sub>, and PM<sub>2.5</sub> would be reduced to levels that would be less than significant.

Via compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines, potential impacts that could result from any potential odor source would be less than significant.

#### (4) Cumulative Impacts

##### *(a) Construction*

Construction-period NO<sub>x</sub> mass regional emissions, and localized NO<sub>x</sub> and PM<sub>10</sub> emissions associated with the proposed Project are already projected to result in a significant impact to air quality. As such, cumulative impacts to air quality during proposed Project construction would also be significant and unavoidable.

Similar to the proposed project, the greatest potential for TAC emissions at each related project would involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. Given that the proposed project contribution to cancer risk from construction activities would be less than significant and is a localized impact, related projects that have not already been built would not result in a long-term (i.e., 70 years) substantial source of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. Thus, TAC emissions from the related projects are anticipated to be less than significant individually and cumulatively.

Also similar to the proposed Project, potential sources that may emit odors during construction activities at each related project would include the use of architectural coatings and solvents. Via mandatory compliance with SCAQMD Rules, it is anticipated that construction activities or materials used in the construction of the related projects would not create objectionable odors. Thus, odor impacts from the related projects are anticipated to be less than significant unto themselves, as well as cumulatively in conjunction with the proposed Project.

*(b) Operation*

The Project's incremental contribution to cumulative air quality effects is not cumulatively considerable, per CEQA Section 15064(h)(3). However, by applying SCAQMD's cumulative air quality impact methodology, implementation of the proposed project would result in an addition of criteria pollutants such that cumulative impacts, in conjunction with related projects in the region, would occur. Therefore, the regional emissions of these pollutants generated by project operation would result in a cumulatively significant and unavoidable impact.

With respect to TAC emissions, the proposed project or any of the identified related projects (which are largely residential, restaurant, retail/commercial, and institutional developments), would represent a substantial source of TAC emissions. Uses typically associated with TAC emissions include large-scale industrial, manufacturing, and transportation hub facilities. Based on recommended screening level siting distances for TAC sources, as set forth in the California Air Resources Board's Land Use Guidelines, the proposed project and related projects would not result in a cumulative impact requiring further evaluation. However, the proposed project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products, landscape maintenance activities, among other things.

Pursuant to California Assembly Bill 1807, which directs the CARB to identify substances such as TAC and adopt airborne toxic control measures (ATCMs) to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the proposed project would not result in any sources of TACs that have been identified by Land Use Guidelines, and thus, would not contribute to a cumulative impact.

With respect to potential odor impacts, neither the proposed project nor any of the related projects (which are primarily general office, residential, retail, and restaurant uses) have a high potential to generate odor impacts.<sup>7</sup> Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement Best Available Control Technology to limit potential objectionable odor impacts to a less than significant level. Thus, potential odor impacts from related projects are anticipated to be less than significant individually and cumulatively.

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<sup>7</sup> According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.

(c) *Global Climate Change*

The proposed project, by implementing project features and GHG reducing measures, results in a net decrease in GHG emissions when compared with business as usual. In addition, the City of Los Angeles is also taking direct action to reduce emissions from all utility users and improve transportation citywide. Therefore, due to the incremental amount of GHG emissions estimated for this project, the fact that estimated operational emissions are likely overstated, the lack of any evidence for concluding that the project's GHG emissions could cause any measurable increase in global GHG emissions necessary to force global climate change, and the fact that the project incorporates design features to reduce potential GHG emissions that are consistent with the goals of AB 32, the CAT Report strategies, and the City of Los Angeles' strategies, the project is not considered to have a significant impact with respect to global climate change on a cumulative basis.

## **C. Biological Resources**

### (1) Environmental Impacts

(a) *Raptor Species*

The project's removal of the four existing on-site non-native trees could potentially have an impact on raptor species due to the removal of potential foraging or hunting habitat to raptors in the area. Although the loss of the existing on-site trees for potential foraging raptors is not critical to the survival of these species, tree removal could possibly impact nesting sites for other bird species including some birds which are considered possible prey species for raptors. Nonetheless, to ensure that any nesting birds found on-site would not be impacted, mitigation measures are recommended to ensure that efforts are made to schedule all tree removals between September 1 and February 14 to avoid the nesting season. In addition, a biologist would be present on the project site to monitor any tree removal to ensure that nests not detected during the initial survey are not disturbed.

(b) *Protected Trees and Street Trees*

No locally protected biological resources such as City-protected trees exist on the project site. As such, the project would not conflict with the City of Los Angeles Preservation of Protected Trees Ordinance, and no impacts on locally protected species would occur. However, the project would involve the removal of four existing elm (*Ulmus* sp.) trees as well as several street trees along Sepulveda Boulevard and Camarillo Street. Since no protected biological resources exist on the site and project implementation would occur in accordance with City codes and Street Tree regulations, the project would not conflict with any local policies or ordinances protecting biological resources. However, to ensure that no significant impacts would occur as a result of the removal of the non-protected trees on the project site, a mitigation measure is recommended.

## (2) Cumulative Impacts

The majority of the 51 related projects are located at a sufficient distance from the project site so as to not cause potential cumulative impacts to raptors in the area. However, three related projects are located within a half mile of the project site. The urbanized nature and sizes of these sites, along with their lack of seclusion, would prevent raptor hunting and breeding. Therefore, current and future use of these sites by raptors is unlikely. In addition, all of the related projects would be required to comply with the Migratory Bird Treaty Act as well as the City ordinances for protected trees and street trees. As a result, cumulative impacts to biological resources would be less than significant.

## (3) Mitigation Measures

To ensure that potential impacts on biological species would be less than significant, the following mitigation measures are provided:

**Mitigation Measure C-1:** If vegetation removal occurs between February 15 and August 31, a biological survey shall be conducted by a qualified biologist prior to the removal of the vegetation to determine if nesting birds are occurring on site.<sup>8</sup> In the event nesting is observed, the biologist shall recommend a buffer area with a specified radius to be established (buffer may range between 50 and 300 feet as determined by the monitoring biologist), within which no disturbance or intrusion shall be allowed until the young had fledged and left the nest or it is determined by the monitoring biologist that the nest has failed. If no nesting is observed, no further action shall be warranted.

**Mitigation Measure C-2:** Prior to the issuance of a grading permit, a plot plan prepared by a reputable tree expert, indicating the location, size, type, and condition of all existing trees on the project site, shall be submitted for approval by the Department of City Planning and the Bureau of Street Services—Street Tree Division. All trees in the public right-of-way shall be treated in accordance with the current Street Tree Division standards and all conditions of approval shall be met.

## (4) Level of Significance After Mitigation

With implementation of the mitigation measures, impacts on potential biological resources would be less than significant.

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<sup>8</sup> *Since the MBTA protects nests, the risk of a “take” exists if a bird were nesting on the ground. Therefore, the measure includes vegetation (i.e., trees, brush) removal.*

## D. Geology/Soils

### (1) Environmental Impacts

#### (a) Soil Conditions

Project construction would require approximately 165,000 cubic yards of grading and soil export. Erosion and sedimentation from exposed soils could occur during construction. However, project construction activities would be conducted in compliance with erosion control measures, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. In addition, the project would be required to have an erosion control plan approved by the City of Los Angeles Department of Building and Safety, as well as a Storm Water Pollution Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System (NPDES) permit requirements. As part of the SWPPP, Best Management Practices (BMPs) would be implemented during construction to reduce soil erosion and pollutant levels to the maximum extent possible. As such, construction of the project would not constitute a geologic hazard to other properties by accelerating instability from erosion or accelerating the natural processes of wind and water erosion and sedimentation that would result in sediment runoff or deposition that would not be contained or controlled on-site. Therefore, construction-related impacts associated with erosion and sedimentation would be less than significant.

With the exception of one single-family residence on the project site, the project site is currently graded and vacant. Implementation of the project would replace the residence and existing graded areas with new structures, paving, and landscaping. Therefore, soil erosion and sedimentation effects during operation would be less as compared with existing conditions. In addition, Standard Urban Stormwater Mitigation Plan (SUSMP) provisions that would include site-specific BMPs would be implemented throughout the operational life of the project, which would assist in reducing on-site erosion. As such, operation of the project would not constitute a geologic hazard to other properties by accelerating instability from erosion or accelerating the natural processes of wind and water erosion and sedimentation that would result in sediment runoff or deposition that would not be contained or controlled on-site. Therefore, operational impacts associated with erosion and sedimentation would be less than significant.

The geotechnical report prepared for the project was found to be acceptable by the City of Los Angeles Department of Building and Safety (LADBS), provided that the conditions specified therein are complied with during site development.<sup>9</sup> As recommended in the geotechnical report, the project's proposed six-story structures would be founded on

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<sup>9</sup> *City of Los Angeles Department of Building and Safety, Soil Report Approval Letter for Vesting Tract Map 61216, lots 1 to 5, 4827 Sepulveda Boulevard, January 26, 2005.*

a system of driven concrete piles and/or drilled cast-in-place piles, bearing in the dense native soil. Thus, with implementation of the geotechnical report's recommendations as set forth in Mitigation Measure D-1, the project would not cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury, and geologic hazard impacts related to soil instability would be less than significant.

With regard to landform alteration, the project site is located in an urbanized area and is currently graded. As no distinct or prominent geologic or topographic features would be destroyed, permanently covered, or materially and adversely modified as a result of the project, impacts related to landform alteration would be less than significant.

*(b) Seismic Hazards*

*(i) Faulting and Groundshaking*

No known active or potentially active faults pass through the project site. Therefore, the project site is not located within an Alquist-Priolo Earthquake Fault Zone or a City-designated Fault Rupture Study Zone, and the potential for surface ground rupture at the project site is considered low.<sup>10</sup>

However, the project site is located in the seismically active region of southern California. In order to minimize seismic hazards, the project would be designed and constructed in accordance with State and local building and safety codes, including the seismic safety requirements in the California Building Code (CBC) and the Los Angeles Building Code. In addition, the project would adhere to the safety guidelines provided in CGS's *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* and the project design recommendations set forth in the geotechnical report regarding support on a system of driven concrete piles and/or drilled, cast-in-place friction piles; shoring; installation of retaining walls for the proposed subterranean levels of the parking structure; waterproofing; and retaining wall drainage. To ensure that the project would adhere to applicable safety requirements and that the project would not cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury, Mitigation Measure D-1 is proposed to reduce potential geologic hazard impacts associated with strong seismic ground shaking to less than significant levels.

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<sup>10</sup> *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure GS-8.*

*(ii) Liquefaction*

The project is located within a State-designated and City-designated liquefaction zone. However, liquefaction tests indicate that soil beneath the project site would not be prone to liquefaction during a 10 percent earthquake (e.g. earthquake with a 475-year return period). Furthermore, the project would comply with State and local building and safety codes, including the CBC and the Los Angeles Building Code. In addition, the project would comply with the safety guidelines set forth in CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* and the project design recommendations set forth in the geotechnical report. The LADBS indicated that due to the improbability of liquefaction on the project site, no mitigation is necessary pursuant to the Seismic Hazard Mapping Act.<sup>11</sup> Therefore, the project would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury and geologic hazard impacts related to liquefaction would be less than significant.

*(iii) Inundation by Seiches and Dam Failures*

The project site lies within the inundation hazard areas of the Encino Reservoir and the Sepulveda Dam, which are managed by the Los Angeles Department of Water and Power. It is possible that overtopping of the reservoir and/or dam could occur with a worst-case scenario, leading to dam failure. Seismic activity could also lead to failure of either of these water containment structures. However, the California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. Mitigation of potential seiche hazards has also been implemented by the Los Angeles Department of Water and Power through regulation of the level of water in its storage facilities and the provision of walls of extra height to contain seiches and prevent overflow or inundation. Further, the Sepulveda Dam has automatically controlled spillway gates that rise and lower to control the dam from overtopping.<sup>12</sup> Automatic release of water from the dam is discharged to the Los Angeles River. In addition, the I-405 and US-101 Freeways serve as physical barriers between the Encino Reservoir, the Sepulveda Dam, and the project site. Therefore, the project would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury due to inundation by a dam or a seiche. Impacts related to these issues would be less than significant.

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<sup>11</sup> *City of Los Angeles Department of Building and Safety, Soil Report Approval Letter for Vesting Tract Map 61216, lots 1 to 5, 4827 Sepulveda Boulevard, January 26, 2005.*

<sup>12</sup> *United States Army Corps of Engineers, Los Angeles District, Reservoir Regulation Section, [www.spl.usace.army.mil/resreg/htdocs/spda.html](http://www.spl.usace.army.mil/resreg/htdocs/spda.html).*

## (2) Cumulative Impacts

Impacts associated with geologic and soil issues are typically confined to a project site or within a very localized area and do not affect off-site areas associated with the related projects or ambient growth. Cumulative development in the area would, however, increase the overall potential for exposure to seismic hazards by potentially increasing the number of people exposed to seismic hazards. Nevertheless, all related projects would be subject to established guidelines and regulations pertaining to seismic hazards. As such, adherence to applicable building regulations and standard engineering practices would ensure that cumulative impacts would be less than significant.

## (3) Mitigation Measures

The following mitigation measure is proposed to reduce the project's potential geotechnical impacts to less than significant levels:

**Mitigation Measure D-1:** The Applicant or its contractor shall incorporate the recommendations detailed in the geotechnical investigation prepared for the proposed project, as approved by the City of Los Angeles. (Geotechnical recommendations regarding pile or drill caissons, footings, slabs, fill, shoring, retaining walls, and site drainage are provided within the Geotechnical Engineering Investigation (geotechnical report) dated June 6, 2002, and Addendum I, Additional Exploration, dated March 17, 2003, both prepared by Geotechnologies, Inc. provided in Appendix C of the Draft EIR.)

## (4) Level of Significance After Mitigation

With implementation of the recommended mitigation measure, geotechnical impacts associated with geology and soils would be reduced to less than significant levels.

# E. Hazards and Hazardous Materials

## (1) Environmental Impacts

### *(a) Release of Hazardous Materials*

Construction of the project would involve the temporary use of potentially hazardous materials, including paints, adhesives, surface coatings, cleaning agents, fuels, and oils. However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

Additionally, any emissions from the use of such materials would be minimal and localized to the project site.

With regard to potentially hazardous conditions on the site, the project site is not listed on any of the local, State, or Federal databases concerning hazardous materials. Furthermore, no evidence of hazardous environmental conditions was observed on the site. As such, the potential to uncover contaminated soils or groundwater beneath the site during project construction (particularly during grading and excavation activities) is considered low. Since construction of the project would comply with applicable regulations and would not increase the risk of interference with existing emergency response capacity to the project area over existing conditions or expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, impacts associated with the potential release of hazardous substances during construction of the proposed project would be less than significant.

Operation of the project would involve the limited use of potentially hazardous materials typical of those used in residential and commercial developments, including cleaning agents, paints, pesticides and other materials for landscaping. All potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations. Thus, any risks associated with these potentially hazardous materials would be reduced to a less than significant level through compliance with these standards and regulations. Therefore, as the project would comply with applicable regulations and would not increase the risk of interference with existing emergency response capacity to the project area over existing conditions or expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, impacts associated with the use of hazardous substances during operation of the proposed project would be less than significant.

*(b) Asbestos Containing Materials*

There is a potential for asbestos containing materials (ACMs) to be present in the existing residence on the project site. As such, the demolition of this building during project construction would have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or removed prior to demolition activities. The removal of ACMs is regulated by SCAQMD Rule 1403 and therefore, ACMs would be removed (if present) by a certified asbestos containment contractor in accordance with applicable regulations prior to demolition. Therefore, as the project would comply with applicable regulations and would not increase the risk of interference with existing emergency response capacity to the project area over existing conditions or expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, the risk of exposure to ACMs would be less than significant.

*(c) Lead-Based Paint*

Results of qualitative lead screening did not indicate the presence of lead-based paint within the existing residence on the site. Therefore, the potential for construction workers to be exposed to lead during demolition of the existing residence is considered low. As the project would not increase the risk of interference with existing emergency response capacity to the project area over existing conditions or expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, potential impacts associated with the presence of lead would be less than significant.

*(d) Underground Storage Tanks*

No evidence of underground storage tanks (USTs) was observed on the site and no records have been found which indicate the potential existence of USTs. As the project would not increase the risk of interference with existing emergency response capacity to the project area over existing conditions or expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, potential impacts associated with USTs would be less than significant.

*(e) Oil and Gas*

There are no oil or gas wells or the drilling of oil and gas wells on the project site. In addition, the project site is not located on an oil, gas, or geothermal field or within a City-designated methane zone or methane buffer zone. As the project would not increase the risk of interference with existing emergency response capacity to the project area over existing conditions or expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, no impacts associated with oil and gas would occur.

*(f) Groundwater*

Excavation activities for the project would not encounter groundwater and the project site is not listed on the local, State, or Federal databases concerning hazardous materials. As such, the potential to uncover contaminated groundwater beneath the project site particularly during grading and excavation activities is considered low. As the project would not expose persons to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards from groundwater contamination, potential impacts associated with contaminated groundwater would be less than significant.

## (2) Cumulative Impacts

Impacts associated with hazards and hazardous materials are typically site-specific and do not cumulatively affect off-site areas. Furthermore, all related projects would be required to comply with local, state, and Federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the cumulative development of the proposed project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

## (3) Mitigation Measures

Impacts associated with hazards and hazardous materials would be less than significant. As such, no mitigation measures would be required.

## (4) Level of Significance After Mitigation

Impacts associated with hazards and hazardous materials would be less than significant and no mitigation measures would be required.

# F. Hydrology and Water Quality

## (1) Environmental Impacts

### *(a) Construction*

#### *(i) Hydrology*

Construction of the proposed project would require the removal of the existing residence and paved surfaces (including Peach Avenue and La Maida Street) on the site as well as earthwork activities (i.e., grading, excavation). As a result, additional underlying soils would be exposed, making the site temporarily more permeable. However, this increase in permeability would not have a substantial impact on existing drainage patterns and flows, particularly since runoff would be properly controlled through the implementation of appropriate BMPs. Construction of the project would not cause on-site flooding during the projected 50-year developed storm event, substantially reduce or increase the amount of surface water in a water body; or produce a substantial change in the current or direction of water flow. Therefore, construction-related impacts to hydrology would be less than significant.

#### *(ii) Water Quality*

Project construction would require approximately 165,000 cubic yards of grading and soil export. During precipitation events, exposed and stockpiled soils on the project

site could be subject to erosion and conveyed via stormwater runoff into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Thus, project-related construction activities have the potential to result in adverse effects on water quality. However, a Storm Water Pollution Prevention Program (SWPPP) would be developed and implemented during project construction. The SWPPP would outline BMPs and other erosion control measures to minimize the discharge of pollutants in storm water runoff.

Project construction activities would occur in accordance with City grading permit regulations to reduce the effects of sedimentation and erosion. Furthermore, routine safety precautions and “good housekeeping” practices would be implemented to minimize the potential pollution of storm water by both hazardous and non-hazardous pollutants. Compliance with State and City level permits, plans, and codes would ensure that construction of the project would not result in discharges that would create pollution, contamination or nuisance or that cause regulatory standards to be violated for the receiving water body. Thus, with compliance with NPDES requirements and City grading regulations, construction impacts related to water quality would be less than significant.

*(b) Operation*

*(i) Hydrology*

Development of the proposed project would permanently remove the surface storm drain system, including the street and curb network, drain inlets, and the storm drain, within La Maida Street. Storm drains and associated inlets and catch basins within Camarillo Street and Sepulveda Boulevard would remain in place. On-site stormwater flows would continue to drain to the existing 7-foot-wide, 2.5-foot-tall concrete culvert via the proposed storm drain system for the project site.

Implementation of the project would increase the amount of impervious surfaces areas on the site and as such, would increase stormwater runoff as compared to existing conditions. Specifically, post-project stormwater runoff flow from a 50-year storm event would be approximately 18.3 cfs, which is greater than the existing 50-year stormwater runoff flow of 11.8 cfs.<sup>13</sup> This increase in on-site stormwater flows from a 50-year storm event would be adequately accommodated by the culvert.<sup>14</sup> In addition, the project would be required to provide appropriate on-site drainage improvements to accommodate anticipated storm water flows. This would include numerous planter areas and, if necessary, a flow detention device that would help detain on-site runoff during a storm event.

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<sup>13</sup> *Hydrology Report, Sukow Engineering, April 2008.*

<sup>14</sup> *Ibid.*

Thus, the project is not anticipated to substantially increase the volume or rate of storm water runoff discharged from the site as compared to existing conditions. As such, the project would not cause on-site flooding during the projected 50-year developed storm event, substantially reduce or increase the amount of surface water in a water body; or produce a substantial change in the current or direction of water flow. Project impacts associated with hydrology during operation would be less than significant.

### *(ii) Water Quality*

During the operational phase of the project, urban-related pollutants could potentially be conveyed by storm water runoff into municipal storm drains. Urban related pollutants may include grease, oil, suspended solids, metals, solvents, phosphates, and pesticides/fertilizers. However, in accordance with NPDES requirements, a SUSMP would be required to be in place during the operational life of the project to reduce the discharge of polluted runoff from the site. The SUSMP would set forth BMPs that would be implemented during the operational life of the project. As part of the BMPs proposed, storm water runoff from the site would be directed to raised filtration planters on-site that would be equipped with a series of perforated pipes to collect water from the planters. Implementation of SUSMP requirements, inclusive of BMPs, would ensure that discharges from the project would not violate water quality standards. Furthermore, the project would also be designed in compliance with the Clean Water Act (CWA) and Order No. 90-079 of the RWQCB, which regulates the issuance of waste discharge requirements.<sup>15</sup> Operation of the project would not result in discharges that would create pollution, contamination or nuisance or that cause regulatory standards to be violated for the receiving water body. Therefore, project impacts on water quality during operation would be less than significant.

## (2) Cumulative Impacts

The 51 related projects within the project vicinity could potentially increase the volume of storm water runoff and contribute point and non-point source pollutants, resulting in a cumulative impact to hydrology and water quality. However, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. In addition, as with the proposed project, the related projects would be subject to State and County NPDES permit requirements for both construction and operation. Furthermore, each project would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to water quality. Thus, cumulative impacts to hydrology and water quality would be less than significant.

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<sup>15</sup> *Ibid.*

### (3) Mitigation Measures

The proposed project would comply with applicable NPDES requirements, including preparation of a SWPPP during construction and implementation of a SUSMP during operation. As such, impacts on hydrology and water quality would be less than significant. Nonetheless, to further ensure that the project would comply with regulations and that project features related to storm drain improvements would be incorporated, the following mitigation measures are proposed:

**Mitigation Measure F-1:** The project shall provide on-site storm drain improvements to detain peak storm water flows to the satisfaction of the City of Los Angeles Department of Public Works.

**Mitigation Measure F-2:** The project shall comply with the requirements of the applicable NPDES permit for stormwater discharge and with all applicable requirements of the RWQCB, EPA and local agencies including the City of Los Angeles regarding water quality.

**Mitigation Measure F-3:** The project shall implement Best Management Practices (BMPs) to detain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be provided.

**Mitigation Measure F-4:** All storm drain inlets and catch basins within the Project area shall be stenciled with prohibitive language (such as “NO DUMPING—DRAINS TO OCEAN”) and/or graphical icons to discourage illegal dumping.

**Mitigation Measure F-5:** The legibility of signs and stencils discouraging illegal dumping shall be maintained.

**Mitigation Measure F-6:** Materials used on site with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.

### (4) Level of Significance After Mitigation

Impacts on hydrology and water quality would be less than significant. Additionally, mitigation measures would further ensure compliance with applicable regulations and incorporation of project features.

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## G. Land Use

### (1) Environmental Impacts

#### *(a) Consistency with Local Plans and Applicable Policies*

##### *(i) City of Los Angeles General Plan*

The project would be substantially consistent with the goals, objectives and policies of the General Plan Framework. In particular, the project would be consistent with the site's Regional Center designation in terms of proposed land uses as it would develop a mix of residential uses and neighborhood-serving commercial uses in proximity to a number of employment, shopping, and dining destinations. The project would also increase the vitality of the Regional Center area by redeveloping an existing underutilized and graded site. Additionally, by locating new residential uses along a major transportation corridor (Sepulveda Boulevard) and orienting neighborhood-serving commercial uses along the street frontages, the project would promote pedestrian activity and would facilitate a reduction of vehicle trips in the project area. Since the project would be consistent with the applicable goals and policies of the General Plan Framework, land use impacts relative to this plan would be less than significant.

##### *(ii) Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan*

As further detailed in Section IV.G, Land Use, of the Draft EIR, the proposed project would be substantially consistent with the goals, objectives, and policies of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan. In general, the project would provide a high-quality mixed-use development consisting of new residential and neighborhood-serving commercial uses in a Regional Commercial area of the Sherman Oaks community. Thus, the project would not conflict with the surrounding uses but rather, would contribute to the area's identity as a major activity center. Furthermore, as the project would locate new residential uses along a major transportation corridor, the project would promote pedestrian activity and other alternative modes of transportation. The project would also comply with applicable Community Plan policies and requirements pertaining to urban design and transportation. Since the project would be consistent with the applicable goals and policies of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, land use impacts relative to this plan would be less than significant.

##### *(iii) Ventura–Cahuenga Boulevard Corridor Specific Plan*

Currently, the existing residence on the project site does not reflect the high quality development promoted by the Ventura–Cahuenga Boulevard Corridor Specific Plan.

Implementation of the proposed project would result in a high-quality, mixed-use development consisting of multiple-family residential and commercial uses along a major public transportation corridor. Section IV.G, Land Use, of the Draft EIR provides a side by side analysis of whether the project would be consistent with the applicable standards and regulations of the Specific Plan. In order to implement the project as proposed, the Applicant seeks Specific Plan Exceptions to: (1) exceed the permitted FAR of 1.5:1 for the project site to a FAR of 3.3:1; (2) exceed the permitted height limit of 75 feet to develop buildings up to 100 feet; (3) eliminate the maximum lot coverage requirement of 75 percent; (4) reduce the required landscape buffer of 10 feet around the surface perimeter of parking structures to 5 feet; and (5) reduce the required 18-inch setback along the front lot line.<sup>16</sup> As noted previously, the Specific Plan includes express provisions for granting exceptions to the Specific Plan. Therefore, seeking exceptions to the Specific Plan would not be inconsistent with the Specific Plan. Additionally, granting of the Specific Plan exceptions would be consistent with the Specific Plan's procedural requirements.

Considering the land use impacts of the Specific Plan exceptions sought by the proposed project, a relevant comparison of the project site to other Regional Commercial sites in the Specific Plan is informative. 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. As shown on the Section maps of the Specific Plan, the project site is the farthest Regional Commercial site from Ventura Boulevard in the Sherman Oaks Section of the Specific Plan. It is three times farther from Ventura Boulevard than nearly every other Regional Commercial site in all other Sections of the Specific Plan. Only one other Regional Commercial site in the entire Specific Plan is a comparable distance from Ventura Boulevard, and that site is in the Tarzana Section of the Specific Plan.

Prior to the granting of the Specific Plan exceptions, the floor area, lot coverage, height limits, and front yard setback elements of the proposed project would be inconsistent with the associated requirements of the Specific Plan. Other elements of the proposed project would be consistent with other requirements of the Specific Plan. In addition, some

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<sup>16</sup> *With the proposed reduction in residential units and commercial uses proposed by the Applicant, the proposed project's floor area ratio of 3.3:1 would be reduced to 2.75:1. In addition, the Applicant has modified the site plan to fully enclose the parking structure along Camarillo Street. With this modification the request to reduce the required landscape buffer of 10 feet around the surface perimeter of parking structures to five feet would be eliminated. Additionally, the Applicant has proposed to modify the site plan to include 18-inch setbacks along Camarillo Street and along portions of Sepulveda Boulevard. With this modification, the request to reduce the required setback would be eliminated. The Applicant is also requesting an exception from the Specific Plan Section 7.A.2.a to exceed the front yard setback along a portion of the Sepulveda Boulevard frontage to accommodate an expanded publicly accessible ground level plaza. The approval of this Specific Plan exception would not result in significant impacts to land use. For additional proposed revisions to the project's discretionary actions, refer to Section II, Corrections and Additions, of this Final EIR.*

of the Specific Plan exceptions would result in less significant environmental impacts than would compliance with the Specific Plan. For example, as shown in Table I-2 on page I-62, a project complying with the Specific Plan floor area rules would result in significantly higher traffic generation than the proposed project. The Regional Commercial Community Plan land use designation combined with a Height District 2 envisions an active center of commerce, numerous jobs and activities which generate large amounts of traffic. By allocating over 90 percent of the proposed project's floor area to residential uses, traffic trip generation is dramatically reduced compared to intense commercial development envisioned in the Specific Plan.

Strictly requiring the amount of commercial development required by the Specific Plan would be inconsistent with the Specific Plan's purpose and intent to reduce traffic trips. Therefore, approval of the requested Specific Plan Exceptions would allow implementation of a project that would be compatible with surrounding uses and improve existing conditions on-site. With approval of the proposed Specific Plan Exceptions, the project would generally be in conformance with the intent of the Specific Plan, and land use impacts relative to this plan would be less than significant.

*(iv) City of Los Angeles Do Real Planning Guidelines*

The Do Real Planning Guidelines includes a set of 14 points to guide planning activities for the City. As further detailed in Section IV.G, Land Use, of the Draft EIR, the project would be consistent with these relevant points. Thus, land use impacts relative to the Do Real Planning Guidelines would be less than significant.

*(v) City of Los Angeles Walkability Checklist*

As further detailed in Section IV.G, Land Use, of the Draft EIR, the project would comply with the principles presented in the City's Walkability Checklist. The project would implement design features that would improve the pedestrian environment, in accordance with the objective of the City's Walkability Checklist. As such, the project would generally be consistent with the City's Walkability Checklist.

*(vi) City of Los Angeles Municipal Code*

The project Applicant proposes a zone change from [Q]CR-1L, R3-1L, R1-1L, and [Q]P-1L to C2 (Commercial Zone) as part of the project. The requested zone change would bring the site into conformance with the existing Community Plan designation of the project site as Regional Center, and the C2 zone would be more appropriate for the project site as this zone was designed to accommodate both commercial and housing development in a manner that contributes to the economic growth of the area. Redevelopment of the site, as allowed under a C2 zone, would be an extension of the

**Table I-2  
Trip Comparison of Proposed Project with Specific Plan Project**

<b>Use</b>	<b>Lot Area and Floor Area</b>	<b>Trips Generated</b>
Proposed Project	Lot area = 219,778 or 5.05 acres Floor Area of 55,000 square feet of retail and 500 residential units <sup>a,b</sup>	5,844 net daily trips, including 321 A.M. peak-hour trips and 549 P.M. peak-hour trips <sup>a</sup>
Regional Commercial Uses	Lot area = 219,778 or 5.05 acres <sup>b</sup> Floor area = 333,000 for a FAR of 1.5:1	11,205 net daily trips, including 409 A.M. peak-hour trips and 876 P.M. peak-hour trips
Mixed-Use as defined in the Specific Plan, which requires a minimum 33 percent of the SF be commercial	Lot area = 219,778 or 5.05 acres <sup>b</sup> Floor Area = 116,000 square feet of commercial uses (including a 45,000-square-foot grocery store and 71,000 square feet of shopping center retail) and 216 residential units for a FAR of 1.5:1	6,045 net daily trips, including 203 A.M. peak-hour trips and 601 P.M. peak-hour trips
<p><sup>a</sup> The reduction of residential units from 500 to 399 units proposed by the Applicant, in response to public comments received regarding the Draft EIR, as well as the reduction of the proposed project's neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet, would further reduce the daily and peak-hour trips generated by the project. Specifically, with the proposed modifications, the proposed project would generate approximately 5,057 net daily trips including 266 A.M. peak-hour trips and 480 P.M. peak-hour trips.</p> <p><sup>b</sup> The existing lot area of approximately 196,673 or 4.51 acres includes the pre-dedicated lot area but not the vacated streets. With implementation of the proposed project, the lot area would be approximately 5.05 acres, including vacated streets and street dedications.</p> <p>Source: Matrix Environmental, 2012.</p>		

revitalization process occurring within the Ventura–Cahuenga Boulevard Corridor Specific Plan area. The C2 zone designation would allow mixed uses that include both residential and commercial development. Therefore, the residential and commercial uses proposed by the project would be permitted in the C2 zone.

The project applicant also proposes a height district change from Height District 1L to Height District 2D as part of the project. Similar to the proposed zoning change, the height district proposed for the site corresponds to the prescribed height district for the land use designation (i.e., Regional Center). The project site is the only site within the boundaries of the Regional Center designation that is not designated as Height District 2D. As the project site was designated as Regional Center because of its proximity and physical relationship to the other properties within the Regional Center area, the proposed height district change would create a height district that is generally consistent with that of the surrounding uses, particularly the uses to the immediate south of the site.

With approval of the requested zone change and height district change, the proposed project would comply with applicable zoning requirements.

*(b) Regional Plans and Applicable Policies*

Per SCAG, the proposed project is considered regionally significant. As further detailed in Section IV.G, Land Use, of the Draft EIR, the proposed project would be consistent with SCAG policies and principles, including those of the Regional Comprehensive Plan, Regional Transportation Plan, Compass Blueprint, and the Regional Housing Needs Assessment.

*(c) Land Use Compatibility*

The project would be compatible with various surrounding uses, which include the Sherman Oaks Galleria to the south as well as multi- and single-family residential uses to the east. The proposed neighborhood commercial uses would complement the Sherman Oaks Galleria and would represent an extension of the existing commercial uses along Sepulveda Boulevard. These neighborhood commercial uses would have hours of operation that are similar to those of other nearby retail uses. Furthermore, 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.

The design of the proposed project would also be compatible with the surrounding uses and structures, which range in height from one story to approximately 16 stories. While the proposed building heights would be greater than the single-story residence that currently exists on-site, the project height would not contrast with the heights of the Sherman Oaks Galleria. Furthermore, the single- and multi-family residential structures comprised of one to three stories to the east of the site are separated from the site by Sepulveda Boulevard, a six-lane Class II Major Highway. Therefore, a buffer currently exists to aid in the transition of the proposed project's high density residential uses to the medium and low density residential areas. In addition, the design of the project would aid in this transition as the commercial uses fronting Sepulveda Boulevard would provide an impression along this street as a smaller and more pedestrian scale, in keeping with the desire to encourage pedestrian activity as well as transition to the less dense residential uses across Sepulveda Boulevard.

The existing development on the project site does not reflect the high quality development promoted by the Ventura–Cahuenga Boulevard Corridor Specific Plan. The development of the proposed project would result in an enhanced, mixed use development on the project site that would complement both the adjacent commercial development and the surrounding residential uses. The project would enhance the project site by creating a cohesive development of contemporary architectural style, multi-faceted massing building

forms, roof forms, elevation, and a mix of colors. Furthermore, the project would provide attractive landscaping including a main central courtyard with three finger-like courtyards and gardens while its mix of uses would encourage pedestrian activity. The project would improve the aesthetic character of the area and the overall appearance of the neighborhood. Thus, the proposed project would be compatible with both the adjacent commercial development and surrounding residential uses.

In addition, the project site is an ideal location for the proposed mixed-use project as it is situated within a high commercial activity Regional Commercial area, along two major transportation corridors, and near a variety of employment opportunities. The project is designed to encourage pedestrian activity as it would locate residential uses and commercial uses within the same building and would be easily accessible by foot for other residents within the project vicinity.

Based on the above, the project would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term affect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation.

## (2) Cumulative Impacts

The 51 related projects generally consist of infill development in an already urbanized area and redevelopment of existing uses. As with the proposed project, related projects are expected to comply with relevant land use plans and regulations. Since the project would be consistent with the Community Plan, Specific Plan, and the LAMC upon approval of the Specific Plan exceptions, zone change and height district change, the project would not incrementally contribute to cumulative inconsistencies with respect to land use plans. Cumulative impacts associated with land use plans within the area would be less than significant.

Additionally, there are no related projects located within the immediate vicinity of the project site. The closest related project is Related Project No. 23, a mixed-use development consisting of 52 condominiums and 7,460 square feet of specialty retail, to be located at 15212–15222 Ventura Boulevard, approximately 0.30 mile to the southeast of the project site. As with the proposed project, the mixed-use nature of Related Project No. 23 would be consistent with the existing mix of commercial and residential uses that characterize the project area. Thus, development of Related Project No. 23 and the proposed project would not alter the existing land use relationships in the community. Therefore, cumulative land use impacts relative to land use compatibility would be less than significant.

### (3) Mitigation Measures

With the approval of the proposed Specific Plan exceptions, zone change and height district change, the proposed project would be consistent with relevant regulatory plans. As such, the proposed project would not result in significant impacts associated with conflicts with regulatory land use plans and guidelines. In addition, the project would also be compatible with the land use, scale, density, and intensity of surrounding development and would not divide or disrupt an established community. As such, the proposed project would result in less than significant impacts relative to consistency with land use regulations and land use compatibility. Therefore, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Impacts of the proposed project related to land use would be less than significant with the approval of the Specific Plan exceptions, zone change and height district change. Therefore, no mitigation measures would be required.

## H. Noise

### (1) Environmental Impacts

#### *(a) Construction*

##### *(i) Noise*

Construction activities at the project site would include three stages: (1) demolition; (2) site grading; and; (3) building construction. Construction is estimated to last approximately 20 months. The proposed project would be constructed using typical construction techniques, and no blasting or impact pile driving will be used. Project construction would require the use of mobile heavy equipment with high noise level characteristics. Construction of the proposed project is estimated to last approximately 20 months. The site preparation work, including demolition, grading and excavation, would take approximately six months. Construction of the parking facility and project buildings would take approximately 14 months.

Construction-related noise would exceed ambient noise levels at the 777 Motor Inn (R3), the residences east of Sepulveda Boulevard (R1), and the residences on La Maida Street (R5) by a maximum of 19, 8, and 6 dBA, respectively, during the most intensive construction periods. Thus, construction activities would cause the exterior ambient noise level to increase by 5 dBA or more at noise-sensitive uses. As such, construction-period noise impacts would be significant without incorporation of mitigation measures.

*(ii) Groundborne Vibration*

The proposed project would generate ground-borne vibration during site clearing and grading activities or large bulldozer operations. Vibration velocities from the operation of construction equipment would range from approximately 0.003 to 0.089 inch per second peak particle velocity (PPV) at 25 feet from the source of activity. The nearest receptor (777 Motor Inn), which is approximately 50 feet from the project construction site, would expose to vibration velocities range from approximately 0.001 to 0.031 inch per second PPV. As this value is considerably below the 0.5 inch per second PPV significance threshold (potential building damage), project construction activities would not cause ground-borne vibration levels to exceed 0.5 inch per second PPV at any off-site structures. Thus, vibration impacts associated with construction would be less than significant.

With respect to annoyance, vibration impacts associated with construction would be significant at the 777 Motor Inn; but would be temporary. This is the worst case scenario where the equipment is operating at the perimeter of the project site, close to the receptor. This would occur only during site grading and excavation phases. Vibration would be quickly reduced to below the significant threshold at approximately 80 feet from the receptor.

*(b) Operation*

*(i) Off-Site Roadway (Mobile) Noise*

The proposed project is expected to generate a maximum of 5,844 additional daily trips. Traffic attributed to the proposed project would increase the total daily traffic traveling along the major thoroughfares within the project vicinity. This increase in roadway traffic volumes was analyzed to determine if any traffic-related noise impacts would result from project development.<sup>17</sup>

The largest project-related traffic noise impact is anticipated to occur along the segment of Camarillo Street, west of Sepulveda Boulevard. Project-related traffic would add 1.8 dBA CNEL to this roadway segment, while related project plus ambient growth traffic volumes are expected to add less than 0.1 dBA CNEL to this roadway segment, for a combined total of 1.8 dBA CNEL. As the incremental increases in noise levels at all other analyzed locations are less than 1.8 dBA CNEL, and these noise level increases are less than the 3-dBA CNEL significance threshold, project roadway noise impacts are considered to be less than significant.

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<sup>17</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant, in response to public comments received regarding the Draft EIR, as well as the reduction of the proposed project's neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet, would further reduce the daily and peak-hour trips generated by the project, which would also reduce roadway noise.*

(ii) *On-Site Stationary Noise*

(A) Mechanical Equipment

Stationary equipment (e.g., parking structure air vents, pool maintenance machinery, and building heating ventilation and air conditioning, HVAC, equipment) would be designed to comply with the City's Noise Ordinance requirement and the project significance threshold of 5 dBA above the ambient noise levels. The project mechanical design documentation will include mitigation measures required to minimize HVAC/mechanical noise levels to no more than 5 dBA above ambient noise levels. As such, impacts from stationary sources would be less than significant.

(B) Loading Dock and Refuse Collection Areas

The loading dock area and refuse collection areas would be located together within a partially enclosed/covered area near the northeast corner of the proposed grocery store/retail building. Delivery and refuse service vehicles would have direct access to this area via a new private roadway along the back side of the site (i.e., along the northern/western frontage), extending from Sepulveda Boulevard to Camarillo Street. Loading dock and refuse service-related activities such as truck movements/idling and loading/unloading operations would generate noise levels that have a potential to adversely impact adjacent land uses during long-term project operations.

The nearest noise-sensitive use (i.e., multi-family residences across Sepulveda Boulevard) is approximately 150 feet east of the proposed loading dock and refuse service area. In addition, the eastern portion of the proposed grocery store/retail building would fully block the line-of-sight between the noise source and sound receptor location. Loading dock and refuse collection noise levels would be 52 and 47 dBA, respectively, and would add less than 1 dBA  $L_{eq}$  to the average daytime and nighttime ambient noise environments at this property line, and would not cause the existing daytime ambient noise level of 68.5 dBA, or nighttime ambient noise level of 58.1 dBA, to increase by the 5-dBA significance criterion. As such, impacts would be less than significant.

(C) Courtyard Areas

The proposed project would incorporate a number of features that allow for small outdoor gatherings. The project would be developed with a main central courtyard and three finger-like themed courtyards and gardens. The proposed courtyard areas would be located at the plaza level on top of the podium. All off-site noise sensitive receptors would be shielded from the courtyard areas by the project buildings. Therefore, potential noise impacts associated with courtyard area activities would be less than significant.

#### (D) Parking Facilities

Parking would be provided within a parking structure with two subterranean levels, one ground level, and one mezzanine level. The ground level and the mezzanine level parking would be below the residential development and enclosed. Therefore, since all parking on the project site would be enclosed within the proposed parking structure, parking facility noise would not increase ambient noise levels at nearby sensitive receptors including the 777 Motor Inn. As such, potential noise impacts would be less than significant.

#### (E) Pool Facility

The proposed project would include a pool/spa facility located on the southwestern portion of the project site. Although the pool and spa related activities would generate noise, sensitive receptors surrounding the project area would not be exposed to adverse noise levels due to the noise shielding provided by the proposed buildings surrounding the pool area. As such, potential noise impacts would be less than significant.

#### *(iii) Site Compatibility (Proposed Residential Uses)*

The proposed project would locate sensitive residential receptors (i.e., proposed residential buildings) near two heavily traveled freeway corridors, I-405 and US-101, and a main thoroughfare, Sepulveda Boulevard. As the proposed residential structures would be built above a 23-foot podium, the existing freeway sound wall would have no measurable noise attenuation effect on freeway noise experienced at or within the proposed residential units. The freeway noise along the project western and northern building façades, which have a direct line-of-sight to the freeway, would be approximately 78 dBA (CNEL). The estimated 78 dBA (CNEL) represents the outdoor environment outside of the proposed residential building structure. With respect to the requirements of the applicable building codes (City's building code), the building design shall include adequate sound insulation to reduce the freeway noise to 45 dBA (CNEL) or lower at the interior of the residential use. The 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 noise limits applicable to the private balconies. Incorporation of the mitigation measures would reduce potential impacts associated with the introduction of residential uses on the project site to a less than significant level.

The proposed courtyard areas would be located at the plaza level on top of the podium. The proposed project is designed such that the west-facing buildings would act as a noise barrier for courtyard uses. No courtyard areas would have direct line-of-sight to either US-101 or I-405, and the buildings would be of sufficient height to attenuate freeway-related noise to well below the "conditionally acceptable" 70 dBA (CNEL) for multi-family

residential uses. As such, potential noise impacts associated with outdoor uses at the courtyard areas would be less than significant.

*(iv) Groundborne Vibration*

The proposed project would include typical residential and commercial-grade stationary mechanical and electrical equipment such as air handling units, condenser units, exhaust fans, and electrical emergency power generators, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed subterranean parking facility, and on-site loading/refuse collection truck activity. Ground-borne vibration generated by each of the above-mentioned activities would be similar to the existing sources (i.e., traffic on adjacent roadways and adjacent parking structure) adjacent to the project site. The potential vibration impacts from all proposed project sources at the closest structure locations would be less than the significance threshold 72 VdB for perceptibility. As such, project operation activities would not cause ground-borne vibration levels to exceed 72 VdB at off-site vibration sensitive receptors including the 777 Motor Inn and impacts would be less than significant.

**(2) Cumulative Impacts**

Of the 51 related projects, the two closest related projects are situated approximately 1,500 feet to 1,700 feet from the project site and include Related Project No. 9—15357 Magnolia Boulevard, Apartment and Related Project No. 23—15212—15222 Ventura Boulevard, Condominium and Specialty Retail. All other related projects are located at a minimum of 2,500 feet away from the proposed project. The potential for noise impacts to occur are specific to the location of each related project, as well as the cumulative traffic on the surrounding roadway network.

*(a) Construction*

Noise from construction of the proposed project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet from the construction site. Due to distance attenuation and intervening structures, construction noise from one site would not result in a noticeable increase in noise at sensitive receptors near the other site, which would preclude a cumulative noise impact. As such, cumulative impacts associated with construction noise would be less than significant.

*(b) Operation*

The cumulative increase in future CNEL traffic noise levels at project buildout with future ambient growth and the 51 related projects, relative to the existing baseline, would be 1.8 dB or less in areas that can potentially be affected by the proposed project. As the

increase would be below the project's 3 dBA significance threshold, cumulative traffic noise impact would be less than significant.

The project site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from lawn maintenance activities, mechanical equipment (e.g., air conditioning systems), and vehicle movements, among other community noise sources. Noise impacts related to project development would be less than significant. In addition, the other related projects are of sufficient distance (approximately 2,100 feet from the project site) such that operational noise levels from these projects would not be audible at the project site. As such, cumulative noise impacts related to long-term project operations would be less than significant.

### (3) Mitigation Measures

#### *(a) Construction*

As noise associated with the project's on-site construction activity would have the potential to result in a significant impact, the following measures are prescribed to minimize construction-related noise impacts:

**Mitigation Measure H-1:** A temporary sound barrier, capable of providing a minimum 10 dBA reduction (e.g., solid wood fence) and minimum height of 8 feet, shall be erected along the project's east property line along Sepulveda Boulevard for the entire length of the project site as well as between the project site and the 777 Motor Inn.

**Mitigation Measure H-2:** To the extent feasible, construction activities shall be scheduled so as to avoid operating several pieces of heavy equipment simultaneously, which causes high noise levels.

**Mitigation Measure H-3:** Engine idling from construction equipment such as bulldozers and haul trucks shall be limited, to the extent feasible. Idling of haul trucks shall be limited to five (5) minutes at any given location as established by the South Coast Air Quality Management District. Signs that limit engine idling shall be posted on the project site during construction.

**Mitigation Measure H-4:** The construction staging area shall be located as far as feasible from sensitive receptors.

#### *(b) Operation*

No significant impacts to off-site noise sensitive receptors were identified related to long-term project operations. The following mitigation measure is recommended to ensure

that the new project buildings would provide adequate sound insulation to meet the City's building code interior noise level requirement of 45 dBA (CNEL) for residential units.

**Mitigation Measure H-5:** An acoustical analysis of the architectural plans of the proposed residential building façade constructions shall be prepared by a qualified acoustical engineer, prior to issuance of building permits, to ensure that the building construction (i.e., exterior wall, window and door) will provide adequate sound insulation to meet the acceptable interior noise level of 45 dBA (CNEL).

**Mitigation Measure H-6:** The Applicant shall retain services of an acoustical consulting engineer experienced in mechanical noise analysis and during plan check provide the City with an acoustical report indicating that the project mechanical design meets the City's noise ordinance (i.e., maximum 5 dBA above ambient noise levels).

#### (4) Level of Significance After Mitigation

##### *(a) Construction*

The temporary sound barrier prescribed in Mitigation Measure H-1 can achieve a noise reduction of 10 dBA or more in areas where the line-of-sight between construction-period noise sources and off-site receptor locations is obstructed. Mitigation Measure H-2 would avoid operating several pieces of heavy equipment simultaneously, which causes high noise levels. Implementation of Mitigation Measure H-3 would reduce the noise level impact associated with construction activities to the extent practicable. Furthermore, as construction activity moves away from the property line towards the center of the project site, noise levels would attenuate considerably from these maximum levels. Noise generated by construction activities would be less than significant on noise sensitive uses at the residences east of Sepulveda Boulevard and at the residences on La Maida Street. However, construction noise levels would still exceed the 5 dBA significance criterion at the 777 Motor Inn. Construction noise impacts would be significant and unavoidable at the 777 Motor Inn.

During the grading and excavation phases, construction vibration impacts would be significant at the 777 Motor Inn only when construction equipment is operating at the perimeter of the project site, close to the receptor. These significant vibration impacts will be quickly reduced to below the significant threshold at approximately 80 feet from the receptor.

##### *(b) Operation*

Operation of the project development would not result in any significant noise impacts to off-site noise sensitive receptors. Implementation of Mitigation Measure H-5

would ensure the interiors of the residential units meet the 45 dBA (CNEL) requirement. Mitigation Measure H-6 would ensure the noise levels of mechanical equipment would meet the requirements of the City's noise ordinance. In addition, Mitigation Measure H-7 would ensure that noise generated from recreational areas on-site are limited and comply with the noise ordinance. As such, operational noise impacts would be less than significant

## **I. Population, Housing, and Employment**

### **(1) Environmental Impacts**

#### *(a) Construction*

Project development would generate construction workers on-site during the demolition, grading and excavation, and building construction and finishing phases. However, individual construction projects would not be expected to necessarily generate new employment within the region. Rather, there is a pool of construction workers who move from project to project and are somewhat mobile. To the extent that the project supports and contributes to the pool of construction workers, its impacts would be considered beneficial. Since construction employment related to the proposed project would not exceed expected growth, construction-related employment impacts would be less than significant.

#### *(b) Operation*

##### *(i) Population*

The proposed project includes new multi-family residential units and thus, would introduce a new residential population into the area. Based on a household size factor of 1.70 persons per household for medium density uses as provided in the Community Plan, the proposed project would generate a residential population of 850 persons at full buildout. The increase of 850 permanent residents would represent approximately 48.16 percent of the anticipated growth within the local (Community Plan) area from 2008 to 2013, 1.02 percent within the subregional area, and 0.23 percent of the anticipated growth within the region. While the 850 new residents represent much of the growth anticipated in the local area, they constitute only a small portion of City and County growth and could easily be absorbed at these levels.<sup>18</sup>

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<sup>18</sup> This residential population would be reduced to 678 persons with the reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received during the Draft EIR public review period.

Additionally, the neighborhood-serving commercial component of the project would generate approximately 130 employees in several shifts. Any population growth attributed to project employees relocating to the area would not be substantial relative to the forecasted population growth in the community. Furthermore, project implementation would not result in indirect growth through the extension of existing roads or infrastructure as the roadways and infrastructure to be utilized by the project are currently in place. Based on all of the above, the project would not substantially alter the location, distribution, density, or growth rate of population planned for the area by local and regional plans. Thus, impacts related to population growth would be less than significant.

### *(ii) Housing*

Development of the project's new multi-family residential units are projected to account for approximately 28.46, 0.89, and 0.35 percent of the 2008 to 2013 increase in residential units in the local area, subregion and region, respectively.<sup>19</sup> The project would account for much of the housing increase within the local area. However, as indicated by the jobs/housing ratio imbalance, the area is experiencing a housing shortage compared to the amount of jobs and therefore, would also benefit with the project's contribution of residential units to the housing supply.

It should be noted that although implementation of the project would displace one existing residential unit from the project site, the proposed project would provide a net increase of residential units on the project site. Therefore, while the project would not eliminate the housing shortage in the City, it would promote the goal of generating more housing. The project would not result in a net loss of available housing units, would not be inconsistent with the current and projected housing demand and supply, and would not contribute to a jobs/housing ratio imbalance in the project area. Therefore, potential impacts related to housing would be less than significant.

### *(iii) Employment*

Project development of approximately 55,000 square feet of commercial uses would result in approximately 130 new employment positions on the site.<sup>20</sup> This increase in employment positions would account for approximately 9.57 percent of the local area's increase in employment, 0.27 percent of the subregion's increase in employment, and 0.10 percent of the region's increase in employment. As the increase in employment

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<sup>19</sup> The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received during the Draft EIR public review period would reduce these percentages.

<sup>20</sup> With the reduction of neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet proposed by the Applicant, new employment opportunities would be reduced to approximately 123 employment positions.

generated by the project would represent a minimal amount of the employment projected for the local, subregional, and regional levels, impacts related to employment would be less than significant. Furthermore, given the current downturn in economic conditions, increases in employment growth would be considered a benefit to the local area, subregion, and region.

*(iv) Jobs/Housing Ratio*

The jobs/housing ratio for the region would be 1.40 in 2013. The jobs/housing ratio would improve to 1.38 by 2013 from 1.40 in 2008 for the subregional area and the jobs/housing ratio would improve to 1.11 by 2013 from the 1.13 for the local area. As such, the Community Plan area, the City of Los Angeles, and the County of Los Angeles would all benefit with a greater increase in residential uses compared to employment positions since all three geographical zones are already projected to experience a greater imbalance in the jobs/housing ratio. As such, the proposed project would not contribute to, but rather would help to alleviate, the jobs/housing ratio imbalance for the local area, subregional area, and the region. Thus, impacts would be less than significant.

*(c) Consistency with Regulatory Framework*

*(i) Contributions to Housing and Employment Opportunities*

Development of new residential units would support the policies of the City of Los Angeles General Plan Framework. The project would accommodate various income levels by providing a mix of one- to three-bedroom units. The provision of new housing as part of the project would assist in addressing the housing shortage that currently exists throughout the County, City, and Community Plan area. In addition, the location of high-density housing in a commercial area such as the project vicinity would increase housing within the community while preserving the lower density residential neighborhoods. As such, the project would be consistent with applicable policies regarding population, housing, and employment, and therefore, impacts would be less than significant.

*(ii) Broadening of Opportunities*

The proposed project would add new units, varying in size, to the general housing supply and would contribute to housing availability and opportunity in the area. According to the RHNA, the Los Angeles City subregion area, in which the project is located, is in need of a total of 112,846 additional housing units, including 27,238 very low income, 17,495 low income, 19,304 moderate income, and 48,839 above moderate income housing. The proposed project would remove one existing single-family residential unit, but would construct 500 new residential units and, thus, would not substantially affect the

existing housing units, generally, or low-income units.<sup>21</sup> Further, the proposed project would not interfere with the potential provision of such housing in the geographic areas analyzed. Additionally, as the project would locate new housing in close proximity to employment, shopping, dining, and other service destinations, the project would create new live-work opportunities in the Sherman Oaks community. Therefore, the proposed project's development would not have adverse affects on the existing or future availability of housing for other sectors.

## (2) Cumulative Impacts

### (a) Population

Fifty-one related projects in the surrounding area are expected to be constructed and/or operational during the same time period as the proposed project. Of the 51 identified projects, a total of approximately 2,819 multi-family residential units (2,054 condominiums and 765 apartments) would be developed. At full capacity, these units could generate approximately 4,792 persons. When combined with the proposed project, a cumulative total of 5,642 persons would be added to the population by 2013.<sup>22</sup> The increase in 5,642 residents would account for 1.49 percent of the anticipated increase in residents within the region. As these numbers are within the anticipated population growth projected by SCAG, the proposed project and the related projects would have a less than significant cumulative impact on population growth.

### (b) Housing

When the project is combined with the related projects, a cumulative total of 3,319 units would be constructed. This would represent 2.32 percent of the total residential units anticipated to be built within the region by 2013.<sup>23</sup> Therefore, as the proposed project and the related projects would contribute to the housing needed within the region, these projects would have a less than significant cumulative impact on housing.

### (c) Employment

Development of the proposed project's 55,000 square feet of commercial space combined with the related projects' developed spaces would result in a total of 859,177 square feet of retail/service uses, 7,797 square feet of restaurant uses,

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<sup>21</sup> As described above, in response to public comments received regarding the Draft EIR, the number of residential units proposed by the Applicant has been reduced from 500 to 399 units.

<sup>22</sup> The project related population would be reduced to 678 persons based on the proposed reduction of residential units from 500 to 399 units.

<sup>23</sup> The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would further reduce this percentage.

71,206 square feet of office uses, 137,109 square feet of medical office uses, expansion or development of 4,783 square feet of school uses, and a net addition of 52,363 square feet of “other” uses (e.g., self-storage space). Based on average employment generation factors for these uses as provided in SCAG’s Employment Density Summary Report, SCAG (October 2001), a total of 2,556 employment positions would be added, which would account for 1.88 percent of the anticipated employment growth in the region.<sup>24,25</sup> As previously noted, given the current downturn in economic conditions, increases in employment growth would be considered a benefit to the region. In addition, the proposed project and related projects would result in a total cumulative development of 3,319 residential units, which accounts for 2.32 percent of the anticipated increase in residential units.<sup>26</sup> Therefore, the related projects would result in a greater increase of residential units compared to employment positions, helping to balance the jobs/housing ratio in the region. Therefore, the proposed project combined with the related projects would have a less than significant cumulative impact on employment.

### (3) Mitigation Measures

Impacts related to population, housing, and employment would be less than significant and thus, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Impacts on population, housing, and employment from the proposed project would be less than significant. No mitigation measures would be required.

## J.1. Police Protection

### (1) Environmental Impacts

#### (a) Construction

With the exception of utility line connections, project construction and staging would be confined to the site and, therefore, would not interfere with LAPD access to surrounding

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<sup>24</sup> Employment factors from SCAG’s Employment Density Summary Report, SCAG (October 2001) that were used are as follows: 1 employee per 424 square feet of retail/service uses, 1 employee per 319 square feet of low-rise office uses, 1 employee per 440 square feet of high-rise office uses, 1 employee per 829 square feet of light manufacturing uses, and 1 employee per 1,442 square feet of government offices (i.e., schools, post offices).

<sup>25</sup> With the reduction of neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet proposed by the Applicant, new employment opportunities would be reduced to approximately 123 employment positions.

<sup>26</sup> The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would further reduce this percentage.

properties. Construction activities would, however, generate traffic associated with the movement of construction equipment, the hauling of materials by construction trucks, and construction worker traffic. As such, construction activities could increase response time for police vehicles on Sepulveda Boulevard due to travel time delays caused by traffic. However, to address the potential for increased response times for emergency vehicles, the LAPD would be notified of the times of day and locations of any traffic slowing or lane closures. 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. Further, appropriate detour signage would be employed as necessary to ensure emergency access would be maintained to the project site and that traffic flow would be maintained on street right-of-ways. With coordination between the project's construction managers and the LAPD, the potential impacts of construction on LAPD emergency access would be reduced to a less than significant level.

*(b) Operation*

Development of the proposed project would generate a residential population of approximately 850 residents.<sup>27</sup> In addition, the approximately 55,000 square feet of neighborhood-serving commercial uses would generate a daytime population of approximately 165 persons.<sup>28,29</sup> The project would be served by the Van Nuys Community Police Station, which has approximately 322 sworn officers and a civilian support staff of 28 persons. With the project's estimated 850 new residents, the residential population for the Van Nuys Community Police Station's service area would increase to a total of approximately 287,664 residents.<sup>30</sup> Based on this new population, the officer per resident ratio in the Van Nuys Community Police Station service area would decrease from 1 officer per 891 residents to 1 officer per 893 residents. This would result in a change in officer per resident ratio of less than one percent, which would not be a significant change.

The new permanent residential and temporary daytime populations associated with the proposed project would increase the demand for police protection services provided by

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<sup>27</sup> *The project related population would be reduced to 678 persons based on the proposed reduction of residential units from 500 to 399 units.*

<sup>28</sup> *The daytime police population was determined based on the following generation factor as indicated in the City of Los Angeles' CEQA Thresholds Guide (2006), Section K.1 Police Protection: 3 persons per 1,000 sf of retail space.*

<sup>29</sup> *With the reduction of the proposed project's neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet, the daytime population associated with these uses would be reduced to approximately 156 persons.*

<sup>30</sup> *This would be reduced based on the proposed project's revised estimated population of 678 persons consistent with the reduction of residential units from 500 to 399 units proposed by the Applicant.*

the Van Nuys Community Police Station. Assuming that the annual crime rate would remain constant at 0.03 crime per capita, the residential population of the project (850 residents) would potentially generate approximately 26 crimes per year. The total annual number of reported crimes in the service area of the Van Nuys Community Police Station was projected to nominally increase from 8,692 crimes to approximately 8,718 crimes. In addition, the commercial components of the proposed project and related projects could potentially generate crimes.

As vehicle theft and burglary from vehicles are the two most common crimes in the Van Nuys area, the proposed project would include security features within the parking facility such as surveillance cameras, appropriate lighting, and gated access. Additionally, the project would provide for on-site security personnel and a keycard access system with keycard readers for residents to minimize the demand for police protection services. Furthermore, the proposed project would also generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc) that could be applied toward the provision of new police facilities and related staffing, as deemed appropriate. The project's security design features as well as revenue to the Municipal Fund would help offset the increase in demand for police services.

Nonetheless, due to the project's population increase and associated demand for police services at the time of project buildout, the LAPD's Crime Prevention Unit has stated that the project would have a significant impact on police services. Therefore, to reduce the proposed project's potential impacts on police services to less than significant levels, mitigation measures are provided below.

## (2) Cumulative Impacts

Of the 51 related projects, 18 include residential uses and are located within the service boundaries of the Van Nuys Community Police Station. In conjunction with the proposed project, these 18 related projects would cumulatively increase the demand for additional police protection services from the Van Nuys Community Police Station. Based on the average household size of 1.70 persons per unit for the Sherman Oaks Community Plan area, the related projects would generate a total residential population of 3,719 persons. The 18 related projects could potentially generate 112 additional crimes per year. Therefore, the residential populations of the proposed project and related projects could generate 138 additional crimes per year for a projected total in the Van Nuys area of 8,830 crimes per year. This represents an approximate 1.5 percent increase in

annual crimes.<sup>31</sup> In addition, the commercial components of the proposed project and related projects could potentially generate crimes.

However, similar to the proposed project, all related projects would be reviewed by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Furthermore, it is anticipated that the LAPD would expand services as necessary to meet anticipated growth. As such, cumulative impacts to existing police protection services due to population growth and associated demand would be less than significant.

### (3) Mitigation Measures

As indicated by the LAPD, due to the project's population growth and associated demand for police services impacts to police services could be potentially significant. Therefore, the following mitigation measures are recommended to reduce impacts associated with police protection to less than significant levels:

**Mitigation Measure J-1:** Prior to the issuance of the building permit, the Applicant shall consult with the LAPD's Crime Prevention Unit, regarding on-site crime prevention features appropriate for the design of the property. These features may include the following elements:

- designing entryways, elevators, lobbies and parking areas with lighting that eliminates areas of concealment;
- eliminating areas of dead space;
- providing solid core doors with deadbolt locks to all residential units and commercial uses; and
- providing parking within an enclosed parking podium that would be internal to the site.

**Mitigation Measure J-2:** Prior to the issuance of any building permits, the Applicant shall provide the commanding officer at the Van Nuys Community Police Station with a diagram of each portion of the property, including access routes and additional information which may facilitate a police response.

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<sup>31</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the number of additional project-related responses, thus reducing this percentage.*

#### (4) Level of Significance After Mitigation

With implementation of mitigation measures above, impacts to police protection services would be less than significant.

### **J.2. Fire Protection**

#### (1) Environmental Impacts

##### *(a) Construction*

Construction activities for the project could temporarily increase the existing demand for fire protection and emergency medical services. However, in compliance with OSHA and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response and fire safety operations. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Project construction would comply with applicable codes and ordinances relating to fire safety practices. Therefore, construction impacts on fire protection and emergency medical services would be less than significant.

With the exception of utility line connections, project construction and staging would be confined to the project site and, therefore, would not interfere with LAFD access to surrounding properties, particularly the Sherman Oaks Galleria located south of the project site. Construction activities would, however, generate traffic associated with the movement of construction equipment, the hauling of materials by construction trucks, and construction worker traffic. As such, construction activities could increase response time for emergency vehicles on Sepulveda Boulevard due to travel time delays caused by traffic. However, 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. Further, appropriate detour signage would be employed as necessary to ensure emergency access would be maintained to the project site and that traffic flow would be maintained on street right-of-ways. Since emergency access to the site would remain clear and unobstructed during construction of the project, impacts related to LAFD emergency access would be less than significant.

*(b) Operation*

*(i) Capability of Existing Fire Services*

As noted earlier, the proposed project would result in approximately 850 new residents.<sup>32</sup> In addition, the project would generate a daytime population associated with retail employees and visitors. The project's residential and daytime populations would increase the demand for LAFD fire protection and emergency medical services.

Fire Station No. 88 is the closest fire station to the project site and thus, would be the responder to the site in the event of an emergency. Based on Fire Station No. 88's current response rate of 0.16 response per capita, the 850 residents generated by the proposed project are anticipated to result in approximately 136 additional responses per year. The 136 additional responses per year by project residents would increase Fire Station No. 88's total annual response by 1.84 percent.<sup>33</sup> Furthermore, additional responses from the station would be required as a result of the project's on-site daytime population. Notwithstanding, a substantial number of responses is not anticipated. Furthermore, given that the project is located within close proximity (0.4 mile) of Fire Station No. 88, impacts relative to the LAFD's capability to provide adequate fire protection services would be less than significant. In addition, Fire Stations Nos. 83 and 39 would also be available to serve the project site in the event of an emergency. Furthermore, the Applicant would submit a plot plan for the project for approval by the LAFD either prior to the recordation of the final map or the approval of a building permit to ensure that the LAFD would review site plans for access before construction of any portion of the project. Therefore, the proposed project would not require the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. Impacts on fire services would be less than significant.

*(ii) Fire Safety, Access, and Fire Flow Requirements*

A project's impact on fire services is determined in part by its compliance with the applicable provisions of the Fire Code and Building Code. A project that closely complies with applicable provisions is less likely to cause any significant impacts to fire services. The project site is 0.4 mile from Fire Station No. 88, which is within LAFD's recommended response distance of 1.5 miles. Based on the project site's response distance from Fire Station No. 88, as well as the anticipated minimal increase in potential demand to Fire Station No. 88, the proposed project would not require the addition of a new fire station.

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<sup>32</sup> *The project related population would be reduced to 678 persons based on the proposed reduction of residential units from 500 to 399 units.*

<sup>33</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the number of additional responses to approximately 108, thus reducing this percentage.*

Pursuant to Division 9 of the Fire Code, the proposed project would comply with specific fire safety, access, and fire flow requirements. The Applicant would submit a plot plan for the project for approval by the LAFD either prior to the recordation of the final map or the approval of a building permit. The plot plan would indicate the project's compliance with the requirements of the Fire Code. Specifically, the project would include a new 28-foot-wide driveway/fire lane along the back side of the site between Camarillo Street and Sepulveda Boulevard that would provide emergency access. Therefore, no portion of an exterior wall would be more than 150 feet from the edge of a roadway.

New hydrants may be required to serve the project to ensure that none of the project's proposed buildings would be further than 300 feet from an approved fire hydrant. However, the project would comply with applicable LAMC fire safety requirements for building construction, which include the submittal of a plot plan indicating the provision of adequate fire hydrants.

With regard to fire flow, a minimum of 4,000 gpm from four hydrants flowing simultaneously would be provided for the proposed project. For eight inch water mains, the LAFD requires fire flows of 2,500 gallons per minute (gpm) and a minimum residual pressure of 20 pounds per square inch (psi) is required for any fire service or hydrant flowing at capacity. Based on the Service Advisory Requests (i.e., fire pressure flow reports) from LADWP, the existing 8-inch water main in Sepulveda Boulevard could accommodate the 2,500 gpm flows with a residual pressure of 94 psi, which is well above the 20 psi fire flow requirement.<sup>34</sup> However, additional coordination with LADWP and LAFD during the development of the project plans would be required to ensure that adequate fire flow would be provided at the time of project occupancy.

The project would comply with the fire safety design and construction requirements for high-rises set forth in Division 118 of the Fire Code. Consistent with Fire Code Division 119, the project would undergo an annual inspection including the evaluation of physical access, property condition, and all fire-safety facilities and equipment required under the LAMC Fire and Building Codes.

Based on the above, the project would comply with applicable Fire Code and LAFD requirements and would have a less than significant impact relative to fire safety, access, hydrant, and fire flow requirements.

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<sup>34</sup> LADWP, SAR Number 7367, Fire Service Pressure Final Reports, March 16, 2004.

*(iii) Emergency Response Times*

Project-related increase in traffic on surrounding roadways could have an impact on fire protection and emergency medical services if the response capabilities of the LAFD were impeded. The 2008 fire-related response time for Fire Station No. 88 was 3.2 minutes, while the emergency medical service response time was 6.0 minutes. These times are above the five minute threshold that is generally acknowledged as an acceptable response time; however, due to the proximity of Fire Station No. 88 (0.4 mile) and the other two supporting stations to the site, emergency response to the project site is not expected to significantly decline due to implementation of the project. Thus, project-related traffic is not anticipated to impair the LAFD from responding to service requests at the project site. Finally, the project would provide access for emergency vehicles to the project site subject to the approval of the LAFD. Therefore, the proposed project's potential impacts related to emergency response times would be less than significant.

**(2) Cumulative Impacts**

Of the 51 related projects, 5 related projects involving residential development are located in the service district of Fire Station No. 88, the first responder to the project site. These related projects, in conjunction with the proposed project, would cumulatively generate the need for additional fire protection and emergency medical services. Specifically, the proposed project in conjunction with the related projects would result in approximately 233 additional responses per year. This would represent an approximate 3.2 percent increase in Fire Station No. 88's number of annual responses for the 2008 year (7,392).<sup>35</sup> In addition, the related projects within Fire Station No. 88's service area involving development of restaurant and service uses would increase the daytime population of the area, thereby increasing demand on LAFD services.

However, it is anticipated that developers of these related projects would be required to coordinate with the LAFD to ensure that the fire services of Fire Station No. 88 would not be significantly impacted. Additionally, the LAFD conducts periodic review of future staffing and facility needs to ensure that Fire Station No. 88 would have adequate staffing and resources. Furthermore, all related projects would be subject to review by the LAFD and thus, would be expected to comply with LAMC Fire Code and Building Code regulations pertinent to fire safety, access, hydrants, and fire flow. Therefore, implementation of the proposed project in conjunction with related projects would result in a less than significant impact relative to fire and EMS services.

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<sup>35</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the number of additional project-related responses to approximately 108, thus reducing this percentage.*

### (3) Mitigation Measures

While impacts regarding fire protection services would be less than significant, the following mitigation measures are proposed to further ensure that such impacts associated with fire protection would remain less than significant.

**Mitigation Measure J-3:** Project building plans including a plot plan shall be submitted for approval by the Los Angeles Fire Department either prior to the recordation of the final map or the approval of a building permit.

**Mitigation Measure J-4:** Prior to the issuance of a building permit, the Applicant shall consult with the Los Angeles Fire Department and design the project to meet on-site fire flow requirements and incorporate fire prevention and suppression features and other life-saving equipment.

**Mitigation Measure J-5:** The project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles, unless otherwise approved.

### (4) Level of Significance After Mitigation

Impacts to fire protection services would be less than significant. The mitigation measures above would further ensure that such impacts would remain less than significant.

## J.3. Public Schools

### (1) Environmental Impacts

The proposed project is estimated to generate approximately 72 elementary school students, 43 middle school students, and 43 high school students for a total of approximately 158 students.<sup>36</sup> The project site is located within LAUSD District 2, therefore, these students would attend Sherman Oaks Elementary School, Van Nuys Middle School, and Van Nuys High School. With the addition of 72 elementary school students from the proposed project, Sherman Oaks Elementary School would have an excess of 184 seats. With the addition of 43 middle school students from the project, Van Nuys Middle School is projected to have an excess of 199 seats. In contrast, with the

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<sup>36</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce this estimated number of students generated by the project.*

project's addition of 43 high school students, Van Nuys High School would have a shortage of 220 seats.

However, pursuant to Section 65995 of the California Government Code, the payment of developer fees in accordance with SB 50 is considered to provide full and complete mitigation for any impact to school facilities. Therefore, with payment of the required SB 50 fees, project impacts to schools would be less than significant.

## (2) Cumulative Impacts

Of the 51 related projects anticipated to be developed within the vicinity of the project site, only 19 were identified as being located within the attendance boundaries of at least one of the schools serving the project site (i.e., Sherman Oaks Elementary School, Van Nuys Middle School, or Van Nuys High School). The proposed project in combination with these 19 related projects would have the potential to generate a cumulative total of 93 elementary school students, 174 middle school students, and 174 high school students. Therefore, Sherman Oaks Elementary School and Van Nuys Middle School would have sufficient capacity to accommodate the cumulative total of 93 elementary school students and 174 middle school students. Van Nuys High School is projected to experience a shortage of 177 student seats, and thus, would be constrained by the addition of 174 high school students from the proposed project and related projects. However, the proposed project and related projects would be subject to the payment of developer fees in accordance with SB 50. Pursuant to Section 65995 of the California Government Code, the payment of developer fees in accordance with SB 50 is considered full and complete mitigation and thus, cumulative impacts on school facilities would be less than significant.

## (3) Mitigation Measures

Pursuant to Government Code Section 65995, the payment of the requisite school impact fees established under the provisions of SB 50 would be deemed as full mitigation of the project's impacts on school facilities (i.e., Sherman Oaks Elementary School, Van Nuys Middle School, and Van Nuys High School). Mitigation Measure J-6 is proposed to ensure project compliance with Government Code Section 65995.

**Mitigation Measure J-6:** Pursuant to California Government Code Section 65995, the Project Applicant shall pay developer fees to Los Angeles Unified School District prior to the issuance of building permits.

#### (4) Level of Significance After Mitigation

With payment of requisite SB 50 fees as provided for in Mitigation Measure J-6, impacts on schools would be less than significant and no mitigation measures would be required.

### **J.4. Parks and Recreation**

#### (1) Environmental Impacts

##### *(a) Impacts on Existing Facilities*

The project's introduction of a new residential population in the area would generate a demand for off-site parks and recreational facilities. However, with the provision of approximately 106,013 square feet of on-site open space<sup>37</sup> which includes recreational amenities, the project's demand for off-site parks and recreation facilities would be minimized.<sup>38</sup> Therefore, project residents would not be expected to cause or accelerate substantial physical deterioration of any off-site parks or recreational facilities. In addition, recreational facility use by commercial employees and customers of the proposed project is expected to be minimal. Thus, the project would not substantially increase the use of off-site neighborhood and regional parks and recreational facilities, nor would it substantially increase demand for recreation programs. Therefore, impacts to parks and recreation facilities would be less than significant.

##### *(b) Consistency with Regulations*

###### *(i) Public Recreation Plan*

The Public Recreation Plan (PRP) establishes a desired long-range Citywide standard for local parks of 2 acres per 1,000 persons within a 0.5-mile radius for neighborhood parks and 2 acres per 1,000 persons within a 2-mile radius for community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short and intermediate-range standards of 1 acre per 1,000 persons within a 1-mile radius for neighborhood parks and 1 acre per 1,000 persons within a 2-mile radius for community parks.

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<sup>37</sup> *With the proposed reduction in residential units and commercial uses, the amount of open space would be reduced from 106,013 square feet to 93,500 square feet. However, this revised amount would still exceed the usable open space requirement, as set forth under Section 12.21 of the LAMC.*

<sup>38</sup> *Open space is defined by Section 12.21 of the LAMC.*

Based on the 850 residents that would be generated by the project, the project would need to provide 1.70 acres of neighborhood parkland to meet the PRP's long-range standard of two acres per 1,000 residents and approximately 0.85 acre to meet the PRP's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents.<sup>39</sup> The project proposes to include 1.54 acres (67,213 square feet) of common open space, which would consist of a swimming pool, community rooms, and courtyards and plazas and thus would be considered as "neighborhood" park space. The project's 1.54 acres would fall 0.14 acre short of the City's long-range standard for neighborhood parks.<sup>40</sup> However, the project would exceed the City's short- and intermediate-range standards for neighborhood parks.

With regard to community parks, the project would need to provide 1.70 acres of community parkland to meet the PRP's long-range standard for community parks of 2 acres per 1,000 residents and approximately 0.85 acre to meet the PRP's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents.<sup>41</sup> The project's provision of on-site open space would help reduce the use of off-site community parks in the area. Nonetheless, project residents would still be expected to utilize the community parks' amenities including sports fields, tennis courts, basketball courts, and children's play areas. The project, therefore, would not meet the PRP's long range standard or short and intermediate range standards for community parks. However, implementation of the mitigation measure below would ensure that through the provision of on-site recreational amenities and open space areas, payment of in-lieu fees, dedication of parkland, or a combination of these methods, the project would comply with parks and recreational requirements. It should be noted that the PRP standards are Citywide standards and not requirements for specific development projects, such as the proposed project. Rather specific, residential development projects are subject to Sections 12.21 and 17.12 of the LAMC.

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<sup>39</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the neighborhood parkland demand to 1.36 acres in order to meet the PRP's long-range goals and to 0.7 acre in order to meet the PRP's short-term and intermediate-range goals.*

<sup>40</sup> *The demand for neighborhood park space would be met with the proposed reduction in residential units from 500 to 399 units. In addition, with implementation of the proposed approximately 13,000-square-foot publicly accessible ground level plaza, the proposed project's common open space would increase to approximately 74,500 square feet or 1.71 acres.*

<sup>41</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the community parkland demand to 1.36 acres in order to meet the PRP's long-range goals and to 0.7 acre in order to meet the PRP's short-term and intermediate-range goals.*

*(ii) City of Los Angeles Municipal Code*

Section 12.21 of the LAMC requires that development projects with six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the project would be required to provide approximately 56,050 square feet of total usable open space.<sup>42</sup> The proposed project would provide a total of approximately 106,013 square feet of usable open space<sup>43</sup> areas consisting of approximately 67,213 square feet of common open space (e.g., courtyards, gardens, pedestrian pathways, large pool facility, spa, gym, community rooms, a bocce court, and lobbies) and approximately 38,800 square feet of private open space (balconies) for its residents. Therefore, the proposed project would exceed the usable open space requirement as set forth under Section 12.21 of the LAMC.

The project would also be subject to Section 17.12 of the LAMC, the City's implementing ordinance of the Quimby Act. Section 17.12 provides a formula for the dedication of land for park and recreational purposes and/or the payment of in-lieu fees (subject to determination by the Department of Recreation and Parks). Per Section 17.12, the project would be required to dedicate approximately 32 percent of the gross subdivision area for parks and recreational purposes. Based on this requirement and the site area of 5.05 acres or approximately 219,778 square feet, the project would be required to do one or a combination of the following: dedicate approximately 1.62 acres or 70,720 square feet of park and recreation space or pay in-lieu fees. The project would provide approximately 1.54 acres (67,213 square feet) of common park and recreation space, but this area would not be dedicated to the City of Los Angeles as required to satisfy Section 17.12 requirements. As such, the project Applicant would be required to pay in-lieu fees to satisfy Section 17.12 parkland requirements. The project's 67,213 square feet of common open space could be credited against the total parkland dedication requirement or the total in-lieu park fee requirement, as determined by the DRP.<sup>44</sup> Thus, potentially significant impacts relative to Section 17.12 could occur.

However, implementation of the mitigation measure below would ensure that through the provision of on-site recreational amenities and open space areas as a credit

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<sup>42</sup> *This demand for usable open space would be reduced with the proposed reduction in residential units from 500 units to 399 units.*

<sup>43</sup> *With the proposed reduction in residential units and commercial uses proposed by the Applicant, the amount of open space would be reduced from 106,013 square feet to 93,500 square feet. However, this revised amount would still exceed the usable open space requirement as set forth under Section 12.21 of the LAMC.*

<sup>44</sup> *With implementation of the proposed approximately 13,000-square-foot publicly accessible ground level plaza, the amount of common open space would increase to approximately 74,500 square feet or 1.71 acres.*

against the dedication of open space, payment of in-lieu fees, dedication of parkland, or a combination of these methods, the project would comply with the maximum requirements established under the Quimby Act. With this mitigation measure, impacts on parks and recreational facilities would be less than significant.

## (2) Cumulative Impacts

Of the 51 related projects identified, 29 are residential in nature or have residential components. These 29 related projects in the area would result in the development of 2,819 new residential units. Growth from the proposed project and these 29 projects would combine to generate a cumulative demand for additional parks and recreational facilities. The 850 residents estimated to be generated by the proposed project, in addition to the estimated 4,792 residents associated with the 29 identified related projects, would result in a cumulative population increase of approximately 5,642 residents.<sup>45</sup> This cumulative population would increase the demand for public parks and recreational facilities. However, as with the project, the 29 related projects with residential uses would be subject to discretionary review to ensure consistency with the PRP and would be required to comply with the requirements of Sections 12.21 and 17.12 of the LAMC. Given that related projects would be required to dedicate land for park and recreational purposes, provide on-site open space to meet the recreational demands of residents per Section 12.21 of the LAMC, and/or pay in-lieu park fees pursuant to Section 17.12 of the LAMC, it can be expected that potential cumulative impacts to parks and recreational facilities would be reduced to levels that are less than significant.

## (3) Mitigation Measures

The following mitigation measure is recommended to reduce potential impacts to parks and recreational facilities to less than significant levels:

**Mitigation Measure J-7:** In consultation with the City of Los Angeles Department of Recreation and Parks, 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) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in-lieu fees.

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<sup>45</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the project-related demand for park space generated by the project and the associated cumulative demand for park space.*

#### (4) Level of Significance After Mitigation

Potential significant impacts to park and recreational facilities associated with the proposed project would be reduced to a level that is less than significant with implementation of Mitigation Measure J-7.

### **J.5. Libraries**

#### (1) Environmental Impacts

Project residents would likely utilize the Sherman Oaks Branch Library. It is projected that the project's 850 residents would represent approximately one percent of the future service population for this library.<sup>46</sup> Therefore, the project would result in a nominal increase in the demand for library services at the Sherman Oaks Branch Library. 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 the Encino–Tarzana Branch Library, are located nearby (within 5 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.

#### (2) Cumulative Impacts

Of the 51 related projects identified in the project vicinity, 29 are residential in nature or have residential components. These 29 related projects would result in the development of 2,819 new residential units and, based on an average household size of 1.70 persons per household, would generate a population of approximately 4,792 residents. These 29 related projects and the proposed project would add a total of 5,642 persons to the Sherman Oaks Branch Library's future 2013 service population of 85,022. However, this number is overstated as it does not consider that much of the growth associated with the project and related projects is already accounted for in the service population projections made by the LAPL. In addition, as with the project, it is anticipated that the related projects would be reviewed on a case-by-case basis to ensure that no significant impacts to library services would occur. As such, cumulative impacts on libraries would be less than significant.

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<sup>46</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the library service population generated by the project.*

### (3) Mitigation Measures

The project's impacts to libraries would be less than significant. Therefore, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Impacts to libraries would be less than significant and no mitigation measures would be required.

## **K. Transportation and Circulation**

### (1) Environmental Impacts

#### *(a) Construction*

Construction equipment, crew vehicles, haul trucks and delivery vehicles would generate traffic during the estimated 23-month construction period. It is anticipated that the construction workers would park off-site in nearby facilities until completion of the project parking structure.

During construction, it is anticipated that on-street parking would be removed along Camarillo Street west of Sepulveda Boulevard to provide additional room for construction activities. However, through traffic lanes near the project site would remain open. To lessen the potential for construction traffic to block through traffic lanes and driveways of nearby residents and businesses, truck staging would occur at an off-site location approved by the City of Los Angeles.

It is estimated that approximately 165,000 cubic yards of exported material would be transported from the site, which would generate approximately 150 outbound and 150 inbound truckloads per day, for a total of 300 truck trips per day. Trucks delivering materials for the construction of the parking structure would average approximately 42 inbound and 42 outbound trips per day, totaling approximately 84 delivery truck trips per day, while the construction of the residential and retail uses would generate an average of 11 outbound and inbound trucks per day, for a total of 22 delivery truck trips per day. Some miscellaneous trips would be generated by visitors, inspectors, lunch vans, etc., averaging approximately 2 inbound and 2 outbound trips per hour. Given the nominal amount of these miscellaneous trips, they were not further analyzed.

It is estimated that for approximately 20 months out of the overall estimated 23-month construction period, each phase would generate construction truck trips separate from the subsequent phase. However, there would be approximately three months of

overlapping phases, which would result in the combination of truck trips during those months. As a result of construction truck trips, a short-term significant construction traffic impact would occur at the intersection of Camarillo Street & Sepulveda Boulevard during Months 1-2 and Months 3-4 in the A.M. peak hour prior to mitigation.

*(b) Operation*

*(i) Study Intersections*

Implementation of the proposed project would generate approximately 5,844 net daily trips, which includes 321 trips during the A.M. peak hour and 549 trips during the P.M. peak hour.<sup>47</sup> Based on the City's significant traffic impact criteria, the proposed project would result in significant impacts at the following 11 study intersections during one or both peak hours:

1. 101 Freeway EB On-Ramp and Sepulveda Boulevard (P.M. peak hour);
2. La Maida Street and Sepulveda Boulevard (P.M. peak hour);
3. Camarillo Street and Sepulveda Boulevard (both peak hours);
4. Ventura Boulevard and Haskell Avenue (North) (P.M. peak hour);
5. Ventura Boulevard/I-405 Freeway Southbound On-Ramp/Sherman Oaks Avenue (P.M. peak hour);
6. Ventura Boulevard and Sepulveda Boulevard (both peak hours);
7. Ventura Boulevard and Kester Avenue (South) (P.M. peak hour);
8. Ventura Boulevard and Van Nuys Boulevard (P.M. peak hour);
9. Ventura Boulevard and Beverly Glen Boulevard (P.M. peak hour);
10. I-405 Freeway Northbound Ramps/Greenleaf Street and Sepulveda Boulevard (both peak hours); and
11. Moorpark Street and Sepulveda Boulevard (both peak hours).

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<sup>47</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR as well as the reduction of the proposed project's neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet would reduce the daily and peak hour trips generated by the project.*

*(ii) Freeways*

As shown in the Traffic Study provided in Appendix H Project-added trips to freeway on- and off-ramps in the vicinity would be less than 50 trips. Therefore, no significant impact to these ramps due to Project traffic is expected and no further analysis is required per City criteria.

Freeway impacts associated with the CMP were analyzed for the nearest CMP freeway monitoring segments. The project would not result in significant impacts on CMP freeway segments during either the A.M. or P.M. peak hour. With regard to impacts on CMP monitoring intersections, the project would add more than 50 trips to the intersection of Ventura Boulevard and Sepulveda Boulevard and thus, would exceed the CMP trips threshold. As discussed above, the project would have a significant impact at this CMP intersection.

*(iii) Public Transit*

The project could add a small amount of new transit riders to existing public transit services. It is estimated that no more than 3.5 percent of the new trips generated by the project would use transit. The 25 buses currently traveling on Sepulveda Boulevard adjacent to the site during the A.M. peak and the 21 buses on Sepulveda Boulevard during the P.M. peak hour would be able to adequately accommodate the project's transit usage. The project would not add substantial new ridership to the transit lines operating in excess of their capacity or conflict with adopted policies, plans, or programs supporting alternative transportation. Project impacts on public transit would be less than significant.

*(iv) Parking*

The proposed project would be required to provide 963 parking spaces for the 500 residential units pursuant to the LAMC.<sup>48</sup> For the 55,000 square feet of retail uses, 220 spaces would be required. However, the City Planning Department's "Residential Parking Policy for Division of Land-No. AA 2000-1" establishes a parking standard for new condominiums of two spaces per unit plus 0.5 space per unit for guest parking. Therefore, to account for the possibility of condominium conversion at a later time, the proposed project would provide a total of 1,250 spaces for the residential uses. The project would provide a total parking supply of approximately 1,470 spaces, which would exceed LAMC's total requirement of 1,183 spaces. The project's parking demand would not exceed the parking supply. Therefore, project impacts on parking would be less than significant.

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<sup>48</sup> As described above, the reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR, as well as the reduction of the proposed project's neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet, would reduce the number of parking spaces required by the LAMC.

*(v) Access*

Primary access would be provided from a new private roadway that would extend along the back side of the site, (i.e., along the northern/western frontage) extending from Sepulveda Boulevard to Camarillo Street. This private roadway would provide two access points to the parking garage. Furthermore, additional driveways for retail access, residential access, and residential drop-off and pick up are proposed. Given these various points of access, no issues related to site access are anticipated to occur.

The intersections nearest the primary site access are La Maida Street at Sepulveda Boulevard and Camarillo Street at Sepulveda Boulevard. The La Maida Street and Sepulveda Boulevard intersection is projected to operate at LOS C during the A.M. peak hour and LOS D in the P.M. peak hour in the Future (2013) "With Project" Conditions. Camarillo Street and Sepulveda Boulevard is projected to operate at LOS C during the A.M. peak hour and LOS E in the P.M. peak hour in the Future (2013) "With Project" Conditions. Therefore, as this intersection would operate at LOS E in the P.M. peak hour, based on the City's significance threshold for access, the project would result in a significant impact with respect to access. However, as detailed in Subsection 4, Mitigation Measure, a mitigation measure is proposed at this intersection to improve conditions to LOS C in the P.M. peak hour.

*(vi) Pedestrian/Bicycle*

The project would encourage pedestrian activity in the area. The neighborhood commercial uses fronting Sepulveda Boulevard and Camarillo Street would be pedestrian-oriented. Pedestrians would have direct access to the neighborhood-serving commercial uses from the sidewalks along Sepulveda Boulevard and Camarillo Street. To further increase circulation a pedestrian entrance to the retail from the ground level parking along Camarillo Street will be included. The project would also not introduce any hazardous design features. Thus, the project would not result in an increase in pedestrian/vehicle or bicycle/vehicle conflict, and impacts relative to pedestrian/bicycle safety would be less than significant. Furthermore, a mitigation measure is provided below to ensure that adequate bicycle parking would be provided on-site.

*(vii) Consistency with Plans*

The project would result in a significant impact to the CMP arterial monitoring intersection of Ventura Boulevard and Sepulveda Boulevard. However, as provided in the following pages, the project would include a mitigation measure that would partially mitigate the impact and another mitigation measure that would provide for a financial contribution to improving operations at this intersection. Thus, the project would be consistent with the intent of the CMP. The proposed project would also be consistent with the goals of the Community Plan to minimize vehicle trips as it would develop a mix of residential and

commercial uses in a Regional Center area of Sherman Oaks, within close proximity to various employment opportunities, retail, and other service destinations. In addition, the project would include neighborhood-serving commercial serving uses on the ground level to encourage pedestrian activity, would be easily accessible to transit service provided along Sepulveda Boulevard and Ventura Boulevard, and would provide adequate parking. To minimize impacts on the transportation system, the project Applicant would also implement mitigation measures. Thus, the project would support the goals of the Community Plan.

Furthermore, the project Applicant would comply with the transportation requirements of the Specific Plan including but not limited to: the implementation of mitigation measures to reduce traffic impacts to the extent feasible, implementation of a TDM Program, and payment of a Project Impact Assessment (PIA) Fee. Therefore, the project would not conflict with the implementation of adopted programs, plans, and policies addressing transportation.

## (2) Cumulative Impacts

The traffic models utilized in the project analysis incorporated cumulative traffic increases due to ambient growth and the 51 related projects identified in Section III, Environmental Setting, of the Draft EIR through the future study year (2013). Therefore, cumulative impacts on intersections and the freeway system have been analyzed and incorporated. As analyzed, prior to mitigation, the project would result in significant impacts on 11 intersections. A number of related projects would generate passengers that would use the same transit lines as the proposed project, cumulatively increasing the demand for transit. The project's transit trips would constitute a small proportion of the cumulative demand for transit. Thus, the project's cumulative impacts on transit would be less than significant.

With regard to parking and access, there are no related projects located in the immediate vicinity of the project site which could contribute to cumulative parking and access impacts. Furthermore, it is anticipated that any future related projects that would be developed near the project site would be subject to City review to ensure that adequate parking and access would be maintained in the project vicinity. It should also be noted that none of the related projects would be developed near the Camarillo Street and Sepulveda Boulevard intersection, in which the project would result in a significant impact in regards to access, prior to mitigation, and no significant impact after mitigation. Therefore, cumulative impacts related to these issues would be less than significant.

Cumulative impacts relative to pedestrian/bicycle safety would occur if related projects impact the same pedestrian facilities or bicycle routes as the proposed project. There are no related projects located within close proximity to the project site to potentially

affect the same pedestrian facilities or bicycle routes as the proposed project. Thus, cumulative impacts relative to pedestrian/bicycle safety would be less than significant.

### (3) Mitigation Measures

#### (a) Construction

The following mitigation measure is proposed to reduce the short-term construction impact at the intersection of Camarillo Street & Sepulveda Boulevard to a less than significant level:

**Mitigation Measure K-1:** Prohibit parking along the west side of Sepulveda Boulevard from the northern site boundary to Camarillo Street and restripe to provide a southbound right-turn-only lane. For this short-term condition, it is proposed that the restriping be limited to the segment of Sepulveda Boulevard approximately from Camarillo Street to La Maida Street, that the existing southbound left-turn lane approaching Camarillo Street be temporarily reduced in width to 9 feet, and that the proposed southbound right-turn-only lane be 10 feet wide.

The following mitigation measures are also recommended to improve public safety, vehicular access, and traffic flow in the project vicinity.

**Mitigation Measure K-2:** Whenever feasible during construction, sidewalk access along Sepulveda Boulevard and Camarillo Street shall be provided to maintain pedestrian access.

**Mitigation Measure K-3:** A Construction Management Plan or Worksite Traffic Control Plan shall be prepared by the Applicant and approved by the Department of Transportation and Department of Public Works and shall contain, at minimum, the following:

- The name and telephone number of a construction manager who can be reached 24 hours a day;
- An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the proposed project area and maps showing access to and within the area and to adjacent properties;
- Procedures for the training of traffic safety personnel (flaggers) to assist in emergency response; and

- The location, times, and estimated duration of any roadway or sidewalk closures, traffic detours, use of protective devices, warning signs, and queuing areas.
- Configure construction parking to minimize traffic interference;
- Provide dedicated turn lanes for movement of construction trucks and equipment, where space is available and would not result in a safety concern for pedestrians and motorists; and
- Reroute construction trucks away from congested streets or sensitive receptor areas, where the resultant trip length would not substantially increase.

**Mitigation Measure K-4:** Flaggers shall be provided as necessary to minimize impact to traffic flow and to ensure safe movement into and out of the project site.

**Mitigation Measure K-5:** Heavy-duty construction trucks shall arrive at the site no earlier than 7:00 A.M. and depart no later than 3:30 P.M.

**Mitigation Measure K-6:** Construction vehicles shall not be permitted to queue where they would interfere with traffic movement or block access to adjacent businesses or residences.

**Mitigation Measure K-7:** All-construction-related vehicles shall be parked on-site or in off-site parking facilities, pursuant to a Temporary Parking Plan. On-street parking of construction-related vehicles shall be prohibited on nearby local streets.

*(b) Operation*

The following measures are proposed for seven of the eleven intersections that would be significantly impacted by the project:

**Mitigation Measure K-8:** *Camarillo Street and Sepulveda Boulevard:* Dedicate an additional 6 feet and widen by 4 feet along the north side of Camarillo Street between Sepulveda Boulevard and the westerly site boundary. In order to implement this measure, on-street parking along both sides of this segment of Camarillo Street shall be removed and this leg of the intersection shall be restriped to provide an eastbound left-turn only lane, shared eastbound through and left-turn lane, and eastbound right-turn only lane. Modify the existing traffic signal to install eastbound protected-permissive phasing. In addition, on-street parking shall be removed during the A.M. peak period (approximately 7:00 A.M. to 10:00 A.M.) along the west side of Sepulveda Boulevard from the northerly site boundary to Galleria Gateway. The southbound approach shall be restriped to provide a

fourth southbound through lane from north of Camarillo Street to north of Ventura Boulevard during the A.M. peak period.

**Mitigation Measure K-9:** *Ventura Boulevard/405 Freeway Southbound On-Ramp—Sherman Oaks Avenue:* Widen by 5 feet the south side of Ventura Boulevard from Sherman Oaks Avenue to approximately 270 feet westerly, as measured from the centerline of Sherman Oak Avenue. Additionally, widen by 2 feet both sides of Ventura Boulevard from US-101 Freeway eastbound off-ramp/I-405 Freeway southbound on-ramp—Sherman Oaks Avenue to approximately 230 feet easterly as measured from the centerlines of the freeway ramps and Sherman Oaks Avenue; and restripe to provide an exclusive westbound right-turn-only lane at the intersection. Modify the existing traffic signal to accommodate restriping.

**Mitigation Measure K-10:** *Ventura Boulevard and Van Nuys Boulevard:* Restripe to add a second southbound left-turn lane at Ventura Boulevard. Modify the existing traffic signal to install southbound protected left-turn phasing.

**Mitigation Measure K-11:** *Ventura Boulevard and Beverly Glen Boulevard:* Widen by 3 feet the south side of Ventura Boulevard from Beverly Glen Boulevard to approximately 160 feet westerly, as measured from the centerline of Beverly Glen Boulevard. Restrict parking on south side of Ventura Boulevard and restripe the eastbound approach to provide an eastbound right-turn-only lane at Beverly Glen Boulevard.

**Mitigation Measure K-12:** *Ventura Boulevard and Sepulveda Boulevard:* Convert the southbound optional through-right-turn lane on Sepulveda Boulevard at Ventura Boulevard to a through lane.

Mitigation Measure K-12 would eliminate the significant impact during the A.M. peak hour, but not during the P.M. peak hour. Therefore, this intersection would remain significantly impacted.

**Mitigation Measure K-13:** *US-101 Freeway Eastbound On-Ramp & Sepulveda Boulevard:* Install a new traffic signal to control this intersection, including southbound left-turn phasing and the ATSC/ATCS upgrade. This signal would provide improved capacity and reduce conflicts between the southbound left-turning traffic accessing the on-ramp and the heavy northbound through traffic on Sepulveda Boulevard.<sup>49</sup>

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<sup>49</sup> *Future traffic volumes at this intersection would satisfy the traffic volume criteria in the “Peak-Hour Traffic Signal Warrant” assuming the southbound left-turn lane as the “Minor Street” and northbound Sepulveda Boulevard as the “Major Street.”*

**Mitigation Measure K-14:** *Ventura Boulevard & Haskell Avenue (North):* Widen the north side of Ventura Boulevard from the north leg of Haskell Avenue to approximately 190 feet easterly, as measured from the centerline of that leg, and restripe to provide a westbound right-turn-only lane.

In addition, the following mitigation measure has been proposed to substantially reduce generalized traffic impacts caused by the lack of on-street parking in the area:

**Mitigation Measure K-15:** The project applicant will contribute \$300,000 to a fund for the identification and implementation of local parking, transportation and circulation improvements in the following areas: the area bounded clockwise by Haskell Avenue beginning at Valley Vista Boulevard and extending northerly to SR-101 (on the west), from that point extending easterly along SR-101 to I-405, and from that point extending northerly along I-405 freeway to westernmost prolongation of Magnolia Boulevard, and from that point extending easterly on Magnolia Boulevard prolongation to Kester Avenue, and from that point extending southerly along Kester Avenue to the prolongation of Moorpark Street, from that point extending easterly along the prolongation of Moorpark Street to Beverly Glen Boulevard-Tyrone Avenue, from that point extending southerly along Beverly Glen Boulevard-Tyrone Avenue to Dickens Street, from that point extending westerly along Dickens Street to Kester Avenue, from that point extending southerly along Kester Avenue to Valley Vista Boulevard, and from that point extending westerly back to Haskell Avenue. The \$300,000 payment will be guaranteed through cash, bond or irrevocable letter of credit, payable to DOT. The fund will be used for measures that include but are not limited to parking improvements intended to increase parking availability, reduce search times and relieve traffic congestion; neighborhood traffic calming; transit-related improvements and amenities; bicycle-related improvements and amenities; pedestrian-related improvements and amenities; and streetscape improvements and amenities.

In addition, while impacts associated with alternative transportation would be less than significant, the following mitigation measure is proposed to ensure that bicycle facilities would be provided on-site:

**Mitigation Measure K-16:** Bicycle rack parking that is secure, convenient, and easily accessible, shall be added on-site and within the public right of way with the approval of Bureau of Street Services, Department of Public Works through their A Permit process. The copy of the A Permit will be submitted to Department of Building and Safety prior to approval of Certificate of Occupancy. Bicycle parking spaces shall

be provided at the rate of two percent of the number of automobile parking spaces required for non-residential uses.

#### (4) Level of Significance After Mitigation

With implementation of the proposed mitigation measures, no significant construction traffic impacts are anticipated under the project.

Implementation of the mitigation measures would reduce traffic impacts at six of the 11 significantly impacted intersections to less than significant levels. All of these mitigation measures are technically feasible. However, two of the measures involve the removal of on-street parking, which may have a secondary impact on local businesses and residents. (Please refer to Section VI, Other Environmental Considerations, of the Draft EIR.) Should any mitigation measures be deemed infeasible by decision-makers, the City may substitute an alternative measure of equivalent effectiveness.

Even with implementation of Mitigation Measure IV.K-12, a significant impact would remain at the intersection of Ventura Boulevard and Sepulveda Boulevard (a CMP monitoring intersection) during the P.M. peak hour.

No feasible mitigation measure could be identified for the intersections:

- La Maida Street and Sepulveda Boulevard;
- I-405 Freeway Northbound On-/Off-Ramps/Greenleaf Street and Sepulveda Boulevard;
- Kester Avenue (South) and Ventura Boulevard; and
- Moorpark Street and Sepulveda Boulevard.

In total, it is concluded that the project would result in significant and unavoidable impacts at five intersections if all of the mitigation measures are determined to be feasible or alternative measures of equivalent effectiveness are provided.

Additionally, with mitigation, the project's impacts relative to access would be less than significant.

## L.1. Water Supply

### (1) Environmental Impacts

#### *(a) Construction*

A short-term demand for water would occur during construction activities on-site (i.e., demolition, excavation, grading). As the project would occur over a 20-month period, construction activities would occur intermittently and would be temporary in nature. Thus, the demand for water supplies for construction activities such as soil watering (i.e., for fugitive dust control), clean up, masonry, painting, and other related activities would be minimal. Overall, construction activities would require minimal water and would not be expected to have any adverse impacts on available water supplies or the existing water distribution system. Therefore, impacts associated with short-term construction activities would be less than significant.

#### *(b) Operation*

##### *(i) Water Supply*

Operation of the proposed project would result in an increase in long-term water demand for consumption, maintenance, irrigation, and other activities on the project site. According to the Water Supply Assessment (WSA) prepared by LADWP for the proposed project, the project is estimated to result in a net increase in water demand of approximately 100 acre feet (AF) per year over pre-existing conditions. When considering only the existing single-family residence currently on the site, the proposed project would result in a net increase of approximately 122 AF per year.

According to the WSA prepared for the proposed project, LADWP anticipates that the approximately 100 AF per year increase in water demand generated by the proposed project over pre-existing conditions would fall within the available and projected water supplies for normal, single-dry, and multiple-dry years through 2020 water demand projections of LADWP's 2000 Urban Water Management Plan (UWMP). Subsequent to the approval of the WSA for the proposed project, LADWP adopted an updated (2005) UWMP and the pre-existing uses were removed from the site. Based on correspondence with the LADWP, the water demand for the proposed project was accounted for in the 2005 UWMP. Therefore, the proposed project's net increase of approximately 100 AF per year over pre-existing conditions and the net increase of approximately 122 AF per year over existing conditions would also fall within the available and projected water supplies for normal, single-dry, and multiple-dry years through 2030 water demand projections of LADWP's

2005 UWMP.<sup>50</sup> Given that LADWP would be able to meet the water demand of the project, as well as the existing and planned future water demands of its service area, operational impacts on water supply would be less than significant.

In addition, compliance with State laws regarding water conservation measures (i.e., Title 20 and Title 24 of the California Code of Regulations (CCR)) as well as implementation of the project's previously described water saving features (i.e., drought tolerant landscaping, low-water fixtures and appliances) and mitigation measures, would reduce water consumption estimates for the project at full buildout, thereby reducing the demand on City supplies.

*(ii) Water Infrastructure*

The project may include the following infrastructure improvements on the project site as well as any extensions to connect the project site to existing water lines in the area. Proposed improvements would include connections to the existing 8-inch water mains located in Sepulveda Boulevard and Camarillo Street. To ensure sufficient water pressure in the system, the existing 8-inch main in Sepulveda Boulevard (approximately 100 feet north of Camarillo Street) and a portion of the existing 8-inch main in Camarillo Street (approximately 130 feet west of Sepulveda Boulevard) may be upgraded to a 12-inch main. An alternative to upgrading the existing 8-inch main in Camarillo Street could be the construction of a new 12-inch main north of the centerline of Camarillo Street. This would prevent interruption of water supply for two existing fire hydrants and other customers connected to the existing 8-inch main in Camarillo Street. The above mentioned infrastructure improvements will be verified during the detail design stage of the project in accordance with the Department of Water and Power. With these anticipated improvements, domestic water and fire flow demand would be met. Furthermore, Mitigation Measure J-4 as described in Section IV.J(2), Fire Protection, of the Draft EIR would reduce potential impacts related to the provision of fire flow to a less than significant level.

*(c) Consistency with Applicable Regulations*

*(i) California Urban Water Management Plan Act*

The California Urban Water Management Plan Act requires water suppliers to develop water management plans every five years to identify short- and long-term demand management measures to meet growing water demands during normal, dry, and multiple-

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<sup>50</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce demand for water generated by the project.*

dry years. This Act addresses water supplies, and is not applicable to specific development projects such as the proposed project.

*(ii) Senate Bill 610 and Senate Bill 221*

The proposed project meets the requirements of SB 610 which requires the water supplier to prepare a WSA to determine whether the projected water demand associated with the proposed project is included as part of the most recently adopted UWMP. The proposed project is consistent with SB 610 as confirmed by LADWP, the water supplier for the City of Los Angeles, in its WSA for the proposed project. The project would not be subject to the requirements of SB 221 as it is located within an urbanized area and has been previously developed for urban uses.

*(iii) California Code of Regulations*

The proposed project would either meet or exceed the water efficiency requirements set forth by Title 20 of the CCR through incorporation of water conservation features that would include, but not be limited to, drought resistant plants and measures to reduce potable water consumption for irrigation by 50 percent, as well as low-water fixtures and appliances to reduce water demand by 20 percent. Therefore, the project would be consistent with applicable regulations of the CCR.

*(iv) City of Los Angeles Ordinance Nos. 172,075 and 163,532*

The proposed project would be consistent with Ordinance Nos. 172,075 and 163,532, as project design features would include water facilities and fixtures with established maximum flow rate standards. The proposed project would include low-water fixtures and appliances to reduce water demand by 20 percent. Therefore, the project would be consistent with Ordinance Nos. 172,075 and 163,532.

*(v) City of Los Angeles Ordinance Nos. 172,075 and 163,532*

The projected water demand for the proposed project would fall within LADWP's projected future water demands set forth in their 2005 UWMP. In addition, the UWMP indicates that water would be available to meet the water demand of the projected service area until 2030. Therefore, the project would be consistent with the UWMP.

## (2) Cumulative Impacts

### *(a) Water Supply*

Fifty-one related projects are anticipated to be developed within the project vicinity. Related projects would have an average daily water demand of approximately 724,509 gpd

or 812 AF per year. The project's net increase of 122 AF per year over pre-existing conditions in conjunction with related projects would yield a total average water demand of approximately 833,900 gpd or 934 AF per year.<sup>51</sup> LADWP's 2005 UWMP projects yearly water demand to reach 776,000 AF by 2030, which is an increase of 17 percent from 2005 water demand. With the anticipated water demand increase of 934 AF per year from the development of the proposed project and related projects, the demand for water would fall within the available and projected water demand of LADWP's 2005 UWMP. In addition, given that the 2005 UWMP plans and provides for water supplies to serve existing and projected needs, including those of future growth and development as may occur through related projects, and that the requirements of SB 610 and SB 221 provide means to ensure that the water supply needs of notable development projects are carefully considered relative to LADWP's ability to adequately meet future needs, it is anticipated that LADWP would be able to supply the demands of the proposed project and related projects through the foreseeable future.

In summary, LADWP would have be able to meet future water demands for the service area with the addition of the proposed project and related projects, and no significant cumulative impacts related to water demand would occur.

*(b) Water Infrastructure*

Development of the project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. However, each related project would be subject to discretionary review to ensure that the existing and planned water infrastructure would be adequate to meet the domestic and fire water demands of the each project. Furthermore, LADWP, Los Angeles Department of Public Works, and the City of Los Angeles Fire Department would conduct ongoing evaluations to ensure facilities are adequate. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

*(c) Global Warming and Water Supply*

There are complex physical, chemical, and atmospheric mechanisms involved in global climate change that make it difficult to predict what the effects of global climate change will be, particularly at a state or local level. Due to this unpredictability, the secondary affects that global climate change may have on water supplies for a given region is even more difficult to predict. The science on global warming is still evolving and has not reached a point where it can be quantified and incorporated into delivery projections of the SWP. Furthermore, policy recommendations on how to incorporate potential changes to

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<sup>51</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the demand for water generated by the project.*

water supply due to climate change into water resource planning and management are still being developed. Therefore, consistent with studies prepared by DWR, it is considered premature to make an assessment of impacts under CEQA of how climate change will affect water availability for the project.

### (3) Mitigation Measures

The proposed project would not result in significant impacts related to domestic water supply. However, the following mitigation measures are recommended to ensure that the project would be compliant with the City's recommended water conservation measures:

**Mitigation Measure L-1:** For the commercial uses on the project site, the applicant shall (unless otherwise required and to the satisfaction of the Department of Building and Safety):

- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.

**Mitigation Measure L-2:** Unless otherwise required, all restroom faucets for the commercial uses on the project site shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.

**Mitigation Measure L-3:** For the residential uses on the project site, the applicant shall (unless otherwise required and to the satisfaction of the Department of Building and Safety).

- Install a demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwelling(s).
- Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.

- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

**Mitigation Measure L-4:** In addition to the requirements of the Landscape Ordinance, the landscape plan for the proposed project shall incorporate the following:

- Weather-based irrigation controller with rain shutoff;
- Matched precipitation (flow) rates for sprinkler heads;
- Drip/microspray/subsurface irrigation where appropriate;
- Minimum irrigation system distribution uniformity of 75 percent;
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials;
- Use of landscape contouring to minimize precipitation runoff; and
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 square feet and greater, to the satisfaction of the Department of Building and Safety.

**Mitigation Measure L-5:** Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment; e.g., vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

#### (4) Level of Significance After Mitigation

Impacts to water supply would be less than significant. The mitigation measures above would further ensure that such impacts would remain less than significant.

## L.2. Wastewater

### (1) Environmental Impacts

#### *(a) Construction*

During construction of the project, a negligible amount of wastewater would be generated by construction staff. It is anticipated that portable toilets would be provided by a private company, with the wastewater transported and disposed of off-site. Wastewater

generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. Construction of the project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities; or result in a determination by the City that it has inadequate capacity to serve the project's projected demand in addition to existing commitments. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

*(b) Operation*

*(i) Wastewater Generation and Infrastructure*

The proposed project is estimated to generate an average wastewater flow of 84,400 gpd and a peak flow of approximately 0.412 cfs.<sup>52,53</sup> The project would include new connections to the 15-inch sewer line within Sepulveda Boulevard and the 8-inch sewer line within Camarillo Street. The project's average wastewater generation flow of 84,400 gpd (0.0844 mgd) would enter the 15-inch sewer main and the 8-inch sewer line within Camarillo Street. Based on the Sewer Availability Request provided by the City of Los Angeles Bureau of Engineering, the existing municipal sewer lines would be able to accommodate project flows.<sup>54</sup> Furthermore, in order to connect to the existing sewer system, the project would be required to obtain an S-permit and pay a proportionate share of the costs of conveyance, operation, maintenance, repair and capital improvements to upgrade and improve the City of Los Angeles sewer system through payment of a Sewerage Facilities Charge. Project wastewater generation during operation would not require or result in the construction of new municipal wastewater conveyance facilities. Therefore, the impact of wastewater generation from the project on sewage conveyance infrastructure would be less than significant.

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<sup>52</sup> Sukow Engineering, May 2008.

<sup>53</sup> The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the amount of wastewater generated by the project.

<sup>54</sup> City of Los Angeles, Sewer Availability Request at 4827 N. Sepulveda Boulevard, Sherman Oaks, CA 91403 for M David Paul Development LLS, May 9, 2008 (see Appendix J of the Draft EIR).

*(ii) Wastewater Treatment*

The project would generate approximately 84,400 gpd (0.084 mgd) of wastewater with a peak flow of 143,480 gpd (0.143 mgd) that would be treated at the Hyperion Treatment Plant (HTP), which is a component of the Hyperion Service Area. The average dry weather flow (ADWF) for 2010 for the HSA is projected to be approximately 492.3 mgd for the year 2015 and 511.3 mgd for the year 2020. These forecasted increases in wastewater flows without the project are well within the HSA effective treatment capacity of 529 mgd. According to these projections and based on effective treatment capacity, the HSA would still have a capacity of 51.7 mgd for the year 2010, 36.7 mgd for the year 2015 and 17.7 mgd for the year 2020.

The project's wastewater generation would contribute an average wastewater flow of 84,400 gpd (0.084 mgd), which could be easily accommodated within the projected available treatment capacity of the HTS for the years 2010, 2015, and 2020. Furthermore, this amount is considered nominal on a Citywide and regional scale and this increase would not significantly impact the projected ADWF for the years 2010, 2015, and 2020. In addition, the wastewater generation estimate does not account for reductions in wastewater that would occur with implementation of water conservation measures. As such, the increase in wastewater flows generated by the project would have a less than significant impact on wastewater treatment facilities.

In addition, effluent conveyed to the HTP would not have a significant effect on the Santa Monica Bay as the HTP continually monitors all effluent to ensure that it currently meets applicable water quality standards and is required to comply with water quality standards established for beneficial uses. Lastly, the project would be required to pay a connection fee through the Connection Fee Program, which would ensure that all users pay a fair share for necessary expansions of the sewer system, additional improvements to conveyance, treatment, and disposal facilities. The project's contribution to the existing average daily flow (84,400 gpd) is approximately 0.12 percent of its remaining capacity. Thus, the project would not result in a determination by the City that it has inadequate capacity to serve the project's projected demand in addition to existing commitments. Therefore, the HTP has sufficient capacity to serve the project's projected wastewater generation, and impacts would be less than significant.

## (2) Cumulative Impacts

Fifty-one related projects are anticipated to be developed within the project vicinity. All 51 are within the service areas of the HTS and the HTP for wastewater treatment. These related projects would cumulatively contribute, in conjunction with the proposed project, to the wastewater generation in the project area. The estimated average wastewater generation associated with the related projects would be approximately

614,968 gpd (0.615 mgd) on average. The proposed project would contribute an additional 84,400 gpd to this estimated generation for a total of 699,368 gpd (0.699 mgd).<sup>55</sup>

The HSA has an effective treatment capacity of 529 mgd. By the years 2010, 2015, and 2020, the ADWF of the HSA is projected to be 477.3 mgd, 492.3 mgd, and 511.3 mgd, respectively. For the year 2010, the cumulative average wastewater flows would increase the projected ADWF to approximately 478 mgd. For the year 2015, the cumulative average wastewater flows would increase the projected ADWF to approximately 493 mgd. For the year 2020, the projected cumulative ADWF would be approximately 512 mgd. Thus, cumulative wastewater flows would be within the effective treatment capacity of the HSA. In addition, the ADWF estimates in conjunction with the projected cumulative wastewater estimate associated with the related projects represent a conservative analysis as the ADWF projections already take into account future population growth, including growth such as that represented by the related projects.

Additionally, in order to connect to the sewer system, related projects would be subject to payment of the City's Sewerage Facility Charges. Furthermore, implementation of the IRP and completion of the "Go-Projects," including improvements throughout the HSA consisting of the expansion of the Tillman Water Reclamation Plant (TWRP) and improvements in the HTP, Los Angeles-Glendale Water Reclamation Plant (LAGWRP), and wastewater collection system, capacity of the HTS would be increased to 570 mgd. The IRP would increase the treatment capacity of the TWRP and treatment process at the LAGWRP, which would result in less bypass flows to the HTP for processing. As such, the LADPW and Bureau of Sanitation anticipates ample wastewater treatment services to the City of Los Angeles and contracting cities through the year 2020 and cumulative impacts associated with wastewater treatment would be less than significant.

The HTP currently meets applicable water quality standards as set forth by the National Pollution Discharge Elimination System (NPDES). As such, the cumulative projects' wastewater effluent discharged to the Santa Monica Bay would have a less than significant impact on water quality. Implementation of the IRP, upgrades in the advanced treatment processes at the HTP, and continual monitoring by the Environmental Monitoring Division (EMD) would ensure that effluent discharged into Santa Monica Bay are within applicable limits. Thus, cumulative impacts on Santa Monica Bay water quality would be less than significant and the proposed project's contribution to the impact would not be cumulatively considerable.

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<sup>55</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the amount of wastewater generated by the project.*

### (3) Mitigation Measures

Impacts to the City's wastewater system would be less than significant. Therefore, no mitigation measures would be required.

### (4) Level of Significance After Mitigation

Impacts to the City's wastewater system would be less than significant, and no mitigation measures would be required.

## L.3. Solid Waste

### (1) Environmental Impacts

#### *(a) Construction*

Construction of the proposed project would require earthwork, demolition of an existing 1,040-square-foot single-family residence, as well as the construction of new buildings on the project site. Each of these activities would generate C&D waste including, but not limited to, soil, wood, asphalt, concrete, paper, glass, plastic, metals, and cardboard that would be disposed of in the County's unclassified landfills. The proposed project would result in the export of approximately 165,000 cubic yards of soil, the demolition of 1,040 square feet of residential uses, and the construction of 656,734 square feet of residential uses and approximately 55,000 square feet of nonresidential uses.<sup>56</sup> Based on these quantities, construction of the proposed project is estimated to generate 173,250 tons of soil, 60 tons of demolition debris, and 1,545 tons of construction debris for a combined total of 174,855 tons of C&D waste. This estimate does not account for the recycling and reuse of the project's C&D. The project's total solid waste generation during construction would represent approximately 0.34 percent of the estimated remaining capacity (50.800 million tons) at the County's unclassified landfills open to the City of Los Angeles. Based on the average 2008 unclassified landfill disposal amount of 0.174 million tons, unclassified landfills generally do not face capacity shortages. Therefore, unclassified landfills would have adequate capacity to accommodate project-generated inert waste. Thus, construction impacts relative to solid waste would be less than significant.

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<sup>56</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR as well as the reduction in the proposed project's neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet would reduce the amount of solid waste generated by project construction.*

*(b) Operation*

The project site is currently developed with a single-family residence that generates approximately 2 tons of solid waste per year. The proposed project's residential, retail, and grocery store uses would result in a net increase in solid waste generation on the site. The residential uses are estimated to generate approximately 1,116 tons of solid waste per year, the retail approximately 44 tons of solid waste per year, and the grocery store approximately 250 tons of solid waste per year for a combined total of approximately 1,410 tons of solid waste per year.<sup>57</sup> This amount represents a net increase of 1,408 tons of solid waste generation per year over existing uses.

Solid waste attributable to the project would be disposed of at one of the County's Class III landfills open to the City of Los Angeles. The project's total solid waste generation during operation of 1,410 tons would represent an approximate 0.04 percent increase in the City's yearly Class III solid waste disposal quantity (based on 2008 quantities), and represents approximately 0.001 percent of the estimated remaining capacity (123.17 million tons) at the County's Class III landfills open to the City of Los Angeles. Further, the project's solid waste generation of 1,410 tons would constitute less than 0.001 percent of the estimated remaining capacity of Class III landfills open to the City of Los Angeles for the year 2011 (156.9 million tons).

As discussed previously, the CoIWMP 2007 Annual Report concludes that the County would be able to provide for its disposal needs through 2022 with the use of and expansion of in-County facilities, increased use of out of County landfills (e.g., Mesquite Regional Landfill) up to 15,000 tpd, as well as use of new conversion technologies for up to 10,000 tpd.<sup>58</sup>

Based on the above, the existing and planned landfills/improvements identified in the CoIWMP 2007 Annual Report would be able to accommodate Project-generated waste. Project-generated waste would not exacerbate the existing shortfall of landfill capacity such that the projected timeline for the County's Class III landfills to reach capacity would be altered. In addition, the project would not generate solid waste at a level that would generate the need for an additional solid waste collection route or require new or expanded recycling or disposal facilities. The available capacity of the existing and/or planned

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<sup>57</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR as well as the reduction in the proposed project's neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet would reduce the amount of solid waste generated by the project during operation.*

<sup>58</sup> *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2007 Annual Report, May 2009.*

landfills would not be exceeded, and impacts on solid waste generation from project operations would be less than significant.

*(c) Consistency with Applicable Regulations*

The proposed project would include design features such as the provision of recycling containers on-site and adequate storage area for such containers in accordance with City Ordinance No. 171687. In addition, the proposed project would include several design features to achieve LEED Silver rating, including diverting construction and demolition waste from landfills, using salvaged, refurbished, or reused materials during project construction, and using materials with recycled content. Additionally, the proposed project would participate in the City's waste diversion programs (i.e., Curbside Recycling Program) to reduce the need for solid waste disposal. Therefore, the proposed project would not conflict with solid waste policies, objectives, regulations, plans, or programs. Impacts would be less than significant.

(2) Cumulative Impacts

Fifty-one related projects are anticipated to be developed within the vicinity of the project site.

Construction of the proposed project in conjunction with related projects would generate C&D waste and thus, would cumulatively increase the need for waste disposal at the County's unclassified landfills. The proposed project would generate 173,250 tons of soil, 60 tons of demolition debris, and 1,545 tons of construction debris for a combined total of 174,855 tons of C&D waste which constitutes approximately 0.34 percent of the estimated remaining capacity at the County's unclassified landfills open to the City of Los Angeles. While the project's contribution to unclassified landfills would not be significant at an individual level, the project's contribution in conjunction with related projects would be cumulatively significant. Therefore, Mitigation Measures L-6 and L-7 are recommended to reduce the project's cumulative impacts during construction to a less than significant level.

Solid waste generation for related projects is forecasted to be 8,454 tons per year. In conjunction with the proposed project's net increase in solid waste generation, the total cumulative solid waste generation would be 9,862 tons of solid waste per year.<sup>59</sup> Based on the proposed project's estimated net increase of 1,408 tons of solid waste generation per

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<sup>59</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR would reduce the amount of solid waste generated by the project.*

year, the proposed project's contribution to cumulative generation would be approximately 16,896 tons by 2022.<sup>60</sup> Thus, the proposed project's net increase in solid waste generation would represent approximately 0.001 percent of the County's projected 199.53 million tons of waste disposal need through 2022.<sup>61</sup> Based on the proposed project's net increase plus related project's estimated 8,454 tons of solid waste generation per year, the cumulative contribution to solid waste generation would be approximately 118,344 tons by 2022.<sup>62</sup> While the project's contribution to Class III landfills would not be significant at an individual level, the project's contribution in conjunction with related projects would be cumulatively significant. Therefore, Mitigation Measures L-8 and L-9 are recommended to reduce the project's cumulative impacts during operation to a less than significant level.

It is anticipated that related projects would be subject to environmental review on a case-by-case basis to ensure that they would not conflict with AB 939 waste diversion goals or the solid waste policies and objectives in the City's Source Reduction and Recycling Element (SRRE) or its updates, the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), and the General Plan Framework. Therefore, cumulative impacts to solid waste regulations, plans, and programs from implementation of the project and related projects would be less than significant.

### (3) Mitigation Measures

The proposed project would contribute to a cumulative significant impact on solid waste disposal facilities during construction and operation. Therefore, the following mitigation measures are recommended to reduce the proposed project's contribution to the cumulative significant solid waste impact to a less than significant level.

#### *(a) Construction*

**Mitigation Measure L-6:** The construction contractor shall only contract for waste disposal services with a company that recycles demolition and construction-related wastes. The contract specifying recycled waste service shall be presented to the Department of Building and Safety prior to approval of the demolition and building permits for the proposed project.

**Mitigation Measure L-7:** To facilitate on-site separation and recycling of demolition and construction-related wastes, the construction

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<sup>60</sup> Based on an 11-year period beginning January 1, 2010 (build-out year of project), through the end of 2020.

<sup>61</sup> Los Angeles County Integrated Waste Management Plan 2005 Annual Report, [http://ladpw.org/swims/Upload/2005%20Annual%20Report%20-%20Signed\\_9618.pdf](http://ladpw.org/swims/Upload/2005%20Annual%20Report%20-%20Signed_9618.pdf), accessed May 21, 2007.

<sup>62</sup> Based on an 11-year period beginning January 1, 2010 through the end of 2020.

contractor should provide temporary waste separation bins on-site during demolition and construction of the proposed project.

*(b) Operation*

**Mitigation Measure L-8:** Recycling bins shall be provided at appropriate locations on the project site to promote recycling of paper, metal, glass, and other recyclable materials.

**Mitigation Measure L-9:** All residential and commercial uses established within the project site shall be permanently provided with clearly marked, durable, source sorted recyclable bins at all times to facilitate the separation and deposit of recyclable materials.

**(4) Level of Significance After Mitigation**

Upon implementation of Mitigation Measures L-6 through L-9, cumulative impacts with regard to solid waste facilities during construction and operation of the proposed project would be reduced to a less than significant level.

## II. Corrections and Additions to the Draft EIR

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## II. Corrections and Additions to the Draft EIR

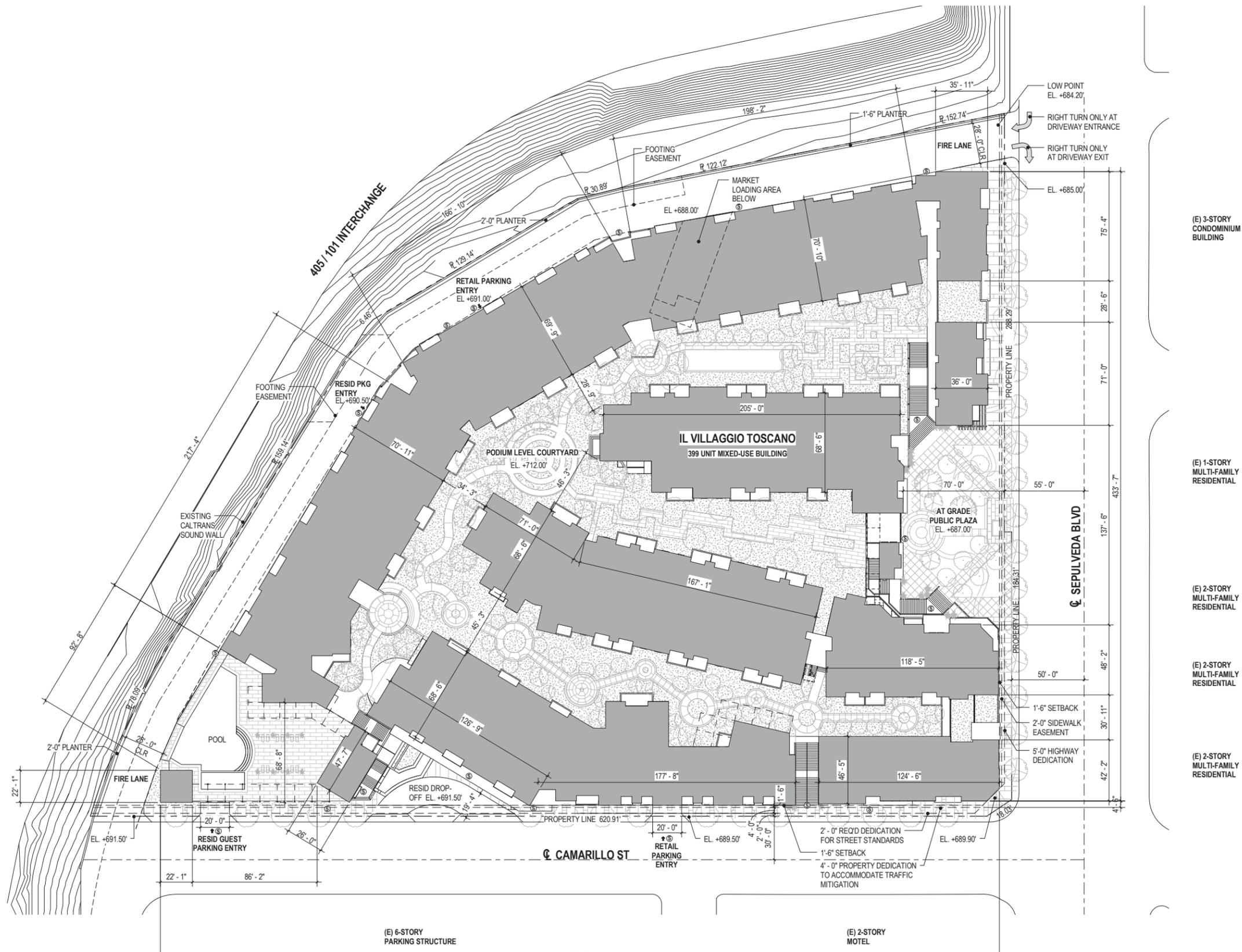
This section of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the Il Villaggio Toscano project (proposed project). Such changes are a result of public and agency comments received in response to the Draft EIR and/or new information that has become available since publication of the Draft EIR. The changes described in this section do not result in any new or increased significant environmental impacts that would result from the proposed project. This section is divided into three parts: Section II.A, General Corrections and Additions to the Draft EIR, Section II.B, Corrections and Additions to Draft EIR Sections and Appendices, and Section II.C, Effect of Corrections and Additions.

### **A. General Corrections and Additions to the Draft EIR**

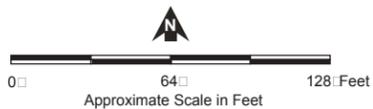
In response to comments, the Applicant has proposed the following general changes to the proposed project.

#### **1. Density and Heights**

The number of residential units proposed by the Applicant has been reduced from 500 to 399 residential units. The refined layout of the Project Site is illustrated in Figure II-1 on page II-2. As shown in Figure II-2 on page II-3, the publically accessible plaza along Sepulveda Boulevard has been expanded. To accommodate an expanded publicly accessible plaza, the proposed project's 55,000 square feet of neighborhood serving retail uses has been reduced by 3,000 square feet to 52,000 square feet of retail uses. Furthermore, the building heights along Sepulveda Boulevard have been reduced 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. Please refer to Figure II-3 through Figure II-5 on pages II-4 to II-6 that illustrate the updated conceptual elevations for the proposed project with the proposed design modifications.

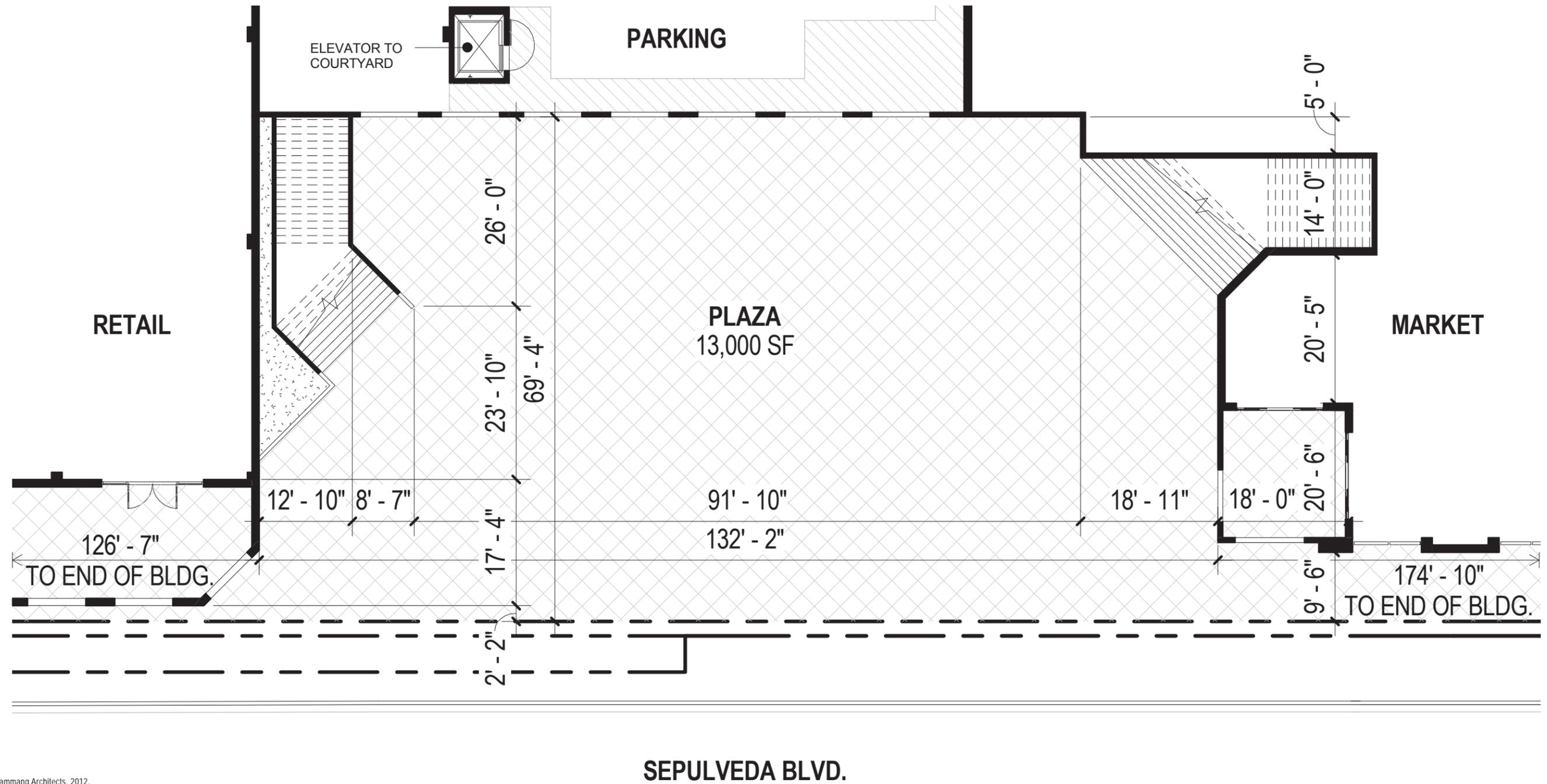


Source: Killefer Flamang Architects, 2012.



Il Villaggio Toscano Project

**Figure II-1**  
Refined Conceptual Site Plan



Source: Killefer Flamang Architects, 2012.

Il Villaggio Toscano Project



**Figure II-2**  
Expanded Publically Accessible Plaza along Sepulveda Boulevard



Source: Killefer Flammang Architects, 2012.

Il Villaggio Toscano Project



**Figure II-3**  
Revised Conceptual Elevation -  
Camarillo Street



Source: Killefer Flammang Architects, 2012.

Il Villaggio Toscano Project



**Figure II-4**  
Revised Conceptual Elevation -  
Sepulveda Boulevard



Source: Killefer Flamang Architects, 2012.

Il Villaggio Toscano Project



**Figure II-5**  
Revised Conceptual Elevation -  
Corner of Sepulveda Boulevard and Camarillo Street

## 2. Proposed Changes to Necessary Approvals

As described above, in response to public comments the Applicant has made numerous modifications to the proposed project. As a result of these modifications, several of the requested exceptions set forth in the Draft EIR have since been revised or are no longer applicable. These changes are provided below.

The Applicant's requested exception pursuant to Los Angeles Municipal Code (L.A.M.C) Section 12.32 F and Q has been revised as follows:

- Pursuant to Los Angeles Municipal Code (L.A.M.C) Section 12.32 F and Q, the Applicant requests a Vesting Zone and Height District change from (Q)CR-1L, (Q)P-1L, R3-1L and R1-1L to the C2 zone and to Height District 2D to permit the construction of a new mixed use project containing a maximum of ~~500-399~~ residential units and approximately ~~55,000-52,000~~ square feet of neighborhood serving retail space on a currently vacant ~~5.1-4.51~~-acre property.<sup>3</sup> While the Height District 2's permitted floor area ratio of 6:1 generates approximately 1,270,602 square feet of development, the proposed project is only seeking a floor area ratio equal to ~~3:3~~ 2.75:1 or approximately ~~708,659-582,359~~ square feet. The requested approval creates consistency with the adjacent zoning and General Plan Framework's vision of the site.<sup>34</sup>

<sup>3</sup> *The existing lot area of approximately 196,673 square feet or 4.51 acres includes the pre-dedicated lot area but not the vacated streets. With implementation of the proposed project, the lot area would be approximately 5.05 acres, including vacated streets and street dedications.*

<sup>34</sup> *The General Plan Framework (Figure 3-4) for the San Fernando Valley designates the site as a Regional-Commercial Center.*

The Applicant's request for exception from the Ventura-Cahuenga Boulevard Corridor Specific Plan ("Specific Plan") Section 6.B.4 is proposed to be revised as follows:

- Section 6.B.4 which restricts the floor area of a project to 1.5 to 1.<sup>4</sup> The Applicant is requesting permission to build a project with a floor area ratio of ~~3-3~~ 2.75 to 1.

<sup>4</sup> *Please note there is an inconsistency between the General Plan's Framework's land use designation (Regional-Commercial Center) and the Community Plan's and Specific Plan's land use designation (Regional Commercial). According to the Community Plan, Regional Commercial land designations are appropriate for a Height District 2 designation which permits a 6:1 floor area ratio.*

Pursuant to L.A.M.C Section 11.5.7.F, the Applicant is requesting the following additional exception from the Specific Plan:

- **Section 7.A.2.a** which prohibits front yard setbacks in excess of 10 feet. The Applicant is requesting to exceed the front yard setback by 59 feet for 132 lineal feet of the proposed project's approximate 461-lineal-foot Sepulveda Boulevard frontage to accommodate an approximately 13,000-square-foot public plaza, which is approximately 69 feet deep and approximately 132 feet wide.

As described in the Draft EIR, pursuant to L.A.M.C. Section 11.5.7.F, the Applicant requested the following exception from the Specific Plan:

- **Section 7.A.2.a** which requires an 18-inch setback along the front lot line, which is defined by the Specific Plan to be Sepulveda Boulevard.<sup>5</sup> The Applicant requests a zero setback along the front lot line.

<sup>5</sup> Please note there is an inconsistency between the General Plan's Framework's land use designation (*Regional-Commercial Center*) and the Community Plan's and Specific Plan's land use designation (*Regional Commercial*). According to the Community Plan, Regional Commercial land designations are appropriate for a Height District 2 designation which permits a 6:1 floor area ratio.

In response to public comments, the Applicant has modified the site plan to include 18-inch setbacks on Sepulveda Boulevard and Camarillo Street. With this modification the request for exception from the Specific Plan Section 7.A.2.a would be eliminated.

The Applicant has revised the request for exception from Specific Plan Section 7.B.1 as follows:

- **Section 7.B.1**, which restricts the maximum lot coverage to 75 percent. The Applicant requests ~~an exception from this provision in order to design a project whole lot coverage 83 percent at grade, but drops to 62 percent lot coverage on the podium level which is also the first residential level~~ a maximum lot coverage of 78.5 percent at grade.

Pursuant to L.A.M.C. Section 11.5.7.F, the Applicant requested the following exception:

- **Section 7.D.2.b** which requires parking structures to have a landscape buffer of 10 feet around the surface perimeter. The

Applicant is requesting a 0 foot buffer along the Camarillo Street frontage for its mixed use project that combines residential and neighborhood-serving retail uses as well as parking for each use in a single structure.

In response to public comments, the Applicant has modified the site plan to fully enclose the parking structure along Camarillo Street. With this modification the request for exception from Specific Plan Section 7.D.2.b would be eliminated.

The Applicant has revised the request for exception from Specific Plan Section 7.E.1.b.4 as follows:

- ~~Section 7.E.1.b.4, which~~ limits the building heights in this sub-area to 75 feet ~~and 82 feet for mixed use projects.~~<sup>6</sup> The Applicant is requesting ~~permission to build a 100 foot tall building~~ a maximum building height of 100 feet, which shall be limited to approximately 32 percent of the building.

<sup>6</sup> ~~According to the Specific Plan definition, 33% of a mixed use project's square footage needs to be designed for commercial uses. An argument can be made that this definition triggers more vehicle trips by requiring a greater level of commercial use.~~

### 3. Visual Quality and Architectural Features

To enhance the visual quality of the proposed project, the Applicant has proposed to extend the landscaped gardens within the interior of the site to Sepulveda Boulevard so that the gardens are visible to the public. Furthermore, as shown on Figure II-4 on page II-5, an open air colonnade along Sepulveda Boulevard has been proposed to enhance the architectural façade.

### 4. Pedestrian Enhancements

To encourage pedestrian activity, an additional pedestrian entrance to the retail uses from the ground level parking along Camarillo Street has been proposed by the Applicant. In addition, the Applicant has proposed to expand the size of the publicly accessible ground level plaza up to approximately 13,000 square feet along the Sepulveda Boulevard frontage. The plaza is envisioned to include tables, chairs, benches, and planters with native landscaped vegetation.

## 5. Parking

The proposed project as evaluated in the Draft EIR included the development of a maximum of 500 multi-family residential units and approximately 55,000 square feet of neighborhood-serving commercial uses. To accommodate the parking requirements of these uses, the proposed project included a total parking supply of approximately 1,470 parking spaces, consisting of an estimated 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for retail visitors. Based on the reduction in residential units from 500 to 399 units and the 55,000 square feet of neighborhood-serving commercial uses to 52,000 square feet, the proposed project would provide a total parking supply of 1,206 parking spaces, including 798 parking spaces for project residents, 200 parking spaces for residential guests, and 208 parking spaces for retail visitors.

## 6. Open Space

The proposed project as evaluated in the Draft EIR provided for a total of approximately 106,013 square feet of usable open space areas consisting of approximately 67,213 square feet of common open space (e.g., courtyards, gardens, pedestrian pathways, large pool facility, spa, gym, community rooms, a bocce court, and lobbies) and approximately 38,800 square feet of private open space (balconies) for its residents. With the proposed reduction in residential units and commercial uses, the amount of open space has been reduced to 93,500 square feet comprising approximately 74,500 square feet of common open space (including the approximately 13,000-square-foot publicly accessible ground level plaza), 17,000 square feet of private open space, and 2,000 square feet of open space for use by residents. While the proposed project open space has been reduced, the proposed project would continue to exceed the usable open space requirement as set forth under Section 12.21 of the LAMC.

## 7. Existing Project Site Setting

Based on further examination of the project site, the height of the existing masonry sound wall within the project site has been revised to more accurately present the height of the sound wall at 26 feet rather than a height of 25 feet as described in the Draft EIR.

## B. Corrections and Additions to Draft EIR Sections and Appendices

Additional changes have been made to the Draft EIR based on comments and/or new information that has become available since publication of the Draft EIR. Such changes to the Draft EIR are indicated in this section under the appropriate Draft EIR

section or appendix heading. Deletions are shown with ~~strikethrough~~ and additions are shown with underline.

## I. Executive Summary

Section I, Executive Summary of this Final EIR has been revised based on the Corrections and Additions provided herein.

## II. Project Description

Other than the general corrections provided above, no additional specific corrections or additions have been made to Section II, Project Description of the Draft EIR.

## III. General Description of Environmental Setting

Other than the general corrections provided above, no additional specific corrections or additions have been made to Section III, General Description of Environmental Setting of the Draft EIR.

## IV. Environmental Impact Analysis

### IV.A. Aesthetics

In addition to the general corrections provided above, revise Volume I, Section IV.A, Aesthetics, page IV.A-29, Subsection IV.A(3)(d)(5), Consistency with Applicable Policies, as follows:

With regard to consistency with the Specific Plan, as indicated in Section II, Project Description, of this Draft EIR, the project, as proposed in the Draft EIR, would require Specific Plan exceptions to: (1) exceed the 1.5:1 FAR to allow a project with a 3.3:1 FAR; (2) exceed the permitted height limit of 75 feet to develop buildings up to 100 feet in height; (3) exceed the maximum lot coverage requirement of 75 percent; (4) reduce the required landscape buffer of 10 feet around the surface perimeter of parking structures to five feet; and (5) reduce the required 18-inch setback along the front lot line. However, with the project modifications proposed by the Applicant as a result of public comments received regarding the Draft EIR, these Specific Plan exceptions have been revised or are no longer applicable. Specifically, with the proposed reduction in residential units and commercial uses proposed by the Applicant, the proposed project's floor area ratio of 3.3:1 would be reduced to 2.75:1. Accordingly, the Applicant's request for

exception from Specific Plan Section 6.B.4 is proposed to be revised to reflect the proposed project's reduction in floor area ratio from 3.3:1 to 2.75:1. In addition, the Applicant has modified the site plan to fully enclose the parking structure along Camarillo Street. With this modification the request to reduce the required landscape buffer of 10 feet around the surface perimeter of parking structures to five feet would be eliminated. The Applicant is also requesting an exception from Specific Plan Section 7.A.2.a to exceed the front yard setback along a portion of the Sepulveda Boulevard frontage to accommodate an expanded publicly accessible ground level plaza. Additionally, the Applicant has proposed to modify the site plan to include 18-inch setbacks along Camarillo Street and along portions of Sepulveda Boulevard. With this modification, the request to reduce the required setback would be eliminated. The Specific Plan includes express provisions for granting exceptions to the Specific Plan. Therefore, seeking exceptions to the Specific Plan would not be inconsistent with the Specific Plan. Additionally, granting of the Specific Plan exceptions would be consistent with the Specific Plan's procedural requirements.

Prior to the granting of the Specific Plan exceptions, the floor area, lot coverage, height limits, and front yard setback elements of the proposed project would be inconsistent with the associated requirements of the Specific Plan. As further discussed in Section IV.G, Land Use, of this Draft EIR, with the granting of the Specific Plan exceptions, the project would be consistent with the Specific Plan. Please refer to Section IV.G, Land Use, of this Draft EIR for an analysis of project consistency with the standards of the Specific Plan.

Based on the above, with the granting of the aforementioned Specific Plan exceptions, implementation of the proposed project would not conflict with the existing regulations or applicable plans addressing aesthetics. Therefore, with the granting of the aforementioned Specific Plan exceptions, project aesthetic impacts relative to consistency with applicable regulations or plans would be less than significant.

## **IV.B. Air Quality**

Volume I, Section IV.B, Air Quality, page IV.B-23, revise Subsection IV.B(2)(b), Air Pollution and Potential Health Effects, as follows:

## (9) Potential Health Impacts

Ambient air pollution is a major public health concern. Excess deaths and increases in illnesses associated with high air pollution levels have been documented in several episodes as early as 1930 in Meuse Valley, Belgium; 1948 in Donora, Pennsylvania; and 1952 in London. Although levels of pollutants that occurred during these acute episodes are now unlikely in the United States, ambient air pollution continues to be linked to increases in respiratory illness (morbidity) and increases in death rates (mortality).

Air pollution has many effects on the health of both adults and children. Over the past several years the incidence of a number of diseases has increased greatly. Asthma is perhaps the most important disease with an increasing incidence, but other diseases, such as allergic reactions, bronchitis and respiratory infections also have been increasing. The cause of these increases may be due at least in part to the effects of air pollution.

The adverse health effects associated with air pollution are diverse and include:

- Increased mortality;
- Increased health care utilization (hospitalization, physician and emergency room visits);
- Increased respiratory illness (symptoms, infections, and asthma exacerbation);
- Decreased lung function (breathing capacity);
- Lung inflammation;
- Potential immunological changes;
- Increased airway reactivity to a known chemical exposure—a method used in laboratories to evaluate the tendency of airways to have an increased possibility of developing an asthmatic response; and
- A decreased tolerance for exercise.

The evidence linking these effects to air pollutants is derived from population based observational and field studies (epidemiological) as well as controlled laboratory studies involving human subjects and animals. There

have been an increasing number of studies focusing on the mechanisms (that is, on learning how specific organs, cell types, and biochemicals are involved in the human body's response to air pollution) and specific pollutants responsible for individual effects. Yet the underlying biological pathways for these effects are not always clearly understood.

Although individuals inhale pollutants as a mixture under ambient conditions, the regulatory framework and the control measures developed are mostly pollutant-specific. This is appropriate, in that different pollutants usually differ in their sources, their times and places of occurrence, the kinds of health effects they may cause, and their overall levels of health risk. Different pollutants, from the same or different sources, may sometimes act together to harm health more than they would acting separately. Nevertheless, as a practical matter, health scientists, as well as regulatory officials, usually must deal with one pollutant at a time in determining health effects and in adopting air quality standards. To meet the air quality standards, comprehensive plans are developed such as the Air Quality Management Plan (AQMP) and the Air Toxics Control Plan (ATCP). These plans examine multiple pollutants, cumulative impacts, and transport issues related to attaining healthful air quality.

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality within the Air Basin.—~~The following pollutants subject to emission reduction measures adopted by federal, state or local regulatory agencies, and measured at official monitoring stations within the SCAQMD:~~ The criteria air pollutants for which national and state standards have been promulgated and which are most relevant to current air quality planning and regulation in the Air Basin include ozone (O<sub>3</sub>), respirable particulate matter (PM<sub>10</sub>), fine particulate matter (PM<sub>2.5</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), and lead. In addition, toxic air contaminants (TAC) and global climate change related greenhouse gases (GHG) are of concern in the Air Basin. Each of these is described below, and is substantially drawn from reviews presented in the SCAQMD 2007 AQMP, and from reviews on the effects of air pollution by the American Thoracic Society (ATS, 1996),<sup>14A</sup> the U.S. EPA reviews for ozone (USEPA, 2006),<sup>14B</sup> Carbon Monoxide (USEPA, 2000),<sup>14C</sup> and Particulate Matter (USEPA, 2004),<sup>14D</sup> from a published review of Air Pollution and Health (Brunekreef,

2002),<sup>14E</sup> and from reviews prepared by the California EPA Office of the Environmental Health Hazard Assessment for Particulate Matter (CalEPA, 2002)<sup>14F</sup> and for Ozone(CalEPA, 2005).<sup>14G</sup>

<sup>14A</sup> American Thoracic Society, Committee of the Environmental and Occupational Health Assembly of the American Thoracic Society. (1996). "Health Effects of Outdoor Air Pollution." American Journal Respiratory and Critical Care Medicine, Parts 1 and 2. 153:3-50 and 153:477-498.

<sup>14B</sup> United States Environmental Protection Agency. (2006). "Air Quality Criteria of Ozone and Other Photochemical Oxidants." EPA 600/R-05/004aF-CF.

<sup>14C</sup> United States Environmental Protection Agency. (2000). "Air Quality Criteria for Carbon Monoxide." EPA 600/P-99/001F.

<sup>14D</sup> United States Environmental Protection Agency. (2004). "Air Quality Criteria for Particulate Matter." EPA 600/P-99/002aB.

<sup>14E</sup> Brunekreef, B and ST Holgate. (2002). "Air Pollution and Health." The Lancet. 360(9341):1233-42, <http://www.thelancet.com/journal/vol360/iss9341/full/llan.360.9341.editorial.and.review.22808.1>

<sup>14F</sup> California Environmental Protection Agency, California Air Resources Board, and Office of Environmental Health Hazard Assessment. (2002). "Public Hearing to Consider Amendments to the Ambient Air Quality Standards for Particulate Matter and Sulfates." <http://arbis.arb.ca.gov/research/aaqs/std-rs/pm-final/pm-final.htm#Summary>.

<sup>14G</sup> California Environmental Protection Agency, Air Resources Board. (2005). "Review of the California Ambient Air Quality Standard for Ozone."

### (a) Ozone (O<sub>3</sub>)

Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds and nitrogen oxides (NOx) under favorable meteorological conditions such as high temperature and stagnation episodes. An elevated level of ozone irritates the lungs and breathing passages, causing coughing, and pain in the chest and throat thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long term exposure may lead to scarring of lung tissue and may lower the lung efficiency.

Ozone is one of the most important air pollutants affecting human health in regions like Southern California. Ozone is a molecule built of three atoms of oxygen linked together in a very energetic combination. When ozone comes into contact with a surface it rapidly releases this extra force in the form of chemical energy. When this happens in biological systems, such as the respiratory tract, this energy can cause damage to sensitive tissues in the upper and lower airways.

The major subgroups of the population considered to be at increased risk from ozone exposure are outdoor exercising individuals including children and people with preexisting respiratory disease(s) such as asthma. The data base identifying the former group as being at increased risk to ozone exposure is much stronger and more quantitative than that for the latter group, probably because of a larger number of studies conducted were with healthy individuals. The adverse effects reported with short-term ozone exposure are greater with increased activity because activity increases the breathing rate and the volume of air reaching the lungs, resulting in an increased amount of ozone reaching the lungs. Children may be a particularly vulnerable population to air pollution effects because they spend more time outdoors, are generally more active, and have a higher ventilation rate than adults.

A number of adverse health effects associated with ambient ozone levels have been identified from laboratory and epidemiological studies (USEPA, 2006; ATS, 1996). These include increased respiratory symptoms, damage to cells of the respiratory tract, decreases in lung function, increased susceptibility to respiratory infection, and increased risk of hospitalization.

The Children's Health Study, conducted by researchers at the University of Southern California, followed a cohort of children that live in 12 communities in southern California with differing levels of air pollution for several years. A publication from this study found that school absences in fourth graders for respiratory illnesses were associated with ambient ozone levels. An increase of 20 ppb ozone was associated with an 83 percent increase in illness related absence rates (Gilliland, 2001).<sup>14H</sup>

The number of hospital admissions and emergency room visits for all respiratory causes (infections, respiratory failure, chronic bronchitis, etc.) including asthma show a consistent increase as ambient ozone levels increase in a community. These excess hospital admissions and emergency room visits are observed when hourly ozone concentrations are as low as 0.08 to 0.10 ppm.

Numerous recent studies have found positive associations between increases in ozone levels and excess risk of mortality. These associations persist even when other variables including season and levels of particulate matter are accounted for. This indicates that ozone mortality effects are independent of other pollutants (Bell, 2004).<sup>14I</sup>

Several population-based studies suggest that asthmatics are more adversely affected by ambient ozone levels, as evidenced by increased hospitalizations and emergency room visits. Laboratory studies have attempted to compare the degree of lung function change seen in age and gender-matched healthy individuals versus asthmatics and those with chronic obstructive pulmonary disease. While the degree of change evidenced did not differ significantly, that finding may not accurately reflect the true impact of exposure on these respiration-compromised individuals. Since the respiration-compromised group may have lower lung function to begin with, the same degree of change may represent a substantially greater adverse effect overall.

A recent publication from the Children's Health Study focused on children and outdoor exercise. In communities with high ozone concentrations, the relative risk of developing asthma in children playing three or more sports was found to be over three times higher than in children playing no sports (McConnell, 2002).<sup>14J</sup> These findings indicate that new cases of asthma in children are associated with heavy exercise in communities with high levels of ozone. While it has long been known that air pollution can exacerbate symptoms in individuals with respiratory disease, this is among the first studies that indicate ozone exposure may be causally linked to asthma.

Some lung function responses (volume and airway resistance changes) observed after a single exposure to ozone exhibit attenuation or a reduction in magnitude with repeated exposures. Although it has been argued that the observed shift in response is evidence of a probable adaptation phenomenon, it appears that while functional changes may exhibit adaptation, biochemical and cellular changes which may be associated with episodic and chronic exposure effects may not exhibit similar adaptation. That is, internal damage to the respiratory system may continue with repeated ozone exposures, even if externally observable effects (chest symptoms and reduced lung function) disappear.

In a laboratory, exposure of human subjects to low levels of ozone causes reversible decrease in lung function as assessed by various measures such as respiratory volumes, airway resistance and reactivity, irritative cough and chest discomfort. Lung function changes have been observed with ozone exposure as low as 0.08 to 0.12 ppm for 6 to 8 hours under moderate exercising conditions. Similar lung volume changes have also been observed in adults and children under ambient exposure conditions

(0.10 to 0.15 ppm). The responses reported are indicative of decreased breathing capacity and are reversible.

In laboratory studies, cellular and biochemical changes associated with respiratory tract inflammation have also been consistently reported in the airway lining after low level exposure to ozone. These changes include an increase in specific cell types and in the concentration of biochemical mediators of inflammation and injury such as cytokines and fibronectin. These inflammatory changes can be observed in healthy adults exposed to ozone in the range of 0.08 to 0.10 ppm.

The susceptibility to ozone observed under ambient conditions could be due to the combination of pollutants that coexist in the atmosphere or ozone may actually sensitize these subgroups to the effects of other pollutants. Some animal studies show results that indicate possible chronic effects including functional and structural changes of the lung. These changes indicate that repeated inflammation associated with ozone exposure over a lifetime may result in sufficient damage to respiratory tissue such that individuals later in life may experience a reduced quality of life in terms of respiratory function and activity level achievable. An autopsy study involving Los Angeles County residents provided supportive evidence of lung tissue damage (structural changes) attributable to air pollution.

A recent study of birth outcomes in southern California found an increased risk for birth defects in the aortic and pulmonary arteries associated with ozone exposure in the second month of pregnancy (Ritz et al., 2002).<sup>14K</sup> This is the first study linking ambient air pollutants to birth defects in humans. Confirmation by further studies is needed.

In summary, acute adverse effects associated with ozone exposures have been well documented, although the specific causal mechanism is still somewhat unclear. Additional research efforts are required to evaluate the long-term effects of air pollution and to determine the role of ozone in influencing chronic effects.

<sup>14H</sup> Gilliland FD, Berhane K, Rappaport EB, Thomas DC, Avol E, Gauderman WJ, London SJ, Margolis HG, McConnell R, Islam KT, Peters JM. (2001). "The Effects of Ambient Air Pollution on School Absenteeism Due to Respiratory Illnesses." *Epidemiology*, 12(1):43-54.

<sup>14I</sup> Bell ML, McDermott A, Zeger SL, Samet, JM, Dominici, F. (2004). "Ozone and Short-Term Mortality in 95 US Urban Communities, 1987-2000." *JAMA* 292:2372-2378.

<sup>14J</sup> McConnell R, Berhane K, Gilliland F, London SJ, Islam T, Gauderman WJ, Avol E, Margolis HG, Peters JM. (2002). "Asthma in exercising children exposed to ozone: a cohort study." *Lancet*, 359:386-91.

<sup>14K</sup> Ritz B, Yu F, Chapa G, Fruin S. (2000). "Effect of Air Pollution on Preterm Birth Among Children Born in Southern California between 1989 and 1993." *Epidemiology*, 11(5)502-11.

### (b) Carbon Monoxide (CO)

Carbon monoxide is primarily emitted from combustion processes and motor vehicles because of incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of moderate levels of carbon monoxide can cause nausea, dizziness, and headaches, and can be fatal at high concentrations.

Inhaled CO has no known direct toxic effect on lungs but rather exerts its effects by interfering with oxygen transport through the formation of carboxyhemoglobin (COHb, a chemical complex of CO and hemoglobin). Exposure to CO is often evaluated in terms of COHb levels in blood measured as percentage of total hemoglobin bound to CO. COHb levels in non-smokers range between 0.3 and 0.7 percent and 5 to 10 percent in smokers. COHb levels in excess of 1.5 percent in a significant proportion of urban nonsmoking populations can be considered as evidence of widespread exposure to environmental CO.

Under controlled laboratory conditions, healthy subjects exposed to CO sufficient to result in 5 percent COHb levels exhibited reduced duration of maximal exercise performance and consumption of oxygen. Studies involving subjects with coronary artery disease who engaged in exercise during CO exposures have shown that COHb levels as low as 2.4 percent can lead to earlier onset of electrocardiograph changes indicative of deficiency of oxygen supply to the heart. Other effects include an earlier onset of chest pain, an increase in the duration of chest pain, and a decrease in oxygen consumption.

### (c) Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)

The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter equal to or less than 10 microns (PM<sub>10</sub>) and even smaller particles with a aerodynamic diameter equal to or less than 2.5 microns (PM<sub>2.5</sub>), can enter the body and are trapped in the nose, throat, and upper respiratory tract. These small

particulates could potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM<sub>10</sub> and PM<sub>2.5</sub>. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids. The U.S. Environmental Protection Agency and the California Air Resources Board have recognized adverse health effects that may be associated with exposure to PM<sub>10</sub> and PM<sub>2.5</sub>, including:<sup>14L</sup>

- Increased respiratory symptoms, such as the irritation of the airways,
- coughing, or difficulty breathing;
- Decreased lung function, particularly in children;
- Aggravated asthma;
- Development of chronic bronchitis;
- Irregular heartbeat;
- Increased respiratory and cardiovascular hospitalizations; and
- Premature death in people with heart or lung disease.

Epidemiological studies have provided continued and consistent evidence for most of the effects listed above. An association between increased daily or several-day-average concentrations of PM<sub>10</sub> and excess mortality and morbidity is consistently reported from studies involving communities across the U.S., as well as in Europe, Asia, and South America. A review and analysis of epidemiological literature for acute adverse effects was undertaken by Dockery and Pope to estimate these effects as percent increase in mortality associated with each incremental increase of PM<sub>10</sub> by 10 µg/m<sup>3</sup>. The estimates are presented below in Table IV.B-3.1 on page II-21.

Studies of PM<sub>2.5</sub> also find associations with elevated mortality. The estimates for PM<sub>2.5</sub> generally are in the range of 2.0 to 8.5 percent increase in total deaths per 25 µg/m<sup>3</sup> increase in 24-hour PM<sub>2.5</sub> levels. The estimates for cardiovascular related mortality range from 3.0 to 7.0 percent per 25 µg/m<sup>3</sup>

**Table IV.B-3.1  
Combined Effect Estimates of Daily Mean Particulate Pollution**

<u>Effect</u>	<u>□ Change in Health Indicator per each 10 □g/m<sup>3</sup> increase in PM<sub>10</sub></u>
<u>Increase in daily mortality</u>	
<u>Total Deaths</u>	<u>1.0</u>
<u>Respiratory Deaths</u>	<u>3.4</u>
<u>Cardiovascular Deaths</u>	<u>1.4</u>
<u>Increase in hospital usage (all respiratory diagnoses)</u>	
<u>Admissions</u>	<u>1.4</u>
<u>Emergency Department Visits</u>	<u>0.9</u>
<u>Exacerbation of Asthma</u>	
<u>Asthmatic Attacks</u>	<u>3.0</u>
<u>Bronchodilator Use</u>	<u>12.2</u>
<u>Emergency Department Visits</u>	<u>3.4</u>
<u>Hospital Admissions</u>	<u>1.9</u>
<u>Increase in Respiratory Symptom Reports</u>	
<u>Lower Respiratory</u>	<u>3.0</u>
<u>Upper Respiratory</u>	<u>0.7</u>
<u>Cough</u>	<u>2.5</u>
<u>Decrease in Lung Function</u>	
<u>Forced Expiratory Volume</u>	<u>0.15</u>
<u>Peak Expiratory Flow</u>	<u>0.08</u>
<u>Source: American Journal of Respiratory and Critical Care Medicine, Volume 153, 113-50, 1996.</u>	

24-hour PM<sub>2.5</sub>, and for respiratory mortality estimates range from 2.0 to 7.0 percent per 25 µg/m<sup>3</sup> 24-hour PM<sub>2.5</sub>.

A number of studies have evaluated the association between particulate matter exposure and indices of morbidity such as hospital admissions, emergency room visits or physician office visits for respiratory and cardiovascular diseases. The effects estimates are generally higher than the effects for mortality. The effects are associated with measures of PM<sub>10</sub> and PM<sub>2.5</sub>. Effects are also associated with PM<sub>10-2.5</sub>. Thus, it appears that when a relatively small number of people experience severe effects, larger numbers experience milder effects, which may relate either to the coarse or to the fine fraction of airborne particulate matter.

In the National Morbidity, Mortality, and Air Pollution Study (NMMAPS) study, hospital admissions for those 65 years or older were assessed in 14 cities. Hospital admissions for these individuals showed an increase of 6 percent for cardiovascular diseases and a 10 percent increase for

respiratory disease admissions, per 50  $\mu\text{g}/\text{m}^3$  increase in  $\text{PM}_{10}$ . The excess risk for cardiovascular disease ranges from 3 to 10 percent per 50  $\mu\text{g}/\text{m}^3$   $\text{PM}_{10}$  and from 4 to 10 percent per 25  $\mu\text{g}/\text{m}^3$   $\text{PM}_{2.5}$  or  $\text{PM}_{10-2.5}$ .

Similarly, school absences, lost workdays and restricted activity days have also been used in some studies as indirect indicators of acute respiratory conditions. The results are suggestive of both immediate and delayed impact on these parameters following elevated particulate matter exposures. These observations are consistent with the hypothesis that increased susceptibility to infection follows particulate matter exposures.

Some studies have reported that short-term particulate matter exposure is associated with changes in lung function (lung capacity and breathing volume); upper respiratory symptoms (hoarseness and sore throat); and lower respiratory symptoms (increased sputum, chest pain and wheeze).

The severity of these effects is widely varied and is dependent on the population studied, such as adults or children with and without asthma. Sensitive individuals, such as those with asthma or pre-existing respiratory disease, may have increased or aggravated symptoms associated with short-term particulate matter exposures. Several studies have followed the number of medical visits associated with pollutant exposures. A range of increases from 3 percent to 42 percent for medical visits for respiratory illnesses was found corresponding to a 50  $\mu\text{g}/\text{m}^3$  change in  $\text{PM}_{10}$ . A limited number of studies also looked at levels of  $\text{PM}_{2.5}$  or  $\text{PM}_{10-2.5}$ . The findings suggest that both the fine and coarse fractions may have associations with some respiratory symptoms.

The biological mechanisms by which particulate matter can produce health effects are being investigated in laboratory studies. Inflammatory responses in the respiratory system in humans and animals exposed to concentrated ambient particles have been measured. These include effects such as increases in neutrophils in the lungs. Other changes reported include increased release of cytokines and interleukins, chemicals released as part of the inflammatory process. The effects of particulate matter may be mediated in part through the production of reactive oxygen species during the inflammatory process. Recent reviews discuss mechanistic studies in more detail (Brunekreef, 2002).

While most studies have evaluated the acute effects, some studies specifically focused on evaluating the effects of chronic exposure to  $\text{PM}_{10}$  and

PM<sub>2.5</sub>. Studies have analyzed the mortality of adults living in different U.S. cities. After adjusting for important risk factors, these studies found a consistent positive association of deaths and exposure to particulate matter. A similar association was observable in both total number of deaths and deaths due to cardiorespiratory causes. A shortening of lifespan was also reported in these studies.

Significant associations for PM<sub>2.5</sub> for both total mortality and cardiorespiratory mortality were reported in a study using data from the American Cancer Society. A re-analysis of the data from this study confirmed the finding (Krewski, 2000).<sup>14M</sup> The Harvard Six Cities Study evaluated several size ranges of particulate matter and reported significant associations with PM<sub>15</sub>, PM<sub>2.5</sub>, sulfates, and non-sulfate particles, but not with coarse particles (PM<sub>15</sub>-PM<sub>2.5</sub>). An extension of the Harvard Six Cities Cohort confirmed the association of mortality with PM<sub>2.5</sub> levels (Laden, 2006).<sup>14N</sup> These studies provide evidence that the fine particles, as measured by PM<sub>2.5</sub>, may be more strongly associated with mortality effects from long-term particulate matter exposures than are coarse compounds.

A follow-up study of the American Cancer Society cohort confirmed and extended the findings in the initial study. The researchers estimated that, on average, a 10 µg/m<sup>3</sup> increase in fine particulates was associated with approximately a 4 percent increase in total mortality, a 6 percent increase in cardiopulmonary mortality, and an 8 percent increase risk of lung cancer mortality (Pope, 2002).<sup>14O</sup> The magnitude of effects is larger in the long-term studies than in the short-term investigations. An analysis of the American Cancer Society Cohort from the Los Angeles area used a more detailed estimate of long-term PM<sub>2.5</sub> exposures and found that the risk of mortality was up to three times higher than estimated with the national cohort (Jerrett, 2005).<sup>14P</sup> These findings indicate that long-term exposures may be more important in terms of overall health effects.

Several studies have assessed the effects of long-term particulate matter exposure on respiratory symptoms and lung function changes. Associations have been found with symptoms of chronic bronchitis and decreased lung function. A study of school children in 12 communities in Southern California showed significant association of particulate matter with bronchitis or phlegm in children with asthma. These effects were also associated with NO<sub>2</sub> and acid vapor levels.

A cohort of fourth graders from the Southern California communities was followed over a period of four years by the Children's Health Study. A lower rate of growth in lung function was found in children living in areas with higher levels of particulate pollution (Gauderman, 2000).<sup>14Q</sup> Decreases in lung function growth were associated with PM<sub>10</sub>, PM<sub>2.5</sub>, PM<sub>10-2.5</sub>, acid vapor, and NO<sub>2</sub>. There was no association with ozone levels. The investigators were not able to identify independent effects of the pollutants, but noted that motor vehicle emissions are a major source of the pollutants.

A follow-up study on a second cohort of children confirmed the findings that decreased lung function growth was associated with particulates, nitric oxides, and elemental carbon levels (Gauderman, 2002).<sup>14R</sup> Elemental carbon is often used as a measure for diesel particulate. Additionally, children who moved to areas with less air pollution were found to regain some of the lung function growth rate. By the time the fourth graders graduated from high school, a significant number showed lower lung function. The risk of lower lung function was about five times higher in children with the highest PM<sub>2.5</sub> exposure when compared to the lowest exposure communities (Gauderman, 2004).<sup>14S</sup> These deficits are likely to persist since the children were at the end of their growth period.

Despite data gaps, the extensive body of epidemiological studies has both qualitative and quantitative consistency suggestive of causality. A considerable body of evidence from these studies suggests that ambient particulate matter, alone or in combination with other coexisting pollutants, is associated with significant increases in mortality and morbidity in a community.

In summary, the scientific literature indicates that an increased risk of mortality and morbidity is associated with particulate matter at ambient levels. The evidence for particulate matter effects is mostly derived from population studies with supportive evidence from clinical and animal studies. Although most of the effects are attributable to particulate matter, co-pollutant effects cannot be ruled out on the basis of existing studies. The difficulty of separating the effects may be due to the fact that particulate levels co-vary with other combustion source pollutants. That is, the particle measurements serve as an index of overall exposure to combustion-related pollution, and some component(s) of combustion pollution other than particles might be at least partly responsible for the observed health effects.

- <sup>14L</sup> See, e.g., U.S. Environmental Protection Agency, Health and the Environment, accessed at the U.S. Environmental Protection Agency website: [www.epa.gov/air/particlepollution/health.html](http://www.epa.gov/air/particlepollution/health.html) (as of July 30, 2008); U.S. Environmental Protection Agency, Particle Pollution and Your Health, accessed at the U.S. Environmental Protection Agency website: [www.epa.gov/airnow/particles-bw.pdf](http://www.epa.gov/airnow/particles-bw.pdf) (as of July 30, 2008); California Air Resources Board, Health Effects of Particulate Matter and Ozone Air Pollution, January 2004.
- <sup>14M</sup> Krewski D, Burnett RT, Goldberg MS, Hoover K, Siemiatycki J, Abrahamowicz M, White WH, et al. (2000). "Reanalysis of the Harvard Six Cities Study and the American Cancer Society Study of Particulate Air Pollution and Mortality. A Special Report of the Institute's Particle Epidemiology Reanalysis Project." Health Effects Institute.
- <sup>14N</sup> Laden F, Schwartz J, Speizer FE, Dockery DW. (2006). "Reduction in Fine Particulate Air Pollution and Mortality." Am J Respir Crit Care Med, 173:667- 672.
- <sup>14O</sup> Pope III CA, Burnett RT, Thun MJ, Calle E, Krewski D, Kazuhiko I, Thurston G. (2002). "Lung Cancer, Cardiopulmonary Mortality, and Long-Term Exposure to Fine Particulate Air Pollution." JAMA, 287:1132-1141.
- <sup>14P</sup> Jerrett M, Burnett RT, Ma R, Pope CA III, Krewski D, Newbold KB, Thurston G, Shi Y, Finkelstein N, Calle EE, Thun MJ. (2005). "Spatial Analysis of Air Pollution and Mortality in Los Angeles. Epidemiology, 15(6):727-736.
- <sup>14Q</sup> Gauderman JW, McConnell R, Gilliland F, London S, Thomas D, Avol E, Vora H, Berhane K, Rappaport EB, Lurmann F, Margolis HG, Peters J. (2000). "Association between Air Pollution and Lung Function Growth in Southern California Children." Am J Respir Crit Care Med, 162(4):1383-1390.
- <sup>14R</sup> Gauderman JW, Gilliland F, Vora H, Avol E, Stram D, McConnell R, Thomas D, Lurmann F, Margolis HG, Rappaport EB, Berhane K, Peters J. (2002). "Association between Air Pollution and Lung Function Growth in Southern California Children. Results from a Second Cohort." Am J Respir Crit Care Med, 166:76-84.
- <sup>14S</sup> Gauderman JW, Avol E, Gilliland F, Vora H, Thomas D, Berhane K, McConnell R, Kuenzli N, Lurmann F, Rappaport E, Margolis H, Bates D, Peters J. (2004). "The Effect of Air Pollution on Lung Development from 10 to 18 Years of Age." N Engl J Med, 351(11):1057-1067.

(d) Nitrogen Dioxide (NO<sub>2</sub>)

~~Major sources of NO<sub>x</sub> include power plants, large industrial facilities, and motor vehicles. Nitrogen oxides are emitted from combustion processes and irritate the nose and throat. NO<sub>x</sub> increases susceptibility to respiratory infections, especially in people with asthma. The principal concern with NO<sub>x</sub> is its role as a precursor to the formation of ozone.~~

NO<sub>2</sub> is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO<sub>2</sub>, creating the mixture of NO and NO<sub>2</sub> commonly called NO<sub>x</sub>. NO<sub>2</sub> absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. The principal concern of NO<sub>x</sub> is as a precursor to the formation of ozone. NO<sub>2</sub> also contributes to the formation of PM<sub>10</sub>. Nitrogen oxides irritate the nose and throat, and increase one's

susceptibility to respiratory infections, especially in people with asthma. In particular, recent studies related to outdoor exposure have found health effects associated with ambient NO<sub>2</sub> levels, including respiratory symptoms, respiratory illness, decreased lung function, increased emergency room visits for asthma, and cardiopulmonary mortality. However, since NO<sub>2</sub> exposure generally occurs in the presence of other pollutants, such as particulate matter, these studies are often unable to determine the specific role of NO<sub>2</sub> in causing effects.

The Children's Health Study in Southern California found associations of air pollution, including NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, with respiratory symptoms in asthmatics (McConnell, 2002).<sup>14T</sup> Particles and NO<sub>2</sub> were correlated, and it was determined that NO<sub>2</sub> plays a stronger role (McConnell, 2002). Ambient levels of NO<sub>2</sub> were also associated with a decrease in lung function growth in a group of children followed for eight years. In addition to NO<sub>2</sub>, the decreased growth was also associated with particulate matter and airborne acids. The study authors postulated that these may be a measure of a package of pollutants from traffic sources. (Gauderman, 2004).

Results from controlled exposure studies of asthmatics demonstrate an increase in the tendency of airways to contract in response to a chemical stimulus (bronchial reactivity). Effects were observed with an exposure to 0.3 ppm NO<sub>2</sub> for a period ranging from 30 minutes to 3 hours. A similar response is reported in some studies with healthy subjects at higher levels of exposure (1.5 to 2.0 ppm). Mixed results have been reported when people with chronic obstructive lung disease are exposed to low levels of NO<sub>2</sub>.

Effective April 12, 2010 the USEPA set a new 1-hour NO<sub>2</sub> standard at 0.10 parts per million (188 µg/m<sup>3</sup>).<sup>15</sup> To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average must not exceed 0.1 ppm. The USEPA cited evidence that short-term NO<sub>2</sub> exposures could contribute to adverse respiratory effects including increased asthma symptoms, worsened control of asthma, and an increase in respiratory illnesses and symptoms. The USEPA also identified that NO<sub>2</sub> concentrations on or near major roads can be approximately 30 to 100 percent higher than concentrations in the surrounding community, which could contribute to health effects for at-risk populations, including people with asthma, children, and the elderly.

<sup>14T</sup> McConnell R, Berhane K, Gilliland F, London SJ, Islam T, Gauderman WJ, Avol E, Margolis HG, Peters JM. (2002). "Asthma in exercising children exposed to ozone: a cohort study." *Lancet*, 359:386-91.

<sup>15</sup> USEPA, *Final Revisions to the Primary National Ambient Air Quality Standard for Nitrogen Dioxide (NO<sub>2</sub>)*, General Overview, Office of Air and Radiation Office of Air Quality Planning and Standards, January 2010, p. 11-12.

## (10) Public Welfare and Ecological Effects

The EPA has also set “Secondary Standards” for some of the above mentioned criteria pollutants to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

### (a) Nitrogen and Sulfur Oxides (NO<sub>x</sub> and SO<sub>x</sub>)

The ecological effects of nitrogen and sulfur are caused both by the gas-phase and atmospheric deposition of the pollutants. The current secondary NAAQS were set to protect against direct damage to vegetation by exposure to gas-phase NO<sub>x</sub> and SO<sub>x</sub>. Acute and chronic exposures to SO<sub>2</sub> can have phytotoxic effects on vegetation, such as foliar injury, decreased photosynthesis, and decreased growth. Similarly, exposure to sufficient concentrations of NO<sub>x</sub> can cause foliar injury, decreased photosynthesis, and decreased growth.

Deposition of nitrogen-containing and sulfur-containing compounds that are derived from NO<sub>x</sub> and SO<sub>x</sub> may be wet (e.g., rain and snow), occult (e.g., cloud and fog), and dry (e.g., gases and particles) and can affect ecosystem biogeochemistry, structure, and function. Nitrogen and sulfur interactions in the environment are highly complex. Both are essential elements for vegetation growth and development and are needed for growth and productivity. However, excess nitrogen or sulfur can lead to acidification, nitrogen nutrient enrichment, eutrophication, and sulfur-mediated mercury methylation. Acidification causes a cascade of effects that alter both terrestrial and aquatic ecosystems. These effects include slower biotic growth, the injury or death of forest vegetation, and the localized extinction of fish and other aquatic species. Nitrogen nutrient enrichment alters numerous biogeochemical indicators, including primary productivity that may lead to changes in community composition and eutrophication. Mercury methylation has been demonstrated to result in behavioral, reproductive, neurochemical, and hormonal effects in fish and in piscivorous mammals and birds.

### (b) Ozone (O<sub>3</sub>)

Ozone is a very active form of oxygen that causes a variety of symptoms, including tissue collapse, interveinal necrosis, and markings on

the upper surface of leaves known as stipple (numerous tiny spots of yellow, light tan, red-brown, dark brown, red, black, or purple pigment), flecking (silver or bleached straw white spots), mottling (irregular blotches of green, light green, and yellow), yellowing, bronzing, or bleaching. Plant growth is often stunted. Flowering and bud formation can be depressed. Affected leaves of certain plants, such as citrus, grape, and tobacco, commonly wither and drop early.

Conifers frequently show a yellow to brown mottling and tipburn or a yellow to brown or orange-red flecking and banding of the needles. Susceptible white pines are stunted and yellowed.

The injury pattern in small grains and forage grasses generally occurs as a scattering of small, yellowish or white to tan flecks on one or both leaf surfaces. The flecks may later merge to form larger, bleached white to yellowish dead areas.

Ozone usually attacks nearly mature leaves first, progressing to younger and older leaves. Young plants are generally the most sensitive to ozone; mature plants are relatively resistant. Ozone-killed tissues are readily infected by certain fungi.

(c) Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)

PM<sub>2.5</sub> particles may travel hundreds of miles before settling out. The effects of PM deposition include:

- Acid rain, resulting in acidic streams and lakes.
- Changing the nutrient balance in coastal waters and large river basins.
- Depleting the nutrients in soil, and
- Damaging sensitive forests and farm crops.

Particulate matter can interfere with the photosynthesis functions of plants in two ways; by settling on foliage and blocking sunlight, and by clogging stomatal openings. In this manner, high PM concentrations in the atmosphere can lead to growth stunting or mortality in some plant species. Wildlife can also be affected in the same way that humans can, by breathing in particulates.

Particles can affect the climate in two different ways. The direct effect is caused by the fact that the particles scatter and absorb solar and infrared radiation in the atmosphere. The indirect effects of particles are more complex and more difficult to assess. Changes in the concentration of aerosols and PM in the atmosphere cause variations in the density and size of cloud droplets. There is a set amount of water available for clouds. The water can form large droplets within clouds, which causes precipitation (a major removal mechanism for aerosols and source of acid rain). The addition of PM into the atmosphere causes the water to condense onto the particles. This results in more, but smaller droplets in the clouds, which increases the cloud albedo. In addition to increasing albedo, this effect tends to decrease the chance of precipitation. If precipitation is suppressed, this results in excess water remaining in the atmosphere.

Volume 1, Section IV.B, Air Quality, page IV.B. 73, revise the second paragraph as follows:

Mitigation Measures B-1 and B-2 provided below are in addition to SCAQMD Rule 403 (Fugitive Dust) requirements, while Mitigation Measures B-3 through B-6 address NO<sub>x</sub> emissions that exceed SCAQMD daily significance thresholds for construction activities. Mitigation Measures B-7 through B-9 are provided to reduce area source emissions during operation of the proposed project. Proposed residential uses near the freeway would exceed the carcinogenic risk threshold and PM<sub>10</sub> and PM<sub>2.5</sub> significance thresholds associated with particulate exposures from diesel exhaust and the reentrainment of paved roadway dust. As a result, mitigation of particulate impacts may be accomplished by reducing pollutant concentrations within residential occupancies. Air Quality Dynamics recommends restricting the rate of infiltration and resultant pollutant exposures to reduce carcinogenic risk estimates to within acceptable limits, as well as reduce particulate exposures below SCAQMD significance thresholds. ~~As recommended by Specific Air Quality Dynamics recommendations limiting particulate infiltration can be accomplished by locating the heating, ventilation and air conditioning (HVAC) control systems that service residential occupancies at or above 20.4 meters (67 feet) and installing particulate filters that conform to the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) dust spot efficiency rating of 90 to 95 percent. This corresponds to a Minimum Efficiency Reporting Value (MERV) of 14. For HVAC control systems that service residential occupancies at or above 26.5 meters (87 feet), installation of particulate filters would be required that conform to an ASHRAE dust spot efficiency rating of 80 to 90 percent. This corresponds to~~

a MERV of 13. per floor and building location are included in Attachment A of Appendix FEIR-D of this Final EIR. At a minimum, residential units shall include HVAC control systems with particulate filters that have a minimum efficiency reporting value (MERV) of 15 as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2 (removal efficiency of 90 percent). Mitigation Measure B-10 provided below implements this recommendation. In addition, Mitigation Measure B-11 is provided to further reduce these emissions and is consistent with City of Los Angeles recommendations.

Volume 1, Section IV.B, Air Quality, page IV.B. 74, Mitigation Measure B-1, revise as follows:

**Mitigation Measure B-1:** In addition to SCAQMD Rule 403 (Fugitive Dust) requirements, the Project applicant will implement the following measures:

- Water three times daily or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Replace ground cover in disturbed areas as quickly as possible;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph; and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM<sub>10</sub> generation.

Volume 1, Section IV.B, Air Quality, page IV.B-74, Mitigation Measure B-2, revise as follows:

**Mitigation Measure B-2:** Streets shall be swept as needed during construction with sweepers using reclaimed water, where available, but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.

Volume 1, Section IV.B, Air Quality, page IV.B. 74, Mitigation Measure B-4, revise as follows:

**Mitigation Measure B-4:** General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, all trucks and vehicles in loading and unloading queues will have their engines turned off when not in use or idling will be limited to five (5) minutes or less, to reduce vehicle emissions. Ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449. Construction activities should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Volume 1, Section IV.B, Air Quality, page IV.B. 74, Mitigation Measure B-6, revise as follows:

**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.~~ The project representative shall make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the mass grading phase of project construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided onsite at the time of mobilization of each applicable unit of equipment. Off-road diesel-

powered construction equipment shall meet the Tier standards based on the following schedule:<sup>38</sup>

- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

<sup>38</sup> Construction equipment standards based on the April 1, 2010, to December 31, 2011, schedule have expired and, as such, are no longer applicable to the proposed project. All construction equipment utilized during construction of the proposed project would conform to the standards set forth under the January 1, 2012, to December 31, 2014, and Post-January 1, 2015, schedules, as applicable.

Volume 1, Section IV.B, Air Quality, page IV.B. 75, Mitigation Measure B-10, revise as follows:

**Mitigation Measure B-10:** ~~The project shall locate~~ include heating, ventilation and air conditioning (HVAC) control systems that service residential occupancies ~~at or above 67 feet (e.g., rooftop). These HVAC systems shall consistent with the minimum specifications per floor and building location included in Attachment A of Appendix FEIR-D. At a minimum, residential units shall include HVAC control systems with particulate filters that have a minimum efficiency reporting value (MERV) of 44-15 as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2 for residential occupancies that are 67 to 86 feet in height above the terrain. The HVAC systems~~

~~shall include particulate filters with a MERV of 13 for residential occupancies that are 87 feet or more above the terrain.~~ The air handling systems shall be maintained on a regular basis per manufacturer's recommendations by a qualified technician employed or contracted by the project proponent or successor. Operation and maintenance of the system shall ensure that it performs in compliance with the manufacturers' specified reporting value.

#### **IV.C. Biological Resources**

No corrections or additions have been made to this section of the Draft EIR.

#### **IV.D. Geology and Soils**

No corrections or additions have been made to this section of the Draft EIR.

#### **IV.E. Hazards and Hazardous Materials**

No corrections or additions have been made to this section of the Draft EIR.

#### **IV.F Hydrology and Water Quality**

No corrections or additions have been made to this section of the Draft EIR.

#### **IV.G. Land Use**

In addition to the general corrections provided above, revise Volume I, Section IV.G., Land Use, page IV.G-43, Subsection (3)(d)(1)(c), Ventura-Cahuenga Boulevard Corridor Specific Plan, as follows:

Currently, the project site, which is graded except for one single-family residence, does not reflect the high quality development promoted by the Ventura-Cahuenga Boulevard Corridor Specific Plan. Implementation of the proposed project would result in a high-quality, mixed-use development consisting of multiple-family residential and commercial uses along a major public transportation corridor. A side by side analysis of whether the project would be consistent with the applicable standards and regulations of the Specific Plan is presented in Table IV.G-3 of Section IV.G. Land Use of the Draft EIR beginning on page IV.G-44. As indicated therein, in order to implement the project, as proposed in the Draft EIR, the Applicant would seek

Specific Plan Exceptions to (1) exceed the permitted FAR of 1.5:1 for the project site to an FAR of 3.3:1; (2) exceed the permitted height limit of 75 feet to develop buildings up to 100 feet (3) eliminate the maximum lot coverage requirement of 75 percent; (4) reduce the required landscape buffer of 10 feet around the surface perimeter of parking structures to five feet; and (5) reduce the required 18-inch setback along the front lot line. Approval-However, with the project modifications proposed by the Applicant in response to comments on the Draft EIR, these Specific Plan exceptions have been revised or are no longer applicable. Specifically, with the proposed reduction in residential units and commercial uses proposed by the Applicant, the proposed project's floor area ratio of 3.3:1 would be reduced to 2.75:1. Accordingly, the Applicant's request for exception from Specific Plan Section 6.B.4 is proposed to be revised to reflect the proposed project's reduction in floor area ratio from 3.3:1 to 2.75:1. In addition, the Applicant has modified the site plan to fully enclose the parking structure along Camarillo Street. With this modification the request to reduce the required landscape buffer of 10 feet around the surface perimeter of parking structures to 5 feet would be eliminated. The Applicant is also requesting an exception from Specific Plan Section 7.A.2.a to exceed the front yard setback along a portion of the Sepulveda Boulevard frontage to accommodate an expanded publicly accessible ground level plaza. Additionally, the Applicant has proposed to modify the site plan to include 18-inch setbacks along Camarillo Street and along portions of Sepulveda Boulevard. With this modification, the request to reduce the required setback would be eliminated. The Specific Plan includes express provisions for granting exceptions to the Specific Plan. Therefore, seeking exceptions to the Specific Plan would not be inconsistent with the Specific Plan. Additionally, granting of the Specific Plan exceptions would be consistent with the Specific Plan's procedural requirements.

Considering the land use impacts of the Specific Plan exceptions sought by the proposed project, a relevant comparison of the project site to other Regional Commercial sites in the Specific Plan is informative. 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. As shown on the Section maps of the Specific Plan, the project site is the farthest Regional Commercial site from Ventura Boulevard in the Sherman Oaks Section of the Specific Plan. It is three times farther from Ventura Boulevard than nearly every other Regional Commercial site in all other Sections of the Specific Plan. Only one other Regional Commercial site in the entire Specific Plan is a comparable distance from Ventura Boulevard, and that site is in the Tarzana Section of the Specific Plan.

Prior to the granting of the Specific Plan exceptions, the floor area, lot coverage, height limits, and front yard setback elements of the proposed project would be inconsistent with the associated requirements of the Specific Plan. Other elements of the proposed project would be consistent with other requirements of the Specific Plan. In addition, some of the Specific Plan exceptions would result in less significant environmental impacts than would compliance with the Specific Plan. For example, a project complying with the Specific Plan floor area rules would result in significantly higher traffic generation than the proposed project. The Regional Commercial Community Plan land use designation combined with a Height District 2 envisions an active center of commerce, numerous jobs and activities which generate large amounts of traffic. By allocating over 90 percent of the proposed project's floor area to residential uses, traffic trip generation is dramatically reduced compared to intense commercial development envisioned in the Specific Plan. Strictly requiring the amount of commercial development required by the Specific Plan would be inconsistent with the Specific Plan's purpose and intent to reduce traffic trips. Therefore, approval of the requested Specific Plan Exceptions would allow implementation of a project that would be compatible with surrounding uses and improve existing conditions on-site. The project would create a development that would incorporate a contemporary architectural style, exhibiting multi-faceted massing building forms, roof forms, differing elevations, and a mix of colors that are complimentary to surrounding uses; provide a substantial amount of landscaping including a main central courtyard with gardens; and encourage pedestrian activity and safety. Overall, with approval of the proposed Specific Plan Exceptions, the project would generally be in conformance with the intent of the Specific Plan, and land use impacts relative to this plan would be less than significant.

#### **IV.H. Noise**

No corrections or additions have been made to this section of the Draft EIR.

#### **IV.I. Population, Housing, and Employment**

Other than the general corrections provided above, no additional specific corrections or additions have been made to Section IV.I, Population, Housing, and Employment, of the Draft EIR.

### IV.J.1. Public Services—Police Protection

Other than the general corrections provided above, no additional specific corrections or additions have been made to Section IV.J.1, Public Services—Police Protection, of the Draft EIR.

### IV.J.2. Public Services—Fire Protection

Volume I, section IV.J.2, Public Services—Fire Protection, pages IV.J-19 and IV.J-20, revise as follows:

Division 9 of the Fire Code also addresses fires safety, access, and fire flow requirements. Under Division 9 (Section 57.09.03), if any portion of an exterior wall is more than 150 feet from the edge of a roadway, an approved, posted fire lane shall be provided. Fire hydrant spacing and hydrant type is also determined according to land use. For high density residential uses, one hydrant per 100,000 square feet of land is required with a 300 to 450 foot distance between hydrants. A 2½-inch by 4-inch double fire hydrant is required for this land use. For commercial uses, one hydrant per 80,000 square feet of land is required with a 300-foot distance between hydrants. A 2½-inch by 4-inch double fire hydrant ~~or 4-inch by 4-inch double fire hydrant~~ is required. Furthermore, every first story of a residential unit and all first story portions of any commercial or industrial building must be within 300 feet of an approved hydrant. Division 9 (Section 57.09.06) also establishes fire flow standards. Fire flow is defined as the quantity of water available or needed for fire protection in a given area and is normally measured in gallons per minute (gpm), as well as duration of flow. The determination of fire flow adequacy is based on the type of land use, with greater intensity land uses requiring higher flows from a greater number of hydrants. The specific public fire flow requirements for a project are determined by LAFD. Typically, the fire flow required for high density residential buildings is 4,000 gpm from four adjacent hydrants flowing simultaneously. The fire flow required for high density commercial or industrial buildings is 12,000 gpm available to any block. ~~The fire flow required for a high density commercial or industrial use is 12,000 gpm available to any block.~~ A minimum residual water pressure of 20 pounds per square inches (psi) is required for any fire service or hydrant flowing at capacity to remain in the water system in addition to the required gpm flowing. Furthermore, the LAFD sets forth further fire flow requirements for existing water infrastructure (e.g., water mains, other conveyance lines, etc).

Please refer to Section IV.L.1, Water Supply, for a discussion of impacts related to existing water infrastructure.

Volume I, Section IV.J.2, Public Services—Fire Protection, page IV.J-25 second to last paragraph, revise as follows:

New hydrants may be required to serve the project to ensure that none of the project's proposed buildings would be further than 300 feet from an approved fire hydrant. As indicated previously, the project would comply with applicable LAMC fire safety requirements for building construction, which include the submittal of a plot plan indicating the provision of adequate fire hydrants. With regard to fire flow, a minimum of 4,000 gpm from four hydrants flowing simultaneously would be provided for the proposed project. For eight inch water mains, the LAFD requires fire flows of 2,500 gpm and with a minimum residual pressure of 20 psi is required for any fire service or hydrant flowing at capacity. Based on the Service Advisory Requests (i.e., fire pressure flow reports) from LADWP, the existing 8-inch water main in Sepulveda Boulevard could accommodate the 2,500 gpm flows with a residual pressure of 94 psi, which is well above the 20 psi fire flow requirement.<sup>20</sup> However, additional coordination with LADWP and LAFD during the development of the project plans would be required to ensure that adequate fire flow is provided at the time of project occupancy.

<sup>20</sup> Los Angeles Department of Water and Power, Service Advisory Request (SAR) Number 7367, Fire Service Pressure Final Reports, March 16, 2004.

### **IV.J.3. Public Services—Public Schools**

Other than the general corrections provided above, no additional specific corrections or additions have been made to Section IV.J.3, Public Services—Public Schools, of the Draft EIR.

### **IV.J.4. Public Services—Parks and Recreation**

Other than the general corrections provided above, no additional specific corrections or additions have been made to Section IV.J.4, Public Services—Parks and Recreation, of the Draft EIR.

## IV.J.5. Public Services—Libraries

Other than the general corrections provided above, no additional specific corrections or additions have been made to Section IV.J.5, Public Services—Libraries, of the Draft EIR.

## IV.K. Transportation and Circulation

Volume 1, Section IV.K, Transportation and Circulation, page IV.K-23, first paragraph under the heading c. Project Features, subheading (2) Operation, revise as follows:

Project parking would be provided within a parking structure that would include two subterranean levels, one ground level, and one mezzanine level. The proposed project would provide a total parking supply of 1,470 parking spaces, consisting of an estimated 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for retail users. Retail parking would be provided on the ground level and would be clearly marked and conveniently separated from the residential parking. The Applicant would include within all commercial leases with its commercial tenant(s) the necessary provision to provide parking within the project site to accommodate the demands of its respective employees. All employees of the commercial tenant(s) would park within the project site and would be prohibited from parking in the adjacent residential neighborhood across Sepulveda Boulevard. The Applicant would also include within all residential leases the necessary provision to require all residential tenants and their guests/visitors to park their respective vehicle(s) within the project site and would be prohibited from parking in the adjacent residential neighborhood across Sepulveda Boulevard.

Volume 1, Section IV.K, Transportation and Circulation, page IV.K-24, first complete paragraph, revise as follows:

A Transportation Demand Management Plan would also be prepared by the Applicant and approved by the Department of Transportation and would contain, at minimum, the 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.
- ~~Provide transportation information when prospective residents are considering leasing a unit.~~
- 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.
- ~~Provide a shelter and passenger amenities at the bus stop closest to the project.~~
- Unbundle the leasing of dwelling units from parking spaces.
- ~~Provide secure parking for resident and patron bicycles.~~
- ~~Provide a Passenger Loading area adjacent to the site.~~
- ~~Prepare "Safe Routes to School" materials to help parents walk children to nearby schools.~~

Volume 1, Section IV.K, Transportation and Circulation, page IV.K. 46, Mitigation Measure K-3, revise to include the following bullets:

**Mitigation Measure K-3:** A Construction Management Plan or Worksite Traffic Control Plan shall be prepared by the Applicant and approved by the Department of Transportation and Department of Public Works and shall contain, at minimum, the following:

- The name and telephone number of a construction manager who can be reached 24 hours a day;
- An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies.

Coordination shall include the assessment of any alternative access routes that might be required through the proposed project area and maps showing access to and within the area and to adjacent properties;

- Procedures for the training of traffic safety personnel (flaggers) to assist in emergency response; ~~and~~
- The location, times, and estimated duration of any roadway or sidewalk closures, traffic detours, use of protective devices, warning signs, and queuing areas;
- Configure construction parking to minimize traffic interference;
- Provide dedicated turn lanes for movement of construction trucks and equipment, where space is available and would not result in a safety concern for pedestrians and motorists; and
- Reroute construction trucks away from congested streets or sensitive receptor areas, where the resultant trip length would not substantially increase.

Volume 1, Section IV.K, Transportation and Circulation, page IV.K. 48, Mitigation Measure K-15, revise as follows:

**Mitigation Measure K-15:** ~~The Project applicant will contribute \$300,000 to implement a Special Parking Congestion Zone. This proposed parking project will implement new on and off street parking technology in City-operated spaces in the vicinity of Sepulveda and Ventura Boulevards that will increase parking availability, reduce search times, and relieve traffic congestion. The proposed parking project area is bounded by the Ventura Freeway on the north, Valley Vista Boulevard on the south, Haskell Avenue on the west, and Willis Avenue on the east. The project applicant will contribute \$300,000 to a fund for the identification and implementation of local parking, transportation and circulation improvements in the following areas: the area bounded clockwise by Haskell Avenue beginning at Valley Vista Boulevard and extending northerly to SR-101 (on the west), from that point extending easterly along SR-101 to I-405, and from that point extending northerly along I-405 freeway to westernmost prolongation of Magnolia Boulevard, and from that point extending easterly on Magnolia Boulevard~~

prolongation to Kester Avenue, and from that point extending southerly along Kester Avenue to the prolongation of Moorpark Street, from that point extending easterly along the prolongation of Moorpark Street to Beverly Glen Boulevard-Tyrone Avenue, from that point extending southerly along Beverly Glen Boulevard-Tyrone Avenue to Dickens Street, from that point extending westerly along Dickens Street to Kester Avenue, from that point extending southerly along Kester Avenue to Valley Vista Boulevard, and from that point extending westerly back to Haskall Avenue. The \$300,000 payment will be guaranteed through cash, bond or irrevocable letter of credit, payable to DOT. The fund will be used for measures that include but are not limited to parking improvements intended to increase parking availability, reduce search times and relieve traffic congestion; neighborhood traffic calming; transit-related improvements and amenities; bicycle-related improvements and amenities; pedestrian-related improvements and amenities; and streetscape improvements and amenities.

Volume 1, Section IV.K, Transportation and Circulation, page IV.K-49, starting with third paragraph under the heading 6. Level of Significance After Mitigation, revise as follows:

Even with implementation of Mitigation Measure IV.K-12, a significant impact would remain at the intersection of Ventura Boulevard and Sepulveda Boulevard (a CMP monitoring intersection) during the P.M. peak hour.

No feasible mitigation measure could be identified for the following intersections:

- La Maida Street and Sepulveda Boulevard; ~~(a CMP monitoring intersection);~~
- I-405 Freeway Northbound On-/Off-Ramps/Greenleaf Street and Sepulveda Boulevard;
- Kester Avenue (South) and Ventura Boulevard; and
- Moorpark Street and Sepulveda Boulevard.

## IV.L.1. Utilities—Water Supply

Volume 1, Section IV.L.1, Utilities—Water Supply, page IV.L.1-22, fourth sentence in the last paragraph, revise as follows:

Today, with the single-family residence remaining on the site, the existing water demand is approximately 1,800 gpd or ~~0.2~~2.0 AF per year.

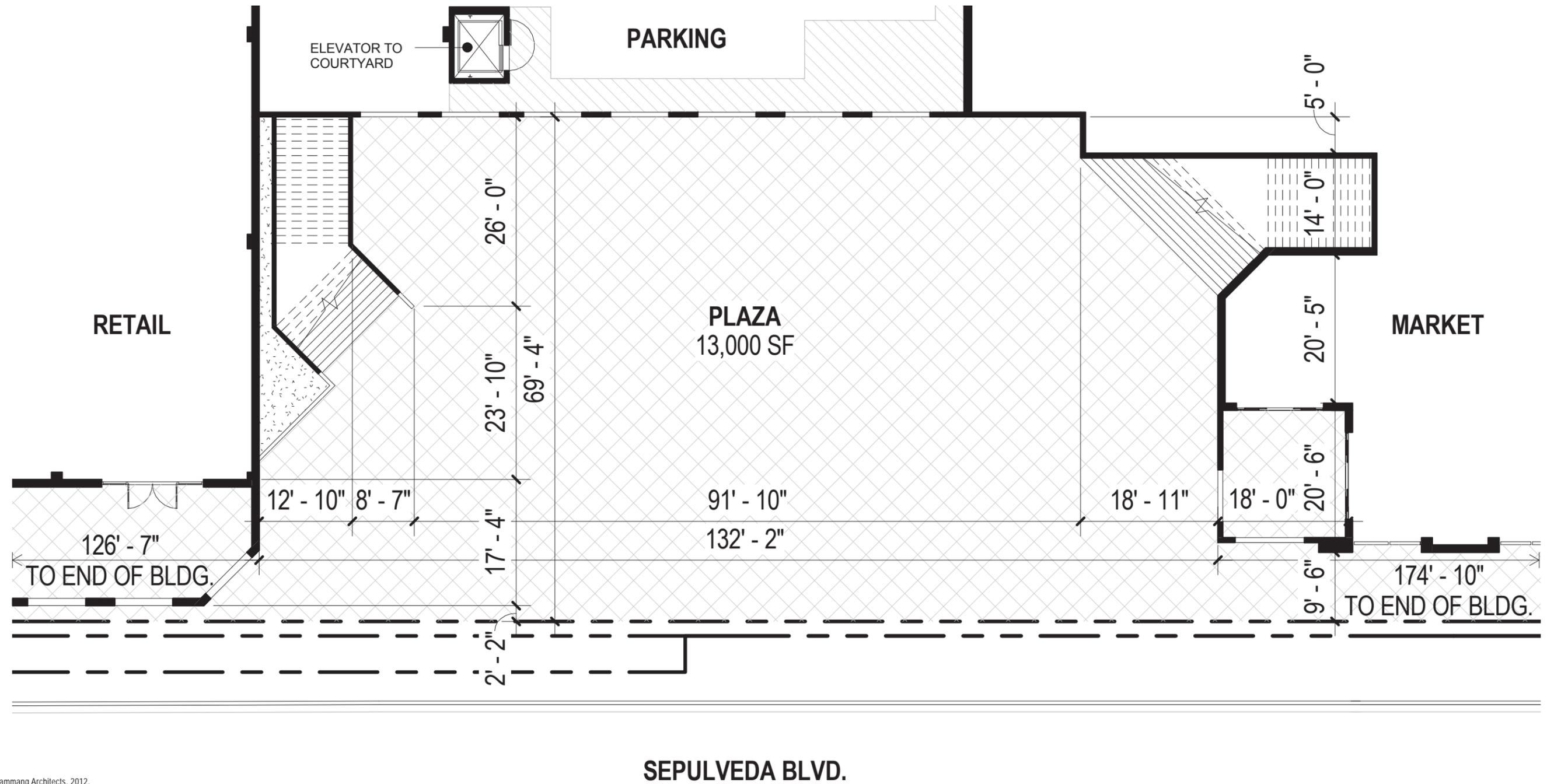
Volume 1, Section IV.L.1, Utilities—Water Supply, page IV.L-24, Figure IV.L-1 revise figure as shown on page II-43:

Volume 1, Section IV.L.1, Utilities—Water Supply, page IV.L.1-37, last bullet point, revise as follows:

- A portion of the existing 8-inch main in Sepulveda Boulevard (approximately 100 feet north of Camarillo Street) and a portion of the existing 8-inch main in Camarillo Street (approximately 130 feet west of Sepulveda Boulevard-) ~~would~~—may be upgraded to a 12-inch main. An alternative to the upgrading of the 8-inch existing main in Camarillo Street ~~is~~ could be the construction of a new 12-inch main north of the centerline of the street. If found necessary, the final sizes for the water distribution main upgrades will be determined during the detailed design stage of the project and in accordance with the Department of Water and Power.

Volume 1, Section IV.L.1, Utilities—Water Supply, page IV.L.1-39, first four bullet points, revise as follows:

- For the proposed residential uses, domestic water demand would be served by two connections: one connection to the existing 8-inch water main in Sepulveda Boulevard, and another one to the existing 8-inch main in Camarillo Street. ~~Estimated size of the domestic water meters would be 8 inches each.~~ Water demand for fire protection (fire sprinkler) would be served by on-site looping system with two connections one to the existing 8-inch water line in Sepulveda Boulevard and another one to the upgraded 12-inch water main in Camarillo Street. Based on Appendix J of the Draft EIR, the domestic flow estimates for the proposed residential uses would be 8,895 GPM. The upgraded sizes and domestic flow requirements are estimates and will be verified in the detailed design stage of the project in accordance with the Department of Water and Power.



Source: Killefer Flamang Architects, 2012.



Il Villaggio Toscano Project

**Figure IV.L-1**  
Existing Water Infrastructure

- For the proposed market, a connection would be made to the existing 8-inch water main in Sepulveda Boulevard. It would require installation of one 8-inch Fire Service and one 3-inch water meter for domestic purposes. Based on Appendix J of the Draft EIR, the domestic flow estimates for the proposed market would be 60 GPM. The upgraded sizes and domestic flow requirements are estimates and will be verified in the detailed design stage of the project in accordance with the Department of Water and Power.
- For the proposed retail, a connection would be made to the upgraded 12-inch portion of the 8-inch existing water main in Sepulveda Boulevard. It would require the installation of one Fire Service and one domestic water meter. The estimated size for Fire Service is 6-inch, and for domestic water, 2-inch. Based on Appendix J of the Draft EIR, the domestic flow estimates for the proposed retail building would be 47 GPM. The upgraded sizes and domestic flow requirements are estimates and will be verified in the detailed design stage of the project in accordance with the Department of Water and Power.
- Water system for irrigation purposes would be served off existing 8-inch main in Sepulveda. Estimated size of water meter is 2 inches. Based on Appendix J of the Draft EIR, the domestic flow estimates for the proposed irrigation purposes would be 100 GPM. The upgraded sizes and domestic flow requirements are estimates and will be verified in the detailed design stage of the project in accordance with the Department of Water and Power.

Volume 1, Section IV.L.1, Utilities—Water Supply, page IV.L.1-44, third full paragraph, revise as follows:

*(b) Water Infrastructure*

As described above in Subsection C, Project Features, the project ~~would~~ may include the ~~necessary~~ following infrastructure improvements on the project site as well as any extensions to connect the project site to existing water lines in the area. Proposed improvements would include connections to the existing 8-inch water mains located in Sepulveda Boulevard and Camarillo Street. To ensure sufficient water pressure in the system, the existing 8-inch main in Sepulveda Boulevard (approximately 100 feet north of Camarillo Street) and a portion of the existing 8-inch main in Camarillo Street (approximately 130 feet west of Sepulveda Boulevard) may be upgraded to a 12-inch main. An alternative to upgrading the existing 8-inch main in Camarillo Street is the construction of a new 12-inch main

north of the centerline of Camarillo Street. This would prevent interruption of water supply for two existing fire hydrants and other customers connected to the existing 8-inch main in Camarillo Street. The above-mentioned infrastructure improvements will be verified during the detail design stage of the project in accordance with the Department of Water and Power. With these anticipated improvements, domestic water and fire flow demands would be met. Furthermore, Mitigation Measure J-4 as described in Section IV.J.2, Fire Protection, of the Draft EIR would reduce potential impacts related to the provision of fire flow to a less than significant level.

#### **IV.L.2. Utilities—Wastewater**

Other than the general corrections provided above, no additional specific corrections or additions have been made to Section IV.L.2, Utilities—Wastewater, of the Draft EIR.

#### **IV.L.3. Utilities—Solid Waste**

Other than the general corrections provided above, no additional specific corrections or additions have been made to Section IV.L.3, Utilities—Solid Waste, of the Draft EIR.

### **V. Alternatives**

Volume 1, Section V, Alternatives, page V-40, second full paragraph, revise as follows:

The Development in Accordance with Existing Plans/Regional Commercial Use Alternative would develop 333,000 square feet of regional commercial uses. Based on information provided by the traffic consultant, this alternative would result in a net trip generation of 11,205 daily trips, including ~~482~~409 A.M. peak hour trips and 876 P.M. peak hour trips. Thus, this alternative would result in approximately 5,361 more daily trips, including ~~161~~88 more A.M. peak hour trips and 327 more P.M. peak hour trips, as compared to the proposed project. With this increase in vehicle trips, this alternative would result in traffic impacts on the study intersections that would be considerably greater than the project. Specifically, after applying the same mitigation this alternative would result in significant and unavoidable impacts at ~~10~~11 intersections as compared to five intersections under the proposed project. The ~~10~~11 significantly impacted include: Oxnard Street/Sepulveda Boulevard; Burbank Boulevard/Sepulveda Boulevard; Magnolia Boulevard/Sepulveda Boulevard;; La Maida Street/Sepulveda Boulevard; Camarillo Street/Sepulveda Boulevard; Ventura Boulevard/Sepulveda Boulevard;

Ventura Boulevard/Kester Avenue (North); Ventura Boulevard/Kester Avenue (South); 405 Freeway Northbound Ramps—Greenleaf Street/Sepulveda Boulevard; Dickens Street/Ventura Boulevard; and Moorpark Street/Sepulveda Boulevard. Thus, impacts on intersections would be greater under this alternative and would be significant and unavoidable. This alternative's increase in daily trips would also result in greater traffic on freeways segments, on residential street segments, and at access points. Thus, impacts related to these issues would be greater than the project.

## VI. Other Environmental Considerations

Other than the general corrections provided above, no additional specific corrections or additions have been made to Section VI, Other Environmental Considerations, of the Draft EIR.

## Appendices

Volume III, Appendix B-5, replace with Revised Appendix B-5, Pollutant Exposure Assessment, appended to this Final EIR.

Volume III, Appendix C, add Appendix C-3, Addendum II—Update of Geotechnical Engineering Investigation, Appendix C-4, City of Los Angeles Grading Division Approval Letter, and C-5, Addendum III—Confirmation of Previous Analyses, all of which are appended to this Final EIR.

Volume III, Appendix H-3 DOT Traffic Assessment under Heading H, replace second full paragraph with the following:

In addition, the applicant will contribute \$300,000 to a fund for the identification and implementation of local parking, transportation and circulation improvements in the following areas: the area bounded clockwise by Haskell Avenue beginning at Valley Vista Boulevard and extending northerly to SR-101 (on the west), from that point extending easterly along SR-101 to I-405, and from that point extending northerly along I-405 freeway to westernmost prolongation of Magnolia Boulevard, and from that point extending easterly on Magnolia Boulevard prolongation to Kester Avenue, and from that point extending southerly along Kester Avenue to the prolongation of Moorpark Street, from that point extending easterly along the prolongation of Moorpark Street to Beverly Glen Boulevard-Tyrone Avenue, from that point extending southerly along Beverly Glen Boulevard-Tyrone

Avenue to Dickens Street, from that point extending westerly along Dickens Street to Kester Avenue, from that point extending southerly along Kester Avenue to Valley Vista Boulevard, and from that point extending westerly back to Haskall Avenue. The \$300,000 payment will be guaranteed through cash, bond or irrevocable letter of credit, payable to DOT. The fund will be used for measures that include but are not limited to parking improvements intended to increase parking availability, reduce search times and relieve traffic congestion; neighborhood traffic calming; transit-related improvements and amenities; bicycle-related improvements and amenities; pedestrian-related improvements and amenities; and streetscape improvements and amenities.

Volume III, Appendix J, Utilities Reports, Exhibit 2 Pre-Development Conditions Water Distribution Map, revise figure as shown on page II-48.

## C. Effect of Corrections and Additions

The Final EIR documents changes to the Draft EIR. As demonstrated by the following discussion, the modifications to the Draft EIR do not result in new significant impacts and do not warrant circulation of the Draft 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. The entire document need not be circulated if revisions are limited to specific portions of the document.

The relevant portions of CEQA Guidelines section 15088.5 read as follows:

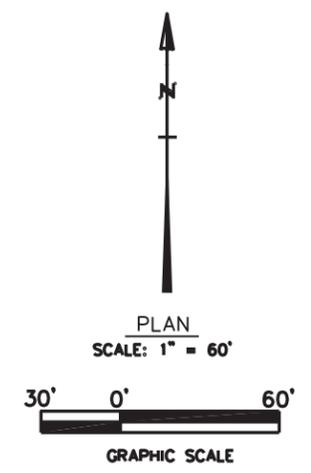
- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:



LEGEND:

AC	ASPHALT CONCRETE
C/L	CENTERLINE
CLF	CHAIN LINK FENCE
CONC	CONCRETE
CLR	CLEARANCE
DRYV	DRIVEWAY
DWPWS	DEPT. OF WATER & POWER WATER SYS
FH	FIRE HYDRANT
GM	GAS METER
MH	MANHOLE
MWD	METROPOLITAN WATER DISTRICT
PA	PLANTED AREA
PP	POWER POLE
P&T	POWER & TELEPHONE
RET	RETAINING
SSMH	SANITARY SEWER MANHOLE
SLPB	STREET LIGHT PULL.BOX
SPRK	SPRINKLER
SD	STORM DRAIN
T	TREE
TEL	TELEPHONE
TW	TREEWELL
WM	WATER METER
WV	WATER VALVE
W	WITH

SS	SEWER LINE
SD	STORM DRAIN
W	WATER LINE
G	GAS LINE
T	TELEPHONE LINE
O	OIL LINE
---	PROPERTY LINE



Source: Killefer Flammang Architects, 2012.

Il Villaggio Toscano Project



**Exhibit 2**  
Pre-Development Conditions Water Distribution Map

- (1) A new significant environmental impact 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 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 would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
  - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The information contained in this section and Section III, Responses to Comments, of this Final EIR, merely clarifies, amplifies, or makes insignificant changes to the Draft EIR. Section III, Responses to Comments, of this Final EIR, fully considers and responds to comments claiming that the proposed project would have significant impacts or more severe impacts not disclosed in the Draft EIR and demonstrates that none of these comments provided substantial evidence that the proposed project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR. In addition, the information added to the Draft EIR is not significant because the Draft EIR is not changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the proposed project. Rather, as provided by the following discussion, the corrections and additions to the Draft EIR, including the modifications to the project proposed by the Applicant, would not result in new significant impacts or an increase in any impact already identified in the Draft EIR. Furthermore, in many cases, the modifications to the project proposed by the Applicant would reduce the environmental impacts of the proposed project set forth in the Draft EIR.

### Aesthetics

As set forth above, language has been added to Section IV.A, Aesthetics, to clarify the exceptions to the Specific Plan sought by the Applicant and to clarify that granting of the Specific Plan exceptions would be consistent with the Specific Plan's procedural

requirements. This clarifying language does not change the impact conclusions reached in the Draft EIR.

As set forth in the general corrections and additions above, the Applicant has proposed to reduce the number of residential units from 500 to 399 residential units. In addition, to accommodate an expanded publicly accessible plaza, the proposed project's 55,000 square feet of neighborhood serving retail has been reduced by 3,000 square feet to 52,000 square feet of retail. Furthermore, the Applicant has also proposed to reduce the height of the buildings along Sepulveda Boulevard based on the distance from the Sepulveda property line. Specifically, buildings from zero to 45 feet from Sepulveda Boulevard would be a maximum of four stories, buildings 45 feet to 125 feet from Sepulveda Boulevard would be a maximum of six stories, and buildings more than 125 feet from Sepulveda Boulevard would be a maximum of 8 stories. Based on the reduction in density and height resulting from these modifications, aesthetics impacts would be reduced relative to the aesthetics impacts evaluated in the Draft EIR.

### Air Quality

With regard to air quality, the corrections and additions above include clarifying and amplifying language regarding the effects of air pollution on human health, public welfare and ecology. This clarifying language does not change the impact conclusions reached in the Draft EIR.

Within the corrections and additions above, construction mitigation measures have been strengthened (e.g., require use of lower pollutant emitting heavy-duty construction equipment) to further reduce regional and localized construction air quality impacts. Please refer to Mitigation Measures B-1, B-2, B-4 and B-6 provided above. Even with these more stringent mitigation measures, the proposed project will still result in short-term significant and unavoidable regional NO<sub>x</sub> and localized PM<sub>10</sub> construction air quality impacts.

While the proposed reductions in square footage resulting from the proposed modifications may reduce the overall construction timeframe for the proposed project, peak day construction activities would not change. As the analysis of construction impacts is based on a peak day, no changes to the impact conclusions would result. Thus, construction-related impacts would continue to be significant and unavoidable.

With regard to toxic air contaminants associated with project operations, an assessment was prepared to identify discrete HVAC requirements for the proposed project based upon consideration of the proposed residential building setbacks and elevations above local terrain and more refined specifications for the location of air filtration systems (refer to Appendix FEIR-D of this Final EIR). The HVAC system design was revised to

incorporate individual filtration systems whereby the location of outside air ducting would correspond with the location of individual residential units. To determine HVAC control requirements, a dispersion analysis was performed for diesel particulate, PM<sub>10</sub> and PM<sub>2.5</sub> emissions corresponding to the HVAC control system heights and locations. Results of the dispersion analysis confirmed that all residential occupancies can continue to be serviced with available HVAC control equipment to reduce pollutant exposures below significance thresholds. Attachment A of Appendix FEIR-D of this Final EIR identifies discrete HVAC control efficiency requirements per floor and building location. As provided above, Mitigation Measure B-10 (HVAC requirements) has been updated to reflect these revised HVAC specifications. In addition, in response to the modifications to setbacks, building heights and the HVAC control systems and in response to public comments, the Pollutant Exposure Assessment was also revised and is included as Appendix B-5 to this Final EIR. As shown therein, potential impacts associated with pollutant exposure would continue to be less than significant.

With regard to operational impacts associated with regional emissions, the proposed modifications would result in a decrease in stationary emissions due to a reduction in building square footage and a decrease in mobile emissions associated with vehicular traffic due to a reduction in residential units. However, impacts would continue to be significant and unavoidable.

Localized impacts associated with CO concentrations at nearby intersections would also be reduced as a result of the proposed reduction in unit count and the associated reduction in traffic. Such impacts would continue to be less than significant.

### Biological Resources

There are no text changes proposed to Section IV.C, Biological Resources, of the Draft EIR. In addition, the proposed modifications to the project would not change the number of trees to be removed and the proposed mitigation measures would continue to be implemented. Thus, no new impacts would result and impacts would continue to be less than significant with implementation of the mitigation measures.

### Geology and Soils

There are no text changes proposed to Section IV.D, Geology and Soils, of the Draft EIR. In addition, the proposed modifications to the project would not change the geographic area to be developed or the approximate amount of grading or depth of grading required for the project. The proposed mitigation measures would continue to be implemented. Thus, no new impacts would result and impacts would continue to be less than significant with implementation of the mitigation measures.

### Hazards and Hazardous Materials

There are no text changes proposed to Section IV.E, Hazards and Hazardous Materials, of the Draft EIR. In addition, the proposed modifications to the project would not change the geographic area to be developed or the types of uses proposed by the project. Thus, no new impacts would result and impacts would continue to be less than significant.

### Hydrology and Water Quality

There are no text changes proposed to Section IV.F, Hydrology and Water Quality, of the Draft EIR. With the proposed modifications to the proposed project, the square footage of the neighborhood-serving commercial uses would be reduced and an expanded plaza that would include tables, chairs, benches, and planters with native landscaped vegetation would be provided. While additional landscaping would be provided with the proposed modifications, the amount of pervious area within the project site would not be significantly increased. Therefore, the hydrology of the project site as described in the Draft EIR would remain substantially the same with the proposed modifications. In addition, as the proposed modifications would not result in a significant increase in the amount of pervious area within the project site, stormwater runoff from the project site and associated potential impacts to water quality as set forth in the Draft EIR would be similar with the proposed modifications. Thus, no new impacts would result and impacts would continue to be less than significant with implementation of the mitigation measures.

### Land Use

As set forth above, language has been added to Section IV.G, Land Use, to clarify the exceptions to the Specific Plan sought by the Applicant and to clarify that granting of the Specific Plan exceptions would be consistent with the Specific Plan's procedural requirements. This clarifying language does not change the impact conclusions reached in the Draft EIR.

Based on the modifications to the project proposed by the Applicant, several of the requested Specific Plan exceptions set forth in the Draft EIR would be revised or would no longer be applicable. Specifically, with the proposed reduction in residential units and commercial uses, the Applicant would reduce the proposed project's floor area ratio of 3.3:1 to 2.75:1. In addition, in order to accommodate an expanded publicly accessible ground level plaza, the Applicant is requesting an additional exception from Specific Plan Section 7.A.2.a to exceed the front yard setback along the Sepulveda Boulevard frontage. Moreover, with the inclusion of an 18-inch setback on Sepulveda Boulevard and Camarillo Street, the request for exception from Specific Plan Section 7.A.2.a would no longer be required. Furthermore, the request for exception from Specific Plan Section 7.B.1 has

been revised to reduce the lot coverage of 83 percent at grade to a maximum lot coverage of 78.5 percent at grade. Finally, with the revision to fully enclose the parking structure along Camarillo Street, the request for exception from Specific Plan Section 7.D.2.b would be eliminated. These proposed changes along with the proposed reduction in building heights and density and the expansion of the publicly accessible ground level plaza would reduce the overall impacts of the proposed project with regard to consistency with local plans and applicable policies as well as reduce impacts associated with land use compatibility. As set forth in the Draft EIR, such impacts would be less than significant.

### Noise

There are no text changes proposed to Section IV.G, Noise, of the Draft EIR. With the proposed modifications to the project, the square footage to be developed would be reduced. However, the peak day construction activities would not change. Thus, as set forth in the Draft EIR, construction-related noise impacts would continue to be significant and unavoidable.

The proposed modifications to the project would not change the type of uses and activities proposed or the general locations of such uses. Thus, as set forth in the Draft EIR, noise impacts associated with on-site uses would continue to be less than significant. As traffic would be reduced with the proposed modifications, mobile noise impacts would also be reduced. Such impacts would continue to be less than significant.

### Population, Housing and Employment and Public Services

The only text changes to these sections of the Draft EIR are associated with minor clarifications in Section IV.J.2, Public Services—Fire Protection, regarding infrastructure. This clarifying language would not change the impact conclusions reached in the Draft EIR.

In terms of population, housing, and employment, with the proposed reduction in residential units, the residential population generated by the proposed project would be reduced. Similarly, with the reduction of neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet, the number of employees generated by the proposed project would be slightly reduced. Thus, as the project-related population and employment set forth in the Draft EIR would be consistent with SCAG population and employment projections, so would the population and employment with the proposed modifications. Impacts would continue to be less than significant.

The reduction in the residential and daytime population would also result in a reduction in the demand for police protection, fire protection, schools, and library services.

Impacts would continue to be less than significant with implementation of mitigation measures.

### Transportation and Circulation

The corrections and additions above to Section IV.K, Transportation and Circulation, address prohibition of parking in the residential neighborhood across Sepulveda Boulevard, bolstering of the TDM and Construction Management Plan, and contribution of funds for local traffic and circulation improvements. These clarifications would serve to reduce potential impacts associated with traffic and parking and would not result in any new significant impacts.

Regarding operational traffic, the reduction in residential units and neighborhood-serving commercial uses would reduce the daily and peak hour trips generated by the proposed project. Thus, traffic impacts would be reduced, but would continue to be significant and unavoidable.

Based on the proposed reduction in residential units from 500 to 399 units and the 55,000 square feet of neighborhood-serving commercial uses to 52,000 square feet, a total parking supply of 1,206 parking spaces would be provided. These would include 798 parking spaces for project residents, 200 parking spaces for residential guests, and 208 parking spaces for retail visitors. As this number of spaces would comply with code requirements, parking impacts would continue to be less than significant with implementation of mitigation measures.

### Utilities

The only text changes to these sections of the Draft EIR are associated with minor clarifications regarding infrastructure. This clarifying language does not change the impact conclusions reached in the Draft EIR.

With the proposed modifications, the number of residential units and neighborhood-serving commercial uses would be reduced. Thus, the water demand, wastewater generation and solid waste generation would be reduced relative to that set forth in the Draft EIR. Impacts would be reduced and would continue to be less than significant with implementation of mitigation measures.

### Conclusion

Based on the above, the corrections and additions, which include proposed modifications to the project, do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR. In addition, the corrections and additions to the Draft EIR merely clarify, amplify or make insignificant modifications to the Draft EIR. Furthermore, for many issue areas, the proposed corrections and additions would reduce impacts set forth in the Draft EIR. Thus, recirculation of the Draft EIR is not required.

### III. Responses to Comments

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# III. Responses to Comments

## A. Comment Matrix

Table III-1  
Response to Comments Matrix

LETTER NO.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESOURCES	GEOLOGY AND SOILS	HAZARDS AND HAZARDOUS MATERIALS	HYDROLOGY/WATER QUALITY	LAND USE	NOISE	POPULATION, HOUSING, AND EMPLOYMENT	PUBLIC SERVICES	TRAFFIC, CIRCULATION & PARKING	WATER SUPPLY	WASTEWATER	SOLID WASTE	ALTERNATIVES	OTHER ENVIRONMENTAL CONSIDERATIONS	GENERAL SUPPORT	GENERAL OPPOSITION	OTHER	
1	Scott Morgan, Director State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit 1400 Tenth Street P.O. Box 3044 Sacramento, CA 95812-3044																							X
2	Dianna Watson IGR/CEQA Program Manager Caltrans, District 7 100 Main Street, MS #16 Los Angeles, CA 90012-3606									X		X			X									X

**Table III-1 (Continued)  
Response to Comments Matrix**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESOURCES	GEOLOGY AND SOILS	HAZARDS AND HAZARDOUS MATERIALS	HYDROLOGY/WATER QUALITY	LAND USE	NOISE	POPULATION, HOUSING, AND EMPLOYMENT	PUBLIC SERVICES	TRAFFIC, CIRCULATION & PARKING	WATER SUPPLY	WASTEWATER	SOLID WASTE	ALTERNATIVES	OTHER ENVIRONMENTAL CONSIDERATIONS	GENERAL SUPPORT	GENERAL OPPOSITION	OTHER
3	Dave Singleton Program Analyst Native American Heritage Commission 915 Capitol Mall, Room 364 Sacramento, CA 95814					X																	X
4	Gail Farber on behalf of: Anthony E Niyinih Assistant Deputy Director Land Development Division County of Los Angeles Department of Public Works 900 South Fremont Avenue Alhambra, CA 91803-1331							X		X													X
5	Ian MacMillan Program Supervisor, Inter-Governmental Review Planning, Rule Development & Area Sources South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765-4178				X																		X

**Table III-1 (Continued)  
Response to Comments Matrix**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESOURCES	GEOLOGY AND SOILS	HAZARDS AND HAZARDOUS MATERIALS	HYDROLOGY/WATER QUALITY	LAND USE	NOISE	POPULATION, HOUSING, AND EMPLOYMENT	PUBLIC SERVICES	TRAFFIC, CIRCULATION & PARKING	WATER SUPPLY	WASTEWATER	SOLID WASTE	ALTERNATIVES	OTHER ENVIRONMENTAL CONSIDERATIONS	GENERAL SUPPORT	GENERAL OPPOSITION	OTHER	
6	Gayle Glauz Engineer of West Valley District Department of Water and Power 111 North Hope Street Los Angeles, CA 90012-2607  <i>Mailing Address:</i> Post Office Box 51111 Los Angeles, CA 90051-5700	X												X		X								X
7	Kathy Delle Donne, President, 3rd Council District Appointee  Los Angeles City Planning Department Plan Review Board (PRB) Ventura/Cahuenga Boulevard Corridor Specific Plan 6262 Van Nuys Boulevard, Suite 351 Van Nuys, CA 91401-2709			X							X				X									

**Table III-1 (Continued)  
Response to Comments Matrix**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESOURCES	GEOLOGY AND SOILS	HAZARDS AND HAZARDOUS MATERIALS	HYDROLOGY/WATER QUALITY	LAND USE	NOISE	POPULATION, HOUSING, AND EMPLOYMENT	PUBLIC SERVICES	TRAFFIC, CIRCULATION & PARKING	WATER SUPPLY	WASTEWATER	SOLID WASTE	ALTERNATIVES	OTHER ENVIRONMENTAL CONSIDERATIONS	GENERAL SUPPORT	GENERAL OPPOSITION	OTHER
8	Kathy Delle Donne, President, 3rd Council District Appointee  Los Angeles City Planning Department Plan Review Board Ventura/Cahuenga Boulevard Corridor Specific Plan 6262 Van Nuys Boulevard, Suite 430 Van Nuys, CA 91401-2709			X							X				X								
9	Jill Banks Barad President Sherman Oaks Neighborhood Council  Ronald Ziff Chair Land Use Committee Sherman Oaks Neighborhood Council P.O. Box 5721 Sherman Oaks, CA 91413			X											X				X				X
10	Louis Krokover, President Encino Neighborhood Council P.O. Box 260439 Encino, CA 91426-0439										X												X

**Table III-1 (Continued)  
Response to Comments Matrix**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESOURCES	GEOLOGY AND SOILS	HAZARDS AND HAZARDOUS MATERIALS	HYDROLOGY/WATER QUALITY	LAND USE	NOISE	POPULATION, HOUSING, AND EMPLOYMENT	PUBLIC SERVICES	TRAFFIC, CIRCULATION & PARKING	WATER SUPPLY	WASTEWATER	SOLID WASTE	ALTERNATIVES	OTHER ENVIRONMENTAL CONSIDERATIONS	GENERAL SUPPORT	GENERAL OPPOSITION	OTHER	
11	ENCINO PROPERTY OWNERS ASSN. Diane Rosen, Vice President PO Box 16279 Encino, CA 91416  HOMEOWNERS OF ENCINO Gerald A. Silver, President PO Box 260205 Encino, CA 91436  SHERMAN OAKS HOMEOWNERS ASSN. Marshall Long, Ph.D., PE Board Member and Land Use Chair Sherman Oaks Homeowners Association PO Box 5223 Sherman Oaks, CA 91413			X	X	X		X			X	X	X	X	X	X	X	X	X					X
12	Gerald A. Silver, President Homeowners of Encino gsilver4@sbcglobal.net	X																						X
13	Anonymous																							X

**Table III-1 (Continued)  
Response to Comments Matrix**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESOURCES	GEOLOGY AND SOILS	HAZARDS AND HAZARDOUS MATERIALS	HYDROLOGY/WATER QUALITY	LAND USE	NOISE	POPULATION, HOUSING, AND EMPLOYMENT	PUBLIC SERVICES	TRAFFIC, CIRCULATION & PARKING	WATER SUPPLY	WASTEWATER	SOLID WASTE	ALTERNATIVES	OTHER ENVIRONMENTAL CONSIDERATIONS	GENERAL SUPPORT	GENERAL OPPOSITION	OTHER	
14	Michael Ball 4761 Halbrent Avenue Sherman Oaks, CA 91403 michael54@aol.com										X				X									
15	Joann Benjamin 4736 Halbrent Avenue Sherman Oaks 91403 joannbenjamin@vdn.com			X							X				X									X
16	Tom Boulet 4623 Burnet Avenue TBoulet123@aol.com										X				X									X
17	C. Robert Brooks 4737 Halbrent Avenue Sherman Oaks, California 91403-2421														X									X
18	Eliot & Julie Cohen 5021 Densmore Ave. Encino, CA 91436 eecho@yahoo.com										X				X									X
19	Leslie Dodson lesliedodson@gmail.com																							X

**Table III-1 (Continued)  
Response to Comments Matrix**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESOURCES	GEOLOGY AND SOILS	HAZARDS AND HAZARDOUS MATERIALS	HYDROLOGY/WATER QUALITY	LAND USE	NOISE	POPULATION, HOUSING, AND EMPLOYMENT	PUBLIC SERVICES	TRAFFIC, CIRCULATION & PARKING	WATER SUPPLY	WASTEWATER	SOLID WASTE	ALTERNATIVES	OTHER ENVIRONMENTAL CONSIDERATIONS	GENERAL SUPPORT	GENERAL OPPOSITION	OTHER
20	Gene Igdal igdal@sbcglobal.net																		X				
21	Natalie & Pat Kater 16149 Otsego St. Encino, CA 91436										X				X								X
22	Mr. and Mrs. Pat Kater 16149 Otsego St. Encino, CA 91436 pfknat@gmail.com			X							X				X								X
23	Paul W. Krueger Development Manager M. David Paul Associates 100 Wilshire Boulevard, Suite 1600 Santa Monica, California 90401																						X
24	R. Russell Meyer 4755 Burnet Avenue Sherman Oaks, California 91403														X								X
25	Melissa Michelson melmiamich@yahoo.com										X				X								X

**Table III-1 (Continued)  
Response to Comments Matrix**

LETTER No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESOURCES	GEOLOGY AND SOILS	HAZARDS AND HAZARDOUS MATERIALS	HYDROLOGY/WATER QUALITY	LAND USE	NOISE	POPULATION, HOUSING, AND EMPLOYMENT	PUBLIC SERVICES	TRAFFIC, CIRCULATION & PARKING	WATER SUPPLY	WASTEWATER	SOLID WASTE	ALTERNATIVES	OTHER ENVIRONMENTAL CONSIDERATIONS	GENERAL SUPPORT	GENERAL OPPOSITION	OTHER
26	Maria Pavlou 4737 Burnet Ave. Sherman Oaks, CA 91403 tailfeathersmpk@aol.com														X								X
27	Marcy Shaffer 4755 Burnet Avenue Sherman Oaks, CA 91403 marcyshaffer@roadrunner.com																						X
28	Elaine and Philip Shapiro Elainasha@aol.com										X				X								X
29	Bill Winkelmann 4736 Halbrent Avenue Sherman Oaks, CA 91403			X							X												

### **III. Responses to Comments**

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#### **B. Comment Letters**

##### **Comment Letter No. 1**

Scott Morgan  
Director, State Clearinghouse  
1400 10th Street  
P.O. Box 3044  
Sacramento, CA 95812-3044

##### **Comment No. 1-1**

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 7, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 211 04( c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

**Response to Comment No. 1-1**

This comment acknowledges the receipt of the Draft EIR by the State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, and compliance with State Clearinghouse review requirements for draft environmental documents, in accordance with CEQA.

**Comment Letter No. 2**

Dianna Watson  
IGR/CEQA Program Manager  
Caltrans, District 7  
100 Main Street, MS #16  
Los Angeles, CA 90012-3606

**Comment No. 2-1**

We have reviewed the Traffic Impact Analysis (TIA) included in the Draft Environmental Impact Report (DEIR) prepared for the proposed Village mixed-used project. The proposed project involves development of a maximum of 500 residential units and approximately 55,000 square feet of neighborhood commercial space. The project site is located between Sepulveda Boulevard and the I-405 freeway connector to Southbound US 101 in the Sherman Oaks area of the City of Los Angeles.

The California Department of Transportation (Caltrans) as the State agency with jurisdiction over maintenance and operations of State highway facilities reviewed the DEIR which was prepared with respect to potential impacts to freeways I-405 and US 101 in the vicinity of the project. Based on the information included in the DEIR, we have the following comments:

**Response to Comment No. 2-1**

This comment acknowledges receipt of the Draft EIR by the California Department of Transportation and provides a summary of the proposed project. As discussed in Section II, Corrections and Additions, of this Final EIR, the density, scale and heights of the project have been proposed to be reduced by the Applicant in response to public comments. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 2-2****Intersections**

Per Table IV.K-8 the proposed project is estimated to generate approximately 5,840 daily trips with 321 occurring during the AM peak hour and 549 during the PM peak hour. Based on City of Los Angeles criteria, the following State highway facilities are projected to be significantly impacted:

- US-101 Eastbound off-ramp to Ventura Blvd. and I-405 Southbound On-Ramp/ Sherman Oaks Ave.
- US-101 Eastbound on-ramp from Sepulveda Boulevard
- Northbound I-405 off-ramp to Sepulveda Boulevard and Greenleaf Street

Mitigation improvements are proposed to the US-101 ramp intersections but none to the I-405 ramps at Sepulveda Boulevard and Greenleaf Street. You should be aware that congestion at the intersection might affect operations on the off-ramp. Please evaluate whether the off-ramp has enough capacity to store the projected vehicle queue. In addition, please evaluate potential transportation impacts to the Southbound 405/Valley View/Sepulveda Boulevard off ramp and the US-101/Van Nuys Boulevard ramp intersections as they would provide additional access to the project. We request the lead agency consult with Caltrans to explore mitigation alternatives that may be feasible for the proposed project.

### **Response to Comment No. 2-2**

The Commentor correctly states the project daily and peak-hour trip generations. The Commentor also correctly identifies the three study intersections involving State highway facilities that would be significantly impacted by the project, prior to mitigation. Project mitigation has been proposed for two of those intersections. For the third intersection, the 405 Freeway NB Ramps-Greenleaf Street/Sepulveda Boulevard, no feasible physical mitigation could be determined. As described in more detail on page 56 of Appendix H-2 of the Draft EIR, these reasons include right-of-way constraints and the need to maintain minimum sidewalk widths to meet pedestrian and American Disability Act considerations. The physical restraints at this location render it impossible to construct improvements which could mitigate the impact without vacating a right-of-way and violating existing law. Mitigation is, therefore both physically and legally infeasible. Thus, the project impact at this intersection is considered significant and unavoidable.

An evaluation has also been made of the queuing on the 405 Freeway Northbound Off-Ramp at the study intersection of 405 Freeway Northbound Ramps-Greenleaf Street/Sepulveda Boulevard. According to the current signal timing chart for this intersection, the overall signal cycle length is 120 seconds, resulting in 30 signal cycles per hour. The off-ramp movement is allocated 29 seconds per signal cycle, which does not include any yellow or "all red" time. Figures IV.K-4 and IV.K-5, Future (2013) Without Project Traffic Volumes, of the Draft EIR, show that the off-ramp would experience a volume of 797 vehicles during the A.M. peak hour and 798 vehicles during the P.M. peak hour. This equates to an average of approximately 27 vehicles per signal cycle arriving during both peak hours. Per the 2010 Highway Capacity Manual (HCM), two seconds of

startup time is needed for the first vehicle to proceed upon receiving a green signal indication. As the HCM does not mention the time needed for the following vehicles to proceed, it has been conservatively assumed that two seconds each per following vehicle would also be necessary. Assuming current signal timing conditions for the evaluation of future conditions, including 29 seconds per signal cycle for the off-ramp movement, it is estimated that for the Future Without Project condition, a total of approximately 29 vehicles per signal cycle would be able to depart the two lanes of the off-ramp during both peak hours. Compared to the arrival of 27 vehicles per cycle to the off-ramp, therefore, no residual queuing or clearance issue regarding the off-ramp is anticipated for the Future Without Project condition.

As shown in Figures IV.K-6 and IV.K-7, Future (2013) With Project Traffic Volumes, of the Draft EIR, the traffic volume on the off-ramp would increase to a total of 808 vehicles during the A.M. peak hours and 836 vehicles during the P.M. peak hour. Analyzing these volumes in the same manner as the Future Without Project volumes, it is estimated that an average of 27 and 28 vehicles per signal cycle would be arriving to the off-ramp during the A.M. and P.M. peak hours, respectively. As previously calculated, 29 vehicles would be able to depart the off-ramp each signal cycle. Therefore, for the Future With Project condition, it is also estimated that there would be no residual queuing or clearance issuance regarding the off-ramp. It should also be noted that if yellow time is included in the time given to the off-ramp movement, the number of vehicles being able to depart the off-ramp would increase.

Furthermore, based on an aerial photograph of the off-ramp, it is estimated that the left-turn lane has approximately 550 feet of storage length and the shared left-turn/through/right-turn lane has approximately 775 feet of storage length. Assuming a length of 22 feet per passenger vehicle, approximately 25 and 35 vehicles can be stored in the left-turn lane and the shared left-turn/through/right-turn lane, respectively, combining for a total storage of 60 vehicles. Compared to this storage capacity, it is anticipated that the maximum number of arriving vehicles per signal cycle, i.e., 28 vehicles in the P.M. peak hour for the Future With Project condition, would be adequately accommodated by the off-ramp.

It is assumed that the Commentor means the 405 Freeway southbound off-ramp for Valley Vista Avenue, rather than for Valley View. As shown in Figures 4(a) and 4(b) in Appendix H-2 of the Draft EIR, the project trip distribution/assignment, which was reviewed and approved by the Los Angeles Department of Transportation (LADOT), estimated that project trips southbound on the 405 Freeway would exit via the Burbank Boulevard off-ramp. This off-ramp is north of the project site and provides a direct route to the site. No project trips were estimated to use the 405 Freeway southbound off-ramp for Valley Vista Avenue as it is approximately two-thirds of a mile to the south beyond the site and would involve “doubling back” to reach the site. Therefore, analysis of the Valley Vista

Avenue off-ramp was not conducted nor is such warranted. As shown in Figures 4(a) and 4(b) in Appendix H-2 of the Draft EIR, the project trip distribution/assignment, which was reviewed and approved by LADOT, estimated that project trips to and from the east on the 101 Freeway would use the off- and on-ramps at Sepulveda Boulevard. These ramps within 400 feet of the project site and provide the most convenient, direct freeway access to and from the east for the site. The 101 Freeway ramps at Van Nuys Boulevard are not only one mile from the site, but their use would also entail additional and circuitous travel as other streets between the site and Van Nuys Boulevard would need to be used. Therefore, no project trips were estimated to use the 101 Freeway ramps at Van Nuys Boulevard and, accordingly, no analysis of these ramps was conducted nor is such warranted.

Some project trips would go through the intersections of 101 Freeway Eastbound Ramps/Van Nuys Boulevard and 101 Freeway Westbound Ramps/Van Nuys Boulevard. Extrapolating from the project traffic volumes in Figures 5(a) and 5(b) in Appendix H-2, it is estimated that no more than five northbound and two southbound project trips during the AM peak hour, and no more than five northbound and six southbound project trips during the PM peak hour would traverse these two intersections. These are nominal trip amounts and are well below any significant impact threshold. Therefore, further analysis of these two intersections is not warranted.

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

### **Comment No. 2-3**

We remind you that all improvements on-and-or affecting State right-of-way will need an encroachment permit from Caltrans. During the permit review process, Caltrans may require additional analysis and changes to the proposed actions might be needed. To avoid delays and confusion, please coordinate proposed mitigation improvements with our Office of Permits as early as possible, you may call (213) 897-3631 to schedule an appointment.

### **Response to Comment No. 2-3**

The Applicant will coordinate with Caltrans to obtain any permits required by Caltrans for the project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 2-4****Freeway Mainline**

The Traffic Impact Analysis states that the proposed development would not exceed Los Angeles County's Congestion Management Program (CMP) criteria of significance for freeways I-405 and US-101. Generally, Caltrans does not consider the Los Angeles County's CMP analysis alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. A CMP analysis alone fails to provide adequate information as to the potential cumulative effect of the added traffic, please see Section 15065(3) of the CEQA guidelines.

**Response to Comment No. 2-4**

Cumulative traffic impacts are discussed on pages IV.K-44 and IV.K-45 of the Draft EIR. The City of Los Angeles, the lead agency, has specific guidelines and criteria for requiring further analysis of a project's potential impact to a freeway mainline or an on- or off-ramp, as well as for the determination of a significant impact under such an analysis. These guidelines and criteria are described on page IV.K-21 of the Draft EIR. The City has also adopted the County of Los Angeles Congestion Management Program (CMP). The CMP has similar specific guidelines and criteria for the evaluation of regional transportation impacts, which are also described on page IV.K-21 of the Draft EIR. As discussed on pages IV.K-39 and IV.K-40 of the Draft EIR, the project's contribution of trips to freeway mainlines and on- and off-ramps would be below the City and CMP thresholds, and would not be expected to result in any significant impacts. This is supported by the results in Table IV.K-9 of the Draft EIR, which indicate there would be no significant project impacts on nearby CMP freeway mainline monitoring locations.

The comment expresses doubt whether CMP analysis alone would provide adequate information as to the potential cumulative effect of the added traffic and references Section 15065(3) of the CEQA guidelines. However, the comment does not identify what other method should be used or provide any evidence showing that if the unspecified method were used that the cumulative impacts would be significant. The Caltrans Guide for the Preparation of Traffic Impact Studies (the "Caltrans Guide") identifies the Highway Capacity Manual ("HCM") as its *preferred* methodology for calculating impacts on state highways and transit uses, but expressly states on that "other methodologies might be accepted." Also, neither the Caltrans Guide nor the HCM contained therein identify any thresholds of significance for CEQA impacts. The thresholds in Section II.A of the Caltrans Guide refer only to *when* a traffic study is required, not to *impact* thresholds of significance for CEQA analyses.

The reference to Section 15065(3) of the CEQA guidelines is not clear. Section 15065 of the CEQA guidelines is divided into subsections (a), (b), and (c), each of which are further subdivided into numerical sections. It is not clear which alphabetical subsection is being referenced. Also, Section 15065 of the CEQA guidelines regards Mandatory Findings of Significance not cumulative impacts.

'This comment has been noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

### **Comment No. 2-5**

We note on Table IV.K-9, the project assigns approximately 65 vehicle trips to US-1 01 northbound direction and 66 in the southbound direction during the PM peak period. The project assigns approximately 61 vehicle trips to I-405 in the northbound direction and 22 in the southbound direction during the PM peak period. Given the close proximity to said freeways (1/2 mile or less) those trip assignments seem unreasonably low. Please elaborate on the methodology used to estimate the directional distribution percentages.

### **Response to Comment No. 2-5**

It was estimated that Project drivers would tend to avoid using the freeway system for short to medium-range trips, largely relying on surface streets. For destinations farther away, most of them would choose to use the freeway system. This behavior was taken into account in developing the project distribution pattern, which was reviewed and approved by LADOT. The directional distribution percentages for the residential and retail uses of the project are shown in Table IV.K-5, page IV.K-18 of the Draft EIR. It was estimated that approximately 57 percent of the residential use and 30 percent of the retail use would access the project site primarily via the freeway system. These percentages are incorporated in Figures 4(a) and 4(b) in Appendix H-2 of the Draft EIR.

The trip distribution percentages in the current CMP for the Regional Statistical Area (RSA) in which the Project site exists support the trip distribution percentages used in the traffic analysis. RSA 12 includes the Project site and the area generally comprised of Sherman Oaks, Woodland Hills, Sepulveda and Porter Ranch. The CMP shows that of the work trips generated by residential and non-residential uses in this RSA, approximately 42 percent of those trips remain within this RSA and 58 percent go beyond this RSA. The CMP also shows that of the non-work trips generated by residential and non-residential uses in this RSA, approximately 74 percent remain within this RSA and 26 percent go beyond this RSA. It is assumed that trips within this RSA are short to medium length and would be expected to largely utilize surface streets. Trips outside this RSA are longer and would be expected to largely utilize the freeway system.

The trips generated by the Project's residential use during the peak-hours are mostly work-related trips. As noted above, the traffic analysis distributed 57 percent of the residential trips to the freeway system, which is nearly the same as the 58 percent indicated in the CMP for work trips outside this RSA. Similarly, 30 percent of the Project retail trips were distributed to the freeway system. This percentage is reasonably close to the 26 percent indicated in the CMP for non-work trips, which includes retail trips, outside this RSA. Therefore, the Project trip distribution pattern and percentages used in the analysis were reasonable and also consistent with the CMP.

#### **Comment No. 2-6**

We acknowledge that based on vehicle trip assignments shown to be directed to nearby freeways, the proposed project by itself is not likely to result in significant transportation impacts. However, when viewed in the context of already deficient operating conditions (LOS "F") and when combined with future foreseeable traffic from 51 related development projects and ambient growth, the added traffic would be cumulative considerable.

#### **Response to Comment No. 2-6**

The Commentor again states that the project traffic added to the nearby freeways would be cumulatively considerable. Please refer to Response to Comment No. 2-4.

#### **Comment No. 2-7**

The US-101 and I-405 interchange is known to be one of the most congested interchanges in Los Angeles County for a long time. In 1997 the City of Los Angeles and Caltrans prepared a feasibility study to determine possible improvements to this interchange. As a result, several improvements were recommended and some have actually been completed. However, improvements to the Southbound I-405 freeway to freeway connector to Northbound and Southbound US-101 are still pending, as well as those to the US-101 ramps to and from Van Nuys Boulevard. We request the lead agency consult with Caltrans to explore mitigation alternatives for potential cumulative transportation impacts to nearby freeways which may include funding contribution towards currently planned or future improvements.

#### **Response to Comment No. 2-7**

The Commentor's request to be consulted regarding freeway mitigation alternatives for cumulative impacts, including possible funding contribution, will be forwarded to the decision-makers for review and consideration. In terms of contribution towards freeway improvements, it should be noted that in 2003, the Applicant provided property as a result

of condemnation in order to allow Caltrans to widen and improve the connector ramp from the northbound 405 Freeway to the eastbound 101 Freeway.

Also, funding contributions must be linked to reasonably foreseeable impacts and must be narrowly-tailored and proportionate to such an impact. Any funding mechanism will require study to show these requisite factors before any financial contribution could be imposed on the project proponent.

### **Comment No. 2-8**

We acknowledge that to comply with Community Plan goals and policies as well as with the Corridor Specific Plan mitigation requirements, the project will implement a Transportation Demand Management Program (TDM) and pay a Project Impact Assessment Fee (PIA fee). The PIA fee would be used to fund the Phase 1 traffic improvements listed in the Specific Plan, please disclose what those improvements are and whether they involve State highway facilities.

### **Response to Comment No. 2-8**

The current Ventura-Cahuenga Boulevard Corridor Specific Plan lists the following improvements and services for which the Project Impact Assessment (PIA) Fee can be used:

- Transit/TDM/TMO programs
- Off-Street Parking Lots or Structures
- Intersection Improvements (listed below)
- Lankershim Boulevard/Ventura Boulevard
- Tujunga Avenue/Ventura Boulevard
- Woodman Avenue/Ventura Boulevard
- Beverly Glen Boulevard/Ventura Boulevard
- Kester Avenue (West Jog)/Ventura Boulevard
- 101/405 Freeway Ramps—Sherman Oaks Avenue/Ventura Boulevard
- Balboa Boulevard/Ventura Boulevard
- White Oak Avenue/Ventura Boulevard

- Lindley Avenue/Ventura Boulevard
- Reseda Boulevard/Ventura Boulevard
- Vanalden Avenue/Ventura Boulevard
- Tampa Avenue/Ventura Boulevard
- Winnetka Avenue/Ventura Boulevard
- Canoga Avenue/Ventura Boulevard
- De Soto Avenue/Ventura Boulevard
- Topanga Canyon Boulevard/Ventura Boulevard
- 101 Freeway Ramps near Shoup Avenue/Ventura Boulevard
- Shoup Avenue/Ventura Boulevard
- Fallbrook Avenue/Ventura Boulevard

The Specific Plan does not allow the PIA Fee to be used for improvements to State facilities, other than those comprising the intersections listed above.

**Comment No. 2-9**

Noise

We note the project site is currently exposed to freeway noise levels in excess of acceptable levels for a residential use. Therefore, the building design shall include adequate sound insulation, per current building codes, to reduce the freeway noise to within acceptable levels. We understand that no additional noise mitigation will be required from the State.

**Response to Comment No. 2-9**

Section IV.H, Noise, of the Draft EIR, includes a mitigation measure that will ensure that the residential uses on-site will have adequate sound insulation to meet the acceptable interior noise level of 45 dBA CNEL.

**Comment No. 2-10****Construction**

Since the project site borders State right-of-way (I-405 northbound connector to US-101), there is the possibility that work may encroach onto it. We request an opportunity to verify that proposed construction does not jeopardize or compromise the integrity of State facilities. Please submit grading and utility plans together with a hydrology report to our Office of Permits as soon as they are available. Please be aware that diversion of flow onto State facilities is generally not permitted.

**Response to Comment No. 2-10**

No encroachment into State right of way is proposed. Hydrology Reports, grading plans, and utility plans will be submitted to Caltrans for review in the detailed design stage of the project. No diversion of flow onto State facilities is proposed. Drainage from the site will be collected by existing public storm drain facilities. This comment is noted for the administrative record and will be forwarded to the decision-makers for further review and consideration.

**Comment No. 2-11**

We remind you that the transportation of heavy construction equipment, materials, or other special equipment, which requires the use of oversized-transport vehicles on State highways, would require a Caltrans transportation permit.

**Response to Comment No. 2-11**

As advised by the Commentor, the Applicant will obtain the necessary Caltrans transportation permit should oversized transport vehicles be used by the project on State highways. This comment is noted for the administrative record and will be forwarded to the decision-makers for further review and consideration.

**Comment No. 2-12**

Due to the high volume of through traffic on nearby I-405 and US-101 during the peak commute periods, we request that construction-related truck trips be limited to off-peak hours as much as possible.

**Response to Comment No. 2-12**

As requested by the Commentor, project construction-related truck trips on the 405 and 101 Freeways will be limited to off-peak hours as much as possible. This comment is noted for the administrative record and will be forwarded to the decision-makers for further review and consideration.

**Comment No. 2-13**

If you have any questions regarding these comments, you may contact Elmer Alvarez, project coordinator at (213) 897-6696. Please refer to our internal record number 101225/EA.

**Response to Comment No. 2-13**

This comment providing the contact information for Caltrans is noted for the administrative record and no further response is required.

**Comment Letter No. 3**

Dave Singleton  
Program Analyst  
Native American Heritage Commission  
915 Capitol Mall, Room 364  
Sacramento, CA 95814

**Comment No. 3-1**

The Native American Heritage Commission (NAHC) is the state ‘trustee agency’ pursuant to Public Resources Code §21 070 for the protection and preservation of California’s Native American Cultural Resources. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3rd 604). The California Environmental Quality Act (CEQA—CA Public Resources Code §21000-21177, amendment effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a ‘significant effect’ requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c )(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as “a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance. The lead agency is required to assess whether the project will have an adverse impact on these resources within the ‘area of potential effect (APE), and if so, to mitigate that effect. State law also addresses Native American Religious Expression in Public Resources Code §5097.9.

**Response to Comment No. 3-1**

This comment provides an overview of the role of the Native American Heritage Commission and an overview of CEQA requirements regarding historic and archaeological resources. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 3-2**

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural Resources were NOT identified within one-half mile of several of the Area of Potential Effect (APE). Also, it is important to understand that the absence of archaeological, Native American cultural resources in an area does not indicate that they are not present, or will be present once ground-breaking activity begins. The NAHC recommends early consultation with Native American tribes in

your area as the best way to avoid unanticipated discoveries once a project is underway and to learn of any sensitive cultural areas.

### **Response to Comment No. 3-2**

Consistent with the findings of the NAHC Sacred Lands File (SLF) search referenced in this comment, the Initial Study included in Appendix A of the Draft EIR and Section VI, Other Environmental Considerations, of the Draft EIR, stated that the project site is not known to contain any Native American cultural resources. Nonetheless, any discovery of human remains or related resources would be treated in accordance with federal, State, and local regulations and guidelines for disclosure, recovery, relocation, and preservation, as appropriate, including CEQA Guidelines Section 15064.5(e). Therefore, potential impacts would be reduced to less than significant levels.

### **Comment No. 3-3**

Enclosed a list with the names of the culturally affiliated tribes and interested Native American individuals that the NAHC recommends as ‘consulting parties,’ for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. [sic] Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the ‘Initial Study’ and in other phases of the environmental planning processes.

### **Response to Comment No. 3-3**

As discussed above, in Response to Comment No. 3-2, the project site is not known to contain any Native American cultural resources. Nonetheless, any discovery of human remains or related resources would be treated in accordance with federal, State, and local regulations and guidelines for disclosure, recovery, relocation, and preservation, as appropriate, including CEQA Guidelines Section 15064.5(e). This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration

### **Comment No. 3-4**

Furthermore the NAHC recommends that you contact the California Historic Resources Information System (CHRIS) of the Office of Historic Preservation (OHP), for information on recorded archaeological data. This information is available at the OHP Office in Sacramento (916) 445-7000.

**Response to Comment No. 3-4**

As discussed in the Initial Study provided in Appendix A or the Draft EIR, a records search was conducted by the South Central Coastal Information Center at California State University, Fullerton to identify previously documented prehistoric and historic archaeological resources in and around the project site. This search included a review of the National Register of Historic Places (National Register) and its annual updates, the California Historical Resources Inventory database maintained by the California Office of Historic Preservation (OHP), and the City of Los Angeles Historic-Cultural Monuments register. The records search indicated that there are currently no previously identified federal or State level designated or eligible prehistoric or historic resources within or near the project site.

**Comment No. 3-5**

Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the attached NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(t) of federal NHPA (16 U.S.C. 470 [t] et seq.), 36 CFR Part 800.3, .4 & .5, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 et seq.) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 Secretary of the Interior's Standards for the Treatment of Historic Properties were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e).

**Response to Comment No. 3-5**

As discussed in Response to Comment No. 3-5, there are no known historic, archaeological or Native American cultural resources within the project site. In addition, the project site has been subject to extensive disruption over the years making it unlikely that resources would be discovered during construction. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 3-6**

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental

discovery of any human remains in a project location other than a 'dedicated cemetery'. Discussion of these should be included in your environmental documents, as appropriate.

### **Response to Comment No. 3-6**

This comment provides an overview of the regulatory requirements regarding archaeological resources. As stated in the Initial Study located in Appendix A of the Draft EIR and Section VI, Other Environmental Considerations, of the Draft EIR, any discovery of human remains or related resources would be treated in accordance with federal, State, and local regulations and guidelines for disclosure, recovery, relocation, and preservation, as appropriate including CEQA Guidelines Section 15064.5(e).

### **Comment No. 3-7**

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified Cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural Significance" may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C, 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

### **Response to Comment No. 3-7**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

### **Comment No. 3-8**

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 - 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American

individuals as ‘consulting parties,’ on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 Senate Bill 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the ‘electric transmission corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

### **Response to Comment No. 3-8**

As discussed in Response to Comment No. 3-2, the project site is not likely to contain any Native American cultural resources. CEQA Guidelines section 15064(e), therefore, governs. It requires that any discovery of human remains or related resources would be treated in accordance with federal, State, and local regulations and guidelines for disclosure, recovery, relocation, and preservation, as appropriate, including CEQA Guidelines Section 15064.5. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

The Applicant and Lead Agency intend to comply with all applicable state mandates regarding consultation with Native American peoples and the NAHC.<sup>1</sup>

### **Comment No. 3-9**

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

### **Response to Comment No. 3-9**

As discussed in Response to Comment No. 3-6, any discovery of human remains or related resources would be treated in accordance with federal, State, and local regulations, including the regulations cited in this comment.

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<sup>1</sup> *The California Energy Commission [www.energy.ca.gov/33by2020/documents/2009-10-13\\_meeting\\_comments\\_bmp\\_draft/NAHC\\_Tribal\\_Guidance\\_for\\_Desert%20Plans.pdf](http://www.energy.ca.gov/33by2020/documents/2009-10-13_meeting_comments_bmp_draft/NAHC_Tribal_Guidance_for_Desert%20Plans.pdf) accessed August 2, 2011.*

**Comment No. 3-10**

Please feel free to contact me at (916) 653-6251 if you have any questions.

**Response to Comment No. 3-10**

This comment providing the contact information for the Native American Heritage Commission is noted for the administrative record and no further response is required.

**Comment Letter No. 4**

Gail Farber  
Director of Public Works

for

Anthony E Niyinih  
Assistant Deputy Director  
Land Development Division  
County of Los Angeles  
Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

**Comment No. 4-1**

Thank you for the opportunity to review the Draft Environmental Impact Report for the II Villaggio Toscano project. The project will consist of a maximum of 500 multi-family, residential units and approximately 55,000 square feet of neighborhood-serving commercial uses in a series of six-story buildings built over a parking podium. The project is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area of the City of Los Angeles.

The following comments are for your consideration and relate to the environmental document only.

**Response to Comment No. 4-1**

This comment acknowledges receipt of the II Villaggio Toscano Project Draft EIR by the Los Angeles County Department of Public Works and provides an overview of the proposed project. As discussed in Section II, Corrections and Additions, of this Final EIR, the density, scale and heights of the project have been proposed to be reduced by the Applicant in response to public comments.

**Comment No. 4-2**

**Hazards-Geotechnical/Geology/Soils**

The liquefaction analyses completed by Geotechnologies were based on the California Department of Conservation, Division of Mines and Geology's Special Publication 117

(1997). Updated liquefaction and seismically-induced settlement analyses based on the California Geological Survey's Special Publication 117A (2008) should be completed.

#### **Response to Comment No. 4-2**

The liquefaction analysis provided in the geotechnical report by Geotechnologies, Inc. was prepared in accordance with the CDMG Special Publication 117 (1997), and the Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction Hazards in California (SCEC, 1999). Subsequently, Geotechnologies, Inc., prepared an addendum report, Addendum II—Update of Geotechnical Engineering Investigation (dated 5/21/09), providing updated seismic parameters. This addendum report was submitted and approved by the City of Los Angeles Grading Division (Log # 72746, dated 1/10/11). The updated geotechnical report has been included in Section II, Corrections and Additions of this Final EIR. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

#### **Comment No. 4-3**

Also, Technical Appendix C, in the Geotechnologies report dated June 6, 2002, should be updated to reflect current seismic design criteria required for liquefaction analyses as presented in the current building code.

If you have any questions regarding the geotechnical/geology/soils comment, please contact Mr. Jeremy Wan at (626) 458-4925 or [jwan@dpw.lacounty.gov](mailto:jwan@dpw.lacounty.gov).

#### **Response to Comment No. 4-3**

Refer to Response to Comment No. 4-2 regarding the Addendum to the Geotechnical Report that has been prepared for the proposed project.

#### **Comment No. 4-4**

#### **Hazards—Flood/Water Quality**

1. Contact the County of Los Angeles Department of Public Works' Design Division to obtain allowable discharge for any proposed connections to Los Angeles County Flood Control District facilities. Proposed discharge in excess of allowable discharge may require mitigation.

**Response to Comment No. 4-4**

Any connections to the Los Angeles County Flood Control District facilities would be coordinated through the County of Los Angeles Department of Public Works' Design Division. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 4-5**

2. Contact Public Works' Land Development Division, Permits Section, for permitting requirements pertaining to any proposed alterations, connections, or encroachments that affect Flood Control District facilities.

**Response to Comment No. 4-5**

The Applicant will contact the Public Works' Land Development Division, Permits Section, for permitting requirements pertaining to any proposed alterations, connections, or encroachments that affect Flood Control District facilities. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 4-6**

If you have any questions regarding the flood/water quality comments, please contact Ms. Lizbeth Calderon at (626) 458-4921 or [lcalderon@dpw.lacounty.gov](mailto:lcalderon@dpw.lacounty.gov).

If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 [tduong@dpw.lacounty.gov](mailto:tduong@dpw.lacounty.gov).

**Response to Comment No. 4-6**

This comment providing the contact names for LADPW and is noted for the administrative record and no further response is required.

**Comment Letter No. 5**

Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178

**Comment No. 5-1**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

The proposed project includes the construction of up to 500 multi-family residential units and approximately 55,000 square feet of commercial uses in a series of six-story buildings built over a parking structure. The combined gross floor area for both residential and commercial uses would be approximately 708,659 square feet on a 5.1 acre site. The proposed project would also provide a total of 1,470 parking spaces and would include approximately 165,000 cubic yards of grading and soil export. Also, according to Figure II-2 on page II-3, the proposed project area is located less than 500 feet from the Ventura Freeway (US-101)/San Diego Freeway (I-405) interchange to the northwest. Sensitive land uses (i.e., residential uses) are located east of the project site.

**Response to Comment No. 5-1**

This comment acknowledges receipt of the Draft EIR by the South Coast Air Quality Management District and summarizes the proposed project as described in Section II, Project Description, of the Draft EIR. As discussed in Section II, Corrections and Additions, of this Final EIR, the density, scale and heights of the project have been proposed to be reduced by the Applicant in response to public comments. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 5-2**

Recent research has revealed that pollutants found in close proximity to roadways are associated with a variety of adverse health effects, independent of regional air quality impacts<sup>1</sup>. These can include reduced lung capacity and growth<sup>2</sup>; cardiopulmonary disease<sup>3</sup> increased incidence of low birth weight, premature birth, and birth defects<sup>4</sup>; and

exacerbation of asthma<sup>5</sup>. In order to address air quality issues such as these that are related to incompatible land uses, the California Air Resources Board published its Air Quality and Land Use Handbook: A Community Perspective (CARB Land Use Handbook)<sup>6</sup>. The CARB Land Use Handbook recommends avoiding siting [sic] sensitive land uses within 500 feet of high traffic roads.

<sup>1</sup> "Special Report 17. Traffic-related air pollution: A critical review of the literature on emissions, exposure, and health effects". Health Effects Institute, May 2009; 394 p.

<sup>2</sup> "Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study". Gauderman WJ et al., *Lancet*, February 2007; 369 (9561): 571-7.

<sup>3</sup> "Exposure to traffic and the onset of myocardial infarction". Peters A et al., *The New England Journal of Medicine*, 351(17):1721-1730

<sup>4</sup> Ritz B, et al. 2002 Ambient air pollution and risk of birth defects in Southern California. *Am J Epidemiology*, 155:17-25

<sup>5</sup> McConnell R, et al. 2006. Traffic, susceptibility, and childhood asthma. *Environ Health Perspectives* 114(5):766-72

<sup>6</sup> <http://www.arb.ca.gov/ch/handbook.pdf>

### **Response to Comment No. 5-2**

The comment references recent general research that pollutants found in close proximity to roadways are associated with a variety of adverse health effects. The Draft EIR addresses this concern. Specifically, Section IV.B, Air Quality, of the Draft EIR acknowledges that the California Air Resources Board has promulgated an advisory recommendation to avoid siting sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day or rural roads with 50,000 vehicles per day.<sup>2</sup> In addition, a number of traffic related studies have reported noncancerous health effects attributable to vehicular emissions for individuals located within 1,000 feet of high volume roadways. The strongest association of traffic related emissions with adverse health outcomes was seen within 300 feet of roadways with high truck densities. Notwithstanding, in a recent report released by the Health Effects Institute (HEI) on the health effects of primary traffic generated air pollution, it was stated that although there is sufficient evidence to support a causal relationship related to exacerbation of asthma among young children many aspects of the epidemiologic and toxicologic evidence associated with adverse human health effects are incomplete. Although there was suggestive evidence of a causal relationship with the onset of related respiratory symptoms such as impaired lung function, it was concluded the data was not sufficient to support causality. Therefore, the

<sup>2</sup> California Air Resources Board, 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*.

HEI report recommended that additional research is needed to fill key gaps in the understanding of emissions, exposure and health.<sup>3</sup>

Although the Commentor believes there is sufficient “health science data” that “demonstrates serious health consequences” for individuals living near freeways to recommend that the lead agency “reconsider” the location of the proposed project, the HEI report which was based upon a systematic review and analysis of over 700 worldwide studies, found that the body of medical research provides little firm evidence on the relationship between exposure to traffic and disease. Nevertheless, the California Code of Regulations, Title 14, Section 15126.2(a) requires that significant environmental effects of a project be assessed whereby an analysis is required when the project brings development and people into an affected area. For the proposed project, adjoining freeway emissions are a potential concern and relevant thresholds and standards exist to determine the potential pollutant exposures to local residents. As such, a health risk assessment (HRA) is appropriate to assess the impact of mobile source emissions utilizing available resources such as emission inventory and dispersion models as well as current risk factors and related ambient air quality standards to assess exposure. This technique is often utilized by regulatory authorities as well as the South Coast Air Quality Management District for both permitting applications as well as projects evaluated under the auspices of the California Environmental Quality Act. The Pollutant Exposure Assessment conducted for this project is exceptionally detailed and conservative (i.e., health protective) in its assumptions. As summarized in Section IV.B, Air Quality, of the Draft EIR, the HRA’s findings and effectiveness of identified mitigation measures are viable and will reduce pollutant exposures such that air quality impacts related to proximity to the I-405 Freeway would be less than significant.

### **Comment No. 5-3**

The AQMD staff is concerned that project residents will be exposed to the substantial amounts of traffic resulting in a variety of adverse health effects. Despite its detail, the HRA and proposed mitigation appears to take an unrealistic view of potential health effects of the project. Given the preponderance of data now available regarding health effects from living near freeways, the AQMD staff strongly encourages the lead agency to reconsider placing new housing immediately adjacent to one of the busiest freeway intersections in southern California. Detailed comments regarding the HRA are attached to this letter.

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<sup>3</sup> *Health Effects Institute, 2010. Special Report 17. Traffic Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects.*

**Response to Comment No. 5-3**

As set forth in Response to Comment No. 5-2, above, the HEI report, which was based upon a systematic review and analysis of over 700 worldwide studies, found that the body of medical research provides little firm evidence on the relationship between exposure to traffic and disease. Furthermore, the Pollutant Exposure Assessment conducted for the proposed project is exceptionally detailed and conservative (i.e., health protective) in its assumptions. As summarized in Section IV.B., Air Quality, of the Draft EIR, the Pollutant Exposure Assessment's findings and effectiveness of identified mitigation measures are viable and would reduce pollutant exposures such that air quality impacts related to proximity to the I-405 Freeway would be less than significant. Specific responses to comments on the Pollutant Exposure Assessment are provided below in Response to Comment Nos. 5-6 through 5-12.

To the extent this comment and the response to comment reveals a disagreement among experts, the decision-maker will consider and determine the credibility of each expert and the data supporting each conclusion.

**Comment No. 5-4**

Finally, AQMD staff is concerned that all feasible mitigation measures have not been considered to reduce the significant emissions associated with the construction and extensive grading activities for this project. In addition to the mitigation measures listed by the lead agency starting on page IV.B-74, AQMD staff recommends that additional mitigation measures be considered that might reduce these emissions further. These additional measures are described in the detailed comments attached to this letter.

**Response to Comment No. 5-4**

The Commentor recommends additional mitigation measures which the Commentor states are feasible to further mitigate construction air quality impacts. The specific measures recommended by the SCAQMD are provided in Comment Nos. 5-13, 5-14, 5-15, 5-17, and 5-18. Therefore, the Commentor is referred to each of the corresponding responses for the detailed response to their recommended mitigation measures. Additional mitigation measures have been included in Section II, Corrections and Additions, of this Final EIR, as described in Response to Comment Nos. 5-13, 5-14, 5-15, 5-17, and 5-18, below.

**Comment No. 5-5**

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final

Environmental Impact Report. The AQMD staff is available to work with the lead agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

### **Response to Comment No. 5-5**

As set forth by this comment and in accordance with CEQA, the SCAQMD will be provided with responses to the comments herein prior to certification of this Final EIR.

### **Comment No. 5-6**

#### **Health Risk Assessment**

AQMD staff is concerned that the HRA underestimates the impacts to the residents that will be living in the proposed project. The 405-101 interchange is one of the busiest freeway intersections in southern California, with well over half a million cars passing through it each day. By placing the residential project immediately adjacent to this interchange, the lead agency is ignoring the abundant health science data that has come out over the past decade that demonstrates serious health consequences for those living near a freeway. Although the lead agency has made an attempt to quantify these impacts, the HRA does not mention any recent health studies that have been published since the regulatory guidance was published upon which the HRA is based. Further, several factors within the HRA analysis are inconsistent with AQMD recommended methodologies, and yield an underestimation of risk.

### **Response to Comment No. 5-6**

With regard to validity and causality of what the Commentor states is “abundant health science data,” please refer to Response to Comment No. 5-2 above. As noted, a worldwide study questions the causality and validity of the conclusions contained in the reports cited by the Commentor. With regard to the Commentor’s specific concerns related to the Pollutant Exposure Assessment, see the responses to those specific concerns below.

### **Comment No. 5-7**

1. The modeling domain only includes emissions from the freeway within 500 feet of the project site. The analysis does not take into account the cumulative impact of the 405 and 101 freeways within ¼ mile of the project site, including the bulk of the interchange. AQMD staff recommends that if the lead agency chooses to continue

pursuing this project, it revise the HRA to include impacts from the freeway out to ¼ mile.

### **Response to Comment No. 5-7**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. The 500 foot modeling domain was based upon an advisory recommendation as noted in Response to Comment No. 5-2 above. On-road mobile source emissions located beyond 500 feet do not fall under this advisory. However, in response to this comment, the health risk assessment was revised to include freeway links located within 0.25 mile of the project site. Refer to Revised Appendix B-5 included as part of this final EIR. The revised health risk assessment did not substantially change the results from the previous assessment and the project would still result in less than significant impacts with incorporation of mitigation measures.

### **Comment No. 5-8**

2. The one in one million carcinogenic risk significance threshold utilized by the lead agency is based on the AQMD CEQA significance thresholds, however the HRA only uses a 30 year exposure period. The AQMD threshold is based on a standard 70 year residential threshold. As the lead agency has not specified a mitigation measure that will limit residential duration to 30 years or less, the HRA underestimates project impacts by a factor of 2.33 ( $70/30=2.33$ ). This change would increase the baseline risk from 69 in one million to 128 in one million. The proposed mitigation (filters) would not mitigate this risk.

### **Response to Comment No. 5-8**

The Commentor asserts that the Pollutant Exposure Assessment is not consistent with the South Coast Air Quality Management District's (SCAQMD) threshold which is based upon a 70-year exposure duration. The SCAQMD's recommended threshold and related assessment methodology are acknowledged for command and control regulations and risk reduction strategies through the implementation of various regulatory programs such as the Air Toxics Hot Spot Information and Assessment Act (AB 2588, Connelly, Statutes of 1987; Health and Safety Code Section 44300 et seq.). There is agreement with SCAQMD's need to provide a consistent basis for relative comparisons of modeled risks for these types of projects.

Notwithstanding, regulatory guidance promulgated by the Office of Environmental Health Hazard Assessment as well as the U.S. Environmental Protection Agency (U.S. EPA) provide additional guidance for individual projects related to residential siting.

According to the Office of Environmental Health Hazard Assessment, a significance determination should be consistent with regulatory guidance which recognizes “one of the important uses for the risk assessment information is for public notification” and that “(i)f a range of risks is calculated for fixed lengths of residency, an individual would have a better idea of what his or her individual range of risks might be” with due consideration of the length of time one resides at a given occupancy.<sup>4</sup> As such, it is the intent of the Pollutant Exposure Assessment to provide cumulative risk estimates from near-field emission sources that are “reasonable” and reflective of the anticipated exposure experienced at a given residential occupancy.

Moreover, CEQA requires 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 30 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 be rationally 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. Finally, CEQA’s purpose is to provide public disclosure of likely and reasonably foreseeable impacts. The Pollutant Exposure Assessment’s conservative 30-year exposure is reasonable and is supported by substantial evidence.

This approach is neither new nor unique. In fact, in 1989 the U.S. EPA introduced the concept of “reasonable maximum exposures” recognizing the need to identify the “highest exposure that is reasonably expected to occur.” It is intended to estimate a conservative exposure case (i.e., well above the average case) that is representative of the range of possible exposures.<sup>5</sup>

Therefore, to characterize residential exposures, the Pollutant Exposure Assessment employed the U.S. EPA’s guidance to develop viable dose estimates based on reasonable maximum exposures. Specifically, activity patterns for population mobility

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<sup>4</sup> California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, September 2000. *Air Toxic Hot Spots Program Risk Assessment Guidelines Part IV: Technical Support Document for Exposure Assessment and Stochastic Analysis.*

<sup>5</sup> United States Environmental Protection Agency, Office of Emergency and Remedial Response, December 1989. *Risk Assessment Guidance for Superfund -Volume 1: Human Health Evaluation Manual (Part A), Interim Final. EPA/540/1-89-002.*

were used as presented in the *Exposure Factors Handbook*.<sup>6</sup> As a result, lifetime risk values for residents were adjusted to account for an exposure duration of 350 days per year for 30 years (i.e., 95<sup>th</sup> percentile). A nine year exposure duration was additionally assessed to identify risk estimates identified by the U.S. EPA that reflect the average time individuals are reported to reside at a given residence. These values are consistent with the California Environmental Quality Act which considers the evaluation of environmental effects of proposed projects in a manner that reflects both reasonable and feasible assumptions.

Expert data supports the Pollutant Exposure Assessment's 30-year duration approach. In particular, a 2002 report and predictive model entitled *Duration of Residence in the Rental Housing Market* (Report to the Real Estate Research Institute) by Yongheng Deng and Stuart A. Gabriel (both authors with the Lusk Center for Real Estate, School of Policy, Planning and Development and Marshall School of Business, University of Southern California), provides substantial evidence that an apartment being occupied for more than 10 years is extraordinary. This report is included as Appendix FEIR-C of this Final EIR.

The report concludes:

“Occupancy duration in rental housing has a wide distribution that is heavily skewed toward shorter durations: median duration is between one and two years, with some tenants staying in their homes well over a decade.”

Table V of the Report applied the predictive model to apartment types in various major metropolitan areas—including Los Angeles. In Los Angeles, 95.4 percent of apartments are expected to turn-over within 10 years. According to this expert analysis and predictive model, less than 5 percent of typical apartments identical to the apartments proposed as part of the project would be occupied more than 10 years. However, for conservative purposes, the Pollutant Exposure Assessment models exposure for a 30-year duration.

It is also relevant to note that the Pollutant Exposure Assessment assumes that baseline traffic conditions (e.g., volume, fleet mix and technology groups) remain constant over a 30 year exposure period. This is a highly conservative (i.e., health protective) assumption. To exemplify, diesel particulate emissions are reduced by over 90 percent from the proposed project buildout year of 2013 to 2040. The year 2040 represents the

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<sup>6</sup> *United States Environmental Protection Agency, National Center for Environmental Assessment, Office of Research and Development, 1997. Exposure Factors Handbook.*

maximum model year currently available from the California Air Resources Board's mobile source emissions inventory model. It is reasonably foreseeable that over the next 40 years, these rates will be further reduced. Therefore, the Pollutant Exposure Assessment provided a conservative estimate of potential health risk impacts and no changes in the analysis are necessary based on this comment.

### **Comment No. 5-9**

3. The HRA assumes that project residents would not be exposed to pollutants while spending time outdoors onsite. The proposed mitigation (filters in the HVAC system) has no effect when people spend time outdoors. However the exposure calculations in the HRA assume that people spend 100% of their time indoors. Additional mitigation measures would be required to ensure this occurs, including removing all areas where outdoor activities could occur, and ensuring that no windows are operable. In addition, a long term maintenance plan needs to be in place to ensure that high efficiency filters are replaced regularly for the life of the building.

### **Response to Comment No. 5-9**

The Pollutant Exposure Assessment considered both indoor and outdoor exposures. The Pollutant Exposure Assessment clearly stated that acute exposures were based upon flagpole heights consistent with the location of outdoor courtyard locations (i.e., 8.2 meters above local terrain). The revised Pollutant Exposure Assessment was completed in a manner commensurate with this approach for all pollutants with identified acute (i.e., 1-hour) exposure thresholds. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. As noted in Response to Comment No. 5-8 above, the U.S. EPA has developed reasonable maximum exposure estimates to characterize human activity patterns. For residential occupancies, individuals spend the preponderance of their time indoors. Nevertheless, the health risk assessment acknowledges that acute exposures may also occur and are, therefore, appropriately evaluated.

### **Comment No. 5-10**

4. The proposed 90% efficiency of the filters would not reduce the PM10 levels to less than significant levels (see table). The most recent data available from AQMD studies of filters indicates that even high efficiency filters rated at 90-99% efficiency only achieve approximately 85-90% efficiency in practice. This appears to result in an unreported significant health risk for residents living at the proposed project site.

<b>Averaging Period</b>	<b>PM10 Baseline from Pollutant Exposure Assessment</b>	<b>PM10 after 90% filtration</b>	<b>PM10 significance threshold</b>
24 hour	33.82	3.38	2.5
Annual	15.09	1.51	1.0

### **Response to Comment No. 5-10**

The reported maximum PM<sub>10</sub> concentrations of 51.72 and 22.68 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) were based upon a flagpole height of 8.2 meters. As noted in the health risk assessment, the mitigation of particulate impacts was achieved by “locating the heating, ventilation and air conditioning (HVAC) control systems that service residential occupancies at specified heights above local terrain and installing corresponding particulate filters that conform to the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2-1999.” Application of the appropriate ASHRAE Particle Size Efficiency (PSE) to predicted particulate concentrations clearly reduces the PM<sub>10</sub> concentration below the 2.5  $\mu\text{g}/\text{m}^3$  significance threshold. As such, the Commentor’s assertion that the health risk assessment resulted in “unreported” significant health risks is incorrect. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. A subsequent assessment, included as Appendix FEIR-D of this Final EIR, has been prepared to identify discrete HVAC requirements for the proposed project based upon consideration of revised residential building setbacks and elevations above local terrain and more refined specifications for the location of air filtration systems. The HVAC system design was revised to incorporate individual filtration systems whereby the location of outside air ducting would correspond with the location of individual residential units. To determine HVAC control requirements, a dispersion analysis was performed for diesel particulate, PM<sub>10</sub> and PM<sub>2.5</sub> emissions corresponding to the HVAC control system heights and locations. Results of the dispersion analysis confirmed that all residential occupancies can continue to be serviced with available HVAC control equipment to reduce pollutant exposures below significance thresholds. Attachment A of Appendix FEIR-D of this Final EIR identifies discrete HVAC control efficiency requirements per floor and building location. As provided in Section II, Corrections and Additions, of this Final EIR, Mitigation Measure B-10 (HVAC requirements) on page IV.B-75 in Section IV.B, Air Quality, of the Draft EIR has been updated to reflect these revised HVAC specifications.

### **Comment No. 5-11**

5. The acute toxics analysis presented in the HRA does not use worst case emission factors. For example, the Total Organic Gas emission factor is 0.086 grams per

mile for the 1 hour acute analysis; however this corresponds to vehicle speeds of 64 mph. Emission factors for congested conditions, for example 5 mph, are 4.5 times higher at 0.387 grams per mile. As congested conditions occur daily at this interchange, the acute analysis should be revisited if the lead agency continues to pursue this project. The vehicle volume should also be revisited for acute conditions as long term rates may underestimate short term rates. AQMD staff notes that the proposed filter mitigation is ineffective at reducing the acute risk impacts from volatile organic compounds, even indoors.

#### **Response to Comment No. 5-11**

The Pollutant Exposure Assessment was revised based on this comment to include both average and reduced roadway speeds with corresponding traffic volumes. Values utilized for the reduced speed scenario were based upon available data from the Freeway Performance Measurement System (PeMS) database maintained by the California Department of Transportation. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. The revised Pollutant Exposure Assessment has been included as Revised Appendix B -5 to this Final EIR

The impact analysis resulting from this revised calculation shows pollutant impacts to be commensurate with the previous analysis whereby incorporation of mitigation measures will reduce identified impacts to within acceptable limits

#### **Comment No. 5-12**

6. The NO<sub>2</sub> analysis presented in the HRA uses a NO<sub>x</sub> to NO<sub>2</sub> conversion factor that may not be valid for this project site. As dispersion modeling was performed for the NO<sub>2</sub> analysis, the NO<sub>x</sub> to NO<sub>2</sub> conversion approaches recommended by the US EPA for use in AERMOD should be used to determine NO<sub>2</sub> impacts if the lead agency chooses to continue with this project.

#### **Response to Comment No. 5-12**

The dispersion modeling analysis was revised in the health risk assessment to include AERMOD (Version 11103) for the NO<sub>x</sub> to NO<sub>2</sub> conversion. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. The revised Pollutant Exposure Assessment has been included as revised Appendix B-5 to this Final EIR.

The impact analysis resulting from this revised calculation shows NO<sub>2</sub> impacts to be consistent with the previous analysis whereby no impacts were identified and concentration estimates were within acceptable limits.

### **Comment No. 5-13**

#### **Construction Mitigation Measures**

7. Because the lead agency has determined that construction phase emissions for oxides of nitrogen (NO<sub>x</sub>) and particulate matter (PM<sub>10</sub>) fugitive dust exceed the established significance thresholds, the SCAQMD recommends the following modifications and additions to the mitigation measures listed on page IV.B-74 to further to reduce NO<sub>x</sub> and PM<sub>10</sub> emissions, if applicable and feasible. Additional construction mitigation measure suggestions can also be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html):

Recommended Changes:

- MM B-2 Streets shall be swept as needed during construction (recommend water sweepers with reclaimed water), but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.

### **Response to Comment No. 5-13**

This comment is an introduction to more specific comments provided below. Therefore, please refer to Response to Comments No. 5-14 through 5-18 for detailed responses to the specific comments. In response to this comment, Mitigation Measure B-2 has been revised. Refer to Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

### **Comment No. 5-14**

- MM B-4 General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, all trucks and vehicles in loading and unloading queues will have their engines turned off when not in use or idling will be limited to five (5) minutes or less, to reduce vehicle emissions. Ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449. Construction activities should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

**Response to Comment No. 5-14**

In response to this comment, Mitigation Measure B-4 has been revised. Refer to Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

**Comment No. 5-15**

MM B-6 ~~On-site mobile equipment shall be powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.~~ Require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:

- April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

**Response to Comment No. 5-15**

In response to this comment, Mitigation Measure B-6 has been revised as follows and is included in Section II, Corrections and Additions, of this Final EIR. Please note that

the potential short-term construction air quality impact presented in Table IV.B-4 of the Draft EIR was limited to the mass grading phase of construction and is only anticipated to occur for approximate four months per phase. Therefore, the following mitigation measure is limited to the mass grading phase of construction.

**MM B-6:** The project representative shall make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the mass grading phase of project construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided onsite at the time of mobilization of each applicable unit of equipment. Off-road diesel-powered construction equipment shall meet the Tier standards based on the following schedule:<sup>7</sup>

- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

As detailed on the SCAQMD's document "Overview—Off-Road Engines Mitigation Measure Tables" and subsequent tables, this measure is expected to result in an estimated

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<sup>7</sup> *Construction equipment standards based on the April 1, 2010, to December 31, 2011, schedule have expired and, as such, are no longer applicable to the proposed project. All construction equipment utilized during construction of the proposed project would conform to the standards set forth under the January 1, 2012, to December 31, 2014, and Post-January 1, 2015, schedules, as applicable.*

33 percent reduction in off-road NO<sub>x</sub>, 75 percent reduction in off-road ROG, and 50 percent reduction in off-road PM emissions before 2012. From January 2012 and later, reductions are expected to increase to 59 percent and 83 percent for NO<sub>x</sub> and ROG, respectively. With incorporation of this mitigation measure, regional and localized NO<sub>x</sub> construction impacts would likely be reduced to less than significant as construction activities would likely not begin until 2012. However, the Project would still result in a short-term localized impact for PM<sub>10</sub> and PM<sub>2.5</sub>.

### **Comment No. 5-16**

For additional measures to reduce off-road construction equipment and other construction related emissions, the following mitigation measure tables are located at the following website:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

### **Response to Comment No. 5-16**

This comment is an introduction to more specific comments provided below. Therefore, please refer to Response to Comments Nos. 5-17 through 5-18 for detailed responses to the specific comments.

### **Comment No. 5-17**

Recommended additions:

#### NO<sub>x</sub>

- Configure construction parking to minimize traffic interference;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site; and
- Reroute construction trucks away from congested streets or sensitive receptor areas~

### **Response to Comment No. 5-17**

Section IV.K, Transportation and Circulation, of the Draft EIR, requires a Construction Traffic Management Plan that would implement extensive traffic control

measures during construction activities beyond what is recommended in this comment. The Commentor is referred to page IV.K-46 of Section IV.K of the Draft EIR for a complete discussion of what is required in the Construction Traffic Management Plan. A detailed discussion of each recommended measure requested by the Commentor is provided below.

- **Recommended Measure: Configure construction parking to minimize traffic interference.** This measure has been included in the Construction Traffic Management Plan requirements as a Correction and Addition to the Draft EIR. Refer to Section II, Corrections and Additions, of this Final EIR. However, it should be noted that the Construction Traffic Management Plan would require construction worker parking to be accommodated on the Project site or in off-site parking facilities, pursuant to a Temporary Parking Plan. On-street parking of construction-related vehicles shall be prohibited on nearby local streets.
- **Recommended Measure: Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.** This measure has been included in the Construction Traffic Management Plan requirements as a Correction and Addition to the Draft EIR. Refer to Section II, Corrections and Additions, of this Final EIR. As access to the Project site and roadway network may not have the necessary space to implement this measure, the recommended measure will be revised as follows: “Provide dedicated turn lanes for movement of construction trucks and equipment, where space is available and would not result in a safety concern for pedestrians and motorists.”
- **Recommended Measure: Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.** Mitigation Measure K-4 on page IV.K-46 of Section IV.K, Transportation and Circulation, of the Draft EIR, satisfies the intent of this recommended measure and reads as follows: “Flaggers shall be provided as necessary to minimize impact to traffic flow and to ensure safe movement into and out of the project site.
- **Recommended Measure: Reroute construction trucks away from congested streets or sensitive receptor areas.** The Construction Traffic Management Plan requires “All construction-related vehicles shall not be permitted to queue where they would interfere with traffic movement or block access to adjacent businesses or residences” which would serve to reduce construction truck traffic from congested streets or sensitive receptor areas. In addition, the Project site is in close proximity to both Interstate 101 and Interstate 405, which would also limit truck traffic in close proximity to sensitive receptors. However, this recommended measure has been included in the Construction Traffic Management Plan requirements as a Correction and Addition to the Draft EIR. Refer to Section II, Corrections and Additions, of this Final EIR.

**Comment No. 5-18**

**PM10/PM2.5**

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Replace ground cover in disturbed areas as quickly as possible;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph; and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

**Response to Comment No. 5-18**

In response to this comment, Mitigation Measure B-1 has been revised to include the recommended measures. Please refer to Section II, Corrections and Additions to the Draft EIR, of this Final EIR. Even with incorporation of these additional mitigation measures, the Project would still result in a significant localized PM<sub>10</sub> construction impact.

**Comment Letter No. 6**

Gayle Glauz  
Engineer of West Valley District  
Department of Water and Power  
111 North Hope Street  
Los Angeles, CA 90012-2607

*Mailing Address:*

Box 51111  
Los Angeles, CA 90051-5700

**Comment No. 6-1**

This is in response to your correspondence of January 24, 2011, requesting comments on the above-referenced draft environmental impact report (DEIR). The Department of Water and Power, Water Distribution Business Unit (LADWP) has the following comments regarding the water availability and facilities for this project.

**Response to Comment No. 6-1**

This comment acknowledges receipt of the Draft EIR by the Department of Water and Power and introduces the comments provided by DWP.

**Comment No. 6-2**

- Section II Project Design - page 11-13:

The DEIR indicates decorative paving will be installed on the sidewalks as part of this project. This will result in additional costs to LADWP to maintain and/or modify public water facilities located behind the curb in the public right-of-way. Therefore, an agreement between the LADWP and developer may be necessary to identify limitations for repairs of decorative features within the City right-of-way.

**Response to Comment No. 6-2**

The Applicant will coordinate with LADWP regarding any decorative paving to be installed on the sidewalks as part of the project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 6-3**

- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-20:

Currently, the City of Los Angeles, Fire Department (LAFD) does not allow new installations of 4x4 double fire hydrants. Please check with LAFD Hydrants and Access Unit for more information at 213-482-6543.

**Response to Comment No. 6-3**

At the time of the detailed design stage of the project, the current standards of the Fire Department will be utilized. Section IV.J.2, Public Services—Fire, of the Draft EIR, has been revised to reflect this comment. Please refer to Section II, Corrections and Additions, of this Final EIR, for the revised text.

**Comment No. 6-4**

- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-20:

There are 2 of the same sentence in the first paragraph, "The fire flow required for a high density commercial or industrial use is 12,000 gpm available to any block."

**Response to Comment No. 6-4**

Section IV.J.2 has been revised to reflect this comment. Please refer to Section II, Corrections and Additions, of this Final EIR, for the revised text.

**Comment No. 6-5**

- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-20:

This sentence in the first paragraph needs to be rewritten, "A minimum residual water pressure of 20 pounds per square inches (psi) is required to remain in the water system in addition to the required gpm flowing." It needs to indicate that the minimum residual pressure of 20 psi is required for any fire service or hydrant flowing at capacity.

**Response to Comment No. 6-5**

Section IV.J.2 has been revised to reflect this comment. Please refer to Section II, Corrections and Additions, of this Final EIR.

**Comment No. 6-6**

- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-23:

A fire flow of 4,000 gpm from 4-hydrants may be low for high density residential. Please verify with Inspector McClain of LAFD's Hydrant and Access Unit at 213-482-6506.

**Response to Comment No. 6-6**

As noted in Appendix J of the Draft EIR the detailed design for fire hydrants will be verified with and approved by the LAFD Hydrant and Access Unit during that stage of the project design. This requirement will assure that the design is in compliance with the regulations and standards applicable at the time the project commences construction. This comment has been noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 6-7**

- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-25:

The EIR indicates that there are currently three hydrants located on the project site. One of these is public hydrant, F-51597, located at the southwest corner of La Maida Street and Peach Avenue. This hydrant will be abandoned when the existing water distribution mains in Peach Avenue and La Maida Street are abandoned, likely prior to grading of the site. The LAFD Hydrants and Access Unit will determine the need for private on-site hydrants during the Department of City Planning's (DCP) Subdivision process.

**Response to Comment No. 6-7**

The Applicant will coordinate with the LAFD regarding abandonment and construction of new on-site fire hydrants. Fire hydrant location, capacity, and design will be in compliance with the applicable regulations and standards at the time the project commences construction. This comment is noted for the administrative record and will be forwarded to the decision makers for review and consideration.

**Comment No. 6-8**

- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-25:

This sentence in the first paragraph needs to be rewritten, "For eight inch water mains, the LAFD requires fire flows of 2,500 gpm with a residual pressure of 20 psi." It needs to indicate that the minimum residual pressure of 20 psi is required for any fire service or hydrant flowing at capacity, not for the water main. A 2,500 gpm fire flow could normally be provided from an 8-inch fire service. However, a Water Pressure Flow Report, otherwise known as an SAR, will need to be requested when the fire flow requirements are determined for this project.

### **Response to Comment No. 6-8**

Section IV.J.2 has been revised to reflect this comment. Please refer to Section II, Corrections and Additions, of this Final EIR." A SAR will be obtained during the detailed design stage of the project. This SAR process will ensure that the fire flow design is in compliance with the regulations and standards applicable at the time the project commences construction.

### **Comment No. 6-9**

- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-22:

In the last paragraph on the page, the existing water demand of 1,800 gpd should be 2.0 AF per year, not 0.2 AF per year.

### **Response to Comment No. 6-9**

Section IV.L.1 Water Supply has been revised to reflect this comment. Please refer to Section II, Corrections and Additions, of this Final EIR.

### **Comment No. 6-10**

- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-24:

Figure IV.L-1 shows existing water infrastructure. The two existing water service meters at on the west side of Sepulveda Boulevard at the north side of the project site are reversed. The water meter closest to La Maida Street should be a 1-1/2" domestic and the next meter north should be a 2" domestic.

**Response to Comment No. 6-10**

Figure IV.L-1 in Section IV.L.1 of the Draft EIR and Exhibit 2 of Appendix J of the Draft EIR have been revised with the revisions requested. Please refer to Section II, Corrections and Additions, of this Final EIR.

**Comment No. 6-11**

- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-37:

The last bullet paragraph at the bottom of the page indicates the sizes for the water distribution main upgrades. The only hydraulics that have been done for this project is an SAR for an 8" fire service with a 6" domestic combination meter on 3/16/04. Therefore, it may be premature to assume the sizes of any new water mains without final information about the fire flow requirements for the public and private hydrants. It may be enough to indicate that based on the domestic and fire flow requirements for this project, water distribution main upgrades may be required in Sepulveda Boulevard and Camarillo Street.

**Response to Comment No. 6-11**

For purposes of CEQA impact analysis it is not premature to estimate the size and capacity requirements of new water mains. On the contrary, CEQA requires that a project's reasonably foreseeable impacts be set forth and the best information be presented regarding mitigation. Furthermore, CEQA requires that this information be presented in sufficient detail to make mitigation measures enforceable and reasonably likely to reduce potential impacts. Merely stating that "main upgrades may be required" is not sufficient for CEQA analysis. CEQA does not, however, require that a Draft EIR contain information that cannot be presently obtained. Consequently, the best estimates were made by Sukow Engineering to determine approximate needs for water system upgrades based on the best available data. However, as stated by the Commentor, the final sizes of the water system upgrades will be determined during the detail design stage of the project. This clarification has been included in Section II, Corrections and Additions of this Final EIR. The conclusion of the Draft EIR is supported by expert engineering analysis based on the best available data, combined with a requirement to comply with regulations and directives from LADWP, L.A. Dept. of Public Works, and the City of Los Angeles Fire Dept. regarding any capacity upgrades that may be required to meet minimum capacity and flow requirements. Such compliance is required by law before the project can become operational and is not set forth separately as a mitigation measure, but may properly be considered a design feature of the project.

**Comment No. 6-12**

- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-39:

The first bullet at the top of the page indicates multiple 8" domestic water meters. It might be better to indicate the domestic flow requirement in gpm for the project rather than size the water meters at this time.

**Response to Comment No. 6-12**

The Draft EIR has been modified to reflect this comment. Please refer to Section II, Corrections and Additions, of this Final EIR.

**Comment No. 6-13**

- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-39:

The first bullet at the top of the page indicates sizes for the water distribution main upgrades. The only hydraulics that have been done for this project is an SAR for an 8" fire service with a 6" domestic combination meter on 3/16/04. Therefore, it may be premature to assume the sizes of any new water mains without final information about the fire flow requirements for the public and private hydrants. It may be enough to indicate that water distribution main upgrades may be required in Sepulveda Boulevard and Camarillo Street.

**Response to Comment No. 6-13**

As discussed in Response to Comment 6-11, the preliminary assumptions were made by Sukow Engineering to determine approximate needs for water system upgrades. However, as stated by the Commentor, the final sizes of the water system upgrades will be determined during the detail design stage of the project. This clarification has been included in Section II, Corrections and Additions, of this Final EIR.

**Comment No. 6-14**

- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-39:

The bullets at the top of the page indicate the sizes for the domestic water and fire service meters. It might be better to indicate the approximate domestic and fire flow requirements in gpm for the proposed commercial establishments rather than the size of the water meters at this time.

**Response to Comment No. 6-14**

The Draft EIR has been modified to reflect this comment. Please refer to Section II, Corrections and Additions, of this Final EIR.

**Comment No. 6-15**

- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-44:

Section (b) Water Infrastructure again indicates the size of water distribution main upgrades in Sepulveda Boulevard and Camarillo Street. As previously stated above, the only hydraulics that have been done for this project is an SAR for an 8" fire service with a 6" domestic combination meter on 3/16/04. Therefore, it may be premature to assume the sizes of any new water mains without final information about the fire flow requirements for the public and private hydrants. It may be enough to indicate that based on the domestic and fire flow requirements for this project, water distribution main upgrades may be required in Sepulveda Boulevard and Camarillo Street. Or something like, this development will require public water system modifications that would accommodate project requirements.

**Response to Comment No. 6-15**

As discussed in Response to Comment No. 6-11, the preliminary assumptions were made by Sukow Engineering to determine approximate needs for water system upgrades. However, as stated by the Commentor, the final sizes of the water system upgrades will be determined during the detail design stage of the project. This clarification has been included in Section II, Corrections and Additions, of this Final EIR.

**Comment No. 6-16**

If you or your consultant have any questions, please contact me at 213-367-1244.

**Response to Comment No. 6-16**

This comment providing the contact information for Department of Water and Power is noted for the administrative record and no further response is required.

**Comment Letter No. 7**

Kathy Delle Donne, President, 3rd Council District Appointee  
Craig Buck, 2nd Council District Appointee  
Dennis DiBiase, 3rd Council District Appointee  
Bryce C. Lowery, Vice-President, 4th Council District Appointee  
Diane Rosen, 5th Council District Appointee  
Lisa Sarkin, 2nd Council District Appointee  
Gerald Silver, 5th Council District Appointee

Los Angeles City Planning Department  
Plan Review Board (PRB)  
Ventura/Cahuenga Boulevard Corridor Specific Plan  
6262 Van Nuys Boulevard, Suite 351  
Van Nuys, CA 91401-2709

**Comment No. 7-1**

The Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board (PRB) is concerned that the Il Villaggio [sic] Toscano Draft Environmental Impact Report (DEIR) does not conform to the Ventura/Cahuenga Boulevard Corridor Specific Plan (Specific Plan) and includes several proposed exceptions that could be detrimental to the Corridor and neighboring areas. Here are our primary concerns:

**Response to Comment No. 7-1**

Within the context of CEQA, potential environmental impacts related to land use are determined by thresholds of significance set forth on pages IV.G-18 and IV.G-19 of the Draft EIR. An inconsistency between a project and some land use controls does not in itself mandate a finding of 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. An EIR is only required to analyze policies intended to reduce environmental impacts, i.e., physical impacts (Guidelines §15002 [“a significant effect on the environment is defined as a substantial adverse change in the *physical* conditions”] {emphasis supplied}, §15064, subd. (d) [“the lead agency shall consider direct physical changes in the environment”], §15064, subd. (e) [“Economic and social changes resulting from a project shall not be treated as significant effects on the environment”]; Guidelines, Appendix G.) Thus, CEQA analysis does not address itself to the policy decision of whether the lead agency should or should not approve requested exceptions from an adopted plan or policy. To the extent comments address the policy considerations, such

comments are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Additionally, 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.

Considering the environmental impacts of the Specific Plan exceptions sought by the proposed project, a relevant comparison of the project site to other Regional Commercial sites in the Specific Plan is informative. 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. As shown on the Section maps of the Specific Plan, the project site is the farthest Regional Commercial site from Ventura Boulevard in the Sherman Oaks Section of the Specific Plan. The project site is three times farther from Ventura Boulevard than nearly every other Regional Commercial site in all other Sections of the Specific Plan. Only one other Regional Commercial site in the entire Specific Plan is a comparable distance from Ventura Boulevard, and that site is in the Tarzana Section of the Specific Plan.

#### **Comment No. 7-2**

- The DEIR specifies major traffic impacts (see Appendix H, Table 10 of the Traffic Study) that affect the area. This is especially true of the already taxed 101 and 405 freeway ramps and the intersection of Sepulveda and Ventura, a crowded commuter route from all directions that is already rated F. None of the Applicant's proposed mitigations address these major areas of concern.

According to DOT's Revised Traffic Study of 2007, "...the proposed project will have significant impacts at the following intersections":

- Burbank Blvd. and Sepulveda Blvd.
- Camarillo St. and Sepulveda Blvd.
- Sherman Oaks Ave., San Diego Freeway S/B ramps and Ventura Blvd.
- Sepulveda Blvd. and Ventura Blvd.
- Van Nuys Blvd. and Ventura Blvd.
- Beverly Glen and Ventura Blvd.
- Dickens and Sepulveda Blvd.

Except for the first and the last, all of these intersections are within the Specific Plan.

**Response to Comment No. 7-2**

The Commentor identifies study intersections significantly impacted by the project according to a superseded traffic study. Please see the updated traffic analysis for the year 2013 (dated March 23, 2010) in Appendix H-1 and the traffic study (dated December 2008) in Appendix H-2 of the Draft EIR. Prior to mitigation, the proposed project would result in significant impacts at 11 study intersections, as listed on page IV.K-39 in the Transportation and Circulation section of the Draft EIR. Contrary to the assertion made by the Commentor that none of the proposed mitigation measures address traffic concerns, the mitigation measures included as part of the Draft EIR would reduce significant impacts at 6 of the 11 intersections. After mitigation, five study intersections would remain with significant and unavoidable impacts.

Project impacts to the freeway were analyzed and are summarized in Table IV.K-9 of the Draft EIR. Levels of Service without and with the project are forecast to range from A to F, depending on the freeway segment, peak hour, and direction. As no significant freeway impacts were determined for the project, no mitigation measures for these facilities have been proposed.

Also with regard to traffic trip impacts, the project as proposed would result in less traffic impacts than a project that meets the Specific Plan commercial floor area requirements. A project complying with the Specific Plan floor area rules would result in significantly higher traffic generation than the proposed project. By allocating over 90 percent of the proposed project's floor area to residential uses, traffic trip generation is dramatically reduced compared to intense commercial development envisioned in the Specific Plan.

**Comment No. 7-3**

- The DEIR specifies that the Il Villaggio [sic] Toscano project is "mixed-use," and all requests for exceptions are based on this assumption. But Section 4 of the Specific Plan clearly defines a Mixed-Use Project as "A Project which combines office or other commercial uses with a residential use with at least 25% of the total Project floor area as residential and at least 33% of the total Project floor area as commercial." The commercial use of Il Villaggio [sic] Toscano comprises only about 8% of the total space, thus it does not meet the Specific Plan's definition of a Mixed-Use project and should not be considered as such for the purpose of exception requests.

**Response to Comment No. 7-3**

The comment expresses an opinion that an Exception from the Specific Plan is required because the project is not consistent with the definition of a mixed-use project in the Specific Plan. While it is true that the Il Villaggio Toscano does not meet the Specific Plan’s technical definition of mixed-use, the fact remains that the Il 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.

It is worth noting that the Specific Plan definition for a mixed-use project requires at least 33 percent of the floor area to be dedicated to commercial uses. Commercial uses generate significantly more vehicular trips than residential uses, which is the first concern raised by the Commentor. As evidenced by the trip rate comparison table below, a project designed consistent with the Specific Plan definition for a mixed-use project will generate approximately 6,045 net daily trips compared to the 5,844 net daily trips generated by the proposed project. Furthermore, as noted in the comparison table, a project consisting of entirely regional commercial uses would generate approximately twice as many net daily trips as the proposed project. Nonetheless, this comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Use	Lot Area and Floor Area	Trips Generated
Proposed Project	Lot area = 219,778 or 5.05 acres Floor Area of 55,000 square feet of retail and 500 residential units <sup>8,9</sup>	5,844 net daily trips, including 321 A.M. peak-hour trips and 549 P.M. peak-hour trips.
Regional Commercial Uses	Lot area = 219,778 or 5.05 acres Floor area = 333,000 for a FAR of 1.5:1	11,205 net daily trips, including 409 A.M. peak-hour trips and 876 P.M. peak-hour trips

<sup>8</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR as well as the reduction of the proposed project’s neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet would reduce the daily and peak hour trips generated by the project.*

<sup>9</sup> *The existing lot area of approximately 196,673 or 4.51 acres includes the pre-dedicated lot area but not the vacated streets. With implementation of the proposed project, the lot area would be approximately 5.05 acres, including vacated streets and street dedications.*

Use	Lot Area and Floor Area	Trips Generated
Mixed-Use as defined in the Specific Plan, which requires a minimum 33 percent of the SF be commercial	Lot area = 219,778 or 5.05 acres Floor Area = 116,000 square feet of commercial uses (including a 45,000-square-foot grocery store and 71,000 square feet of shopping center retail) and 216 residential units for a FAR of 1.5:1	6,045 net daily trips, including 203 A.M. peak-hour trips and 601 P.M. peak-hour trips

**Comment No. 7-4**

- The Applicant is requesting an exception to the Plan’s height restrictions in Section 7.E.1.b4 in order to build to a height of 100 feet, exceeding the limit by 33%. The Specific Plan limits the height in this sub-area to 75 feet. Even if, for the sake of argument, this were a mixed-use project, the limit would still be only 82 feet. The PRB believes height limit exceptions should be rare, minimal and made only in cases where the applicant can show a benefit to the Corridor and the community. Due to the traffic impact expected from the scale of the project, the PRB believes this exception is both unjustified and detrimental.

**Response to Comment No. 7-4**

The comment expresses an opinion regarding whether an exception from the height limitations in the Specific Plan should be granted, but does not address environmental impacts related to height or aesthetics. That granting of the proposed height increase is justified and will not be detrimental is a requisite finding that the Lead Agency must make in order to approve the project. Substantial evidence that the request is justified and will not be detrimental has been offered by the Applicant in the project application materials submitted to the City and which are part of the public record. In summary, the evidence supporting a finding that the height is justified and not detrimental is based on the site’s location and surrounding uses.

The general purpose of height limits is to create compatible development in the area that does not impact the adjacent community. This project site is surrounded by the 405 and 101 Freeways to the west and north. On its southern flank across Camarillo is the Galleria parking structure, which stands six stories and at least 75 feet tall. Meanwhile the closest single family residential uses are located over 100 feet to the east across Sepulveda Boulevard, which is designated a Major Highway Class II. Consequently, the unique setting of the project site mitigates any impacts associated with height of the surrounding community and helps to justify the approval of this project.

The 405 and 101 Freeways present a unique design challenge that helps to justify the height request. The sound wall dividing the site from the freeway extends up approximately 26 feet from the grade of the site. Consequently, a Specific Plan compliant design would require the first two floors of units to look directly into the wall. The wall would limit access to light and air impacting the desirability and marketability of the units. Raising the first level of the units equal to the top of the wall permits light, air and views of the valley and mountains

As outlined above and in the submitted application the height increase is justified and not detrimental to the surrounding community. Furthermore, in response to public comments, the project has been modified to include a reduction in density and terracing of the heights of the buildings. Specifically, with the proposed modifications, the heights of the buildings would be stepped back from Sepulveda Boulevard such that the taller buildings would be located within the more central areas of the site. Please refer to Section II, Corrections and Additions of this Final EIR.

The existence of some significant and unavoidable traffic impacts does not render it impossible for the Lead Agency to grant an exception to the Specific Plan if the requisite findings can otherwise be made. Furthermore, with regard to project benefits, before the Lead Agency may approve the project, it must adopt a statement of overriding considerations wherein the project's benefits are set forth and are determined to outweigh the project's significant unavoidable impacts.

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

#### **Comment No. 7-5**

The project developer is requesting an exception to significantly exceed the Plan's Floor Area Ratio restrictions in Section 6.B.4. The Specific Plan restricts the FAR of a project to 1.5 to 1. The applicant wants to execute an FAR of 3.3 to 1. This exceeds the Specific Plan by more than double. The PRB believes FAR exceptions should be rare, minimal and made only in cases where the applicant can show a benefit to the community. Due to the traffic impact expected from the scale of the project, the PRB believes this exception is both unjustified and detrimental to the community.

#### **Response to Comment No. 7-5**

The comment expresses an opinion regarding whether an exception from the FAR limitations in the Specific Plan should be granted, but does not address environmental impacts related to height or aesthetics. That granting of the proposed floor area increase is

justified and will not be detrimental is a requisite finding that the Lead Agency must make in order to approve the project. Substantial evidence that the request is justified and will not be detrimental has been offered by the Applicant in the project application materials submitted to the City and which are part of the public record. In summary, the evidence supporting a finding that the floor area increase is justified and not detrimental is based on the type of development and the site's location.

The first purpose of the Specific Plan is to “assure that an equilibrium is maintained between the transportation infrastructure and the land use development.” A goal of the Specific Plan is to protect the abutting and adjacent residential development from the potential impacts of the commercial development along the Ventura Boulevard corridor. 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 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, 55,000 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.<sup>10</sup> 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.

As demonstrated below this project generates significantly less trips than many other uses that are permitted on the site.

Use	Lot Area and Floor Area	Trips Generated
Proposed Project	Lot area = 219,778 or 5.05 acres Floor Area of 55,000 square feet of retail and 500 residential units <sup>11,12</sup>	5,844 net daily trips, including 321 A.M. peak-hour trips and 549 P.M. peak-hour trips.

<sup>10</sup> In order to accommodate an expanded publicly accessible plaza, the proposed project's 55,000 square feet of neighborhood-serving commercial uses has been reduced to 52,000 square feet.

<sup>11</sup> The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR as well as the reduction of the proposed project's neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet would reduce the daily and peak hour trips generated by the project.

<sup>12</sup> The existing lot area of approximately 196,673 or 4.51 acres includes the pre-dedicated lot area but not the vacated streets. With implementation of the proposed project, the lot area would be approximately 5.05 acres, including vacated streets and street dedications.

Use	Lot Area and Floor Area	Trips Generated
Regional Commercial Uses	Lot area = 219,778 or 5.05 acres Floor area = 333,000 for a FAR of 1.5:1	11,205 net daily trips, including 409 A.M. peak-hour trips and 876 P.M. peak-hour trips
Mixed-Use as defined in the Specific Plan, which requires a minimum 33 percent of the SF be commercial	Lot area = 219,778 or 5.05 acres Floor Area = 116,000 square feet of commercial uses (including a 45,000-square-foot grocery store and 71,000 square feet of shopping center retail) and 216 residential units for a FAR of 1.5:1	6,045 net daily trips, including 203 A.M. peak-hour trips and 601 P.M. peak-hour trips

According to the analysis prepared by Crain & Associates, the proposed project as set forth in the Draft EIR generates 5,844 net trips per day, which are substantially less than the number of trips that would be generated by the other development options permitted by the Specific Plan’s restrictive floor area ratio.<sup>13</sup> A project consisting entirely of regional commercial uses with a FAR equal to 1.5:1 generates approximately 11,205 trips per day or twice that of the proposed project. Even a mixed-use project, consistent with the Specific Plan’s definition for a mixed-use project which includes at least 33 percent commercial uses, generates approximately 201 more trips per day than the proposed project while providing less than half of the residential units planned by the proposed project.

The project site is an infill development location with multiple proximate transit options and within walking distance of a Regional Commercial employment node containing approximately 6,000,000 square feet of commercial office space. The project is within walking distance of a major intersection offering access to the area’s public transit, including MTA Rapid Buses which provide access to the jobs centers such as UCLA, Warner Center, North Hollywood and downtown Los Angeles. These buses also provide access to the MTA Orange line. In addition to the approximately 6,000,000 square feet of commercial office space within walking distance of the site, there are numerous entertainment venues and restaurants that can be accessed by the project’s residents. Equally important is the site’s unique location within the Specific Plan. The vast majority of the commercial sites located in the Specific Plan front on Ventura Boulevard, while the residential uses, typically single family homes, border the rear yards of the commercial buildings, creating the need to require strict height, floor area and landscape requirements to protect these adjacent residential neighborhoods. The site is surrounded by two

<sup>13</sup> The proposed reduction of residential units from 500 to 399 units proposed by the Applicant would further reduce the daily trips generated by the project.

freeways, Sepulveda Boulevard, a 104-foot-wide Major Highway Class II right-of-way, and the multi-story parking garage, making it a unique site that can accommodate the project without negatively impact adjacent residential properties.

Based on the above, the location and type of development combine to justify the increased floor area while protecting the community from adverse impacts. Furthermore, in response to public comments, the density of the project has been reduced from a maximum of 500 units to 399 units. Additionally, the Applicant has proposed to reduce the FAR from 3.3:1 to 2.75:1. Please refer to Section II, Corrections and Additions of this Final EIR.

The existence of some significant and unavoidable impacts does not render it impossible for the Lead Agency to grant an exception to the Specific Plan if the requisite findings can otherwise be made. Furthermore, with regard to project benefits, before the Lead Agency may approve the project, it must adopt a statement of overriding considerations wherein the project's benefits are set forth and are determined to outweigh the project's significant unavoidable impacts.

#### **Comment No. 7-6**

The Applicant requests an exception from the Specific Plan's 18-inch setback requirement in Section 7.A.2.a. The PRB sees no reason to grant this exception.

#### **Response to Comment No. 7-6**

In response to public comments, the Applicant has modified the project such that an 18-inch setback along Camarillo Street and Sepulveda Boulevard would be provided. Please refer to Section II, Corrections and Additions of this Final EIR.

#### **Comment No. 7-7**

Until these issues are specifically addressed, or the scale of the project significantly reduced, the Ventura/Cahuenga Boulevard Corridor Specific PRB recommends the City oppose granting these discretionary approvals. We also strenuously oppose any amendments to the Ventura/Cahuenga Boulevard Corridor Specific Plan.

Approved unanimously\* by the Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board on March 3, 2011.

**Response to Comment No. 7-7**

As discussed in Section II, Corrections and Additions of this Final EIR, the size and scale of the project has been reduced. In addition, the Applicant does not propose amendments to the Specific Plan. Rather, exceptions to the Specific Plan are proposed in accordance with the process established by the City of Los Angeles and the process for exceptions set forth in the Plan. This comment addresses the policy of whether such exceptions should be approved and does not identify an environmental impact or issue. It is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 8**

Kathy Delle Donne, President, 3rd Council District Appointee  
Craig Buck, 2nd Council District Appointee  
Dennis DiBiase, 3rd Council District Appointee  
Bryce C. Lowery, Vice-President, 4th Council District Appointee  
Diane Rosen, 5th Council District Appointee  
Lisa Sarkin, 2nd Council District Appointee  
Gerald Silver, 5th Council District Appointee

Los Angeles City Planning Department  
Plan Review Board  
Ventura/Cahuenga Boulevard Corridor Specific Plan  
6262 Van Nuys Boulevard, Suite 430  
Van Nuys, CA 91401-2709

**Comment No. 8-1**

The Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board (PRB) is concerned that the Il Villaggio [sic] Toscano Draft Environmental Impact Report (DEIR) does not conform to the Ventura/Cahuenga Boulevard Corridor Specific Plan (Specific Plan) and includes several proposed exceptions that could be detrimental to the Corridor and neighboring areas. Here are our primary concerns:

**Response to Comment No. 8-1**

As discussed in detail in Section IV.G, Land Use of the Draft EIR, while the project does seek certain exceptions to the Specific Plan, the project does conform to the overall intent of the Specific Plan.

Within the context of CEQA, potential environmental impacts related to land use are determined by thresholds of significance set forth on pages IV.G-18 and IV.G-19 of the draft EIR. An inconsistency between a project and some land use controls does not in itself mandate a finding of 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. An EIR is only required to analyze policies intended to reduce environmental impacts, i.e., physical impacts (Guidelines §15002 [“a significant effect on the environment is defined as a substantial adverse change in the physical conditions”] {emphasis supplied}, §15064, subd. (d) [“the lead agency shall consider direct physical changes in the environment”], §15064, subd. (e) [“Economic and social changes resulting

from a project shall not be treated as significant effects on the environment”]; Guidelines, Appendix G.)

Thus, CEQA analysis does not address itself to the policy decision of whether the Lead Agency should or should not approve requested exceptions from an adopted plan or policy. To the extent comments address the policy considerations, such comments are noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

### **Comment No. 8-2**

- The DEIR specifies major traffic impacts (see Appendix H, Table 10 of the Traffic Study) that affect the area. This is especially true of the already taxed 101 and 405 freeway ramps and the intersection of Sepulveda and Ventura, a crowded commuter route from all directions that is already rated F. None of the Applicant’s proposed mitigations address these major areas of concern.

According to DOT’s Revised Traffic Study of 2007, “...the proposed project will have significant impacts at the following intersections”:

- Burbank Blvd. and Sepulveda Blvd.
- Camarillo St. and Sepulveda Blvd.
- Sherman Oaks Ave., San Diego Freeway S/B ramps and Ventura Blvd.
- Sepulveda Blvd. and Ventura Blvd.
- Van Nuys Blvd. and Ventura Blvd.
- Beverly Glen and Ventura Blvd.
- Dickens and Sepulveda Blvd.

Except for the first and the last, all of these intersections are within the Specific Plan.

### **Response to Comment No. 8-2**

Please refer to Response to Comment No. 7-2, above.

### **Comment No. 8-3**

- The DEIR specifies that the Il Villaggio [sic] Toscano project is “mixed-use,” and all requests for exceptions are based on this assumption. But Section 4 of the Specific Plan clearly defines a Mixed-Use Project as “A Project which combines office or other commercial uses with a residential use with at least 25% of the total Project floor area as residential and at least 33% of the total Project floor

area as commercial.” The commercial use of Il Villaggio [sic] Toscano comprises only about 8% of the total space, thus it does not meet the Specific Plan’s definition of a Mixed-Use project. Because the project does not comply with the Specific Plan’s definition, an exception from the Specific Plan’s definition of a Mixed-Use project is required and the PRB believes this exception is both unjustified and detrimental.

**Response to Comment No. 8-3**

Please refer to Response to Comment No. 7-3, above.

**Comment No. 8-4**

- The Applicant is requesting an exception to the Plan’s height restrictions in Section 7.E.1.b4 in order to build to a height of 100 feet, exceeding the limit by 33%. The Specific Plan limits the height in this sub-area to 75 feet. Even if, for the sake of argument, this were a mixed-use project, the limit would still be only 82 feet. The PRB believes height limit exceptions should be rare, minimal and made only in cases where the applicant can show a benefit to the Corridor and the community. Due to the traffic impact expected from the scale of the project, the PRB believes this exception is both unjustified and detrimental.

**Response to Comment No. 8-4**

Please refer to Response to Comment No. 7-4, above.

**Comment No. 8-5**

- The project developer is requesting an exception to significantly exceed the Plan’s Floor Area Ratio restrictions in Section 6.B.4. The Specific Plan restricts the FAR of a project to 1.5 to 1. The applicant wants to execute an FAR of 3.3 to 1. This exceeds the Specific Plan by more than double. The PRB believes FAR exceptions should be rare, minimal and made only in cases where the applicant can show a benefit to the community. Due to the traffic impact expected from the scale of the project, the PRB believes this exception is both unjustified and detrimental to the community.

**Response to Comment No. 8-5**

Please refer to Response to Comment No. 7-5, above.

**Comment No. 8-6**

- The Applicant requests an exception from the Specific Plan’s 18-inch setback requirement in Section 7.A.2.a. The PRB sees no reason to grant this exception.

**Response to Comment No. 8-6**

Please refer to Response to Comment No. 7-6, above.

**Comment No. 8-7**

Until these issues are specifically addressed, or the scale of the project significantly reduced, the Ventura/Cahuenga Boulevard Corridor Specific PRB recommends the City oppose granting these discretionary approvals. We also strenuously oppose any amendments to the Ventura/Cahuenga Boulevard Corridor Specific Plan.

Approved unanimously\* by the Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board on March 3, 2011.

**Response to Comment No. 8-7**

Please refer to Response to Comment No. 7-7, above.

**Comment Letter No. 9**

Jill Banks Barad  
President  
Sherman Oaks Neighborhood Council

Ronald Ziff  
Chair Land Use Committee  
Sherman Oaks Neighborhood Council  
P.O. Box 5721  
Sherman Oaks, CA 91413

**Comment No. 9-1**

The Sherman Oaks Neighborhood Council Land Use Committee has studied the Draft Environmental Impact Report for the M. David Paul Project “Il Vilaggio [sic] Toscano” proposed for 4827 Sepulveda Blvd. in Sherman Oaks and presented its findings to the Sherman Oaks Neighborhood Council Board (SONC). The Board voted the adoption of the attached Comments on the Il Vilaggio [sic] Toscano Draft EIR.

The comments are grouped in four categories: Aesthetics and Visual Quality; Traffic Impacts; Project Alternatives; and Issues Omitted from the Draft EIR That Were Not Addressed and Why SONC did not Address Them.

**Response to Comment No. 9-1**

This comment introducing comments from the Sherman Oaks Neighborhood Council Land Use Committee is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 9-2**

**Aesthetics, and Visual Quality**

The Draft EIR fails to properly analyze the project’s impacts to aesthetics. Regulations regarding required setbacks, limitations on lot coverage and floor area ratio, and buffering between uses all contribute to the visual quality and walkability of an area. However, the Draft EIR fails to consider the potential impacts on the area’s visual quality that would be the result of the applicant’s proposal to eliminate the front yard setback and increase the lot coverage from the 75% allowed under the Specific Plan to 83%.

**Response to Comment No. 9-2**

Although the comment claims that the Draft EIR fails to consider the impact to visual quality, the Draft EIR specifically addresses potential impacts to visual character and quality as well as walkability. Whether the project would substantially degrade visual character and quality is one of the Thresholds of Significance set forth on page IV.A-14 of the Draft EIR. Potential impacts to visual character and quality are discussed on pages IV.A-21 through IV.A-25. The comment expresses an opinion disagreeing with the conclusions of this analysis but does not identify facts showing that Draft EIR analysis is inadequate. The City's Walkability Checklist is referenced on Page IV.A10, but discussion of the project's consistency with the Walkability Checklist is provided in the Land Use section of the Draft EIR, Section IV.G. The Draft EIR includes a comprehensive analysis of the potential aesthetic impacts of the project. Please refer to Response to Comment Nos. 7-4 through 7-6, above. As indicated therein, the Applicant has proposed to modify the project to include an 18-inch setback and to reduce the density proposed as part of the project. As described further in Section II, Corrections and Additions, of this Final EIR, with these modifications, the request to reduce the required 18-inch setback would be eliminated. In addition, the request for exception from Specific Plan Section 7.B.1 has been revised to reduce the lot coverage of 83 percent at grade to a maximum lot coverage of 78.5 percent at grade.

**Comment No. 9-3**

The Draft EIR also fails to consider the project's proposed FAR of 3.3 to 1 on the area's visual quality. The proposed FAR is more than twice that allowed by the Specific Plan, resulting in a very dense project that negatively impacts the area's aesthetics.

**Response to Comment No. 9-3**

Please refer to Response to Comment No. 7-5, above, regarding the FAR of the project and Response to Comment No. 8-2, above, regarding analysis of potential impacts to visual quality. In addition, as discussed in Section IV.A, Aesthetics, of the Draft EIR, the project as proposed would not result in significant impacts in regard to visual quality. The project as proposed would develop an underutilized and blighted property with a cohesive mix of residential and neighborhood-serving commercial uses. Furthermore, the visual character of the surrounding project area is largely defined by the medium to high density, urban built environment. Overall, the project would not alter, degrade, or eliminate the existing valued visual character of the area. Specifically, the project would not remove or alter existing features or elements that substantially contribute to the area's valued visual character nor would it convert a large area of visible natural open space. Furthermore, the project would not introduce inappropriate contrast between the proposed project elements and existing features that embody the surrounding area's valued aesthetic image.

Nonetheless, as provided in Section II, Corrections and Additions, of this Final EIR, the Applicant has proposed to revise the request for exception from Specific Plan Section 6.B.4 to reduce the FAR from 3.3:1 to 2.75:1. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

The comment expresses an opinion disagreeing with the conclusions of this analysis but does not identify facts showing that Draft EIR analysis is inadequate.

#### **Comment No. 9-4**

The architectural drawings show a wall of 100 feet in height for the building at the sidewalk along Sepulveda Boulevard. Such a wall will loom over pedestrians visiting the project, detracting from the visual quality and walkability of the project.

#### **Response to Comment No. 9-4**

As shown in the renderings provided in Section IV.A, Aesthetics of the Draft EIR, the project would not appear as a “wall” along Sepulveda Boulevard. Rather, the proposed project would incorporate pedestrian-oriented street frontage improvements including a piazzetta for outdoor seating/dining and new landscaping along Sepulveda Boulevard. In addition, the proposed project would incorporate a landscaping plan that would include the planting of flowering and shade trees, shrubs, and turf throughout the project site as well as on the street frontages. The mass and proportion of all new buildings would adequately address pedestrian scale and the design of new buildings would be articulated to provide variation and visual interest and enhance the streetscape. Building materials would be employed to provide texture, interest, and variety to exterior building façades fronting public streets. Furthermore, in response to public comments, the project has been modified to include a reduction in density and terracing of the heights of the buildings along Sepulveda Boulevard. Thus, overall, the project would contribute to the diversity of building heights and would not detract from the existing aesthetic quality of the project area as viewed from Sepulveda Boulevard.

#### **Comment No. 9-5**

Similarly, the lack of a front yard setback eliminates opportunities for perimeter landscaping which would contribute to the visual quality.

#### **Response to Comment No. 9-5**

In response to public comments, the applicant has modified the project such that an 18-inch setback along Camarillo Street and Sepulveda Boulevard would be provided. Please refer to Section II, Corrections and Additions, of this Final EIR.

**Comment No. 9-6**

Finally, the project's open space should be visible to the street, so as to contribute to the visual quality and walkability of the project.

**Response to Comment No. 9-6**

The comment is noted for the administrative record. As discussed in Section IV.G, Land Use, and Section IV.J.4, Parks and Recreation, of the Draft EIR, the proposed open space would be accessible from street level via stairs and would include a main central courtyard, with multiple-themed gardens (e.g., a maze garden, herb garden, orchard garden, poplar garden) on the plaza level. The courtyards and gardens would be articulated at the ground level by a piazzetta (a small Italian-style plaza) and stairs leading up to the plaza level (i.e., podium) above. The project would provide a total of approximately 106,013 square feet of on-site open space consisting of 67,213 square feet of common open space and 38,800 square feet of private open space.<sup>14</sup> In addition, in response to public comments, the density of the project has been reduced, which will also provide for additional open space areas within the project site. Specifically, the Applicant has proposed to expand the size of the proposed publicly accessible ground level plaza up to approximately 13,000 square feet along the Sepulveda Boulevard frontage. Please refer to Response to Comment No. 9-4 for a discussion of visual quality and walkability.

**Comment No. 9-7****Traffic Impacts**

The Draft EIR fails to adequately analyze the project's impacts on traffic. The traffic study does not address morning congestion on Sepulveda and the traffic that will go east on Camarillo and then attempt to go south via Noble or Kester.

**Response to Comment No. 9-7**

Traffic congestion along Sepulveda Boulevard was addressed by the analysis of 12 intersections involving Sepulveda Boulevard in the traffic study. Intersections are typically the physical constraint having the most effect on capacity and traffic flow along a

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<sup>14</sup> *With the proposed reduction in residential units and commercial uses, the amount of open space has been reduced to 93,500 square feet comprising approximately 74,500 square feet of common open space (including the approximately 13,000-square-foot publicly accessible ground level plaza), 17,000 square feet of private open space, and 2,000 square feet of open space for use by residents.*

street or route. As shown in Table IV.K-4 of the Draft EIR, the existing service levels at several of the Sepulveda Boulevard intersections is LOS E in the A.M. or P.M. peak hour, which is indicative of severe traffic congestion, as noted in Table IV.K-3 in the Transportation and Circulation section of the Draft EIR. Under future conditions, as shown in Table IV.K-7, additional intersections involving Sepulveda Boulevard are projected to be experiencing LOS E or F conditions. LOS F is indicative of further worsened conditions; i.e., forced flow with stoppages of long duration.

#### **Comment No. 9-8**

Additionally, the traffic study does not consider the feasibility of “scrambled” pedestrian crossings, whereby pedestrians may cross in all directions while traffic is stopped, at Ventura and Sepulveda. Such crossings have been shown to have positive impacts on traffic flow in areas such as Westwood, Beverly Hills, and Pasadena.

#### **Response to Comment No. 9-8**

The Commentor’s advocacy of a pedestrian “scramble” operation at the intersection of Ventura Boulevard/Sepulveda Boulevard does not address environmental issues raised by the project. The traffic analysis in the Draft EIR takes into account existing and reasonably assured transportation improvements, not speculative proposals or concepts such as a pedestrian “scramble” operation at the intersection of Ventura Boulevard/Sepulveda Boulevard. While a pedestrian “scramble” operation at this intersection may be desirable to the Commentor, it is beyond the scope of the Draft EIR to evaluate its feasibility. Such evaluation would be under the purview of the Los Angeles Department of Transportation (LADOT). The comment will be brought to the attention of LADOT. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

#### **Comment No. 9-9**

The Draft EIR proposes to mitigate the removal and/or restriction of street parking during peak traffic hours by requiring that the applicant allocate \$300,000 to a parking congestion zone. However, the Draft EIR fails to identify with any specificity what those funds will be used for or how that will mitigate the removal and/or restriction of street parking spaces. The effectiveness of the allocation of such funds as a mitigation measure is unpredictable at best.

#### **Response to Comment No. 9-9**

Please refer to Section II, Corrections and Additions, of this Final EIR where mitigation measure K-15 has been replaced with the following:

The project applicant will contribute \$300,000 to a fund for the identification and implementation of local parking, transportation and circulation improvements in the following areas: the area bounded clockwise by Haskell Avenue beginning at Valley Vista Boulevard and extending northerly to SR-101 (on the west), from that point extending easterly along SR-101 to I-405, and from that point extending northerly along I-405 freeway to westernmost prolongation of Magnolia Boulevard, and from that point extending easterly on Magnolia Boulevard prolongation to Kester Avenue, and from that point extending southerly along Kester Avenue to the prolongation of Moorpark Street, from that point extending easterly along the prolongation of Moorpark Street to Beverly Glen Boulevard-Tyrone Avenue, from that point extending southerly along Beverly Glen Boulevard-Tyrone Avenue to Dickens Street, from that point extending westerly along Dickens Street to Kester Avenue, from that point extending southerly along Kester Avenue to Valley Vista Boulevard, and from that point extending westerly back to Haskell Avenue. The \$300,000 payment will be guaranteed through cash, bond or irrevocable letter of credit, payable to DOT. The fund will be used for measures that include but are not limited to parking improvements intended to increase parking availability, reduce search times and relieve traffic congestion; neighborhood traffic calming; transit-related improvements and amenities; bicycle-related improvements and amenities; pedestrian-related improvements and amenities; and streetscape improvements and amenities.

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

#### **Comment No. 9-10**

Finally, the Draft EIR concludes that the project would result in significant and unavoidable impacts at five intersections, even if all proposed mitigation measures are determined to be feasible. What are the overriding considerations the applicant intends to rely on to justify the adverse impacts under CEQA?

#### **Response to Comment No. 9-10**

The comment requests a list of public benefits that the Lead Agency may consider if it decides that the benefits of the project outweigh its significant impacts. CEQA does not require that the Draft of Final EIRs set forth the public benefits of the project. The purpose of EIRs is set forth the potential environmental impacts and feasible mitigation measures and alternatives that would avoid or substantially reduce the impacts. However, prior to approving the project, the City will be required to adopt findings, including a Statement of Overriding Considerations for any significant unavoidable impacts. The public benefits must be set forth in such a statement—if the lead agency chooses to adopt a Statement of Overriding Considerations.

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**Comment No. 9-11****Project Alternatives**

The Draft EIR's analysis of Project Alternatives is incomplete. The Draft EIR fails to consider a project that would not require vacation of public streets and would comply with the zoning, Q conditions and Specific Plan requirements as those requirements exist today.

**Response to Comment No. 9-11**

The Draft EIR included Alternative B, which evaluates the potential impacts of a project that would be in compliance with the Specific Plan. However, the project site is divided into four disparate zones (CR, R3, R1, PF, and P). Therefore, any reasonable project alternative would necessarily require some change in zoning. Alternative B envisions rezoning the entire project site C2.

The primary purpose of an alternatives analysis is to reduce or eliminate the significant impacts of a project. Implementation of the proposed project would result in short-term air quality and noise impacts during construction and traffic and air quality impacts during operation. Based on these significant environmental impacts and the objectives established for project, the alternatives to the project that were evaluated included Alternative A, No Project/No Build Alternative; Alternative B, Development in Accordance with Existing Plans/Regional Commercial Use Alternative; Alternative C, All Residential Alternative; and Alternative D, Alternative Site Alternative. As discussed in Section IV.G, Land Use, of the Draft EIR, land use impacts of the proposed project, including impacts associated with the proposed street vacations, existing zoning and the existing specific plan, would be less than significant with the approval of the Specific Plan exceptions, zone change and height district change. Thus, the proposed street vacations and consistency of the project with zoning and specific plan requirements were not a focus of the alternatives analysis since they would not result in significant impacts. Nonetheless, Alternative B, Development in Accordance with Existing Plans/Regional Commercial Use Alternative within the alternatives analysis would not require a Specific Plan exception. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 9-12**

Additionally, the Draft EIR's analysis of Project Alternatives fails to consider alternate uses for the vacation of public streets such as realigning the streets to serve the public access or turning them into landscaped "park like" public open space.

**Response to Comment No. 9-12**

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, the purpose of an environmental impact report is to identify alternatives to the project. Since there are no impacts with regard to the vacation of public streets evaluation as an alternative is not necessary. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Direction regarding project alternatives is provided in Section 15126.6 of the CEQA Guidelines, which states: "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. Rather it must consider a reasonable range or potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible." The comment proposes an alternative use of vacated streets as public parks, but fails to identify any potentially significant impact related to public open space that would be substantially reduced or avoided by such an alternative. Furthermore, there are no significant impacts that would be created by vacation of the streets within the project site. As such, analysis of the suggested alternative is not necessary or required. In addition, Section V, Alternatives of the Draft EIR provides a reasonable range of alternatives to the project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 9-13****Issues Omitted from the DEIR That Were Not Addressed and Why SONC Did Not Address Them.**

SONC has not addressed the following issues in its comments on the Draft EIR based upon representations by the applicant's representatives: .

- The off ramp from the 405 Freeway behind the project is not expected to be pursued.

**Response to Comment No. 9-13**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 9-14**

- The peak hour parking prohibition on Ventura Boulevard has been rejected by DOT.

**Response to Comment No. 9-14**

Appendix H-1 of the Draft EIR contains an analysis of future traffic conditions for the year 2013. That analysis determined that the project would have a significant traffic impact at the intersection of Ventura Boulevard/Kester Avenue (South), prior to mitigation. As described in Appendix H-1, the project proposed to mitigate this impact by restriping to provide a third eastbound through lane on Ventura Boulevard during the P.M. peak period. This proposed measure involved the removal of on-street parking along the south side of Ventura Boulevard during the P.M. peak period. LADOT disapproved of this measure as infeasible due to the impact that the loss of the on-street parking could have on businesses along this segment of Ventura Boulevard.

**Comment No. 9-15**

- Parking for the retail employees will be in the resident parking areas.

**Response to Comment No. 9-15**

The retail portion of the project will meet the city's required parking ratio for commercial uses which incorporates vehicular parking demand from both patrons and employees. Thus retail parking as planned and designed will be in a contiguous area on the ground floor adjacent to the retail spaces.

**Comment No. 9-16**

- Loading for the 10,000 square feet of community retail will be allowed off hours in the customer parking area.

**Response to Comment No. 9-16**

Due to the smaller nature of the retail area not dedicated toward the specialty grocery store, loading activities will be accommodated within the retail parking, on-site, during non-peak hours that will facilitate the intermittent use of vacant retail parking spaces.

**Comment Letter No. 10**

Louis Krokover, President  
Encino Neighborhood Council  
P.O. Box 260439  
Encino, CA 91426-0439

**Comment No. 10-1**

Case No CASE NO. EIR 10-039-PL, ENV-2004-6000-EIR

Project Name: Il Villaggio Toscano

Project Location: 4827 N. Sepulveda Blvd., Sherman Oaks, CA 91403

Proposed Project: The proposed project includes 500 multi-family residential units and 55,000 square feet of neighborhood-serving commercial uses in a series of six-story buildings built over a parking podium. Maximum height of the buildings would be 100 feet above finished grade. The combined gross floor area for the residential and neighborhood-serving commercial uses for the proposed project would total 708,659 square feet, with a floor area ratio (FAR) of 3.3:1. The proposed project would provide 1,470 parking spaces, consisting of 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for retail visitors. The proposed project is located within the boundaries of the Ventura/Cahuenga Boulevard Corridor Specific Plan.

**Response to Comment No. 10-1**

This comment summarizing the description of the proposed project provided in Section II, Project Description, of the Draft EIR is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. As discussed in Section II, Corrections and Additions, of this Final EIR, the density, scale and heights of the project have been proposed to be reduced by the Applicant in response to public comments.

**Comment No. 10-2**

*On January [sic] 26, 2011, the Encino Neighborhood Council passed the following Motion*

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**MOTION**

“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 for the Il Villaggio Toscano, 8-story, 500 unit apartment projects at 4827 Sepulveda Blvd. The project is in the Ventura/Cahuenga Specific Plan that forbids structures of this size and height. The project violates the language and

**Response to Comment No. 10-2**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 10-3**

spirit of the Specific Plan and will create environmental problems that cannot be mitigated.”

**Response to Comment No. 10-3**

The comment expresses an opinion that the proposed project violates the spirit of the Specific Plan.

Within the context of CEQA, potential environmental impacts related to land use are determined by thresholds of significance set forth on pages IV.G-18 and IV.G-19 of the Draft EIR. An inconsistency between a project and some land use controls does not in itself mandate a finding of 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. An EIR is only required to analyze policies intended to reduce environmental impacts; i.e., physical impacts (Guidelines §15002 [“a significant effect on the environment is defined as a substantial adverse change in the *physical* conditions”] {emphasis supplied}, §15064, subd. (d) [“the lead agency shall consider direct physical changes in the environment”], §15064, subd. (e) [“Economic and social changes resulting from a project shall not be treated as significant effects on the environment”]; Guidelines, Appendix G.) The comment does not identify how the unspecified inconsistencies could result in significant environmental impacts.

Nevertheless, that the proposed project is consistent with the principles, intent and goals of the Specific Plan is a requisite finding that the Lead Agency must make in order to approve the project. 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.

The first purpose of the Specific Plan is to “assure that an equilibrium is maintained between the transportation infrastructure and the land use development.” A goal of the Specific Plan is to protect the abutting and adjacent residential development from the potential impacts of the commercial development along the Ventura Boulevard corridor. 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 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, 55,000 square feet or eight 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 opposed to being destination-oriented retail which draws in patrons from a wider area.<sup>15</sup>

As demonstrated in the table provided in Response to Comment No. 7-3, this project generates significantly less trips than many other uses that are permitted on the site. Specifically, the proposed project generates 5,844 net trips per day which are substantially less than other development options permitted by the Specific Plan’s restrictive floor area ratio.<sup>16</sup> A project consisting entirely of regional commercial uses with a floor area ratio (FAR) equal to 1.5:1 generates approximately 11,205 trips per day or twice that of the proposed project. Even a mixed-use project, consistent with the Specific Plan’s definition for a mixed-use project which includes at least 33 percent commercial uses, generates approximately 201 more trips than the proposed project while providing less than half of the residential units planned by the proposed project.

The site is an ideal infill development location with multiple proximate transit options and within walking distance of a Regional Commercial employment node. The project is within walking distance of a major intersection offering access to the area’s best public transit including MTA Rapid Buses which provide access to the jobs centers such as UCLA, Warner Center, North Hollywood and downtown Los Angeles. These buses also

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<sup>15</sup> As previously noted, the proposed project’s 55,000 square feet of neighborhood-serving commercial uses has been reduced to 52,000 square feet.

<sup>16</sup> The proposed reduction of residential units from 500 to 399 units proposed by the Applicant would further reduce the daily trips generated by the project.

provide access to the MTA Orange Line. There are approximately 6,000,000 square feet of commercial office space within walking distance of the site as well as numerous entertainment venues and restaurants that are easily accessed by the project's residents. The proximity to the transit, jobs and services provides the perfect opportunity for residents to leave their cars at home. Equally important is the site's unique location within the Specific Plan. The vast majority of the commercial sites located in the Specific Plan front on Ventura Boulevard, while the residential uses, typically single family developments, border the rear yards of the commercial buildings, creating the need to require strict height, floor area and landscape requirements to protect these adjacent residential neighborhoods. The site is surrounded by two freeways, Sepulveda Boulevard, a 104-foot-wide Major Highway Class II right-of-way, and the multi-story parking garage making it a unique site that can actually accommodate a large development such as Il Villaggio Toscano.

Based on the above and the analysis provided within Section IV.G, Land Use, of the Draft EIR, the project is consistent with the spirit of the Specific Plan.

**Comment Letter No. 11**

ENCINO PROPERTY OWNERS ASSN.  
Diane Rosen, Vice President  
PO Box 16279  
Encino, CA 91416

HOMEOWNERS OF ENCINO  
Gerald A. Silver, President  
PO Box 260205  
Encino, CA 91436

SHERMAN OAKS HOMEOWNERS ASSN.  
Marshall Long, PhD., PE  
Board Member and Land Use Chair  
Sherman Oaks Homeowners Association  
PO Box 5223  
Sherman Oaks, CA 91413

**Comment No. 11-1**

Proposed Project: The proposed project includes 500 multi-family residential units and 55,000 square feet of neighborhood-serving commercial uses in a series of six-story buildings built over a parking podium. Maximum height of the buildings would be 100 feet above finished grade. The combined gross floor area for the residential and neighborhood-serving commercial uses for the proposed project would total 708,659 square feet, with a floor area ratio (FAR) of 3.3:1. The proposed project would provide 1,470 parking spaces, consisting of 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for retail visitors. The proposed project is located within the boundaries of the Ventura/Cahuenga Boulevard Corridor Specific Plan.

**Response to Comment No. 11-1**

This comment summarizing the description of the project provided in Section II, Project Description, of the Draft EIR is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. As discussed in Section II, Corrections and Additions, of this Final EIR, the density, scale and heights of the project have been proposed to be reduced by the Applicant in response to public comments.

**Comment No. 11-2**

We object to the traffic, noise, congestion, infrastructure damage and pollution that six massive 8-story, apartment buildings, totaling 500 units, which violate the Ventura/Cahuenga Boulevard Corridor Specific Plan will bring to Encino and Sherman Oaks.

**Response to Comment No. 11-2**

This comment references environmental issues but provides no comment as to the adequacy of the environmental impact analysis in the Draft EIR. Please refer to Sections IV.K, Traffic; IV.H, Noise; IV.L, Utilities; and IV.B, Air Quality, of the Draft EIR, regarding the traffic, noise, infrastructure, and air quality impacts associated with the project. As discussed in detail in Section IV.G, Land Use, of the Draft EIR, while the project does seek certain exceptions to the Specific Plan, the project does conform to the overall intent of the Specific Plan. In addition, as discussed in Section II, Corrections and Additions, of this Final EIR, the density, scale and heights of the project have been proposed to be reduced by the Applicant in response to public comments. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-3**

We ask that the City and County reject the draft EIR for this project. The draft EIR prepared by Matrix Environmental is “authoritative” looking on the surface, but is grossly inadequate and fails in its findings. The draft 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 ignoring mitigation measures that are required by CEQA. Throughout the draft EIR the preparer reaches faulty conclusions claiming impacts are reduced to “less than insignificant” when in reality the impacts are significant.

**Response to Comment No. 11-3**

The comment expresses an opinion that the Draft EIR is defective and inadequate, but does not provide specific inadequacies or facts or evidence demonstrating that the Draft EIR is inadequate. The Draft EIR is comprehensive and has been prepared in accordance with CEQA requirements. Potential impacts are based on the significance thresholds and methodologies set forth within the City of Los Angeles CEQA Thresholds Guide. In addition, each of the sections in Chapter IV, Environmental Impact Analysis, of the Draft EIR, fully discloses the environmental impacts associated with the project. Where significant impacts are identified in these sections, specific mitigation measures are provided to address the potentially significant impacts. This comment is noted for the

administrative record and will be forwarded to the decision-makers for review and consideration.

#### **Comment No. 11-4**

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 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:

We oppose the Applicant's request for a Vesting Zone and Height District change from (Q) CR-1L, (Q) P-1L, R3-1L and R1-1L to the C2 zone and to Height District 2D to permit the construction of a new mixed use project containing a maximum of 500 residential units and 55,000 square feet [sic] of neighborhood serving retail space on a currently vacant 5.1 acre property.

We oppose the Applicant's request for Exceptions from the Ventura-Cahuenga Boulevard Corridor Specific Plan ("Specific Plan") sections to build a project with a floor area ratio of 3.3 to 1. Section 6.B.4 restricts the floor area ratio of a project to 1.5 to 1.

We oppose the Applicant's request for a zero setback along the front lot line, in violation of Section 7.A.2.a which requires an 18-inch setback along the front lot line defined by the Specific Plan to be Sepulveda Boulevard.

We oppose Applicant's request for an exception to Section 7.B.1 which restricts the maximum lot coverage to 75 % [sic] in order to design a project whose lot coverage 83% at grade, but drops to 62% percent lot coverage on the podium level.

We oppose the Applicant request for a 10-foot buffer along the Camarillo frontage for its mixed use project that combines residential and neighborhood serving retail uses as well as parking for each use in a single structure. Section 7.D.2.b requires parking structures to have a landscape buffer of 10 feet around the surface perimeter.

We oppose the Applicant's request to build a 100 foot tall building in violation of Section 7.E.1.b4 which limits the building height in this sub-area to 75 feet and 82 feet for mixed use projects.

We oppose the Applicant's request that the Director of Planning approve the project for compliance with the Ventura/Cahuenga Boulevard Corridor Specific Plan with the exceptions identified herein.

We oppose the Applicant's request for permission to sell a full line of alcoholic beverages for off-site consumption in conjunction with a retail grocery store. We also oppose the Applicant's request that subsequent to this application, an Administrative Plan Approval process be required once the future tenant of the grocery is selected.

We oppose the Applicant's request for approval of a 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 500 residential condominiums units with 55,000 square feet of commercial space.

We oppose the Applicant's request for permission to vacate La Maida Street and Peach Avenue.

We oppose the Applicant's request for approval of a Haul Route [sic]

We oppose the Applicant's request that Sepulveda be defined as the front yard and the remaining two yards be defined as side yards.

We oppose the Applicant's request that the decision-maker make the Site Plan Review findings.

We oppose granting the Applicant's procuring various permits from the City of Los Angeles Department of Building and Safety and other municipal agencies for project construction activities, including but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, and building permits.

Our members strongly oppose granting any zone changes, height district changes, vesting zone changes, general plan amendments, specific plan amendments, variances, exceptions or conditional use permits for this project because it is in violation of the Ventura/Cahuenga Boulevard Corridor Specific Plan. We ask that you deny the applicant's requests, based in part upon the following facts:

**Response to Comment No. 11-4**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. Please refer to Response to Comment

No. 10-3 for a discussion of the project's consistency with the overall intent of the Specific Plan. Please refer to Response to Comment No. 7-6, above, regarding setbacks. Also please refer to Response to Comment No. 7-1, above, for a discussion regarding the proposed exceptions to the Specific Plan. As discussed in Section II, Corrections and Additions, of this Final EIR, the density, scale and heights of the project have been reduced in response to public comments. This comment is noted for administrative record and will be forwarded to the decision-makers for review and consideration.

#### **Comment No. 11-5**

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.

#### **Response to Comment No. 11-5**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. As discussed in detail in Section IV.G, Land Use, of the Draft EIR, the project would be compatible with the surrounding uses including the Sherman Oaks Galleria to the south as well as multi- and single-family residential uses to the east. Specifically, the street level and mezzanine level of the project would be developed with neighborhood-serving commercial uses, which would front along Sepulveda Boulevard and Camarillo Street. The parking for the residential and commercial uses would be located within structured parking areas that would be designed to be screened from view. The anticipated neighborhood specialty grocery store, which would be the commercial anchor at the project site, would be located on Sepulveda Boulevard immediately south of US-101. The proposed neighborhood commercial uses would complement the Sherman Oaks Galleria and would represent an extension of the existing commercial uses along Sepulveda Boulevard. These neighborhood commercial uses would have hours of operation that are similar to those of other nearby retail uses. Furthermore, 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 Commercial. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

#### **Comment No. 11-6**

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.

**Response to Comment No. 11-6**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. As discussed in detail in Section IV.A, Aesthetics, of the Draft EIR, the scale, height and bulk of the project would not result in any significant impacts. Also refer to Response to Comment No. 7-4. In addition, as discussed in Section II, Correction and Additions, of this Final EIR, the density, scale, and height of the project has been reduced by the Applicant. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-7**

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 the developer purchased the property. The developer can build and use his property rights without the exceptions requested.

**Response to Comment No. 11-7**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. The comment expresses an opinion that the proposed project is not in harmony with the various elements and objectives of the Specific Plan. That the proposed project is in harmony with the various elements and objectives of the Specific Plan is a requisite finding that the Lead Agency must make in order to approve the project. Substantial evidence that the project is in harmony with the various elements 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 supports 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. Please also refer to Response to Comment No. 10-3.

**Comment No. 11-8**

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.

### **Response to Comment No. 11-8**

The Commentor's opinion regarding the project's location having an adverse effect on traffic is noted. The traffic analysis in the Draft EIR adequately disclosed that several study intersections along Ventura Boulevard and Sepulveda Boulevard currently experience unacceptable service levels (Levels of Service E or F), which are forecast to worsen in the future without and with the project. As shown in Table IV.K-8 of the Draft EIR, the project would generate 321 net A.M. and 549 net P.M. peak-hour trips. The project would result in significant impacts at a total of 11 study intersections along Ventura Boulevard and Sepulveda Boulevard, prior to mitigation, as shown in Table IV.K-7 of the Draft EIR. However, it should be noted that with the reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR as well as the reduction of the proposed project's neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet would reduce the daily and peak hour trips generated by the proposed project.

### **Comment No. 11-9**

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 in the future to circumvent the Specific Plan. The Specific Plan only provides minimal protection to the communities of Sherman Oaks and Encino. It must not be degraded further.

### **Response to Comment No. 11-9**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. That there are exceptional circumstances or conditions unique to the subject property is a requisite finding that the Lead Agency must make in order to approve the project. Substantial evidence that there are exceptional circumstances has been provided in the project application materials submitted to the City and which are part of the public record. As outlined below, there are a series of factors which combine to generate a special circumstance, including the site's size, shape, and the surrounding built environment.

At 4.51 acres,<sup>17</sup> the site is much larger than those generally found in the Specific Plan area. Its inordinately large size allows a development to provide a significant number of residential units at a time when additional housing is urgently needed.<sup>18</sup> Using the permitted density of the C2-2 and R4-2 sites south of Camarillo, located in the same Regional Commercial land use designation, between 549 (1 unit per 400 square feet of lot area) and 1,099 (1 unit per 200 square feet of lot area) residential units are permitted on the site. Consequently, the project is able to provide a substantial number of urgently needed residential units, 399 units (approximately 1 unit per every 551 square feet of lot area) without equaling the permitted density of its neighbors.

The irregular shape of the site, including its curvilinear property line, generates circumstances unique from other sites in the area. Its northwestern boundary, stretching from the southwestern portion of the project all the way to the northeastern portion, is an arc shape outlining the interchange connection between the 405 and the 101 Freeways. The property's arc shape creates a site planning constraint atypical of other properties in the Specific Plan area. Additionally, the 26-foot-tall wall along the Freeway's boundary not only creates a physical impediment to keep vehicles out of the property, it also negatively impacts the site's light and air circulation.

The project site's built environment will be consistent with its Regional Commercial land use designation as it places commercial, retail and residential uses proximate to a network of roads providing vehicular access. The multi-story Sherman Oaks Galleria, the hotel, the 405 Freeway, the 101 Freeway and Sepulveda Boulevard buffer the site from any sensitive uses. Many of the development standards respond to the impacts of commercial uses abutting single family residential uses (R1). The closest R1 zoning is found 200 feet away from the site which includes a physical separation of over 100 feet of a Major Highway Class II roadway. These existing buffers enhance the development potential of the site because such buffers allow the site to generate a significant amount of housing units while not directly impacting R1 zoned properties.

It is the combination of these special circumstances that create a justification for approving this project on this site.

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<sup>17</sup> *The existing lot area of approximately 196,673 or 4.51 acres includes the pre-dedicated lot area but not the vacated streets. With implementation of the proposed project, the lot area would be approximately 5.05 acres, including vacated streets and street dedications.*

<sup>18</sup> *See Housing Element discussion in Exception Finding E.*

**Comment No. 11-10**

On behalf of our members, and the thousands of Encino and other Sherman Oaks residents that are daily impacted by noise, traffic and congestion along Ventura Blvd. and Sepulveda Blvd., we ask that you not approve the zone changes, height district changes, variances and exceptions that are requested.

**Response to Comment No. 11-10**

This comment expresses opposition to the proposed project and references environmental issues but provides no comment as to the adequacy of the environmental impact analysis in the Draft EIR. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-11**

RESPONSE to the Draft Environmental Impact Report (DEIR) for a project known as:

Il Villaggio Toscano

The project will be located at:

4827 N. Sepulveda Blvd., Sherman Oaks, CA 91403

The proposed project affects transportation, earth, air, water, plant life, population, energy, utilities, land use, and other environmental elements in Sherman Oaks, Encino, and their surrounding communities. This document contains our response to the scope and content of the draft environmental information which is germane to your environmental evaluation of this project.

- I. ENCINO PROPERTY OWNERS ASSN. HOMEOWNERS OF ENCINO SHERMAN OAKS HOMEOWNERS ASSN.

This Response is filed by the Encino Property Owners Assn., Homeowners of Encino, and the Sherman Oaks Homeowners Assn., California non-profit corporations duly organized and existing under the laws of the State of California. They are organized for the purpose of promoting social welfare. These corporations seeks [sic] 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.

**Response to Comment No. 11-11**

This comment expresses opposition to the proposed project and references environmental issues but provides no comment as to the adequacy of the environmental impact analysis in the Draft EIR. Each of the environmental issues listed in this comment have been addressed in the Draft EIR and/or Initial Study and are addressed in more detail in the responses below. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-12****II. DESCRIPTION OF PROJECT**

The proposed project would include a maximum of 500 multi-family residential units and approximately 55,000 square feet of neighborhood-serving commercial uses in a series of six-story buildings built over a parking podium. Maximum height of the buildings would be approximately 100 feet above finished grade. The combined gross floor area for the residential and neighborhood-serving commercial uses for the proposed project would total approximately 708,659 square feet, with a floor area ratio (FAR) of 3.3:1.

The proposed project would provide a total of 1,470 parking spaces, consisting of 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for retail visitors.

The Applicant requests a Vesting Zone and Height District change from (Q) CR-1L, (Q) P-1L, R3-1L and R1-1L to the C2 zone and to Height District 2D to permit the construction of a new mixed use project containing a maximum of 500 residential units and approximately 55,000 square feet [sic] of neighborhood serving retail space on a currently vacant 5.1 acre property.

The Applicant requests Exceptions from the Ventura-Cahuenga Boulevard Corridor Specific Plan ("Specific Plan") sections as follows:

Exception to Section 6.B.4 which restricts the floor area ratio of a project to 1.5 to 1. The Applicant is requesting permission to build a project with a floor area ratio of 3.3 to 1.

Exception to Section 7.A.2.a which requires an 18-inch setback along the front lot line, which is defined by the Specific Plan to be Sepulveda Boulevard. The Applicant requests a zero setback along the front lot line.

Exception to Section 7.B.1 which restricts the maximum lot coverage to 75 % [sic]. The Applicant requests an exception from this provision in order to design a project whose lot coverage 83% at grade, but drops to 62% percent lot coverage on the podium level which is also the first residential level.

Exception to Section 7.D.2.b which requires parking structures to have a landscape buffer of 10 feet around the surface perimeter. The Applicant is requesting a 10-foot buffer along the Camarillo frontage for its mixed use project that combines residential and neighborhood serving retail uses as well as parking for each use in a single structure.

Exception to Section 7.E.1.b4 which limits the building heights in this sub-area to 75 feet and 82 feet for mixed use projects. The Applicant is requesting permission to build a 100 foot tall building.

Pursuant to L.A.M.C. Section 11.5.7 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.

Pursuant to L.A.M.C. Section 12.24 W the Applicant requests permission to sell a full line of alcoholic beverages for off-site consumption in conjunction with a retail grocery store. The Applicant also requests that subsequent to this application, an Administrative Plan Approval process be required once the future tenant of the grocery is selected. Future store layouts must be in substantial compliance, in terms of percent of floor area dedicated to alcohol sales, with the floor plans submitted with this application.

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 condominiums units with approximately 55,000 square feet of commercial space.

The Applicant requests permission to vacate La Maida Street and Peach Avenue.

The Applicant requests approval of a Haul Route

The Applicant is requesting that Sepulveda be defined as the front yard and the remaining two yards be defined as side yards.

Pursuant to L.A.M.C. Section 16.05, the Applicant requests that the decision-maker make the Site Plan Review findings. In addition to the specific discretionary actions listed above,

the Applicant will also need to procure various permits from the City of Los Angeles Department of Building and Safety and other municipal agencies for project construction activities, including but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, and building permits. The Applicant will be required to provide for construction of on- and off-site street improvements and other infrastructure as required as a condition of project approval.

### **Response to Comment No. 11-12**

This comment provides the Commentor's summary of the project and the list of approvals associated with the project. As set forth in Section II, Corrections and Additions, of this Final EIR, the Applicant no longer requests an exception to the 18-inch setback. As discussed in Section II, Corrections and Additions, of this Final EIR, the density, scale and heights of the project have been proposed to be reduced by the Applicant in response to public comments. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

### **Comment No. 11-13**

#### 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 draft EIR. It will have a significant impact on air quality, water, natural resources, population, noise, geology, energy, and population growth.

The draft EIR prepared by Matrix Environmental is "authoritative" looking on the surface, but is grossly inadequate and fails in its findings. The draft 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 draft EIR the preparer reaches faulty conclusions claiming that 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 draft EIR the Applicant 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 the final EIR, the Applicant must recognize that any proposed mitigations 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. The Applicant must include verifiable mitigations in the final EIR, not merely a recital of legal requirements or standard operating practices. We ask that the Applicant revise the findings and address the following environmental concerns which we believe have been overlooked or inadequately mitigated within the draft EIR:

### **Response to Comment No. 11-13**

The comment expresses an opinion that the Draft EIR is defective and inadequate, but does not provide specific inadequacies or facts or evidence demonstrating that the Draft EIR is inadequate. As discussed in Response to Comment No. 11-3, the Draft EIR is comprehensive and has been prepared in accordance with CEQA requirements. Potential impacts are based on the significance thresholds and methodologies set forth within the City of Los Angeles CEQA Thresholds Guide. In addition, each of the sections in Chapter IV, Environmental Impact Analysis, of the Draft EIR, fully discloses the environmental impacts associated with the project. Where significant impacts are identified in these sections, specific mitigation measures are provided to address the potentially significant impacts. As discussed in Section IV.B, Air Quality, even with implementation of mitigation measures, the project would result in significant air quality impacts. In addition, as discussed in Section IV.K, Transportation and Circulation, the traffic study has been reviewed and approved by LADOT and the project will result in significant traffic impacts even with the incorporation of mitigation measures. As discussed in Sections IV.L.1, Water Supply; IV.C, Biological Resources; IV.I, Population, Housing, and Employment; IV.H, Noise; IV.D, Geology; and VI, Other Environmental Considerations, in the Draft EIR, the project would not result in significant impacts associated with water, biological resources, population, noise, geology or energy. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

The comment misstates the law regarding compliance with existing applicable regulations and mitigation measures. Compliance with applicable regulations and policies may be assumed as characteristics of the project for purposes of determining reasonably foreseeable environmental impacts or may be set forth as mitigation measures. CEQA does not prohibit mitigation measures requiring compliance with regulations that are intended to reduce environmental impacts. If a proposed project that is anticipated to comply with all applicable regulations and policies does not cause environmental impacts

above the thresholds of significance, no mitigation is or can be required. Mitigation measures must be rationally related to environmental impacts before they can be imposed. Thus, compliance with applicable regulations or policies may be all that can be set forth (either as a design feature or as mitigation measure) if such compliance is sufficient to reduce a potentially significant environmental impact below the threshold of significance.

**Comment No. 11-14**

IV. IMPACTS ON EARTH

The draft EIR's geological impact mitigation Measure D-1 is inadequate and does not reduce the earth impacts to insignificance.

**Response to Comment No. 11-14**

The comment expresses an opinion without supporting evidence that Mitigation Measure D-1 is inadequate. As discussed in Section IV.D, Geology and Soils, of the Draft EIR, Mitigation Measure D-1 requires that the Applicant incorporate the recommendations detailed in the geotechnical investigation prepared for the proposed project, as approved by the City of Los Angeles. Implementation of the recommendations within the geotechnical investigation and regulatory requirements related to geology and soils would ensure that potential impacts associated with geology and soils would be less than significant. Furthermore, the Geotechnical Report is prepared by experts in the scientific disciplines relative to geology. The comment offers no scientific or expert analysis supporting the opinion expressed. Nevertheless, this comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-15**

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.

**Response to Comment No. 11-15**

The comment expresses an opinion without supporting evidence that the project will result in disruptions, displacements, compaction, and overcovering of soil. The comment offers no scientific or expert analysis supporting the opinion expressed. As discussed in Section II, Project Description, of the Draft EIR, the proposed project would result in the export of approximately 165,000 cubic yards of soil. In addition, construction of the project would require approximately 20 to 23 months to complete. Primary grading activities would

require approximately four to five months to complete. Activities associated with the grading and export of soil would occur in accordance with City requirements, as specified in the LAMC and through the grading plan review and approval process.

**Comment No. 11-16**

Haul 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.

**Response to Comment No. 11-16**

The anticipated haul route for the project is described on page IV.K-23 of the Draft EIR. A detailed analysis of project construction traffic is provided on pages IV.K-27 through IV.K-31 of the Draft EIR. Proposed construction traffic mitigation measures are described on pages IV.K-45 and IV.K-46 of the Draft EIR.

**Comment No. 11-17**

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 [sic] 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.

**Response to Comment No. 11-17**

Section IV.D, Geology and Soils, of the Draft EIR, includes a comprehensive analysis of geologic hazards associated with the project including a discussion soil stability and seismic shaking found on pages IV.D-2 under heading (3) Seismic Hazards. This analysis is based on the expert Geotechnical Report prepared by Geotechnologies, Inc. and included in Appendix C of the Draft EIR. A supplemental geotechnical report has also been included as part of this Final EIR. Flooding is discussed in Section IV.F, Hydrology and Water Quality. As indicated in the Draft EIR, implementation of mitigation measures

would ensure that potential impacts associated with geologic hazards and flooding would be less than significant.

### **Comment No. 11-18**

#### V. AIR IMPACTS

The air impacts mitigation Measures B-1 through B-11 are inadequate and do not reduce the air impacts to insignificance, as is claimed in the draft EIR.

The draft 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. The Applicant should 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.

### **Response to Comment No. 11-18**

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Contrary to what is stated in this comment, the Draft EIR on page IV.B-75 of Section IV.B, Air Quality, concluded that the proposed project would result in a significant unavoidable air quality impact even with incorporation of mitigation measures. Mitigated construction impacts (i.e., estimate of emissions with incorporation of mitigation measures) are provided in Table IV.B-11. As shown in Table IV.B-11, regional construction activities during mass grading activities would exceed the SCAQMD daily emission thresholds for regional NO<sub>x</sub> after implementation of all feasible mitigation measures. Maximum on-site daily NO<sub>x</sub> and PM<sub>10</sub> emissions during mass grading activities would result in localized NO<sub>2</sub> and PM<sub>10</sub> concentrations that result in a significant and unavoidable localized impact after mitigation. In addition, regional operational emissions would still exceed the SCAQMD daily emission threshold for regional VOC and NO<sub>x</sub> after implementation of all feasible mitigation measures. Therefore, operation of the project would have a significant and unavoidable impact on regional air quality with regard to emission of these constituents. Consistent with SCAQMD recommended cumulative impact methodology (i.e., if a project exceeds SCAQMD project-level significance thresholds, then the project would also contribute to a cumulative significant air quality impact), the project was concluded to result in cumulative construction and operational air quality impact.

The Commentor correctly identifies that the proposed project does not include mitigation measures that fully mitigate the air quality impacts. The Draft EIR provided proposed mitigation measures that would, to the extent feasible, substantially reduce the severity of significant construction and operational emissions from the proposed project. Many of the measures are recommended by the City of Los Angeles and SCAQMD and are not readily quantifiable (e.g., the project shall be designed and operated to conserve energy as required by the Southern California Edison, Southern California Gas Company, and/or other appropriate agencies).

In addition to the proposed mitigation measures, the proposed project incorporates many of the pollutant emission reducing measures built into the proposed project as Project Design Features. As discussed in Section IV.B, Air Quality, of the Draft EIR, development of the proposed project at the proposed site location offers the opportunity to provide residential uses within a highly urbanized regional employment center and adjacent to a regional shopping center. The project would support the reduction of air emissions via its use of existing infrastructure, proximity to existing regional and local transit facilities, the provision of pedestrian-scale street frontages, and location near existing commercial uses that would meet many of the needs of the project's future residents. In addition, the proposed project would be constructed to achieve a "Silver" rating from the USGBC's LEED™ green building program. While not specifically listed as mitigation measures, these Project Design Features would be incorporated as part of the project to reduce pollutant emissions related to the proposed project.

Although this comment does not provide any specific recommended measures to reduce air quality impacts, additional measures were included in this Final EIR in response to Comment Nos. 5-13, 5-14, 5-15, 5-17, and 5-18. Please refer to Section II, Corrections and Additions, of this Final EIR, for a list of the additional mitigation measures. With incorporation of the additional mitigation measures, the project could potentially reduce the regional and localized NO<sub>x</sub> construction impact to less than significant. Even with incorporation of these additional mitigation measures, the project would still result in a significant localized PM<sub>10</sub> construction impact.

#### **Comment No. 11-19**

The 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. The 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.

The assessment should also address the air impacts at both the local level, and within the region. It should 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.

### **Response to Comment No. 11-19**

Significance thresholds on pages IV.B-34 through IV.B-41 of Section IV.B, Air Quality, of the Draft EIR. Specifically, the SCAQMD recommends that cumulative impacts be evaluated using SCAQMD's project-level significance thresholds; if a project exceeds these project-level thresholds, then the project would also contribute to a cumulative significant air quality impact. As discussed in the methodology and impacts discussions, regional and localized impacts, including vehicular emissions, were fully analyzed in accordance with SCAQMD recommended methodologies. Results are summarized in Section IV.B of the Draft EIR and the supporting calculations were provided in Appendix B of the Draft EIR. The URBEMIS model was used extensively for the analysis and, therefore, a complete set of modeling output was provided in the appendix. The Commentor is referred to the URBEMIS model's website for the User's Manual (<http://urbemis.com/software/URBEMIS9%20Users%20Manual%20Main%20Body.pdf>) and complete description of emission factors, formulas and equations (<http://urbemis.com/software/URBEMIS9%20Users%20Manual%20Appendices.pdf>). As concluded in Section IV.B, Air Quality, of the Draft EIR, the project would exceed construction period thresholds for NO<sub>x</sub> and PM<sub>10</sub> and operational period thresholds for VOC and NO<sub>x</sub>, thus resulting in a significant cumulative impact. The Draft EIR included several project design features, such as pursuing LEED™ "Silver" certification, and mitigation measures, such as street sweeping and watering unpaved areas to reduce construction related emissions and installing "cool" roofs and double-paned windows to reduce operational emissions, aimed at reducing these significant impacts. In response to several comments by the SCAQMD, additional mitigation measures have been provided in Section II, Corrections and Additions, of this Final EIR, which potentially could reduce the construction related NO<sub>x</sub> impact to a level of less than significant. Nevertheless, impacts for construction related PM<sub>10</sub>, and operational VOC and NO<sub>x</sub> would remain significant and unavoidable. As such, in accordance with CEQA requirements, the City will prepare a Statement of Overriding Considerations once the Final EIR is completed. The Statement of Overriding Considerations will then be considered by the decision-makers at future public hearings for the Project.

**Comment No. 11-20**

The final EIR should explain 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.

**Response to Comment No. 11-20**

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Section IV.B, Air Quality, of the Draft EIR, evaluated potential impacts from the above described sources. These sources result in emissions of criteria pollutants such as ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). The EPA and CARB have established a set of ambient air quality standards for these criteria pollutants, which the SCAQMD has used in their established localized thresholds in addition to their regional thresholds. The Commentor is referred to pages IV.B-23 through IV.B-27 of the Draft EIR for a detailed discussion of air pollution and potential health effects within the South Coast Air Basin. While the discussion is not specific to the exact location of the project, it is indicative of areas that have the potential to exceed ambient air quality standards. In response to this comment a more detailed discussion of potential health effects from air pollution and ambient air quality studies conducted for the Los Angeles area has been included in Section II, Corrections and Additions to the Draft EIR, of this Final EIR. Additionally, in response to this comment, potential effects of criteria pollutant emissions on the ecosystem, including flora and fauna has been added to Section II, Corrections and Additions to the Draft EIR, of this Final EIR

In response to several comments by the SCAQMD, additional mitigation measures have been provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, which could potentially reduce the construction related NO<sub>x</sub> impact to a level of less than significant. Nevertheless, impacts for construction related PM<sub>10</sub>, and operational VOC and NO<sub>x</sub> would remain significant and unavoidable. It should be noted, however, that the PM<sub>10</sub> impact would only occur over a short duration of time, during the site grading phase of construction. Additionally, as the project results in a significant and unavoidable long term impact for VOC and NO<sub>x</sub> (ozone precursors), in accordance with CEQA requirements, the City will prepare a Statement of Overriding Considerations once the Final EIR is completed. The Statement of Overriding Considerations will then be considered by the decision-makers at future public hearings for the project. However, it is important to note that the SCAQMD's AQMP provides a plan to reduce ozone impacts, and as discussed in Section IV.B, Air Quality, of the Draft EIR, the project is consistent with this plan.

**Comment No. 11-21**

## VI. WATER IMPACTS

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

**Response to Comment No. 11-21**

The comment expresses an opinion without supporting evidence that the mitigation measures are inadequate. Section IV.L.1, Utilities—Water Supply, of the Draft EIR, analyzes the proposed project's potential impacts on water supply and the water infrastructure system. The analysis describes regional water supplies and existing water infrastructure serving the project site, estimates the water demand associated with the proposed project, and assesses whether there is sufficient water supply and infrastructure capacity to meet that demand. The water supply analysis contained in the Draft EIR accounts for aqueduct, groundwater, and MWD water sources. The analysis includes a discussion of how both DWP and MWD have implemented programs to ensure reliable water supplies are available. A Water Supply Assessment was prepared for the proposed project and it was determined that the LADWP would have sufficient capacity to accommodate the water supply needs of the proposed project during normal, single-dry, and multiple-dry years. A more detailed discussion of the reliability of water supplies can be found in the Water Supply Assessment and associated attachments prepared by the Los Angeles Department of Water and Power, Water Resources Division on February 10, 2005 (refer to Appendix I of the Draft EIR).

As discussed in Section IV.L.1, Utilities—Water Supply, of the Draft EIR, the project would not result in significant impacts associated with water supply. However, numerous mitigation measures have been recommended to ensure that the project would be compliant with the City's recommended water conservation measures. In addition, the project would be constructed to achieve a "silver" rating from the US Green Building Council's LEED™ program and the project would include the following water saving features:

- Project landscaping would include drought resistant plants and measures to reduce potable water consumption for irrigation by 50 percent.
- The project would use low-water fixtures and appliances to reduce water demand by 20 percent.

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

### **Comment No. 11-22**

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. The final EIR should impose more extensive measures to deal with the water consumption issue. The Applicant must 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. Applicant must also detail the amount of water necessary for the control of dust as well as the cumulative amount of water needed by this project during the construction phase.

### **Response to Comment No. 11-22**

Compliance with applicable regulations is anticipated and are considered project design features. As discussed in Response to Comment No. 11-21, a Water Supply Assessment was prepared by DWP that demonstrates that adequate water supplies would be available to provide for the project. Thus, no significant impacts associated with water supply would result. While mitigation measures were not required, mitigation measures were provided to ensure that the project would comply with City water conservation requirements. Additional conservation features have also been included that extend beyond the City's water conservation requirements.

As discussed in Section IV.L.1, Utilities—Water Supply, of the Draft EIR, a short-term demand for water would occur during construction activities on-site. As the project would occur over a 20- to 23-month period, construction activities would occur intermittently and would be temporary in nature. Thus, the demand for water supplies for construction activities, such as soil watering (i.e., for fugitive dust control), clean up, masonry, painting, and other related activities, would be minimal. This demand would also be much less than the water demand estimated for operation of the project. Therefore, impacts associated with short-term construction activities would be less than significant.

**Comment No. 11-23**

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.

**Response to Comment No. 11-23**

Reclaimed sewage water is not contemplated for use for dust control. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-24**

## VII. IMPACT UPON ANIMAL AND PLANT LIFE

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.

The mitigation Measures C-1 through C-6 are inadequate and do not reduce the impacts to insignificance, as is claimed in the draft EIR.

**Response to Comment No. 11-24**

The comment asserts that that the project site is habitat for unspecified species of birds and animals and asserts an opinion that the project may have a significant impact on unspecified plant and animal life. An analysis of potential impacts associated with flora and fauna is provided in Section IV.C, Biological Resources, of the Draft EIR. As indicated therein, the project site and surrounding area have been disturbed by urban development and human use. Currently, the project site is developed with a single-family residence. The remainder of the project site is graded and vacant. CEQA does not consider any impact to any biota species of plant or animal significant. Biota impacts are evaluated with reference to thresholds of significance that take into account the protected class of plant and animal species. Vegetation on the project site consists of four existing non-native elm (*Ulmus* sp.) trees. No native or locally protected biological resources, such as oak, or California black walnut trees for example, exist on the project site or the street frontages and no habitat for sensitive species or wetlands are located on the project site. Furthermore, given the urbanized nature of the project area, the project site is not utilized for wildlife movement/migration. The two mitigation measures included in Section IV.C,

Biological Resources, of the Draft EIR, have been proposed to ensure that the project would comply with existing street tree regulations and to ensure that that any potential impacts to potential raptor species associated with the removal of the existing on-site trees would be less than significant. These mitigation measures would adequately mitigate impacts associated with street tree removal and nesting birds. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

### **Comment No. 11-25**

#### VIII. NOISE IMPACTS

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. The draft EIR should [sic] 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 noise impact mitigation Measures H-1 through H-6 are inadequate and do not reduce the noise impacts to insignificance, as is claimed in the draft EIR.

### **Response to Comment No. 11-25**

The Draft EIR concludes that despite including all feasible mitigation measures, the project will result in temporary noise impacts that exceed the thresholds of significance. The comment asks how severe noise impacts can be avoided. Some significant noise impacts during construction cannot be avoided. CEQA does not require that noise impacts “must be reduced to insignificance” as the comment states. Rather, CEQA requires that the lead agency impose all feasible mitigations measures that would avoid or substantially reduce the impact to less than significant levels. This requirement does not, however, require that all impacts be reduced to less than significant levels if impacts will remains significant despite incorporating all feasible mitigation measures. The comment does not identify any additional mitigation measures that could reduce construction impacts.

A comprehensive analysis of potential impacts associated with construction noise is provided in Section IV.H, Noise, of the Draft EIR. The estimated construction noise levels (for various construction phases) at the nearby sensitive uses are provided in Table IV.H-6 of the Draft EIR. The noise levels provided in Table IV.H-6 represent a worst-case scenario, which includes multiple pieces of equipment operating simultaneously (including a drill rig, excavator, dump/haul truck, backhoe, and air compactor) at the closest distance to the offsite noise receptor. The construction noise levels would exceed the significance

threshold at the nearby residences east of Sepulveda Boulevard (receptor R4) and on La Maida Street (receptor R5) by up to 8 dBA and 6 dBA, respectively; and at the adjacent 777 Motor Inn (receptor 3) by up to 19 dBA. However, Mitigation Measures H-1 through H-4 would reduce the construction noise impacts. The temporary sound barrier prescribed in Mitigation Measure H-1 would achieve a noise reduction of 10 dBA or more in areas where the line-of-sight between construction-period noise sources and off-site receptor locations is obstructed. Therefore, the maximum  $L_{eq}$  noise levels would be reduced to approximately 76.0 dBA at the 777 Motor Inn, to approximately 70.0 dBA at the residences east of Sepulveda Boulevard, and to approximately 57.0 dBA at the residences on La Maida Street. Mitigation Measure H-2 would avoid operating several pieces of heavy equipment simultaneously, which causes high noise levels. Implementation of Mitigation Measure H-3 would limit idling of construction equipment and haul trucks. In addition, Mitigation Measure H-4 would require that the construction staging area shall be located as far as feasible from sensitive receptors. Furthermore, as construction activity moves away from the property line towards the center of the project site, noise levels would attenuate considerably from these maximum levels. With implementation of these mitigation measures, potential construction-related impacts at residential uses would be reduced to less than significant levels. However, construction noise levels would still exceed the 5 dBA significance criterion at the 777 Motor Inn. No feasible mitigation measures would be available to further reduce these impacts to a less than significant level.

With regard to haul trucks, as presented in Section IV.K, Transportation and Circulation, of the Draft EIR, approximately 165,000 cubic yards of exported materials would be transported from the site, which 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 inbound and 19 outbound). As indicated in Section IV.K, Transportation and Circulation of the Draft EIR, the haul trucks would access the project site via the US-101 Freeway. Haul trucks leaving the site would travel a short distance (less than 500 feet) north on Sepulveda Boulevard to the US-101 Freeway eastbound on-ramp. Return trucks would travel the same route, exiting the US-101 freeway at the westbound off-ramp at Sepulveda Boulevard and then traveling approximately 500 feet south on Sepulveda Boulevard to the project site. The haul trucks would generate noise level of 66.5 dBA ( $L_{eq}$ ) along Sepulveda Boulevard, between the project site and the US-101 Freeway on- and off-ramps. The estimated noise level from haul trucks would be below the existing daytime ambient noise levels along Sepulveda Boulevard, which ranged from 68.5 to 76.6 dBA ( $L_{eq}$ ), based on the measured ambient noise levels at receptor R4 (refer to Table IV.H-2 on page IV.H-13 of the DEIR). In addition, Mitigation Measure H-3 would require that the Idling of haul trucks be limited to 5 minutes at any given location, as established by the South Coast Air Quality Management District. Therefore, noise impacts from haul trucks associated with project construction would be less than significant.

**Comment No. 11-26**

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.

**Response to Comment No. 11-26**

As discussed in Response to Comment No. 11-25, a comprehensive analysis of potential impacts associated with construction noise is provided in Section IV.H, Noise, of the Draft EIR. This analysis includes noise levels from specific pieces of equipment, usage factors for each piece of equipment as well as the noise levels that sensitive uses would be exposed to. As discussed in Section IV.H., Noise, of the Draft EIR, project construction activities would be conducted in accordance with the City Municipal Code allowable hours, which are from 7:00 A.M. to 9:00 P.M., Monday through Friday and from 8:00 A.M. to 6:00 P.M. on Saturdays and holidays. The methodology and thresholds of significance used in the noise analysis are based on those set forth in the Los Angeles CEQA Thresholds Guide. The analysis represents a worst-case scenario that assumes multiple pieces of equipment would be operating simultaneously at the closest distance to the receptor. As described in Response to Comment No. 11-25, based on these conservative assumptions and accounting for proposed mitigation measures, construction noise levels at residential land uses in the project vicinity would be reduced to less than significant levels. However, the short-term construction noise levels would still exceed the 5 dBA significance criterion at the 777 Motor Inn. No feasible mitigation measures would be available to further reduce this short-term impact to a less than significant level. This comment is noted for the administrative records and will be forwarded to the decision-makers for review and consideration.

The comment seeks information regarding the potential effects of noise impacts on human psychology physiology as well as on the aged and ill. Although certain types of land uses such as residences, schools, hospitals, and nursing homes are identified in the Draft EIR as "sensitive receptors," CEQA does not require an analysis of environmental impacts on particular persons. The sensitive receptors in proximity to the project are set forth on pages IV.H-8 through IV.H-14 of the Draft EIR.

**Comment No. 11-27**

The noise impacts must include future delivery trucks including refrigerated trucks at loading docks associated with the proposed markets and other shops. Mitigation measures must address truck and refrigeration units which will continue to run during unloading and their impact of both residential neighbors and residences within the project.

**Response to Comment No. 11-27**

Noise impacts associated with delivery trucks have been analyzed Section IV.H, Noise, of the Draft EIR. As indicated therein, noise impacts from these delivery trucks at nearby sensitive residential uses would be less than significant. With respect to the new project on-site residences, the building sound insulation requirements as specified in Mitigation Measure H-5, would ensure that the new on-site residential buildings meet the interior noise level of 45 dBA (CNEL), as required by the City's building code. This mitigation measure would ensure that truck deliveries and other sources of noise would not impact on-site residents.

**Comment No. 11-28**

Since its passage in 1974 the City of Los Angeles has refused to enforce the State Law (Title 24) and UBC Appendix Subchapter 35 requiring that multifamily dwellings be constructed so that interior noise levels from exterior sources is limited to a CNEL of 45 or below. The law also requires that party walls and floor ceilings be constructed with minimum Sound Transmission Class (STC) and Impact Insulation Class (IIC) ratings of fifty. The project is located immediately adjacent to the 405 and 101 freeways which generate elevated levels of noise. These will require specially rated windows, doors, and dwelling unit separations as wall [sic] as certified acoustical analyses.

**Response to Comment No. 11-28**

As discussed in Response to Comment No. 2-9, a mitigation measure has been proposed requiring the residential uses on-site to have adequate sound insulation to meet the acceptable interior noise level of 45 dBA CNEL.

**Comment No. 11-29****IX. LIGHT AND GLARE IMPACTS**

The draft EIR does not contain any Land Use mitigation measures and do not reduce the Land Use impacts to insignificance.

Light and glare were not adequately mitigated in the draft 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.

### **Response to Comment No. 11-29**

As discussed in Section IV.G, Land Use, of the Draft EIR, the project would not result in significant impacts associated with land use. Thus, no mitigation measures are required. The comment expresses an opinion disagreeing with the analysis in the Draft EIR, but does not provide facts or evidence to support this opinion.

A detailed analysis of light and glare and shading is provided in Section IV.A, Aesthetics of the Draft EIR. As discussed therein, lighting would be designed to minimize light spillover through the use of shielding, cutoff fixtures, and similar measures. The comment seems to state that mitigation must eliminate all light spill-over and glare from the project. CEQA does not require any mitigation measure to eliminate potentially significant impacts, but merely to reduce them to less than significant levels as determined by thresholds of significance. The proposed mitigation measures would reduce light and glare impacts to less than significant levels. In addition, the project would comply with the lighting regulations set forth in the LAMC. Thus potential impacts associated with lighting would be less than significant. With regard to glare, the façades of the project buildings would include plaster siding and would not contain highly reflective materials. Windows would also consist of low-reflectivity glass. Thus, potential impacts associated with glare would be less than significant. In addition, based on the shading simulations included in Section IV.A, Aesthetics, of the Draft EIR, shading impacts of the project would also be less than significant. As these impacts would be less than significant, no mitigation measures are required.

### **Comment No. 11-30**

#### **X. CHANGES IN POPULATION**

The draft 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. The draft EIR does not include any mitigation measures for population, housing and employment, and such measures need to be provided.

**Response to Comment No. 11-30**

As discussed in detail in Section IV.I, Population, Housing, and Employment, of the Draft EIR, the project would not generate new growth that would exceed projected levels and could not be accommodated by existing and/or planned infrastructure. The comment expresses its disagreement with the conclusions of the Draft EIR but provides no facts or evidence showing that impacts to population, housing and employment would be significant. Thus, significant impacts would not occur and no mitigation measures would be required.

**Comment No. 11-31**

Changes in population will occur if this project is approved. These 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 the final EIR, the Applicant must show how the project adheres to the job/housing balance. Provide a detailed assessment of the growth and job impacts. Describe 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.

**Response to Comment No. 11-31**

As discussed in Section IV.I, Population, Housing, and Employment, of the Draft EIR, the proposed project includes 500 new multi-family residential units and thus, based on a household size factor of 1.70 persons per household for medium density residential uses, as provided in the Community Plan, would generate a residential population of 850 persons at full buildout.<sup>19</sup> The increase of 850 permanent residents would represent approximately 48.16 percent of the anticipated growth within the local (Community Plan) area, 1.02 percent within the City subregional area, and 0.23 percent of the anticipated growth between 2008-2013 within the County region. Thus, significant population impacts would not occur and no mitigation measures would be required.

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<sup>19</sup> *This residential population would be reduced to 678 persons with the reduction of residential units from 500 to 399 units proposed in response to public comments received during the Draft EIR public review period.*

With regard to housing, development of the project's 500 new multi-family residential units are projected to account for approximately 28.46 percent, 0.89 percent, and 0.35 percent of the 2008 to 2013 increase in residential units in the local area, City of Los Angeles subregion, and County region, respectively.<sup>20</sup> In addition, the project would not result in a net loss of available housing units. Thus, significant housing impacts would not occur and no mitigation measures would be required.

With regard to employment, based on a factor of 1 employee per 424 square feet of retail uses for Los Angeles County as provided in SCAG's Employment Density Summary Report (October 2001), project development of approximately 55,000 square feet of commercial uses would result in approximately 130 new employment positions on the site.<sup>21</sup> This increase in employment positions would account for approximately 9.57 percent of the local area's increase in employment, 0.27 percent of the City of Los Angeles subregion's increase in employment, and 0.10 percent of the County region's increase in employment. Project development would also generate construction workers on-site during the demolition, grading and excavation, and building construction and finishing phases. Given the current downturn in economic conditions, increases in employment growth would be considered a benefit to the local area, City of Los Angeles subregion, and County region. Thus, significant employment impacts would not occur and no mitigation measures would be required.

With regard to the jobs/housing balance, as discussed in Section IV.I, Population, Housing, and Employment, of the Draft EIR, the Community Plan area, the City of Los Angeles, and the County of Los Angeles would all benefit with a greater increase in residential uses compared to employment positions since all three geographical zones are already projected to experience a greater imbalance in the jobs/housing ratio. As such, the proposed project would not contribute to, but rather would alleviate, the jobs/housing ratio imbalance for the local area, City of Los Angeles subregional area, and the County region.

Analyzing the effects on unemployment on individuals with various jobs skills is not within the scope of CEQA and was therefore not analyzed in the Draft EIR. The Commentor is referred to Response to Comment No. 11-3 regarding the inclusion of mitigation measures for the proposed project.

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<sup>20</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received during the Draft EIR public review period would reduce these percentages.*

<sup>21</sup> *With the reduction of neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet, new employment opportunities would be reduced to approximately 123 employment positions.*

**Comment No. 11-32**

## XI. AIR TRAFFIC IMPACTS

Due to the proposed building height, it appears that the project will require a Notice of Proposed Construction or Alteration (Form 7660-1) 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 draft EIR. The final EIR should fully cover all air safety, and building height issues.

**Response to Comment No. 11-32**

A Notice of Proposed Construction or Alteration is not expected to be required for the project as the height of the building will not exceed 200 feet and will not be in close proximity to an airport or heliport. In addition, a heliport is not contemplated as part of the project. Furthermore, the project will comply with applicable LAMC requirements regarding access and building heights.

**Comment No. 11-33**

## XII. TRAFFIC AND CIRCULATION

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.

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 draft EIR. Only seven of the eleven intersections are mitigated, and then only minimally, while others remain with serious impacts.

**Response to Comment No. 11-33**

The comment offers an opinion that mitigation measures are inadequate but provides no facts or evidence showing that the mitigations will not be adequate. Traffic conditions without the project, during project construction and with the completed project are adequately analyzed and evaluated in Section IV.K, Transportation and Circulation, of the Draft EIR. As indicated by the Commentor, LOS E and F conditions were determined for a number of study intersections. According to City significant impact thresholds,

mitigation measures K-1 to K-16, as described on pages IV.K-45 to IV.K-50 of the Draft EIR, would reduce many of the project impacts to a level below significance. However, as concluded on page IV.K-50, the project would still result in significant and unavoidable impacts at five intersections if all of the mitigation measures are determined to be feasible or alternative measures of equivalent effectiveness are provided.

#### **Comment No. 11-34**

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 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.

#### **Response to Comment No. 11-34**

Pages IV.K-25 to IV.K-31 of the Draft EIR describes the analysis of project construction impacts. During construction, it is anticipated that on-street parking would be removed along Camarillo Street west of Sepulveda Boulevard to provide additional room for construction activities. However, through traffic lanes near the project site would remain open. To lessen the potential for construction traffic to block through traffic lanes and driveways of nearby residents and businesses, truck staging areas would occur at off-site locations, as approved by the City. The analysis accounted for the large size of construction vehicles. A detailed Level of Service and impact analysis of construction traffic was performed. Construction mitigation measures were identified. Conceptual plans showing the proposed mitigation measures for the completed project are provided in Appendices H-1 and H-2 of the Draft EIR.

#### **Comment No. 11-35**

Since the project has corridor level transportation impacts, the long term impacts must be described and mitigated. Estimate the number of trips generated, and provide documentation on the assumptions. Describe how the project will affect public transportation in the region, and locally. Describe how the project will impact the nearby freeways and the need to widen or 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. Explain thoroughly the methods to arrive at trip generation rates, trip distributions, time of day analysis, effects on A.M. and P.M. traffic conditions, etc.

**Response to Comment No. 11-35**

The details regarding the methodology, procedures, assumptions and databases used to analyze project trip generation and distribution; time periods; intersection, freeway and transit impacts; cumulative impacts; and mitigation measures are contained in Appendices H-1 and H-2 of the Draft EIR. Twenty-six study intersections, including several along Ventura Boulevard and several involving secondary highways, were analyzed for existing and future conditions. It should be noted that these Appendices were the bases for Section IV.K, Transportation and Circulation, of the Draft EIR.

**Comment No. 11-36**

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. Provide an appendix with all necessary and supporting documentation, including the paper trail that will allow concerned citizens, or decision makers to trace the steps, and resultant conclusions with regard to traffic impacts.

**Response to Comment No. 11-36**

The project will not be phased. It will be constructed in one phase, and was analyzed accordingly in the traffic study. The traffic mitigation measures will be suitably guaranteed prior to the issuance of any project building permit. Please see Response to Comment No. 11-35 regarding the documentation of the details for the traffic study and analysis. Please also see Appendix H-3 of the Draft EIR, which contains the traffic assessment letter from the Los Angeles Department of Transportation approving the traffic study methodology, content and results.

**Comment No. 11-37**

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 food market, post office, drug store and other services to discourage employees from leaving during working hours.

**Response to Comment No. 11-37**

The project proposes to implement a Transportation Demand Management (TDM) Plan with the goal of reducing project vehicle trips, and encouraging carpooling and public transit usage among project employees and residents. The initial measures of the TDM Plan are described on page IV.K-24 in Section IV.K, Transportation and Circulation, of the Draft EIR. These measures may be refined and other measures may be added as the plan matures. As the project will be a mixture of residential and retail uses, including a grocery store, there will be internal trip-making, which will decrease the number of vehicle trips entering and exiting the project site. Also, it should be noted for purposes of a conservative analysis, no reductions to the project trip generation were made due to the TDM Plan.

The proposal to eliminate the underground parking levels would eliminate all 1,250 residential parking spaces for the project, leaving the project without any residential parking spaces. This proposal would require an unprecedented variance to the City parking requirements for residential development. Although encouraging transit use, transportation demand management, and other alternatives to automobile dependency are included in the project, eliminating all parking and substituting transit and shuttle services would likely create a significant parking impact to the surrounding area because no credible evidence suggests that alternatives to auto-dependence eliminate all parking needs of urban-dwelling residents.

Nevertheless, various methods for encouraging public transit use are incorporated in the project.

**Comment No. 11-38****XIII. PUBLIC SERVICE IMPACTS**

The public service impact mitigation Measures J-1 through J-7, are inadequate and do not reduce the public service impacts to insignificance, as is claimed in the draft EIR.

The draft EIR fails to mitigate how adding 500 new apartments with thousands of new residents will impact local schools, parks and libraries. The draft 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-7 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) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in lieu [sic] fees.

**Response to Comment No. 11-38**

As discussed in Section IV.J.3, Public Services—Public Schools, of the Draft EIR, in accordance with the provisions of SB50, payment of the school fee set forth in Mitigation Measure J-6 serves to fully mitigate all potential project impacts on school facilities to less than significant levels. CEQA allows payment of fees as mitigation when the formula for calculating the fee is set forth, and there is a program in place that reasonably assures that the paid fees will be used toward the mitigation of potential impacts. Payment of school fees meets this CEQA requirement. In addition, as described in Section IV.J.4, Public Services—Parks and Recreation, of the Draft EIR, with implementation of Mitigation Measure J-7, the project would comply with the maximum requirements established under the Quimby Act. CEQA allows mitigation measures that set forth more than one option for mitigating potential significant effects, such as compliance with the various options set forth in the Quimby Act. It is not required that a Draft EIR choose or specify one option, provided that all options are clearly set forth. Regarding the option to pay Quimby Fees, CEQA allows the payment of fees as mitigation when the formula for calculating the fee is set forth and there is a program in place that reasonably assures that the paid fees will be used toward the mitigation of potential impacts. Payment of Quimby fees meets this CEQA requirement. Finally, based on information provided by the LAPL, the Sherman Oaks Branch Library does adequately meet the demand for library services within its community. Therefore, as discussed in Section IV.J.5, Public Services—Libraries, of the Draft EIR, considering the population increase from the project and the project's nominal increased demand for library services, impacts would be less than significant. Thus, no mitigation measures related to libraries are required. Additionally, as discussed in Section II, Corrections and Additions, of this Final EIR, in response to public comments received during the Draft EIR comment period, the number of residential units are proposed to be reduced from 500 to 399 residential units. Thus, the residential population set forth in the Draft EIR would be reduced. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-39**

Without any foundation the draft EIR concludes “the project's impacts to libraries would be less than significant. Therefore, no mitigation measures would be required.”

**Response to Comment No. 11-39**

Substantial evidence supports the conclusion of the Draft EIR. The foundational evidence is the information provided by the LAPL, that the Sherman Oaks Branch Library does adequately meet the demand for library services within its community. As discussed in Section IV.J.5, Public Services—Libraries, of the Draft EIR, considering the population increase from the project and the project's nominal increased demand for library services,

impacts would be less than significant. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

#### **Comment No. 11-40**

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.

#### **Response to Comment No. 11-40**

The Draft EIR provides detailed analysis of police and fire protection with regard to response time and services. Police protection is provided to the project site and the surrounding area by the Los Angeles Police Department. The proposed project would provide on-site security personnel, who would patrol parking areas, outdoor courtyard areas, residential lobbies, and entrances/exits of the commercial uses. Additionally, the proposed project would include surveillances cameras, appropriate lighting, and gated access for the parking facility. Also please refer to Mitigation Measures J-1 and J-2 that are proposed to ensure that such impacts associated with fire protection would remain less than significant.

Fire prevention and suppression services and emergency medical services to the project site and surrounding area are provided by the Los Angeles Fire Department. During project construction, construction managers and personnel would be trained in emergency response and fire safety operations. Fire suppression equipment specific to construction would be provided on-site in accordance with Occupational Safety and Health Administration (OSHA) and Fire Code requirements. During operation of the project building design features would be incorporated that comply with the LAMC fire safety requirements including but not limited to automatic sprinkler systems, rooftop access, fire-resistant building materials, emergency, and fire safety signage on all floors. In addition Mitigation Measures J-3 through J-5 are proposed to further ensure that such impacts associated with fire protection would remain less than significant.

The comment claims the Project will have significant impacts but based on evidence shown in the Draft EIR there is a less than significant impact on police and fire services. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-41**

The 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. It also need [sic] 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.

**Response to Comment No. 11-41**

As set forth in Comment and Response to Comment 6-3-through-6-8, the necessary information to evaluate potential impacts associated with fire protection has already been included in Appendix J, *Water System Study*, of the Draft EIR and in Sections IV.L.1, Utilities—Water Supply, and IV.J.2, Public Services—Fire Protection, of the Draft EIR. These sections include a description of proposed infrastructure improvements, an overview of fire protection services to the project site, fire flows, response distances and a discussion of emergency access to the project site. As indicated by these sections, based on initial coordination with LAFD and LADWP, adequate fire protection services and infrastructure would be available to accommodate the project.

**Comment No. 11-42**

The final EIR should also analyze police services and crime rates in the area, and the impact of this project on these rates. 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.

**Response to Comment No. 11-42**

The necessary information required to evaluate potential impacts on police protection services is included in Section IV.J.1, Public Services—Police Protection, of the Draft EIR. This section includes a discussion of police protection services servicing the

project site, including response times, crime data, the number of officers service the project vicinity and the effect of the project on current staffing. As indicated therein, the proposed project would include Project Design Features that would provide for on-site security personnel, who would patrol parking areas, outdoor courtyard areas, residential lobbies, and entrances/exits of the commercial uses. Additionally, the proposed project would include surveillance cameras, appropriate lighting, and gated access for the parking facility. The project would also have a keycard access system with keycard readers placed in all resident only entrances and exits. In addition, as set forth in Section IV.J-1, Public Services—Police Protection, of the Draft EIR, mitigation measures for the project include consultation with LAPD regarding the design of the project and presentation of a diagram of the property to LAPD. Implementation of these mitigation measures would ensure the project impact on police protection would be less than significant. The Draft EIR was provided to the LAPD for their expert review. The LAPD did not indicate that the CEQA impact analysis to police services was inadequate or that the Draft EIR’s conclusions were incorrect.

#### **Comment No. 11-43**

#### XIV. IMPACT ON ENERGY AND UTILITIES

The mitigation Measures L-1 through L-5, [sic] are inadequate and do not reduce the energy and utility impacts to insignificance, as is claimed in the draft EIR.

The Applicant offers 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.

#### **Response to Comment No. 11-43**

The comment offers an opinion without supporting evidence the mitigation measures are in adequate and that the conclusion of the Draft EIR is incorrect. Substantial evidence supports the conclusion of the Draft EIR. Please refer to Response to Comment No. 11-3 regarding the inclusion of mitigation measures for the proposed project. Sukow Engineering prepared an expert analysis of the projected capacity of the wastewater system and the potential impacts of the project upon the wastewater infrastructure. (Draft EIR page IV.L-61 & Appendix J.) This analysis is based on the City of Los Angeles Integrated Resources Plan, Facilities Plan. Consequently, as discussed in detail in Section IV.L.2, Utilities—Wastewater, of the Draft EIR, substantial evidence shows that the project would not result in significant impacts associated with wastewater infrastructure capacity. Thus, no mitigation measures are required.

**Comment No. 11-44**

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. Show specifically how many cubic yards of soil will be trucked to landfills, and how much solid waste will be exported, and to which sites?

**Response to Comment No. 11-44**

As discussed in Section IV.L.3, Utilities—Solid Waste, of the Draft EIR, the proposed project would result in the export of approximately 165,000 cubic yards of soil, the demolition of 1,040 square feet of residential uses, and the construction of 656,734 square feet of residential uses and approximately 55,000 square feet of nonresidential uses.<sup>22</sup> Based on these quantities, construction of the proposed project is estimated to generate 173,250 tons of soil, 60 tons of demolition debris, and 1,545 tons of construction debris for a combined total of 174,855 tons of C&D waste. The project's total solid waste generation during construction would represent approximately 0.34 percent of the estimated remaining capacity (50.800 million tons) at the County's unclassified landfills open to the City of Los Angeles. In addition, unclassified landfills do not face capacity issues. Furthermore, project design features would be included to reduce the amount of solid waste generated during construction of the project. Specifically, during construction, the project would divert at least 75 percent of construction and demolition debris from project construction from landfills and would utilize building materials with 20 percent recycled-content. Furthermore, Mitigation Measures L-6 and L-7 are included to ensure impacts during construction are less than significant.

As discussed in Section IV.L.3, Utilities—Solid Waste, of the Draft EIR, the project's total solid waste generation during operation of 1,410 tons would represent an approximate 0.04 percent increase in the City's yearly Class III solid waste disposal quantity (based on 2008 quantities), and represents approximately 0.001 percent of the estimated remaining capacity (123.17 million tons) at the County's Class III landfills open to the City of Los Angeles. Further, the project's solid waste generation of 1,410 tons would constitute less than 0.001 percent of the estimated remaining capacity of Class III landfills open to the City

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<sup>22</sup> *The reduction of residential units from 500 to 399 units proposed by the Applicant in response to public comments received regarding the Draft EIR as well as the reduction in the proposed project's neighborhood-serving commercial uses from 55,000 square feet to 52,000 square feet would reduce the amount of solid waste generated by project construction.*

of Los Angeles for the year 2011 (156.9 million tons). In addition, as discussed previously, the ColWMP 2007 Annual Report concludes that the County would be able to provide for its disposal needs through 2022 with the use of and expansion of in-County facilities, increased use of out of County landfills (e.g., Mesquite Regional Landfill) up to 15,000 tpd, as well as use of new conversion technologies for up to 10,000 tpd.<sup>23</sup> Thus, potential impacts associated Class III land use capacity would be less than significant.

#### **Comment No. 11-45**

Show haul routes and the time of day when city streets will be used for this purpose. Describe how much electrical energy will be needed to operate the project, once it is in operation. Will backup energy sources be used?

#### **Response to Comment No. 11-45**

As discussed in Section IV.K, Transportation and Circulation of the Draft EIR, it is anticipated that the haul route for site excavation and soil movement work would be to the east via the US-101 Freeway, which has an eastbound on-ramp at Sepulveda Boulevard proximate to the site. Return trucks would travel the same route but would use the westbound off-ramp at Sepulveda Boulevard. Trucks delivering materials for the construction of the parking structure, as well as trucks providing building materials for the construction of the residential and retail uses, would use the US-101 and I-405 Freeways for primary access and would directly access the site via the Camarillo Street/Sepulveda Boulevard intersection. In accordance with Mitigation Measure K-5, heavy-duty construction trucks would arrive at the site no earlier than 7:00 A.M. and depart no later than 3:30 P.M.

The project would generate a net increase of approximately 5,150 megawatt hours of electricity and approximately 39.64 million cubic feet of natural gas per year. It is expected that this demand for electricity and natural gas would be accommodated by LADWP and The Gas Company. In addition, operation of the project would occur in accordance with Title 24, Part 6 of the California Code of Regulations, which establishes conservation practices that would limit the amount of energy consumed by the project. In addition, as the project would be designed to achieve the Leadership in Energy and Environmental Design (LEED) Silver rating, several project design features would be included that would improve water and energy efficiency. This comment is noted for the

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<sup>23</sup> *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2007 Annual Report, May 2009.*

administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-46**

Describe the impacts 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.

**Response to Comment No. 11-46**

Appendix J, Sewer Study, and Section IV.L.2, Utilities—Wastewater, of the Draft EIR, includes the estimated amount of wastewater anticipated to be generated by the project. The project was submitted to the City of Los Angeles Bureau of Engineering for a sewer availability analysis and the results confirmed that the project would not result in a significant impact on any of the major sewer lines or treatment plant facilities. Sewer infrastructure lines are set forth on Figure IV.L-4. Wastewater treatment destinations and capacity are set forth on Draft EIR pages IV.L-66 through IV.L-67. No existing sewers would be required to be upsized as a result of the project. Affected streets would include Sepulveda Boulevard for the construction of two to four six inch sewer lateral connections. This comment has been noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-47**

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. The 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 the steps, and resultant conclusions with regard to energy, sewage and utility impacts.

**Response to Comment No. 11-47**

Compliance with applicable ordinances and standards is required and anticipated, and are not set forth as mitigation measures. As discussed in Section IV.L.2, Utilities—

Wastewater, and Appendix J, Sewer Study, of the Draft EIR, the existing wastewater system has adequate capacity to accommodate the project. Thus, no mitigation measure have been proposed or required.

**Comment No. 11-48**

**XV. AESTHETIC IMPACTS**

The Applicant offer [sic] 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.

**Response to Comment No. 11-48**

Please refer to Response to Comment No. 11-29 regarding the analysis within Section IV.A, Aesthetics, of the Draft EIR, that demonstrates that impacts associated with light and glare and shading would be less than significant. Please refer to Response to Comment No. 9-3 regarding the visual quality impacts of the project.

As discussed in Section IV.A, Aesthetics, of the Draft EIR, views of scenic resources are generally not available from the project site. Specifically, due to the site’s relatively flat topography, its adjacency to the elevated I-405 and US-101 interchange, and the presence of existing low- to mid-rise buildings along Sepulveda Boulevard and Camarillo Street, the project site does not offer any valued views or occupy a substantial portion of any scenic viewshed. Additionally, most long-range views in the surrounding project area are obstructed or at least partially obstructed by existing development and/or the surrounding freeway infrastructure. Views are thus limited to the immediate urban built environment. Furthermore, private views are not protected from intrusion under the City’s CEQA thresholds of significance. Although the project will introduce new buildings into some private views, this is not a significant impact according CEQA. Nor is the subjective opinion that the proposed project is aesthetically offensive constitute a significant impact according to CEQA. Therefore, view impacts were determined to be less than significant and no mitigation measures are required.

**Comment No. 11-49**

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.

**Response to Comment No. 11-49**

Please refer to Response to Comment No. 9-3 regarding the scale of the project in relation to surrounding development. Ambience and habitability are not factors that must be considered under the applicable thresholds of significance for evaluating potentially significant aesthetic impacts. However, to the extent the comment's reference to ambience and habitability are interpreted to mean Aesthetic/Visual Quality thresholds of significance set forth on page IV.A-14 of the Draft EIR, please see the Response to Comment Nos. 11-29 and 9-4.

**Comment No. 11-50**

Explain the impacts this project will have on the other business establishments, access to businesses and the present viewscape. Explain the impact it will impact will it have on the marketability of homes nearby?

**Response to Comment No. 11-50**

The project includes residential uses with approximately 55,000 square feet of neighborhood-serving commercial space.<sup>24</sup> The comment's reference to impacts to surrounding businesses appears to request an economic or social impact analysis. Economic or social impacts are generally not considered environmental impacts according to CEQA. Only physical changes are considered environmental impacts. These uses would not have a significant impact on other business establishment in the project vicinity. Rather these uses would support and complement existing businesses within the project vicinity. In addition, operation of the project would not impact pedestrian or vehicular access to existing businesses. Refer to Response to Comment No. 11-48 regarding view impacts.

The environmental impact issue raised by the comment's reference to "access to businesses" is unclear.

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<sup>24</sup> *In order to accommodate an expanded publicly accessible plaza, the proposed project's 55,000 square feet of neighborhood-serving commercial uses has been reduced to 52,000 square feet.*

**Comment No. 11-51**

## XVI. GROWTH INDUCING IMPACTS

The 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. The final EIR must include mitigation measures to reduce the impacts to insignificance.

**Response to Comment No. 11-51**

The comment expresses its disagreement with the conclusions of the Draft EIR but provides no facts or evidence showing that impacts to population, housing, and employment would be significant. Please refer to Response to Comment No. 11-31 regarding the less than significant impacts associated with population, housing and employment. As these impacts would be less than significant, no mitigation measures would be required.

**Comment No. 11-52**

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. Describe the cumulative impacts of growth in the region? [sic] 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.” 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.

**Response to Comment No. 11-52**

In accordance with CEQA, a detailed discussion of potential growth inducing impacts of the project is provided in Section VI, Other Environmental Considerations, of the Draft EIR under subheading D, Growth-Inducing Impacts on page VI-5. As indicated therein, no growth-inducing impacts beyond the direct effects of additional housing and employment opportunities would occur as a result of the project. In addition, cumulative impacts associated with development of the project and other related projects are addressed within each of the environmental impact analysis sections within Chapter IV of the Draft EIR.

**Comment No. 11-53**

Since the project includes requested variances from the Ventura Boulevard Specific Plan specifically in the areas of density and height, the EIR must address the impacts of applying similar variances to current and future projects throughout the area. Should these variances be granted they could lead to precedent setting increases in density, height, traffic, air quality and service requirements whose impacts must be included and mitigated.

**Response to Comment No. 11-53**

The project does not include variances from the Specific Plan. Rather, the project includes several exceptions to the Specific Plan. As discussed in Section IV.G, Land Use, of the Draft EIR, such exceptions from the Specific Plan are granted by the City or Area Planning Commission (APC) for a given project only if specific findings are made.

Granting Specific Plan exceptions does not create a binding precedent upon the Lead Agency to grant similar requests for exceptions in the future. CEQA does not require that cumulative impact analysis engage in speculation. It would be speculative to assume that a future project will request and obtain similar requests as the proposed project.

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-54****XVII. ADDITIONAL ENVIRONMENTAL MITIGATIONS ARE NEEDED**

In the preparation of the final EIR, 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 concrete 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.

**Response to Comment No. 11-54**

Several mitigation measures, as described on pages IV.K-45 and IV.K-46 of the Draft EIR, are proposed to reduce the short-term construction impacts, as well as improve public safety, vehicular access and traffic in the project vicinity. A Construction Management Plan (CMP) will be prepared and approved by the City, which will provide information about coordination of construction activities, potential delays, roadway or sidewalk closure, detours, alerts regarding unanticipated roadway conditions or delays, and access routes. The CMP will also have the name and phone number of a construction manager who can be contacted 24 hours a day. Flaggers will be provided to minimize traffic flow impacts, and to ensure safe movement into and out of the project site. Construction vehicles will not be permitted to queue where they would interfere with traffic movement or block access to adjacent business or residences. As noted on page IV.K-25 of the Draft EIR, it is anticipated that on-street parking along Camarillo Street west of Sepulveda Boulevard would be removed to provide additional room for construction activities. However, through traffic lanes near the site would remain open.

**Comment No. 11-55**

3. No motion picture theaters, night clubs, 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.

**Response to Comment No. 11-55**

Motion picture theater and night clubs are not proposed as part of the project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-56**

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

**Response to Comment No. 11-56**

As discussed in Section IV.C, Biological Resources, of the Draft EIR, any street trees removed would be replaced in accordance with the City's Street Tree Regulations. In addition, all off-site roadways affected by construction activities would be immediately repaired in accordance with City requirements. Adjacent roadways would not fall into a

state of disrepair as a result of the project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-57**

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

**Response to Comment No. 11-57**

It may be necessary to use Sepulveda Boulevard for the maneuvering of trucks, cranes, and construction vehicles. However, no construction vehicles, equipment, or materials will block Sepulveda Boulevard. All construction activities will be conducted on-site, to the extent feasible.

**Comment No. 11-58**

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

**Response to Comment No. 11-58**

As indicated on page IV.K-25 of the Draft EIR, it is anticipated that construction workers would park off-site in nearby facilities until completion of the project parking structure. If nearby parking is not available, workers would park at more distant facilities and be transported to and from the project site. For the completed project, code parking at a ratio of four spaces per 1,000 square feet will be provided for the retail uses. As this ratio accounts for the parking demand generated by both patrons and employees, sufficient employee parking is expected to be provided. In addition, the project TDM Plan is expected to result in some employees using alternative transportation modes, which would result in lessened employee parking demand.

**Comment No. 11-59**

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.

**Response to Comment No. 11-59**

During construction of the project, areas adjacent to the project site would be kept free of trash from construction in accordance with City requirements.

**Comment No. 11-60**

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.

**Response to Comment No. 11-60**

As discussed in Section IV.J.1, Public Services—Police Protection, of the Draft EIR, project impacts on police protection during both construction and operation of the project would be less than significant. The project site is not located immediately adjacent to multi-family or single-family residential uses. The nearest residential lawn to the project is approximately 105 feet from the project site across Sepulveda Boulevard. Additionally the project site is large enough to accommodate construction worker parking on site. Thus, the activities listed in this comment are not expected to result from the proposed project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

The comment speculates that activities may occur that would not only be offensive to local residents, but would also violate existing laws. CEQA does not require that a Draft EIR assume the future occurrence of illegal activity. On the contrary, it is reasonable to foresee compliance with existing laws. Nevertheless, measures are in place to assure that appropriate construction worker parking and behavior will be monitored and enforced.

**Comment No. 11-61**

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.

**Response to Comment No. 11-61**

As set forth in Mitigation Measure K-3, a construction management plan will be prepared by the Applicant and approved by LADOT. The construction management plan will include the name and telephone number of a construction manager who can be reached 24-hours a day. This number will also be posted on-site.

**Comment No. 11-62**

9. Air conditioning equipment shall be enclosed and muffled. No audible sounds shall be heard beyond the property line from this type of equipment.

**Response to Comment No. 11-62**

As discussed in Section IV.H, Noise, of the Draft EIR, the project would implement Mitigation Measure H-6, which would require that the Applicant retain services of an acoustical consulting engineer to provide the City with an acoustical report demonstrating that the project mechanical design meets the City's noise ordinance.

**Comment No. 11-63**

Restaurant exhaust vents and fans shall be so constructed as to totally absorb grease and odors so that neighboring homes are not impacted.

**Response to Comment No. 11-63**

Potential odor impacts were addressed in Section IV.B, Air Quality, of the Draft EIR. The analysis of odor impacts were evaluated by conducting a screening-level analysis followed by a more detailed analysis (i.e., dispersion modeling) as necessary. The screening-level analysis consisted of reviewing the proposed project's site plan and project description to identify any new or modified sources that may emit substantial amounts of odiferous emissions. Although the proposed project does include restaurant uses, the SCAQMD does not include restaurant uses as source with a high potential to generate odor impacts.<sup>25</sup> Regardless, restaurants with charbroilers are required to comply with all applicable SCAQMD rules and regulations. Specifically, a charbroiler would be required to comply with SCAQMD Rule 1138 (Restaurant Operations), which would reduce odiferous emissions. In addition, the proposed project would comply with SCAQMD Rule 402 (Nuisance), which would ensure that restaurant operations would result in a less than significant odor impact.

**Comment No. 11-64**

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.

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<sup>25</sup> According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.

**Response to Comment No. 11-64**

All loading and unloading activities shall be located on-site and away from public view. Due to the residential characteristics of the project such activities will occur at reasonable hours so that it does not create a nuisance to residents across Sepulveda Boulevard or above the commercial area of the project.

**Comment No. 11-65**

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.

**Response to Comment No. 11-65**

The comment requests an unspecified amount be paid to a Neighborhood Protection Ordinance with unspecified protective measures. CEQA prohibits imposing a fee as mitigation unless it is directly related to a program of improvements and is narrowly tailored to an identified impact of the project. Without having more information from the Commentor regarding these details of Neighborhood Protection Ordinance, no detailed response can be provided.

**Comment No. 11-66****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) 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. The Applicant 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" [sic] whenever it is feasible to do so." [sic] This substantive duty is enforced through the findings requirements of Seq. 21081 and Guidelines Sec.15091. 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*, 134 Cal.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.]

#### **Response to Comment No. 11-66**

The Commentor primarily restates the Commentor’s understanding of the legal requirements applicable to approving the project. The comment does not provide evidence of how or whether the alternatives analysis in the Draft EIR may be inadequate. The comment implies that alternative sites should be considered but does not identify any alternative sites or provide facts relevant to whether the EIR properly considered alternative sites.

The Commentor’s perspective on the legal requirements of CEQA and the findings CEQA requires will be provided to the decision-maker for consideration. Public Resources Code Section 21081 cited by the Commentor regards the findings that must be made by a public agency prior to approving a project for which an EIR has identified significant impacts. Determinations of feasibility or infeasibility of alternatives are made by the decision-maker. And because substantial evidence must support these determinations, information regarding feasibility may be included in the EIR or elsewhere in the administrative record. The decision-maker’s findings in this regard are made at the time it determines to approve a project.

To be legally sufficient, the consideration of project alternatives in an EIR must permit informed agency decision-making and informed public participation. The analysis of alternatives is evaluated against a rule of reason. Guidelines §15126.6, subds. (a), (f). 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.

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

Nevertheless, it is incorrect that a feasible environmentally superior alternative must be adopted by the lead agency. On the contrary, an otherwise feasible alternative may be rejected if it is contrary to the fundamental goal and purpose of the project. The lead agency may determine that the No Project alternative is contrary to the fundamental goal and purpose of the project to develop a site long left underdeveloped.

The analysis of alternatives within the Draft EIR has been prepared in accordance with Public Resources Code Section 21002.1(a) and CEQA Guidelines Section 15126.6. Specifically, Section V, Alternatives of the Draft EIR includes four alternatives to the proposed project, including a no project alternative. These alternatives represent a range of reasonable alternatives that focus on reducing the significant impacts of the project. In addition, the alternatives analysis also includes a discussion of the environmentally superior alternative as well as a discussion of alternatives that were considered and rejected as infeasible. The analysis concludes that the All Residential Use would be the environmentally superior alternative, although it would not meet many of the project objectives. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-67****XIX. REQUIREMENTS REGARDING PUBLIC NOTICE AND INPUT**

The draft EIR should be sent to all organizations and individuals who have previously requested such notice and shall also be given by at least one of the following procedures (Guidelines, Sec. 15087): “(1) Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed project; 2) Posting of notice by the public agency on and off the site in the area where the project is to be located; 3) Direct mailing to owners of contiguous property owners to the parcel or parcels on which the project is located ... The alternatives for providing notice specified in subsection (a) shall not preclude a public agency from providing additional notice by other means.”

We ask that the Applicant be required to notify a broader range of affected property owners, and present multiple public workshops to explain the project’s impacts to the public and to provide for public input.

We ask that the Applicant provide notice by using all three of the above, in notifying the public, regarding this project. We also request that the City extend the period for public review to a full 90 days, as permitted under the Guidelines, Sec. 15087 (c). This will encourage greater public participation, and is strongly advised by CEQA. We also ask that you hold public hearings on this project. Guidelines, Sec. 15087 (g) states: Public hearings may be conducted on the environmental documents, either in separate proceedings or in conjunction with other proceedings of the public agency. Public hearings are encouraged, but not required as an element of the CEQA process.

These requirements must be interpreted broadly, consistent with the principle that “CEQA must be interpreted in such manner as to afford the fullest possible protection to the environment within there [sic] reasonable scope of the statutory language,” (Friends of Mammoth v. Board of Supervisors, 8 Cal.3d 247, 259) CEQA Sec. 21153, also requires the Lead Agency to consult prior to completion of an environmental impact report with “any city or county which borders on a city or county within which the project is located...” Please see that this is done, in order to assure congruity of the project with neighboring communities. In light of these statutory requirements, we ask that the Applicant make every possible effort to involve the public, community groups and interested citizens in this phase of the CEQA process, and in evaluating the final EIR you will be preparing.

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.

### **Response to Comment No. 11-67**

The project has exceeded the requirements of CEQA with regard to review and notification of the Draft EIR. As one of the initial steps in the CEQA process, the City circulated a Notice of Preparation (NOP) for the proposed project on November 12, 2004, for a 30-day comment period. In addition, a public scoping meeting was held on November 30, 2004, to receive written and verbal comments on the scope and content of the Draft EIR. Once the Draft EIR was completed, a Notice of Completion of the Draft EIR was sent to individuals and businesses within a 500-radius of the project site, the State Clearinghouse, a list of public agencies, entities that commented on the NOP and attended the public scoping meeting and individuals that previously requested notification regarding the project. In addition, the Notice of Availability was also published in the *Los Angeles Times* and posted at the County Clerk. The Draft EIR was also posted on the City's website and made available for review at City Hall and five public libraries near the project site. The public comment period for the Draft EIR was also extended well beyond the 45-day review requirement to 82 days. In addition, the Applicant has discussed the project with the community at numerous meetings. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

### **Comment No. 11-68**

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

We ask that the lead agency prepare a final EIR that interprets CEQA in a manner that affords the fullest possible protection for the environment within the reasonable scope of the statutory language. (*Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d. 247) 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 draft 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 [sic] 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.

**Response to Comment No. 11-68**

This Final EIR has been prepared in accordance with CEQA requirements. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 11-69**

XXI. CONCLUSION

We appreciate your allowing us the opportunity to comment on the draft EIR. We look forward to receiving a detailed and comprehensive final EIR, fully in compliance with CEQA, State and local Guidelines.

**Response to Comment No. 11-69**

The EIR is comprehensive and has been prepared in accordance with CEQA requirements. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 12**

Gerald A. Silver, President  
Homeowners of Encino  
gsilver4@sbcglobal.net

**Comment No. 12-1**

In a discussion I recently had with Louis Krokover, ENC President, I was told that you -- the Planning Dept. -- had received only two letters objecting to the proposed Il Villaggio Toscano, 500 unit apartment project at Sepulveda Blvd. and Camarillo in Sherman Oaks.

Please refer to the official correspondence file managed by Hadar Plafkin. That file should contain an extensive number of emails and letters vociferously objecting to this project. There has been an extensive public outcry in opposition to this project over-sized project. There is little or no public support for this project, and certainly no community support for granting exceptions to the Ventura Blvd. Specific Plan.

I would be happy to forward copies of this correspondence to you. Do you want to be cc'd on all future correspondence on this matter? If so, I would be happy to place you in the receipt loop.

Please be advised that the Encino Property Owners Assn., Homeowners of Encino and the Sherman Oaks Homeowners Assn. all have had extensive dialog with the public on this matter, and virtually everyone has raised strong objections to the City granting any exceptions to the Ventura Blvd. Specific Plan for this project.

**Response to Comment No. 12-1**

This comment expresses opposition to the proposed project but provides no comment as to the adequacy of the environmental impact analysis in the Draft EIR. All of the written comments letters regarding the EIR for the project that have been received by Planning Department during the public comment period have been included in this Final EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 12-2**

On January 26, 2011, the Encino NC approved the following motion:

“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 for the Il Villaggio Toscano, 8-story, 500 unit apartment projects at 4827 Sepulveda Blvd. 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.”

**Response to Comment No. 12-2**

This comment expresses opposition to the project and opinion that the Ventura/Cahuenga Specific Plan forbids the project. Although the comment does not identify an environmental impact or issue related to adequacy of the Draft EIR, the comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 12-3**

To give you a flavor for the significant public objections to this project, I will send you, under separate email, several previous Encino Updates that include public comments in objection. If you desire, I can forward the original emails to you for review.

Please don't assume that there is little or no objection to this project. Questions will soon be asked by the public, “How was this allowed to happened?” and “Who is responsible?” The Planning Dept. needs to be on right side of this issue.

Thank you, and please feel free to call me to discuss this matter.

**Response to Comment No. 12-3**

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 13**

**[Request for Anonymity by Commentor]**

**Comment No. 13-1**

We would like to express our strong opposition to the Toscano Project in the present form . [sic] As it is obvious, [sic] even now we have a serious saturation/parking/ street traffic/noise problems . [sic]

**Response to Comment No. 13-1**

Please refer to Section IV.K, Transportation and Circulation, of the Draft EIR, for an analysis of potential impacts associated with traffic and parking and to Section IV.H, Noise, of the Draft EIR, for an analysis of potential impacts associated with noise. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 13-2**

The way this project is presently presented - it is clear that our problems would grow exponentially simply to benefit this project's financial goals. This would be very unfair to our community and would ruin our remaining peace of living here ( it [sic] is getting worse and noisier and saturated as it is now..) [sic]

Please express our deep concern to our councilman and other officials concerned as above.

We vote our councilmen and other officials to represent us and our rightful basic interests.

We are not unreasonably opposing any reasonable request but when there is no consideration to our peace of life, to our homes which are our life's savings , [sic] then our officials should do everything in their power to help us to stop any project which would ruin the quality of our lives eventually.

We discussed this issue with a good number of neighbors and friends here, - as well and we represent their opinions as well ( some [sic] of them will not email etc) [sic]

We follow up the progress of this project and the actions ( or [sic] lack of them) - from our representing officials starting with our councilman.

Please forward our concerns to whom it may concern - and try to make sure that our life here remains liveable [sic] and with emphasis on our life and not strictly on any profit factor for any project.

We have no objection to any undertaking as such - - but it always should have our peace and basic interests in their view. At this project this does not seem to be the case at all - in our opinion.

We thank our councilman and others for the help we expect here.

We live [sic] in our house for 17 years now and it is our only and most major investment , [sic] and the remaining “ island” to ,live [sic] peacefully. Please help us to maintain this . [sic]

Ps: [sic] Please do not use our address for any marketing or mailing list or otherwise - we strictly provided the address to identify ourselves strictly for the purpose to express our opinion above. Only correspondence from United Neighbors should be addressed to us to follow up the progress of our protests etc.. [sic] However if possible - any email update is even better, hence to save paper etc and keep our environment cleaner and healthier,, [sic] After all the purpose of our email above is the same in essence .. [sic]

**Response to Comment No. 13-2**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 14**

Michael Ball  
4761 Halbrent Avenue  
Sherman Oaks, CA 91403  
michael54@aol.com

**Comment No. 14-1**

As a nearby resident of this project (1/2 block directly east of Sepulveda on Camarillo), I **strongly object to both the height and density of this project.**

**Response to Comment No. 14-1**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. As discussed in Section II, Corrections and Additions, to this Final EIR, the Applicant has proposed to reduce the density and height of the project. In addition, as discussed in detail in Sections IV.A, Aesthetics, and IV.G, Land Use, of the Draft EIR, the project would not result in any significant impacts associated with building heights or density. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 14-2**

I do not object to this type of project, as I think mixed use of residential and retail will serve the community well,

**Response to Comment No. 14-2**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 14-3**

but height will be imposing to the street (much taller than the adjacent Grand Apartments) and the density will make the traffic even worse than it is presently. I think that this project **should comply** with the Ventura-Cahuenga Boulevard Corridor Specific Plan, including a FAR of 1.5 to 1.

**Response to Comment No. 14-3**

Please refer to Response to Comment No. 9-4 for a discussion of the proposed project's height and scale. This comment providing the Commentor's general perception of traffic conditions is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 15**

Joann Benjamin  
4736 Halbrent Avenue  
Sherman Oaks, CA 91403  
joannbenjamin@vdn.com

**Comment No. 15-1**

All I ask is that current zoning is maintained for the proposed project at Sepulveda and the 101, Il Vilaggio [sic]. As I sat in traffic yesterday morning, taking 15 minutes to get from my home on Halbrent/Camarillo to Valley Vista and Sepulveda, approximately .2 miles, there is just way too much traffic in that area on a very consistent basis.

**Response to Comment No. 15-1**

The observation of existing traffic congestion set forth in the comment is consistent with the project traffic study. As noted in Response to Comment No, 10-3, the proposed project generates significantly less trips than many other uses that are permitted on the site. Development of the project site at even greater reduced densities will contribute traffic trips to the existing congestion. Rather than allow existing traffic congestion to forestall any development, the project has been designed below the permitted densities and a traffic mitigation program has been proposed to avoid most impacts and substantially reduce the severity of the remaining significant impacts. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 15-2**

Development is fine, over development with buildings exceeding the current height variances is not.

**Response to Comment No. 15-2**

Please refer to Response to Comment No. 9-4 and Response to Comment No. 7-4 regarding proposed building heights. The project is requesting a Specific Plan Exception for building heights, not a variance.

**Comment No. 15-3**

Personally, I don't see why we would need a large grocery (if Pavillions [sic] and Ralphs are all going to enlarge) nor a lot of new apartments (when there are for lease and for rent signs all over the neighborhood) and I don't see that the developers are really looking out

for the environment (their construction plans are not incorporating enough environmentally friendly ideas).

### **Response to Comment No. 15-3**

As discussed in Section II, Project Description, of the Draft EIR, the project does not include a large grocery store. Rather, the project includes a neighborhood specialty grocery store, which would comprise up to approximately 45,000 of the 55,000 square feet of the neighborhood-serving commercial space and would serve as the project's anchor tenant.<sup>26</sup> This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

### **Comment No. 15-4**

They claim that walking/bicycle friendly development would be good for the neighborhood, but I see nothing in their plans to encourage bicycle lanes or access on the neighboring roads. It is currently not safe to ride a bicycle on Sepulveda and would be less so with increased traffic flow.

### **Response to Comment No. 15-4**

The Commentor's opinions regarding the project uses and construction plans are noted for the administrative record and will be forwarded to the decision-makers for review and consideration. The project's efforts to encourage and enhance pedestrian/bicycle activity are described on pages IV.K-43 and IV.K-44. The project will comply with the principles of the City of Los Angeles' Walkability Checklist, which includes the safe design of pedestrian crossings. The project also will not introduce any hazardous design features. Thus, the project would not result in an increase in pedestrian/vehicle or bicycle/vehicle conflicts and impacts relative to pedestrian/bicycle safety would be less than significant.

In addition to various local roadway improvements proposed as part of the project, the following mitigation measure is provided on page IV.K-49 of the Draft EIR to ensure bicycle access to the project site:

**Mitigation Measure K-16:** Bicycle rack parking that is secure, convenient, and easily accessible, shall be added on-site and within the public right of way with the approval of Bureau of Street Services, Department of

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<sup>26</sup> *In order to accommodate an expanded publicly accessible plaza, the proposed project's 55,000 square feet of neighborhood-serving commercial uses has been reduced to 52,000 square feet.*

Public Works through their A Permit process. The copy of the A Permit will be submitted to Department of Building and Safety prior to approval of Certificate of Occupancy. Bicycle parking spaces shall be provided at the rate of two percent of the number of automobile parking spaces required for non-residential uses.

**Comment No. 15-5**

Please review these plans. The developers have not thought this one out particularly well.

**Response to Comment No. 15-5**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 16**

Tom Boulet  
4623 Burnet Avenue  
tboulet123@aol.com

**Comment No. 16-1**

I am writing to express my concerns about the Il Villaggio [sic] Toscano development proposed for the corner of Sepulveda and Camarillo in Sherman Oaks. I understand the current proposal requires waivers of the Ventura Blvd Specific Plan, around height, density and other aspects.

As a resident of the neighborhood adjacent to the project, I strongly object to the developer's request to build any project that requires alteration of the Ventura Blvd Specific Plan. The Plan allows for development and there is no reason why this developer should be afforded special dispensation to ignore the height, street set-back, or other aspects of the Plan.

**Response to Comment No. 16-1**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. Please refer to Response to Comment Nos. 7-1 and 7-3. As discussed in Section II, Corrections and Additions, of this Final EIR, the Applicant proposes to reduce the density and height of the project and to provide the 18-inch setback set forth in the Specific Plan. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 16-2**

We already have a large number of vehicles driving through our neighborhood on a daily basis to cut through and around the congestion of the Sepulveda/Ventura intersection and to get around other challenges. The proposed project will only worsen matters.

**Response to Comment No. 16-2**

As shown in Table IV.K-4, the existing Levels of Service (LOS) at the intersection of Ventura Boulevard/Sepulveda Boulevard LOS D during the A.M. peak hour and LOS E during the P.M. peak hour. LOS E is indicative of severe traffic congestion. In the future, as shown in Table IV.K-7, this intersection is forecast to be operating at LOS F during both peak hours, without and with the Project. LOS F is indicative of forced flow traffic

conditions, with stoppages of long duration. Some cut-through traffic may use residential streets near the commenter's address to avoid this intersection, as expressed by the commenter. Figures 4(a) and 4(b) of Appendix H-2 show the estimated Project trip percentages at study intersections involving La Maida Avenue, Camarillo Street and Moorpark Street, residential streets in the vicinity of the commenter's address. The Project trip percentages estimated along these streets, which were approved by the Los Angeles Department of Transportation, are negligible. Little or no Project traffic was estimated using these residential streets in this neighborhood. It is similarly estimated that there would be minimal Project traffic on other residential streets in this neighborhood. Therefore, while cut-through traffic may traverse through this neighborhood to avoid the intersection of Ventura Boulevard/Sepulveda Boulevard, the impact of Project traffic on residential streets within this neighborhood would be expected to be less than significant.

**Comment No. 16-3**

It is my hope that our City Council stands up for the voters and residents of Sherman Oaks and denies any request for a waiver from the Plan, instead going back to the developer and having him reduce the size of the project to fit within the Plan guidelines. And, if he does not wish to comply with the Plan, then I suggest he leave the space vacant.

Please feel free to contact me if you would like to discuss or have questions.

**Response to Comment No. 16-3**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. As discussed in Section II, Corrections and Additions of this Final EIR, the Applicant proposes to reduce the density and height of the project and to provide the 18-inch setback set forth in the Specific Plan. Nonetheless, the project will continue to require a few Specific Plan exceptions. As discussed in Section IV.G, Land Use, of the Draft EIR, with approval of the proposed exceptions, the project would be consistent with the overall intent of the Specific Plan. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 17**

C. Robert Brooks  
4737 Halbrent Avenue  
Sherman Oaks, CA 91403-2421

**Comment No. 17-1**

I would like to have my disapproval of the above-referenced project considered by the City Planning Department.

I live around the corner from this proposed development.

**Response to Comment No. 17-1**

This comment expresses opposition to the proposed project but provides no comment as to the adequacy of the environmental impact analysis in the Draft EIR. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 17-2**

During normal morning commute, traveling on Sepulveda Blvd., from Camarillo Street to Ventura Blvd. takes fifteen minutes. That is a distance of only two blocks!

It is my understanding that the intersection of Sepulveda and Ventura Boulevards is the second busiest in the entire city.

How could any rationale [sic] person who cares for the neighborhood possibly consider adding hundreds of more daily commuters to this already overcrowded traffic disaster?

Please do not let this overly ambitious project proceed.

**Response to Comment No. 17-2**

The comments and opinions are noted for the administrative record and will be forwarded to the decision-makers for review and consideration. The Commentor does not give the basis for his assertion that the intersection of Ventura Boulevard and Sepulveda Boulevard is the second busiest in the City of Los Angeles. For example, some intersections may experience high traffic volumes over a 24-hour period but only moderate volumes during peak hours. Other intersections may experience high volumes only during certain hours of the day and otherwise be much less busy. Table IV.K-4 of the Draft EIR

shows that for existing conditions, the intersection of Ventura Boulevard and Sepulveda Boulevard operates at Level of Service E in the P.M. peak hour, which is indicative of severe congestion.

**Comment Letter No. 18**

Eliot & Julie Cohen  
5021 Densmore Ave.  
Encino, CA 91436  
ececho@yahoo.com

**Comment No. 18-1**

This is a dream project for the developer and nightmare for everybody else.

This project is an insult to the well thought out zoning ordinances, the Ventura-Cahuenga Specific Plan, Good Environmental Practices, the scale of the buildings around it and common sense.

**Response to Comment No. 18-1**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. As discussed in detail in Section IV.G, Land Use, of the Draft EIR, with approval of the proposed land use actions, the project would meet the intent of the Specific Plan. As discussed in Section II, Corrections and Additions, of this Final EIR, the Applicant proposes to reduce the density and height of the project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 18-2**

It would create more traffic, by adding 1000's [sic] of extra car trips a day, along a vital North-South Artery, further making it much harder to access the 101 Freeway going east. During rush hour, it would clog Sherman Oak residential streets.

**Response to Comment No. 18-2**

Accessing the eastbound 101 Freeway from Sepulveda Boulevard would be expected to become more difficult in the future. Tables IV.K-4 and IV.K-7 of the Draft EIR indicate that the Levels of Service (LOS) at the intersection of the 101 Freeway Eastbound On-Ramp/Sepulveda Boulevard would worsen from LOS B to LOS C during the A.M. peak hour and from LOS C to LOS E during the P.M. peak hour, without and with the project. The Project impact at this intersection during the P.M. peak hour would be expected to be significant, as shown in Table IV.K-7. Mitigation Measure K-13, has been proposed, which would install a new traffic at this intersection, including with the ATSC/ATCS upgrade.

This measure would provide improved capacity and access at this intersection, and would mitigate the Project impact to a less than significant level.

Project traffic would not be expected to clog residential streets. Residential streets were included in the traffic analysis. For example, La Maida Avenue, Camarillo Street, Moorpark Street, Greenleaf Street, and Valley Vista Boulevard were analyzed as part of the study intersections of La Maida Avenue and Sepulveda Boulevard, Camarillo Street and Sepulveda Boulevard, Camarillo Street and Kester Avenue, Moorpark Street and Sepulveda Boulevard, 405 Freeway Northbound Ramps—Greenleaf Street and Sepulveda Boulevard, and Valley Vista Boulevard and Sepulveda Boulevard. Figures 4(a) and 4(b) of Appendix H-2 of the Draft EIR show the estimated project trip percentages at the study intersections and along the above named streets, which were approved by the Los Angeles Department of Transportation. As shown, it was estimated that little or no project traffic would be traversing through residential neighborhoods using the above streets. Therefore, the impact of project traffic on residential streets within those neighborhoods would be expected to be less than significant.

### **Comment No. 18-3**

It is unreasonable as the developer asks the City to secede 2 Streets with no compensation back to the adjoining Neighborhoods or the Cities [sic] finances.

### **Response to Comment No. 18-3**

The proposed street vacation involves the removal of a surface easement that granted access and utility service to uses that are no longer present or allowed on-site. The fee ownership of the land beneath the surface easement is owned in full by the applicant. The removal of this easement will eliminate the financial obligation and maintenance liabilities from the city's responsibility and promote a unified development. In its current condition, these streets within the project area have not been consistently maintain for decades and do not serve as any relevance to the existing circulation pattern of the community. This comment regarding compensation for street vacations does not raise environmental issues related to the EIR or CEQA. This comment is noted for the administrative record and will be forwarded to the decisionmakers for review and consideration.

### **Comment No. 18-4**

Should it be approved in it's [sic] present form would become the new poster project for bad mixed-use developments.

**Response to Comment No. 18-4**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 18-5**

As residents of the Valley for the last 10 years we are shocked by the continued over development and lack of attention to traffic, noise, density, quality of life issues, congestion. It is time for the City to just say no to unreasonable projects and to protect the neighborhoods from unwanted Urbanization.

**Response to Comment No. 18-5**

A detailed analysis of traffic, noise and land use is provided in the Draft EIR in Sections IV.K, Traffic; IV.H, Noise; and IV.G, Land Use, of the Draft EIR, respectively. Quality of life is not a specific issue that is evaluated under CEQA. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 19**

Leslie Dodson  
lesliedodson@gmail.com

**Comment No. 19-1**

The attached comments were drafted by me to address the proposed Il Villaggio Toscano project in Sherman Oaks (corner of Camarillo and Sepulveda).

I cannot make Thursday's Sherman Oaks Neighborhood Council Land Use Committee, but have provided these comments to Samantha Foley, a representative from the Il Villaggio Toscano Outreach Team. Samantha will be sharing my comments at the meeting.

Samantha also advised that I submit these comments to the City of Los Angeles to ensure they are taken into consideration during the formal approval process, and provided me with your contact information.

I thank you in advance for your consideration of these comments. I can be contacted using the information below if there are any questions.

**Response to Comment No. 19-1**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 20**

Gene Igdal  
igdal@sbcglobal.net

**Comment No. 20-1**

My name is, Gene Igdal, I am representing investors from Ukraine. We would like to present the ice skating rink project for the site on Sepulveda Blvd. and Camarillo St.

Please consider this project. We think it would benefit the community.

**Response to Comment No. 20-1**

The proposed project is consistent with the project objectives for the proposed site where an ice skating rink would not be compatible. The proposed project will create new living opportunities where it will help to meet the market demand for housing in southern California in particular San Fernando Valley whereas an ice skating rink would not include residential uses. In addition the mix of residential and convenient commercial uses for the proposed project would transform an existing underutilized site to a community-based, urban living environment. This comment has been noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 21**

Natalie & Pat Kater  
16149 Otsego Street  
Encino, CA 91436

**Comment No. 21-1**

Just looking at the architects rendering of Il Villaggio Toscano absolutely boggels [sic] the mind!

It is like looking at the MONSTER on the corner of Sepulveda & Ventura Blvd. and wondering just how much our Community will suffer Environmentally!

**Response to Comment No. 21-1**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 21-2**

However, the location of this new project is quite different than the development to its south.

It is overwhelming!

It totally ignores the Ventura Blvd. Corridor Specific Plan!

NOTHING NEW HERE, BUT ENOUGH IS ENOUGH!

**Response to Comment No. 21-2**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. Please refer to Section IV.A, Aesthetics, and IV.G, Land Use, of the Draft EIR, for a discussion of the projects compatibility with surrounding land uses and consistency with the intent of the Specific Plan. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 21-3**

Going up eight stories is outrageous!

**Response to Comment No. 21-3**

Please refer to Response to Comment No. 9-4 and Response to Comment No. 7-4, above, regarding proposed building heights.

**Comment No. 21-4**

Traffic on Sepulveda is daunting and with another, up to 1,000 cars or more added to the already, impossible at times, traffic would be unforgivable....no matter what a paid traffic study might say!

**Response to Comment No. 21-4**

Please refer to Section IV.K, Transportation and Circulation, of the Draft EIR, regarding existing and future traffic conditions within the project vicinity. This comment regarding the Commentor's general perception of traffic conditions is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 21-5**

Mr Plafkin, we understand that you have to look at a developers [sic] request for approval to build, but just one glance at what the developer is asking for, is like looking at a disaster waiting to happen!

**Response to Comment No. 21-5**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 21-6**

This project is just too big and will have a very detrimental impact on this entire community!

The Architectural rendering looks like, to me, that it is purposely made to look overwhelming so they can come back with a new plan, still asking for more than the Corridor Specific Plan would allow for, but it would look more reasonable in comparison... Tricks of the Trade!

**Response to Comment No. 21-6**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 21-7**

Please, Please treat this project with the Community in mind.

We need relief from increased Traffic and Over Building, so we can enjoy life in the Valley!

**Response to Comment No. 21-7**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 22**

Mr. & Mrs. Pat Kater  
16149 Otsego Street  
Encino, CA 91436  
pfknat@gmail.com

**Comment No. 22-1**

This is a very simple situation

Il Villaggio Toscano is Too Big...Totally out of the question for the community it is planned for.

**Response to Comment No. 22-1**

Please refer to Section II, Corrections and Additions, of this Final EIR, regarding the reduction in density and height of the project proposed by the Applicant. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 22-2**

The impact on the traffic on Sepulveda and Ventura Blvd. alone, should make any positive decision to move forward on this project completely outrageous.

After the environmental impact of the TRAFFIC,

**Response to Comment No. 22-2**

The Commentor's opinion is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 22-3**

the size of the physical project is, as stated above, is obviously simply TOO BIG for the community!

We urge a GREAT BIG NO VOTE!!!!

**Response to Comment No. 22-3**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. As discussed in Section II, Corrections and Additions, of this Final EIR, the density and height of the project has been reduced in response to public comments. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 23**

Paul W. Krueger  
Development Manager  
M. David Paul Associates  
100 Wilshire Boulevard, Suite 1600  
Santa Monica, CA 90401

**Comment No. 23-1**

We are writing today to formally request an extension of the public comment period for the above mentioned Draft Environmental Impact Report. Originally we requested and received approval from staff to increase the public comment period for a total of 60 days which is set to expire on February 7, 2011.

Based on a request from the Sherman Oaks Neighborhood Council's Land Use Committee, they have requested that the comment period be extend for another 30 days to afford them the opportunity to provide written comments following their scheduled meeting on February 17, 2011. Thus, we respectfully appeal for your consideration of our request to extend the comment period for the additional 30 days to allow the community's Neighborhood Council the opportunity to officially comment.

We look forward to your approval of our request and are available for any questions you may have.

**Response to Comment No. 23-1**

This comment provides the formal request made by the Applicant to extend the comment period based on a request the Applicant received from the Sherman Oaks Neighborhood Council Land Use Committee. Based on this request, the City extended the public review period for the Draft EIR to a total of 87 days, well beyond the 45 days required by CEQA.

**Comment Letter No. 24**

R. Russell Meyer  
4755 Burnet Avenue  
Sherman Oaks, CA 91403

**Comment No. 24-1**

I am writing you in regards to the proposed **Il Villaggio [sic] Toscano Project**, a 700,000 sq. ft. project in Sherman Oaks, located near the intersections of Sepulveda and Ventura Boulevards and adjacent to the Sherman Oaks Galleria.

**Response to Comment No. 24-1**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 24-2**

I am requesting that the City of Los Angeles **place a moratorium on any future development at the site until (1) adequate measures are taken to mitigate the traffic at intersections whose level of service (LOS) is rated "F"; (2) where no current mitigation measures have been identified by either the city or prospective developers to eliminate such rating; and (3) a proposed project will further adversely affect such designated intersections.** For example the intersections of Sepulveda and Ventura Boulevards are currently rated "F" and the developer and City have no plans to mitigate the "F" rating. In fact, the proposed project will only exacerbate the traffic and associated environmental situation (as contained in the Draft Environmental Impact Report). Such a proposed moratorium should remain in place until at such time the City and the developer create a plan to mitigate such adversely rated intersections as cited above.

**Response to Comment No. 24-2**

The Commentor requests that a building moratorium be imposed in the project vicinity until such time that the City of Los Angeles and the project developer create a plan to mitigate Level of Service (LOS) F intersections in the area. This request will be forwarded to the decision-makers for review and consideration. However, it should be noted that a primary purpose of the adopted Ventura-Cahuenga Boulevard Corridor Specific Plan is to assure that equilibrium is maintained between the transportation infrastructure and land use development in the corridor and within each separate

community in the Plan area. This equilibrium includes conditions where LOS F intersections may exist or occur.

Furthermore, CEQA only requires that a project mitigate its traffic impacts to a less than significant level, not necessarily to better than LOS F conditions. Thus, a project could adequately mitigate an intersection impact while the resulting LOS could still be F. Locations where mitigation measures may be infeasible are to be identified and the reasons cited, as was done for this project. As indicated on Page IV.K-49 of the Draft EIR, feasible physical mitigation measures that would reduce the project impact to a less than significant level could not be identified for five study intersections, including the intersection of Ventura Boulevard and Sepulveda Boulevard. It should be noted that the existing LOS for the intersection of Ventura Boulevard and Sepulveda Boulevard is D during the A.M. peak hour and E during the P.M. peak hour, as shown in Table IV.K-4 of the Draft EIR, rather than F in both peak hours as stated by the Commentor.

### **Comment No. 24-3**

Based on the Draft Environmental Impact Report of the project, other intersections are rated “F”, or as a result of the project deteriorate to lower ratings, including “F”, but I bring to your attention in the interest of your time the largest intersection. It’s illustrative of such a large scale project being introduced to areas where prior inadequate traffic planning has resulted in highly congested conditions warranting an “F”. First, there is the matter of hard and soft costs to the citizenry. The hard costs of increase congestion include increased consumption of motor fuel and associated increased auto emissions. Soft costs include increased travel time to and from work, changes in commute patterns that might adversely affect neighborhood communities and a negative impact on “general livability” which might have very long-term impact on the City. I ask the Councilman not to assume that an “F” rating for an intersection be merely interpreted and the “worst”. It merely reflects an existing grading standard. Although the intersection in question is rated “F”, it could get much worse with the introduction of this project and the associated costs. In fact, I would not be surprised that if a complete cost and benefit analysis were to be undertaken the costs of the project would far outweigh the benefits.

### **Response to Comment No. 24-3**

The comments and opinion regarding “hard” and “soft” costs attributable to increased traffic congestion are noted for the administrative record. However, as they do not address the adequacy of Draft EIR, no response is required.

**Comment No. 24-4**

There are also numerous other programs with the project, such as failure to adequately address the impact on a local, adjacent residential neighborhood of increase traffic, the impact of heavy haulers and other equipment during the minimum of two year construction, etc. I believe these matters have been addressed by others to your office and the Planning Commission so I will not dwell on these matters here.

**Response to Comment No. 24-4**

Residential streets were included in the traffic analysis. For example, La Maida Avenue, Camarillo Street, Moorpark Street, Greenleaf Street, and Valley Vista Boulevard were analyzed as part of the study intersections of La Maida Avenue and Sepulveda Boulevard, Camarillo Street and Sepulveda Boulevard, Camarillo Street and Kester Avenue, Moorpark Street and Sepulveda Boulevard, 405 Freeway Northbound Ramps—Greenleaf Street and Sepulveda Boulevard, and Valley Vista Boulevard and Sepulveda Boulevard. Figures 4(a) and 4(b) of Appendix H-2 of the Draft EIR show the estimated project trip percentages at the study intersections and along the above named streets, which were approved by the Los Angeles Department of Transportation. As shown, it was estimated that little or no project traffic would be traversing through residential neighborhoods using the above streets. Therefore, the impact of project traffic on residential streets within those neighborhoods would be expected to be less than significant.

Please see Response to Comment No. 11-34 regarding construction traffic.

**Comment No. 24-5**

On a somewhat related note, I would like to thank your North Hollywood office. They have been attentive to the community's concern and very responsive. Thank You.

**Response to Comment No. 24-5**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 25**

Melissa Michelson  
melmiamich@yahoo.com

**Comment No. 25-1**

As a concerned member of the Sherman Oaks community, I would like to implore you to ensure that Toscano developers adhere to the city regulations on height, density, and traffic when pursuing their latest project on the corner of Sepulveda and Camarillo, and consider scaling down their project.

**Response to Comment No. 25-1**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 25-2**

I am appalled and outraged that the developers want to build such an enormous structure on that corner. The closest 405 freeway entrance doesn't even have an entrance to or exit from the west, only east; this means in order to go west on 134, the traffic will have to be diverted north on Sepulveda to the other side of Ventura, increasing congestion in all directions. The only bus around is the north-south line on Sepulveda and there isn't even a light transit light servicing the area into Los Angeles along the 405.

**Response to Comment No. 25-2**

The Commentor states that the project site is not conveniently located relative to all of the on- and off-ramps for the nearby freeways. However, it is unclear as to the directionality of the freeways and ramps noted by the Commentor. Southwesterly of the project site, there is an on-ramp to the southbound 405 Freeway, which is located on the north side of Ventura Boulevard and opposite Sherman Oaks Avenue. This on-ramp is expected to be used by some project traffic. The 405 Freeway also has on- and off-ramps at Burbank Boulevard, which are expected to be accessed by project traffic using this freeway to and from the north. Project traffic from the south on the 405 Freeway is expected to exit via the off-ramp opposite Greenleaf Street at Sepulveda Boulevard.

Instead of the 134 Freeway, it is believed that the Commentor means the 101 Freeway. Project traffic accessing the 101 Freeway to and from the east would use the

nearby on- and off-ramps at Sepulveda Boulevard. It is anticipated that project traffic arriving from the west on the 101 Freeway would exit via the off-ramp opposite Sherman Oaks Avenue at Ventura Boulevard. Outbound project traffic desiring to travel westbound on the 101 Freeway would be expected to travel south on Sepulveda Boulevard to access the 405 Freeway northbound on-ramp opposite Greenleaf Street, proceed north for a short distance, and then transition over to the westbound 101 Freeway. Figures 4(a) and 4(b) of Appendix H-2 of the Draft EIR, depict the estimated project trip percentages accessing the nearby freeways.

The Commentor states that the only bus service in the vicinity is north-south along Sepulveda Boulevard. This is incorrect. As discussed on Page IV.K-40 of the Draft EIR, bus service is provided not only on Sepulveda Boulevard, but also on Ventura Boulevard, which is only 0.25 mile to the south and within reasonable walking distance of the project site. Bus service is frequent on both streets, with 21 or more buses during the A.M. and P.M. peak hours going by the site on Sepulveda Boulevard and even more traveling along Ventura Boulevard.

#### **Comment No. 25-3**

I don't see why that area needs such a large complex. It's not like the residents of those units will be working in the shops below - how much will single residence cost????

#### **Response to Comment No. 25-3**

As discussed in Section II, Corrections and Additions of this Final EIR, the size and scale of the project has been reduced. The comments regarding housing costs are not relative to CEQA. This comment has been noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

#### **Comment No. 25-4**

Furthermore, I don't understand what makes the developers believe that being tucked in between 2 freeways is a desirable [sic] location. Similar structures in Downtown LA overlooking the 101 and 110 freeways are hardly filled to capacity. The last thing the neighborhood needs is empty units in an undesirable [sic] corner. It should be scaled back to a reasonable size.

#### **Response to Comment No. 25-4**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 25-5**

Thank you for your kind consideration, and I look forward to the next council meeting.

**Response to Comment No. 25-5**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 26**

Maria Pavlou  
4737 Burnet Avenue  
Sherman Oaks, CA 91403  
tailfeathersmpk@aol.com

**Comment No. 26-1**

I am a resident of Burnet Ave. in Sherman Oaks. I am outraged at the audacity of the Toscano Project on Sepulveda and Camarillo. Currently the traffic capacity is totally maximized on Sepulveda. Why should Toscano be allowed to build anything. They should have developed this site years ago when traffic could have been mitigated. Today there is no way to lessen the congestion. The whole of Sherman Oaks, Encino, Studio City, Van Nuys will be impacted. Why should we approve this.

**Response to Comment No. 26-1**

The comment questions whether the project should be approved but does not raise specific issues regarding the environmental analysis. Please refer to Section IV.K, Transportation and Circulation, of the Draft EIR, regarding existing and future traffic conditions, respectively, within the project vicinity. This comment regarding the Commentor's general perception of traffic conditions is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 26-2**

This project is too high, too dense, and we do not want any more street widening to happen. The city has in the past, approved the closing of Moorpark so that the current location of CVS complex, the Pavilion property, etc. could be built. That action prevented the flow of traffic on Moorpark and thus increased Ventura Blvd. traffic. The City approved The Galleria that has added enormous traffic problems during rush hour and has turned the intersection to an F rating. It is time for the city to take responsibility for its past actions and start saying no to projects that benefit only the developer. We need a city that will stand a chance of being a place we will want to live in for the next 5-10-15-20 years. Toscano has no right to build unless it has a net zero affect on our community.

**Response to Comment No. 26-2**

Please refer to Section II, Corrections and Additions, of this Final EIR, regarding the reduction in density and height of the project proposed by the Applicant. Also refer to Section IV.K, Transportation and Circulation, of the Draft EIR, regarding the traffic impacts

associated with the project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 26-3**

The Toscano EIR does not take into consideration the impact of the proposed Universal City expansion. Universal is another large project that will add considerable traffic to Sherman Oaks, including the Ventura/Sepulveda intersection. It is time for the City to look at the total impact not just a project by project approach.

**Response to Comment No. 26-3**

As discussed in Section III, Environmental Setting, of the Draft EIR, 51 related projects were identified in the vicinity of the project site. These related projects are located within an approximate 3.5-mile radius of the project site. This radius is substantially larger than the 2-mile radius generally used in Los Angeles Department of Transportation traffic studies. The Universal City expansion project was not included in the related projects analysis as it is nearly 7 miles to the east, almost twice the radial distance of the related projects study area. Nonetheless, the traffic attributable to related projects beyond the 3.5-mile radius was accounted for in the 2.0 percent annual traffic growth factor applied to existing volumes.

The comment does not provide any facts or evidence that the 3.5-mile radius and 2.0 percent annual growth is inadequate to evaluate reasonably foreseeable cumulative impacts.

**Comment No. 26-4**

As a homeowner, I and my neighbors have to follow zoning rules. We would like to see Toscano do the same.

**Response to Comment No. 26-4**

Please refer to Section IV.G, Land Use, of the Draft EIR, for an analysis of the discretionary land use approvals sought by the project. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration

**Comment Letter No. 27**

Marcy Shaffer  
4755 Burnet Avenue  
Sherman Oaks, CA 91403  
marcysshaffer@roadrunner.com

**Comment No. 27-1**

I am a homeowner on the section of Burnet Avenue bounded by Moorpark Avenue and Camarillo Street. I write to voice my objections to the Draft EIR for the proposed “Il Villaggio [sic] Toscana” project. I attended the meeting of the Land Use Committee of the Sherman Oaks Neighborhood Council on February 17, 2011. I join in the objections to the Draft EIR for the proposed “Il Villaggio [sic] Toscana” project adopted by the Land Use Committee at that meeting.

**Response to Comment No. 27-1**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 28**

Elaine and Philip Shapiro  
elainasha@aol.com

**Comment No. 28-1**

We live near Haskell and Ventura Blvd. and [sic] have been Encino residents for over 30 years. We have seen a steady decline in the quality of our community life because those in charge have allowed business interests to circumvent the plan approved long ago protecting the community against oversized business projects.

**Response to Comment No. 28-1**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 28-2**

The project proposed for Ventura and Sepulveda will be the biggest fiasco for the San Fernando Valley. To add 500 residences to an area that is already heavily congested is unbelievable. It does not seem to concern those in charge that Sherman Oaks and Encino are massively opposed to this project. Do we not matter? This development should not be allowed to have any exceptions to the plan. The community could well have used the land for cultural and community purposes instead of a means to make money for a massive development firm.

**Response to Comment No. 28-2**

The comment expresses its opposition to the proposed project. It does not address the environmental analysis in the Draft EIR. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Please refer to Section IV.K, Traffic and Circulation, of the Draft EIR, regarding existing and future traffic conditions within the project vicinity. This comment regarding the Commentor's general perception of traffic conditions is noted for the administrative record and will be forwarded to the decision-makers for review and consideration. Please refer to Response to Comment No. 7-1 for a discussion of the Specific Plan Exemptions sought for the proposed project. In addition, as discussed in Section II, Corrections and Additions, of this Final EIR, in response to public comments received during the Draft EIR comment

period, the number of residential units are proposed to be reduced by the Applicant from 500 to 399 residential units.

**Comment No. 28-3**

We have attended meetings in opposition to this project and to date have not seen our concerns addressed. Is anyone of our elected representatives willing to listen to those who elected them and step up in opposition to a project that will completely ruin our community with tons of added cars and congestion?

**Response to Comment No. 28-3**

This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 29**

Bill Winkelmann  
4736 Halbrent Avenue  
Sherman Oaks, CA 91403

**Comment No. 29-1**

As a long time and nearby resident of this project, **I strongly object to both the height and density of this project.**

**Response to Comment No. 29-1**

Please refer to Response to Comment Nos. 7-5, 9-3, and 9-4, above, regarding the height and density of the project. As discussed in Section II, Corrections and Additions, of this Final EIR, the density and height of the project has been reduced in response to public comments. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 29-2**

I do not object to this type of project, as I think mixed use of residential and retail will serve the community well,

**Response to Comment No. 29-2**

The comment expresses its support for the proposed project. It does not address the environmental analysis in the Draft EIR. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 29-3**

but height will be imposing to the street (much taller than the adjacent Grand Apartments) and the density will make the traffic even worse than it is presently. I think that this project **should comply** with the Ventura-Cahuenga Boulevard Corridor Specific Plan, including a FAR of 1.5 to 1.

**Response to Comment No. 29-3**

As discussed in Section II, Corrections and Additions, of this Final EIR, the density and height of the project has been reduced in response to public comments. Please refer to Response to Comment Nos. 7-5, 9-3, and 9-4, above, regarding the height and density of the project.

## IV. Mitigation Monitoring and Reporting Program

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# **IV. Mitigation Monitoring and Reporting Program**

## **1. Introduction**

The California Environmental Quality Act (CEQA) requires a Mitigation Monitoring and Reporting Program (MMRP) for projects where mitigation measures are a condition of their approval and development. An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the project. Where appropriate, the EIR includes recommended mitigation measures to avoid or substantially lessen the significant environmental impacts associated with the project. This MMRP is designed to monitor implementation of these mitigation measures. This MMRP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the CEQA Guidelines. This MMRP describes the procedures the Applicant shall use to implement the mitigation measures adopted in connection with the approval of the project and the methods of monitoring and reporting on such actions. “Monitoring” is generally an ongoing or periodic process of project oversight. “Reporting” generally consists of a written compliance review that is presented to the decision making body or authorized staff person. For this MMRP, the City of Los Angeles is the Lead Agency for the project.

## **2. Purpose**

It is the intent of this MMRP to:

1. Verify compliance of the required mitigation measures of the EIR;
2. Provide a methodology to document implementation of required mitigation;
3. Provide a record and status of mitigation requirements;
4. Identify monitoring and enforcement agencies;
5. Establish and clarify administrative procedures for the clearance of mitigation measures;
6. Establish the frequency and duration of monitoring and reporting; and

7. Utilize the existing agency review processes wherever feasible.

### **3. Administrative Procedures**

The Project Applicant shall be obligated to provide documentation concerning implementation of the listed mitigation measures to the appropriate monitoring agency and the appropriate enforcement agency as provided for herein. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Project Applicant unless otherwise noted.

As shown on the following pages, each required mitigation measure for the project is listed and categorized by impact area, with accompanying discussion of:

- **Enforcement Agency**—The agency with the power to enforce the Mitigation Measure.
- **Monitoring Agency**—The agency to which reports involving feasibility, compliance, implementation and development are made.
- **Monitoring Phase**—The phase of the project during which the Mitigation Measure shall be monitored.
- **Monitoring Frequency**—The frequency of which the Mitigation Measure shall be monitored.
- **Action Indicating Compliance**—The action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure has been implemented.

### **4. Enforcement**

This MMRP shall be in place throughout all phases of the project. The entity responsible for implementing each mitigation measure is set forth within the text of the mitigation measure. The entity responsible for implementing the mitigation shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented.

## 5. Program Modification

After review and approval of the final MMRP by the Lead Agency, minor changes and modifications to the MMRP are permitted, but can only be made by the Applicant or its successor subject to the approval by the City of Los Angeles. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. The flexibility is necessary in light of the prototypical nature of the MMRP, and the need to protect the environment with a workable program. No changes will be permitted unless the MMRP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

## 6. Mitigation Monitoring and Reporting Program

### A. Aesthetics, Views, Light/Glare, and Shading

No Mitigation Measures are identified in the Environmental Impact Report for this environmental issue.

### B. Air Quality

#### *(a) Construction*

**Mitigation Measure B-1:** In addition to SCAQMD Rule 403 (Fugitive Dust) requirements, the Project applicant will implement the following measures:

- Water three times daily or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Replace ground cover in disturbed areas as quickly as possible;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph; and

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM<sub>10</sub> generation
- **Enforcement Agency:** SCAQMD
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspection during construction
- **Action Indicating Compliance with Mitigation Measure(s):** Quarterly compliance certification report submitted by project contractor

**Mitigation Measure B-2:** Streets shall be swept as needed during construction with sweepers using reclaimed water, where available, but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.

- **Enforcement Agency:** SCAQMD; Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections during construction
- **Action Indicating Compliance with Mitigation Measure(s):** Quarterly compliance certification report submitted by project contractor

**Mitigation Measure B-3:** All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections during construction
- **Action Indicating Compliance with Mitigation Measure(s):** Quarterly compliance certification report submitted by project contractor

**Mitigation Measure B-4:** General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, all trucks and vehicles will have their engines turned off when not in use or idling will be limited to five (5) minutes or less, to reduce vehicle emissions. Ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449. Construction activities should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

- **Enforcement Agency:** SCAQMD; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections during construction
- **Action Indicating Compliance with Mitigation Measure(s):** Quarterly compliance certification report submitted by project contractor

**Mitigation Measure B-5:** 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.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections during construction
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off

**Mitigation Measure B-6:** On-site mobile equipment shall be powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) where such equipment is commercially available and equivalent in performance to existing petroleum based equipment. In addition, the project representative shall make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the mass

grading phase of project construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided onsite at the time of mobilization of each applicable unit of equipment. Off-road diesel-powered construction equipment shall meet the Tier standards based on the following schedule:<sup>1</sup>

- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- **Enforcement Agency:** SQAMD; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once prior to construction; Periodic field inspections during construction
- **Action Indicating Compliance with Mitigation Measure(s):** Submittal to LADOT and SCAQMD and Quarterly compliance certification report submitted by project contractor

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<sup>1</sup> *Construction equipment standards based on the April 1, 2010, to December 31, 2011, schedule have expired and, as such, are no longer applicable to the Project. All construction equipment utilized during Project construction would conform to the standards set forth under the January 1, 2012, to December 31, 2014, and Post-January 1, 2015, schedules, as applicable.*

*(b) Operation*

**Mitigation Measure B-7:** Light-colored roof materials to deflect heat and reduce energy demand for building cooling purposes shall be used.

- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction (during plan check)
- **Monitoring Frequency:** Once, at plan check
- **Action Indicating Compliance with Mitigation Measure(s):** Plan approval and issuance of building permits

**Mitigation Measure B-8:** Double-paned windows shall be used to reduce thermal loss and reduce energy demand for temperature control purposes.

- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction (during plan check)
- **Monitoring Frequency:** Once, at plan check
- **Action Indicating Compliance with Mitigation Measure(s):** Plan approval and issuance of building permits

**Mitigation Measure B-9:** The project shall be designed and operated to conserve energy as required by the Southern California Edison, Southern California Gas Company, and/or other appropriate agencies.

- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction (during plan check) and Operation (prior to occupancy)
- **Monitoring Frequency:** Once prior to occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of a Certificate of Occupancy

**Mitigation Measure B-10:** The project shall include heating, ventilation and air conditioning (HVAC) control systems that service residential occupancies consistent with the minimum specifications per floor and

building location included in Attachment A of Appendix FEIR-D. At a minimum, residential units shall include HVAC control systems with particulate filters that have a minimum efficiency reporting value (MERV) of 15 as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2. The air handling systems shall be maintained on a regular basis per manufacturer's recommendations by a qualified technician employed or contracted by the project proponent or successor. Operation and maintenance of the system shall ensure that it performs in compliance with the manufacturers' specified reporting value.

- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety and Department of City Planning
- **Monitoring Phase:** Construction; Operation
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off

**Mitigation Measure B-11:** To minimize exposure to diesel exhaust and the reentrainment of paved roadway dust, the proposed project shall: (1) install inoperable windows facing the freeway, except where operable windows are required by the building code; (2) place actively and passively utilized outdoor areas as far away from the roadway as possible; and (3) include landscaping along the property perimeter nearest the freeway with a dense mixture of shrubs and trees to maximize passive filtration of particulate air contaminants.

- **Enforcement Agency:** Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction (during plan check); Construction
- **Monitoring Frequency:** Agency review prior to issuance of building permit; once prior to occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** Plan approval and issuance of building permits; Issuance of a Certificate of Occupancy

## C. Biological Resources

**Mitigation Measure C-1:** If vegetation removal occurs between February 15 and August 31, a biological survey shall be conducted by a qualified biologist prior to the removal of the vegetation to determine if nesting birds are occurring on site.<sup>2</sup> In the event nesting is observed, the biologist shall recommend a buffer area with a specified radius to be established (buffer may range between 50 and 300 feet as determined by the monitoring biologist), within which no disturbance or intrusion shall be allowed until the young had fledged and left the nest or it is determined by the monitoring biologist that the nest has failed. If no nesting is observed, no further action shall be warranted.

- **Enforcement Agency:** California Department of Fish and Game; Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off; Compliance certification report submitted by qualified biologist in the event that vegetation removal occurs between February 15 and August 31.

**Mitigation Measure C-2:** Prior to the issuance of a grading permit, a plot plan prepared by a reputable tree expert, indicating the location, size, type, and condition of all existing trees on the project site, shall be submitted for approval by the Department of City Planning and the Bureau of Street Services—Street Tree Division. All trees in the public right-of-way shall be treated in accordance with the current Street Tree Division standards and all conditions of approval shall be met.

- **Enforcement Agency:** Los Angeles Department of City Planning and Bureau of Street Services—Street Tree Division
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-Construction; Post Construction
- **Monitoring Frequency:** Submittal of plans prior to construction and field inspection upon completion of construction

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<sup>2</sup> Since the MBTA protects nests, the risk of a “take” exists if a bird were nesting on the ground. Therefore, the measure includes vegetation (i.e., trees, brush) removal.

- **Action Indicating Compliance with Mitigation Measure(s):**  
Issuance of grading permit and field inspection sign-off

## D. Geology and Soils

**Mitigation Measure D-1:** The Applicant or its contractor shall incorporate the recommendations detailed in the geotechnical investigation prepared for the proposed project, as approved by the City of Los Angeles. (Geotechnical recommendations regarding pile or drill caissons, footings, slabs, fill, shoring, retaining walls, and site drainage are provided within the Geotechnical Engineering Investigation (geotechnical report) dated June 6, 2002, and Addendum I, Additional Exploration, dated March 17, 2003, both prepared by Geotechnologies, Inc. provided in Appendix C of the Draft EIR.)

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction and Construction
- **Monitoring Frequency:** Once prior to issuance of grading permit; periodic field inspection
- **Action Indicating Compliance with Mitigation Measure(s):**  
Approval of site-specific geotechnical report; Issuance of a grading permit

## E. Hazards and Hazardous Materials

No Mitigation Measures are identified in the Environmental Impact Report for this environmental issue.

## F. Surface Water Hydrology and Surface Water Quality

**Mitigation Measure F-1:** The project shall provide on-site storm drain improvements to detain peak storm water flows to the satisfaction of the City of Los Angeles Department of Public Works.

- **Enforcement Agency:** City of Los Angeles Department of Public Works
- **Monitoring Agency:** City of Los Angeles Department of Public Works
- **Monitoring Phase:** Pre-Construction; Construction

- **Monitoring Frequency:** Once at review of plans and field inspection during construction
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off

**Mitigation Measure F-2:** The project shall comply with the requirements of the applicable NPDES permit for stormwater discharge and with all applicable requirements of the RWQCB, EPA and local agencies including the City of Los Angeles regarding water quality.

- **Enforcement Agency:** Regional Water Quality Control Board; City of Los Angeles Department of Public Works
- **Monitoring Agency:** Regional Water Quality Control Board; City of Los Angeles Department of Public Works
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections during construction
- **Action Indicating Compliance with Mitigation Measure(s):** Approval of a Stormwater Pollution Prevention Plan; Field inspection sign-off

**Mitigation Measure F-3:** The project shall implement Best Management Practices (BMPs) to detain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be provided

- **Enforcement Agency:** City of Los Angeles Department of Public Works
- **Monitoring Agency:** City of Los Angeles Department of Public Works
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once with approval of plans and field inspection during construction
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of certificate of occupancy; Field inspection sign-off

**Mitigation Measure F-4:** All storm drain inlets and catch basins within the Project area shall be stenciled with prohibitive language (such as “NO DUMPING—DRAINS TO OCEAN”) and/or graphical icons to discourage illegal dumping.

- **Enforcement Agency:** Los Angeles Department of Public Works
- **Monitoring Agency:** Los Angeles Department of Public Works
- **Monitoring Phase:** Operation (prior to and post occupancy)
- **Monitoring Frequency:** Once prior to certificate of occupancy; periodic field inspection during operation
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off

**Mitigation Measure F-5:** The legibility of signs and stencils discouraging illegal dumping shall be maintained.

- **Enforcement Agency:** Los Angeles Department of Public Works
- **Monitoring Agency:** Los Angeles Department of Public Works
- **Monitoring Phase:** Operation (prior to and post occupancy)
- **Monitoring Frequency:** Once prior to certificate of occupancy; periodic field inspection during operation
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off

**Mitigation Measure F-6:** Materials used on site with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.

- **Enforcement Agency:** Los Angeles Department of Public Works
- **Monitoring Agency:** Los Angeles Department of Public Works
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Periodic field inspections during operation
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off

## G. Land Use

No Mitigation Measures are identified in the Environmental Impact Report for this environmental issue.

## H. Noise

### (a) Construction

**Mitigation Measure H-1:** A temporary sound barrier, capable of providing a minimum 10 dBA reduction (e.g., solid wood fence) and minimum height of 8 feet, shall be erected along the project's east property line along Sepulveda Boulevard for the entire length of the project site as well as between the project site and the 777 Motor Inn.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off.

**Mitigation Measure H-2:** To the extent feasible, construction activities shall be scheduled so as to avoid operating several pieces of heavy equipment simultaneously, which causes high noise levels.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off and compliance certification report submitted by project contractor

**Mitigation Measure H-3:** Engine idling from construction equipment such as bulldozers and haul trucks shall be limited, to the extent feasible. Idling of haul trucks shall be limited to five (5) minutes at any given location as established by the South Coast Air Quality Management District. Signs that limit engine idling shall be posted on the project site during construction.

- **Enforcement Agency:** SCAQMD; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety

- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance with Mitigation Measure(s):** Quarterly compliance certification report submitted by project contractor

**Mitigation Measure H-4:** The construction staging area shall be located as far as feasible from sensitive receptors.

- **Enforcement Agency:** Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection; Compliance certification report by the project contractor

*(b) Operation*

**Mitigation Measure H-5:** An acoustical analysis of the architectural plans of the proposed residential building façade constructions shall be prepared by a qualified acoustical engineer, prior to issuance of building permits, to ensure that the building construction (i.e., exterior wall, window and door) will provide adequate sound insulation to meet the acceptable interior noise level of 45 dBA (CNEL).

- **Enforcement Agency:** Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once-prior to Construction
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of building permit

**Mitigation Measure H-6:** The Applicant shall retain services of an acoustical consulting engineer experienced in mechanical noise analysis and during plan check provide the City with an acoustical report indicating that the project mechanical design meets the City's noise ordinance (i.e., maximum 5 dBA above ambient noise levels).

- **Enforcement Agency:** Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once; prior to construction
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of building permits

## I. Population, Housing, and Employment

No Mitigation Measures are identified in the Environmental Impact Report for this environmental issue.

### J.1 Public Services—Police Protection

**Mitigation Measure J-1:** Prior to the issuance of the building permit, the Applicant shall consult with the LAPD's Crime Prevention Unit, regarding on-site crime prevention features appropriate for the design of the property. These features may include the following elements:

- designing entryways, elevators, lobbies and parking areas with lighting that eliminates areas of concealment;
- eliminating areas of dead space;
- providing solid core doors with deadbolt locks to all residential units and commercial uses; and
- providing parking within an enclosed parking podium that would be internal to the site.
- **Enforcement Agency:** Los Angeles Police Department, Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once
- **Action Indicating Compliance with Mitigation Measure(s):** Plan approval and issuance of building permit

**Mitigation Measure J-2:** Prior to the issuance of any building permits, the Applicant shall provide the commanding officer at the Van Nuys Community Police Station with a diagram of each portion of the

property, including access routes and additional information which may facilitate a police response.

- **Enforcement Agency:** Los Angeles Police Department, Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once
- **Action Indicating Compliance with Mitigation Measure(s):** Written verification from Los Angeles Police Department

## J.2 Public Services—Fire Protection

**Mitigation Measure J-3:** Project building plans including a plot plan shall be submitted for approval by the Los Angeles Fire Department either prior to the recordation of the final map or the approval of a building permit.

- **Enforcement Agency:** Los Angeles Fire Department; Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Fire Department
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once
- **Action Indicating Compliance with Mitigation Measure(s):** Approval of the plot plan by the Los Angeles Fire Department

**Mitigation Measure J-4:** Prior to the issuance of a building permit, the Applicant shall consult with the Los Angeles Fire Department and design the project to meet on-site fire flow requirements and incorporate fire prevention and suppression features and other life-saving equipment.

- **Enforcement Agency:** Los Angeles Fire Department; Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Fire Department
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once
- **Action Indicating Compliance with Mitigation Measure(s):** Plan approval and issuance of building permit

**Mitigation Measure J-5:** The project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire

Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles, unless otherwise approved.

- **Enforcement Agency:** Los Angeles Fire Department
- **Monitoring Agency:** Los Angeles Fire Department
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Once prior to occupancy; periodic field inspections during occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** Approval of the plot plan by the Los Angeles Fire Department; Field inspection sign-offs

### J.3 Public Services—Schools

**Mitigation Measure J-6:** Pursuant to California Government Code Section 65995, the Project Applicant shall pay developer fees to Los Angeles Unified School District prior to the issuance of building permits.

- **Enforcement Agency:** Los Angeles Unified School District
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once prior to issuance of building permit
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of building permit

### J.4 Public Services—Parks and Recreation

**Mitigation Measure J-7:** In consultation with the City of Los Angeles Department of Recreation and Parks, 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) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in-lieu fees.

- **Enforcement Agency:** Los Angeles Department of Recreation and Parks
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction

- **Monitoring Frequency:** Once prior to certificate of occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** Certificate of occupancy

## J.5 Public Services—Libraries

No Mitigation Measures are identified in the Environmental Impact Report for this environmental issue.

## K. Transportation and Circulation

### (a) Construction

**Mitigation Measure K-1:** Prohibit parking along the west side of Sepulveda Boulevard from the northern site boundary to Camarillo Street and restripe to provide a southbound right-turn-only lane. For this short-term condition, it is proposed that the restriping be limited to the segment of Sepulveda Boulevard approximately from Camarillo Street to La Maida Street, that the existing southbound left-turn lane approaching Camarillo Street be temporarily reduced in width to 9 feet, and that the proposed southbound right-turn-only lane be 10 feet wide.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Public Works, Bureau of Engineering
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of a Certificate of Occupancy

**Mitigation Measure K-2:** Whenever feasible during construction, sidewalk access along Sepulveda Boulevard and Camarillo Street shall be provided to maintain pedestrian access.

- **Enforcement Agency:** Los Angeles Department of Transportation; Los Angeles Department of Public Works, Bureau of Engineering
- **Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of Public Works, Bureau of Engineering
- **Monitoring Phase:** Construction

- **Monitoring Frequency:** Periodic field inspection
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off

**Mitigation Measure K-3:** A Construction Management Plan or Worksite Traffic Control Plan shall be prepared by the Applicant and approved by the Department of Transportation and Department of Public Works and shall contain, at minimum, the following:

- The name and telephone number of a construction manager who can be reached 24 hours a day;
- An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the proposed project area and maps showing access to and within the area and to adjacent properties;
- Procedures for the training of traffic safety personnel (flaggers) to assist in emergency response; and
- The location, times, and estimated duration of any roadway or sidewalk closures, traffic detours, use of protective devices, warning signs, and queuing areas.
- Configure construction parking to minimize traffic interference;
- Provide dedicated turn lanes for movement of construction trucks and equipment, where space is available and would not result in a safety concern for pedestrians and motorists; and
- Reroute construction trucks away from congested streets or sensitive receptor areas, where the resultant trip length would not substantially increase.
- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Public Works
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspection
- **Action Indicating Compliance with Mitigation Measure(s):** Written verification from City of Los Angeles Department of Transportation and City of Los Angeles Department of Public Works

**Mitigation Measure K-4:** Flaggers shall be provided as necessary to minimize impact to traffic flow and to ensure safe movement into and out of the project site.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspection
- **Action Indicating Compliance with Mitigation Measure(s):** Quarterly compliance report submitted by project contractor

**Mitigation Measure K-5:** Heavy-duty construction trucks shall arrive at the site no earlier than 7:00 A.M. and depart no later than 3:30 P.M.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspection
- **Action Indicating Compliance with Mitigation Measure(s):** Quarterly compliance certification report submitted by project contractor

**Mitigation Measure K-6:** Construction vehicles shall not be permitted to queue where they would interfere with traffic movement or block access to adjacent businesses or residences.

- **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Fire Department
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspection
- **Action Indicating Compliance with Mitigation Measure(s):** Quarterly compliance certification report submitted by project contractor.

**Mitigation Measure K-7:** All-construction-related vehicles shall be parked on-site or in off-site parking facilities, pursuant to a Temporary Parking Plan.

On-street parking of construction-related vehicles shall be prohibited on nearby local streets.

- **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspection
- **Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance from the Department of Transportation or the Department of City Planning
- **Mitigation Measure(s):** Quarterly compliance certification report submitted by project contractor

*(b) Operation*

**Mitigation Measure K-8: *Camarillo Street and Sepulveda Boulevard:*** Dedicate an additional 6 feet and widen by 4 feet along the north side of Camarillo Street between Sepulveda Boulevard and the westerly site boundary. In order to implement this measure, on-street parking along both sides of this segment of Camarillo Street shall be removed and this leg of the intersection shall be restriped to provide an eastbound left-turn only lane, shared eastbound through and left-turn lane, and eastbound right-turn only lane. Modify the existing traffic signal to install eastbound protected-permissive phasing. In addition, on-street parking shall be removed during the A.M. peak period (approximately 7:00 A.M. to 10:00 A.M.) along the west side of Sepulveda Boulevard from the northerly site boundary to Galleria Gateway. The southbound approach shall be restriped to provide a fourth southbound through lane from north of Camarillo Street to north of Ventura Boulevard during the A.M. peak period.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Public Works, Bureau of Engineering
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once after completion of construction
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure K-9:** *Ventura Boulevard/405 Freeway Southbound On-Ramp—Sherman Oaks Avenue:* Widen by 5 feet the south side of Ventura Boulevard from Sherman Oaks Avenue to approximately 270 feet westerly, as measured from the centerline of Sherman Oak Avenue. Additionally, widen by 2 feet both sides of Ventura Boulevard from US-101 Freeway eastbound off-ramp/I-405 Freeway southbound on-ramp—Sherman Oaks Avenue to approximately 230 feet easterly as measured from the centerlines of the freeway ramps and Sherman Oaks Avenue; and restripe to provide an exclusive westbound right-turn-only lane at the intersection. Modify the existing traffic signal to accommodate restriping.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Public Works, Bureau of Engineering
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once after completion of construction
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure K-10:** *Ventura Boulevard and Van Nuys Boulevard:* Restripe to add a second southbound left-turn lane at Ventura Boulevard. Modify the existing traffic signal to install southbound protected left-turn phasing.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Public Works, Bureau of Engineering
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once after completion of construction
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure K-11:** *Ventura Boulevard and Beverly Glen Boulevard:* Widen by 3 feet the south side of Ventura Boulevard from Beverly Glen Boulevard to approximately 160 feet westerly, as measured from the centerline of Beverly Glen Boulevard. Restrict parking on south side of Ventura Boulevard and restripe the eastbound approach to provide an eastbound right-turn-only lane at Beverly Glen Boulevard.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Public Works, Bureau of Engineering
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once after completion of construction
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure K-12:** *Ventura Boulevard and Sepulveda Boulevard:* Convert the southbound optional through-right-turn lane on Sepulveda Boulevard at Ventura Boulevard to a through lane.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Public Works, Bureau of Engineering
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once after completion of construction
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure K-13:** *US-101 Freeway Eastbound On-Ramp & Sepulveda Boulevard:* Install a new traffic signal to control this intersection, including southbound left-turn phasing and the ATSAC/ATCS upgrade. This signal would provide improved capacity and reduce conflicts between the southbound left-turning traffic accessing the on-ramp and the heavy northbound through traffic on Sepulveda Boulevard.<sup>3</sup>

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Public Works, Bureau of Engineering

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<sup>3</sup> *Future traffic volumes at this intersection would satisfy the traffic volume criteria in the "Peak-Hour Traffic Signal Warrant" assuming the southbound left-turn lane as the "Minor Street" and northbound Sepulveda Boulevard as the "Major Street."*

- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once after completion of construction
- **Action Indicating Compliance with Mitigation Measure(s):**  
Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure K-14:** *Ventura Boulevard & Haskell Avenue (North):* Widen the north side of Ventura Boulevard from the north leg of Haskell Avenue to approximately 190 feet easterly, as measured from the centerline of that leg, and restripe to provide a westbound right-turn-only lane.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Public Works, Bureau of Engineering
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once after completion of construction
- **Action Indicating Compliance with Mitigation Measure(s):**  
Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure K-15:** The project applicant will contribute \$300,000 to a fund for the identification and implementation of local parking, transportation and circulation improvements in the following areas: the area bounded clockwise by Haskell Avenue beginning at Valley Vista Boulevard and extending northerly to SR-101 (on the west), from that point extending easterly along SR-101 to I-405, and from that point extending northerly along I-405 freeway to westernmost prolongation of Magnolia Boulevard, and from that point extending easterly on Magnolia Boulevard prolongation to Kester Avenue, and from that point extending southerly along Kester Avenue to the prolongation of Moorpark Street, from that point extending easterly along the prolongation of Moorpark Street to Beverly Glen Boulevard–Tyrone Avenue, from that point extending southerly along Beverly Glen Boulevard–Tyrone Avenue to Dickens Street, from that point extending westerly along Dickens Street to Kester Avenue, from that point extending southerly along Kester Avenue to Valley Vista Boulevard, and from that point extending westerly back to Haskell Avenue. The \$300,000 payment will be guaranteed through cash, bond or irrevocable letter of credit, payable to DOT. The fund will be used for measures that include but are not limited to parking improvements intended to increase parking availability, reduce search times and relieve traffic congestion; neighborhood traffic calming; transit-related improvements and amenities; bicycle-related

improvements and amenities; pedestrian-related improvements and amenities; and streetscape improvements and amenities.

- **Enforcement Agency:** Los Angeles Department of Transportation
- **Monitoring Agency:** Los Angeles Department of Transportation; Los Angeles Department of Public Works
- **Monitoring Phase:** Construction (prior to occupancy)
- **Monitoring Frequency:** Once
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure K-16:** Bicycle rack parking that is secure, convenient, and easily accessible, shall be added on-site and within the public right of way with the approval of Bureau of Street Services, Department of Public Works through their A Permit process. The copy of the A Permit will be submitted to Department of Building and Safety prior to approval of Certificate of Occupancy. Bicycle parking spaces shall be provided at the rate of two percent of the number of automobile parking spaces required for non-residential uses.

- **Enforcement Agency:** Los Angeles Department of City Planning
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at issuance of first temporary or permanent Certificate of Occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy.

## L.1 Utilities—Water Supply

**Mitigation Measure L-1:** For the commercial uses on the project site, the applicant shall (unless otherwise required and to the satisfaction of the Department of Building and Safety):

- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.

- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- **Enforcement Agency:** Los Angeles Department of Building and Safety; Los Angeles Department of Water and Power
- **Monitoring Agency:** Los Angeles Department of Building and Safety; Los Angeles Department of Water and Power
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at issuance of first temporary or permanent Certificate of Occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure L-2:** Unless otherwise required, all restroom faucets for the commercial uses on the project site shall be of a self-closing design, to the satisfaction of the Department of Building and Safety.

- **Enforcement Agency:** Los Angeles Department of Building and Safety; Los Angeles Department of Water and Power
- **Monitoring Agency:** Los Angeles Department of Building and Safety ; Los Angeles Department of Water and Power
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at issuance of first temporary or permanent Certificate of Occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure L-3:** For the residential uses on the project site, the applicant shall (unless otherwise required and to the satisfaction of the Department of Building and Safety)

- Install a demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwelling(s).
- Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.

- Install and utilize only high-efficiency, Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.
- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of Water and Power
- **Monitoring Agency:** City of Los Angeles Department of Water and Power; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at issuance of first temporary or permanent Certificate of Occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure L-4:** In addition to the requirements of the Landscape Ordinance, the landscape plan for the proposed project shall incorporate the following:

- Weather-based irrigation controller with rain shutoff;
- Matched precipitation (flow) rates for sprinkler heads;
- Drip/microspray/subsurface irrigation where appropriate;
- Minimum irrigation system distribution uniformity of 75 percent;
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials;
- Use of landscape contouring to minimize precipitation runoff; and
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 square feet and greater, to the satisfaction of the Department of Building and Safety.
- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of Water and Power
- **Monitoring Agency:** City of Los Angeles Department of Water and Power; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction

- **Monitoring Frequency:** Once at issuance of first temporary or permanent Certificate of Occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

**Mitigation Measure L-5:** Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment; e.g., vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of Water and Power
- **Monitoring Agency:** City of Los Angeles Department of Water and Power; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once at issuance of first temporary or permanent Certificate of Occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy

## L.2 Utilities—Wastewater

No Mitigation Measures are identified in the Environmental Impact Report for this environmental issue.

## L.3 Utilities—Solid Waste

### *(a) Construction*

**Mitigation Measure L-6:** The construction contractor shall only contract for waste disposal services with a company that recycles demolition and construction-related wastes. The contract specifying recycled waste service shall be presented to the Department of Building and Safety prior to approval of the demolition and building permits for the proposed project.

- **Enforcement Agency:** Los Angeles Department of Building and Safety

- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction (prior to commencement of construction activities); Construction
- **Monitoring Frequency:** Once prior to issuance of demolition permits
- **Action Indicating Compliance with Mitigation Measure(s):** Submittal of copy of contract by project contractor; Issuance of demolition permit

**Mitigation Measure L-7:** To facilitate on-site separation and recycling of demolition and construction-related wastes, the construction contractor should provide temporary waste separation bins on-site during demolition and construction of the proposed project.

- **Enforcement Agency:** Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off

*(b) Operation*

**Mitigation Measure L-8:** Recycling bins shall be provided at appropriate locations on the project site to promote recycling of paper, metal, glass, and other recyclable materials.

- **Enforcement Agency:** Los Angeles Department of City Planning, Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning, Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction (prior to issuance of Certificate of Occupancy)
- **Monitoring Frequency:** Periodic field inspection
- **Action Indicating Compliance with Mitigation Measure(s):** Field inspection sign-off

**Mitigation Measure L-9:** All residential and commercial uses established within the project site shall be permanently provided with clearly marked,

durable, source sorted recyclable bins at all times to facilitate the separation and deposit of recyclable materials.

- **Enforcement Agency:** Los Angeles Department of City Planning, Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning, Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction (prior to issuance of Certificate of Occupancy)
- **Monitoring Frequency:** Once at plan approval; once at final field inspection
- **Action Indicating Compliance with Mitigation Measure(s):** Plan approval; Field inspection sign-off and issuance of Certificate of Occupancy

## M. Cultural Resources

**Mitigation Measure M-1:** A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the project site where the older Quaternary Alluvium would be disturbed. The services of a qualified paleontologist shall be secured by contacting the Natural History Museum of Los Angeles County. The frequency of inspections will be based on consultation with the paleontologist and will depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** To be determined by consultation with paleontologist
- **Action Indicating Compliance with Mitigation Measure(s):** Written verification by qualified paleontologist

**Mitigation Measure M-2:** If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation

activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** To be determined by consultation with paleontologist if resource(s) are discovered
- **Action Indicating Compliance with Mitigation Measure(s):** If unanticipated discoveries are found, submittal of compliance certification report by a qualified paleontologist

**Mitigation Measure M-3:** At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** To be determined by consultation with paleontologist if resource(s) are discovered
- **Action Indicating Compliance with Mitigation Measure(s):** If unanticipated discoveries are found, submittal of compliance certification report by a qualified paleontologist

**Mitigation Measure M-4:** Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** If unanticipated discoveries are found, submittal of compliance certification report by a qualified paleontologist

**Mitigation Measure M-5:** Any fossils collected shall be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.

- **Enforcement Agency:** Los Angeles Department of City Planning; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** If unanticipated discoveries are found, submittal of compliance certification report by a qualified paleontologist

**Mitigation Measure M-6:** If fossils are found, following the completion of the above tasks, the paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

- **Enforcement Agency:** Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance with Mitigation Measure(s):** If unanticipated discoveries are found, submittal of compliance certification report and report(s) on archaeological findings by a qualified archaeologist

# Appendices

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Appendix FEIR-A  
Draft EIR Comment Letters





JERRY BROWN  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



March 8, 2011

RECEIVED  
CITY OF LOS ANGELES

MAR 15 2011

ENVIRONMENTAL  
IMPACT

Hadar Plafkin  
City of Los Angeles/Department of City Planning  
200 N. Spring Street, Rm 750  
Los Angeles, CA 90012

Subject: Il Villagio Toscano  
SCH#: 2004111068

Dear Hadar Plafkin:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 7, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2004111068  
**Project Title** Il Villagio Toscano  
**Lead Agency** Los Angeles, City of

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**Type** EIR Draft EIR  
**Description** Note: Review per lead

Description, Nature, Purpose and Beneficiaries of Project: The proposed project would include a maximum of 500 multi-family residential units and ~ 55,000 sq ft of neighborhood-serving commercial uses in a series of 6-story building built over a parking podium. Maximum height of the buildings would be ~ 100 ft above finished grade. The combined gross floor area for the residential and neighborhood-serving commercial uses for the proposed project would total ~ 708,659 sq ft with a floor area ratio (FAR) of 3.3:1.

The proposed project would provide a total parking supply of ~ 1,470 parking spaces, consisting of an estimated 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for project for retail visitors.

The project as designed is intended to achieve a Leadership in Energy and Environmental Design (LEED) silver rating.

---

**Lead Agency Contact**

**Name** Hadar Plafkin  
**Agency** City of Los Angeles/Department of City Planning  
**Phone** 213-978-1357 **Fax**  
**email**  
**Address** 200 N. Spring Street, Rm 750  
**City** Los Angeles **State** CA **Zip** 90012

---

**Project Location**

**County** Los Angeles  
**City**  
**Region**  
**Lat / Long**  
**Cross Streets** Sepulveda Boulevard and Camarillo Streets  
**Parcel No.**  

<b>Township</b>	<b>Range</b>	<b>Section</b>	<b>Base</b>
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**Proximity to:**

**Highways** I-405 and SR-101  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use** Regional Commercial

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**Project Issues** Aesthetic/Visual; Air Quality; Biological Resources; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Landuse; Cumulative Effects

---

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage

Note: Blanks in data fields result from insufficient information provided by lead agency.

Document Details Report  
State Clearinghouse Data Base

Commission

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*Date Received* 12/16/2010      *Start of Review* 12/16/2010      *End of Review* 03/07/2011



Arnold Schwarzenegger  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Cathleen Cox  
Acting Director

### Memorandum

**Date:** December 17, 2010  
**To:** All Reviewing Agencies  
**From:** Scott Morgan, Director  
**Re:** SCH # 2004111068  
IL Villaggio Toscano

---

The State Clearinghouse forwarded the above-mentioned project to your agency for review on December 16<sup>th</sup>, 2010 with incorrect review dates. Please make note of the following information for your files:

Review period ends: February 07, 2011

We apologize for any inconvenience this may have caused. All other project information remains the same.

cc: Hadar Plafkin  
City of Los Angeles  
200 N. Spring Street Room 750  
Los Angeles, CA 90012



**matrix**  
environmental

## **T R A N S M I T T A L**

Via U.S. Mail       Via Messenger       Via Federal Express

**Date**                      December 15, 2010

**To**                         State Clearinghouse  
                                 1400 Tenth Street  
                                 Sacramento, CA 95814

**Sent by:**                Stephanie Eyestone-Jones

**Re:**                        **IL Villaggio Toscano Draft EIR (State Clearinghouse  
                                 Number 2004111068)**

**Items:**                   One copy of NOC  
                                 One copy of NOA  
                                 15 CDs with full EIR  
                                 15 Copies of Executive Summary

**Remarks:**            With the holidays, the City has the comment period starting Thursday  
                                 December 16, 2010 and ending February 7, 2011. Please call us as  
                                 424.207.5333 should you have any questions. THANK YOU.

**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

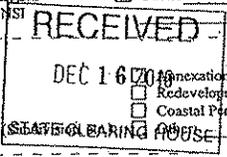
SCH # 2004111068

Project Title: IL Villaggio Toscano  
 Lead Agency: City of Los Angeles/Department of City Planning Contact Person: Hadar Platidn  
 Mailing Address: 200 N. Spring Street Room 750 Phone: 213-978-1357  
 City: Los Angeles Zip: 90012 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Sherman Oaks  
 Cross Streets: Sepulveda Boulevard and Camarillo Street Zip Code: 91403

Longitude/Latitude (degrees, minutes and seconds): \_\_\_\_\_ N / \_\_\_\_\_ W Total Acres: \_\_\_\_\_  
 Assessor's Parcel No.: \_\_\_\_\_ Section: \_\_\_\_\_ Twp.: \_\_\_\_\_ Range: \_\_\_\_\_ Base: \_\_\_\_\_  
 Within 2 Miles: State Hwy #: SR-101A-405 Waterways: \_\_\_\_\_  
 Airports: \_\_\_\_\_ Railways: \_\_\_\_\_ Schools: \_\_\_\_\_

Document Type:  
 CEQA:  NOP  Draft EIR NEPA:  NOI Other:  Joint Document  
 Early Cons  Supplement/Subsequent EIR  EA  Final Document  
 Neg Dec (Prior SCH No.)  Draft EIS  Other: \_\_\_\_\_  
 Mit Neg Dec Other: \_\_\_\_\_  FONSI



Local Action Type:  
 General Plan Update  Specific Plan  Rezone  Annexation  
 General Plan Amendment  Master Plan  Prezone  Redevelopment  
 General Plan Element  Planned Unit Development  Use Permit  Coastal Permit  
 Community Plan  Site Plan  Land Division  Other: \_\_\_\_\_

Development Type:  
 Residential: Units 500 Acres \_\_\_\_\_ Employees \_\_\_\_\_  Transportation: Type \_\_\_\_\_  
 Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Mining: Mineral \_\_\_\_\_  
 Commercial: Sq.ft. 55,000 Acres \_\_\_\_\_ Employees \_\_\_\_\_  Power: Type \_\_\_\_\_ MW \_\_\_\_\_  
 Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_  
 Educational: \_\_\_\_\_  Hazardous Waste: Type \_\_\_\_\_  
 Recreational: \_\_\_\_\_  Other: \_\_\_\_\_  
 Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_

Project Issues Discussed in Document:  
 Aesthetic/Visual  Fiscal  Recreation/Parks  Vegetation  
 Agricultural Land  Flood Plain/Flooding  Schools/Universities  Water Quality  
 Air Quality  Forest Land/Fire Hazard  Septic Systems  Water Supply/Groundwater  
 Archeological/Historical  Geologic/Seismic  Sewer Capacity  Wetland/Riparian  
 Biological Resources  Minerals  Soil Erosion/Compaction/Grading  Growth Inducement  
 Coastal Zone  Noise  Solid Waste  Land Use  
 Drainage/Absorption  Population/Housing Balance  Toxic/Hazardous  Cumulative Effects  
 Economic/Jobs  Public Services/Facilities  Traffic/Circulation  Other: \_\_\_\_\_

Present Land Use/Zoning/General Plan Designation:  
 Regional Commercial

**Description, Nature, Purpose and Beneficiaries of Project:** The proposed project would include a maximum of 500 multi-family residential units and approximately 55,000 square feet of neighborhood-serving commercial uses in a series of six-story buildings built over a parking podium. Maximum height of the buildings would be approximately 100 feet above finished grade. The combined gross floor area for the residential and neighborhood-serving commercial uses for the proposed project would total approximately 708,659 square feet, with a floor area ratio (FAR) of 3.3:1. The proposed project would provide a total parking supply of approximately 1,470 parking spaces, consisting of an estimated 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for retail visitors. The project as designed is intended to achieve a Leadership in Energy and Environmental Design (LEED) silver rating.

State Clearinghouse Contact: \_\_\_\_\_ (916) 445-0613 *BR*

State Review Began: 12-16 2010

SCH COMPLIANCE X 2010  
02 07 - 2011

**Project Sent to the following State Agencies**

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Resources              | State/Consumer Svcs                                      |
| <input type="checkbox"/> Boating & Waterways               | General Services   |
| <input type="checkbox"/> Coastal Comm                      | Cal EPA  |
| <input type="checkbox"/> Colorado Rvr Bd                   | ARB: Airport Projects                                    |
| <input checked="" type="checkbox"/> Conservation           | ARB: Transportation Projects                             |
| <input checked="" type="checkbox"/> Fish & Game # <u>5</u> | ARB: Major Industrial Projects                           |
| <input type="checkbox"/> Delta Protection Comm             | SWRCB: Div. Financial Assist.                            |
| <input type="checkbox"/> Cal Fire                          | SWRCB: Wtr Quality                                       |
| <input type="checkbox"/> Historic Preservation             | SWRCB: Wtr Rights  |
| <input checked="" type="checkbox"/> Parks & Rec            | <input checked="" type="checkbox"/> Reg. WQCB # <u>4</u> |
| <input type="checkbox"/> Central Valley Flood Prot.        | <input checked="" type="checkbox"/> Toxic Sub Ctrl-CTC   |
| <input type="checkbox"/> Bay Cons & Dev Comm.              | Yth/Adlt Corrections                                     |
| <input checked="" type="checkbox"/> DWR                    | Corrections  |
| <input type="checkbox"/> Cal EMA                           |  |
| <input type="checkbox"/> Resources, Recycling and Recovery |  |
| <b>Bus Transp Hous</b>                                     | <b>Independent Comm</b>                                  |
| <input checked="" type="checkbox"/> Aeronautics            | Energy Commission  |
| <input checked="" type="checkbox"/> CHP # <u>7</u>         | <input checked="" type="checkbox"/> NAHC                 |
| <input checked="" type="checkbox"/> Caltrans # _____       | Public Utilities Comm                                    |
| <input type="checkbox"/> Trans Planning                    | State Lands Comm   |
| <input checked="" type="checkbox"/> Housing & Com Dev      | Tahoe Rgl Plan Agency                                    |
| <input type="checkbox"/> Food & Agriculture                |  |
| <input type="checkbox"/> Public Health                     |  |
|  | Conservancy  |
|  | Other: _____   |

Please note State Clearinghouse Number (SCH#) on all Comments

SCH#: 2004111068  
 Please forward late comments directly to the Lead Agency

AQMD/APCD 33  
 (Resources: 12/18)



We remind you that all improvements on-and-or affecting State right-of-way will need an encroachment permit from Caltrans. During the permit review process, Caltrans may require additional analysis and changes to the proposed actions might be needed. To avoid delays and confusion, please coordinate proposed mitigation improvements with our Office of Permits as early as possible, you may call (213)897-3631 to schedule an appointment.

### Freeway Mainline

The Traffic Impact Analysis states that the proposed development would not exceed Los Angeles County's Congestion Management Program (CMP) criteria of significance for freeways I-405 and US-101. Generally, Caltrans does not consider the Los Angeles County's CMP analysis alone to be adequate for the analysis of transportation impacts pursuant to a CEQA review. A CMP analysis alone fails to provide adequate information as to the potential cumulative effect of the added traffic, please see Section 15065(3) of the CEQA guidelines.

We note on Table IV.K-9, the project assigns approximately 65 vehicle trips to US-101 northbound direction and 66 in the southbound direction during the PM peak period. The project assigns approximately 61 vehicle trips to I-405 in the northbound direction and 22 in the southbound direction during the PM peak period. Given the close proximity to said freeways (1/2 mile or less) those trip assignments seem unreasonably low. Please elaborate on the methodology used to estimate the directional distribution percentages.

We acknowledge that based on vehicle trip assignments shown to be directed to nearby freeways, the proposed project by itself is not likely to result in significant transportation impacts. However, when viewed in the context of already deficient operating conditions (LOS "F") and when combined with future foreseeable traffic from 51 related development projects and ambient growth, the added traffic would be cumulative considerable.

The US-101 and I-405 interchange is known to be one of the most congested interchanges in Los Angeles County for a long time. In 1997 the City of Los Angeles and Caltrans prepared a feasibility study to determine possible improvements to this interchange. As a result, several improvements were recommended and some have actually been completed. However, improvements to the Southbound I-405 freeway to freeway connector to Northbound and Southbound US-101 are still pending, as well as those to the US-101 ramps to and from Van Nuys Boulevard. We request the lead agency consult with Caltrans to explore mitigation alternatives for potential cumulative transportation impacts to nearby freeways which may include funding contribution towards currently planned or future improvements.

We acknowledge that to comply with Community Plan goals and policies as well as with the Corridor Specific Plan mitigation requirements, the project will implement a Transportation Demand Management Program (TDM) and pay a Project Impact Assessment Fee (PIA fee). The PIA fee would be used to fund the Phase I traffic improvements listed in the Specific Plan, please disclose what those improvements are and whether they involve State highway facilities.

### Noise

We note the project site is currently exposed to freeway noise levels in excess of acceptable levels for a residential use. Therefore, the building design shall include adequate sound insulation, per current building codes, to reduce the freeway noise to within acceptable levels. We understand that no additional noise mitigation will be required from the State.

Construction

Since the project site borders State right-of-way (I-405 northbound connector to US-101), there is the possibility that work may encroach onto it. We request an opportunity to verify that proposed construction does not jeopardize or compromise the integrity of State facilities. Please submit grading and utility plans together with a hydrology report to our Office of Permits as soon as they are available. Please be aware that diversion of flow onto State facilities is generally not permitted.

We remind you that the transportation of heavy construction equipment, materials, or other special equipment, which requires the use of oversized-transport vehicles on State highways, would require a Caltrans transportation permit.

Due to the high volume of through traffic on nearby I-405 and US-101 during the peak commute periods, we request that construction-related truck trips be limited to off-peak hours as much as possible.

If you have any questions regarding these comments, you may contact Elmer Alvarez, project coordinator at (213) 897 – 6696. Please refer to our internal record number 101225/EA.

Sincerely,



DIANNA WATSON  
IGR/CEQA Program Manager  
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

## NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-5390  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
e-mail: [ds\\_nahc@pacbell.net](mailto:ds_nahc@pacbell.net)



clear  
3/7/11  
e

December 24, 2010

Hadar Plafkin

**City of Los Angeles City Planning Department**

200 N. Spring Street  
Los Angeles, CA 90012

RECEIVED

DEC 28 2010

STATE CLEARING HOUSE

Re: SCH#2004111068; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the L. Villaggio Toscano Project of 500 Residential Units, 1,000 Parking Spaces; Requiring 165,000 cubic yards of grading; located in the Studio City – Toluca Lake – Cahuenga Pass Community Plan Area; City of Los Angeles; Los Angeles County, California

Dear Hadar Plafkin:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3<sup>rd</sup> 604). The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amendment effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance. The lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. State law also addresses Native American Religious Expression in Public Resources Code §5097.9.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural Resources were NOT identified within one-half mile of several of the Area of Potential Effect (APE). Also, it is important to understand that the absence of archaeological, Native American cultural resources in an area does not indicate that they are not present, or will be present once ground-breaking activity begins. The NAHC recommends early consultation with Native American tribes in your area as the best way to avoid unanticipated discoveries once a project is underway and to learn of any sensitive cultural areas.

Enclosed a list with the names of the culturally affiliated tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed

whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.

Furthermore the NAHC recommends that you contact the California Historic Resources Information System (CHRIS) of the Office of Historic Preservation (OHP), for information on recorded archaeological data. This information is available at the OHP Office in Sacramento (916) 445-7000.

Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the attached NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f] *et seq.*), 36 CFR Part 800.3, .4 & .5, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq.*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes*. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e).

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance" may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

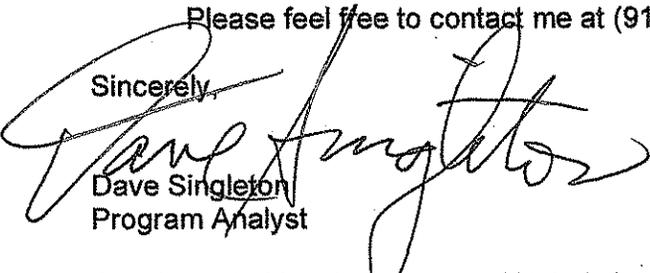
CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 Senate Bill 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission

corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton  
Program Analyst

Attachment: List of Culturally Affiliated Native American Contacts

Cc: State Clearinghouse



GAIL FARBER, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE: **LD-1**

February 9, 2011

Mr. Hadar Palafkin  
Environmental Review Coordinator  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Dear Mr. Palafkin:

**DRAFT ENVIRONMENTAL IMPACT REPORT  
II VILLAGGIO TOSCANO  
4827 NORTH SEPULVEDA BOULEVARD  
CITY OF LOS ANGELES**

Thank you for the opportunity to review the Draft Environmental Impact Report for the Il Villaggio Toscano project. The project will consist of a maximum of 500 multi-family, residential units and approximately 55,000 square feet of neighborhood-serving commercial uses in a series of six-story buildings built over a parking podium. The project is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area of the City of Los Angeles.

The following comments are for your consideration and relate to the environmental document only.

**Hazards-Geotechnical/Geology/Soils**

The liquefaction analyses completed by Geotechnologies were based on the California Department of Conservation, Division of Mines and Geology's Special Publication 117 (1997). Updated liquefaction and seismically-induced settlement analyses based on the California Geological Survey's Special Publication 117A (2008) should be completed. Also, Technical Appendix C, in the Geotechnologies report dated June 6, 2002, should be updated to reflect current seismic design criteria required for liquefaction analyses as presented in the current building code.

Mr. Hadar Plafkin  
February 9, 2011  
Page 2

If you have any questions regarding the geotechnical/geology/soils comment, please contact Mr. Jeremy Wan at (626) 458-4925 or [jwan@dpw.lacounty.gov](mailto:jwan@dpw.lacounty.gov).

**Hazards–Flood/Water Quality**

1. Contact the County of Los Angeles Department of Public Works' Design Division to obtain allowable discharge for any proposed connections to Los Angeles County Flood Control District facilities. Proposed discharge in excess of allowable discharge may require mitigation.
2. Contact Public Works' Land Development Division, Permits Section, for permitting requirements pertaining to any proposed alterations, connections, or encroachments that affect Flood Control District facilities.

If you have any questions regarding the flood/water quality comments, please contact Ms. Lizbeth Calderon at (626) 458-4921 or [lcalderon@dpw.lacounty.gov](mailto:lcalderon@dpw.lacounty.gov).

If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or [tduong@dpw.lacounty.gov](mailto:tduong@dpw.lacounty.gov).

Very truly yours,

GAIL FARBER  
Director of Public Works

  
ANTHONY E. NYINIH  
Assistant Deputy Director  
Land Development Division

JY:ca

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# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

E-MAILED: MARCH 4, 2011

March 4, 2011

Mr. Hadar Plafkin, City Planner, [Hadar.Plafkin@lacity.org](mailto:Hadar.Plafkin@lacity.org)  
Los Angeles Department of City Planning, EIR Unit  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

## **Draft Environmental Impact Report (Draft EIR) for the Proposed II Villaggio Toscano Project (SCH No. 2004111068)**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

The proposed project includes the construction of up to 500 multi-family residential units and approximately 55,000 square feet of commercial uses in a series of six-story buildings built over a parking structure. The combined gross floor area for both residential and commercial uses would be approximately 708,659 square feet on a 5.1 acre site. The proposed project would also provide a total of 1,470 parking spaces and would include approximately 165,000 cubic yards of grading and soil export. Also, according to Figure II-2 on page II-3, the proposed project area is located less than 500 feet from the Ventura Freeway (US-101)/San Diego Freeway (I-405) interchange to the northwest. Sensitive land uses (i.e., residential uses) are located east of the project site.

Recent research has revealed that pollutants found in close proximity to roadways are associated with a variety of adverse health effects, independent of regional air quality impacts<sup>1</sup>. These can include reduced lung capacity and growth<sup>2</sup>; cardiopulmonary disease<sup>3</sup>; increased incidence of low birth weight, premature birth, and birth defects<sup>4</sup>; and exacerbation of asthma<sup>5</sup>. In order to address air quality issues such as these that are related to incompatible land uses, the California Air Resources Board published its Air Quality and Land Use Handbook: A Community Perspective (CARB Land Use Handbook)<sup>6</sup>. The CARB Land Use Handbook recommends avoiding siting sensitive land uses within 500 feet of high traffic roads.

<sup>1</sup> "Special Report 17. Traffic-related air pollution: A critical review of the literature on emissions, exposure, and health effects". Health Effects Institute, May 2009; 394 p.

<sup>2</sup> "Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study". Gauderman WJ et al., Lancet, February 2007; 369 (9561): 571-7.

<sup>3</sup> "Exposure to traffic and the onset of myocardial infarction". Peters A et al., The New England Journal of Medicine, 351(17):1721-1730

<sup>4</sup> Ritz B, et al. 2002 Ambient air pollution and risk of birth defects in Southern California. Am J Epidemiology, 155:17-25

<sup>5</sup> McConnell R, et al. 2006. Traffic, susceptibility, and childhood asthma. Environ Health Perspectives 114(5):766-72

<sup>6</sup> <http://www.arb.ca.gov/ch/handbook.pdf>

The AQMD staff is concerned that project residents will be exposed to the substantial amounts of traffic resulting in a variety of adverse health effects. Despite its detail, the HRA and proposed mitigation appears to take an unrealistic view of potential health effects of the project. Given the preponderance of data now available regarding health effects from living near freeways, the AQMD staff strongly encourages the lead agency to reconsider placing new housing immediately adjacent to one of the busiest freeway intersections in southern California. Detailed comments regarding the HRA are attached to this letter.

Finally, AQMD staff is concerned that all feasible mitigation measures have not been considered to reduce the significant emissions associated with the construction and extensive grading activities for this project. In addition to the mitigation measures listed by the lead agency starting on page IV.B-74, AQMD staff recommends that additional mitigation measures be considered that might reduce these emissions further. These additional measures are described in the detailed comments attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the lead agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:GM

LAC101216-02  
Control Number

**Health Risk Assessment**

AQMD staff is concerned that the HRA underestimates the impacts to the residents that will be living in the proposed project. The 405-101 interchange is one of the busiest freeway intersections in southern California, with well over half a million cars passing through it each day. By placing the residential project immediately adjacent to this interchange, the lead agency is ignoring the abundant health science data that has come out over the past decade that demonstrates serious health consequences for those living near a freeway. Although the lead agency has made an attempt to quantify these impacts, the HRA does not mention any recent health studies that have been published since the regulatory guidance was published upon which the HRA is based. Further, several factors within the HRA analysis are inconsistent with AQMD recommended methodologies, and yield an underestimation of risk.

1. The modeling domain only includes emissions from the freeway within 500 feet of the project site. The analysis does not take into account the cumulative impact of the 405 and 101 freeways within ¼ mile of the project site, including the bulk of the interchange. AQMD staff recommends that if the lead agency chooses to continue pursuing this project, it revise the HRA to include impacts from the freeway out to ¼ mile.
2. The one in one million carcinogenic risk significance threshold utilized by the lead agency is based on the AQMD CEQA significance thresholds, however the HRA only uses a 30 year exposure period. The AQMD threshold is based on a standard 70 year residential threshold. As the lead agency has not specified a mitigation measure that will limit residential duration to 30 years or less, the HRA underestimates project impacts by a factor of 2.33 ( $70/30=2.33$ ). This change would increase the baseline risk from 69 in one million to 128 in one million. The proposed mitigation (filters) would not mitigate this risk.
3. The HRA assumes that project residents would not be exposed to pollutants while spending time outdoors onsite. The proposed mitigation (filters in the HVAC system) has no effect when people spend time outdoors. However the exposure calculations in the HRA assume that people spend 100% of their time indoors. Additional mitigation measures would be required to ensure this occurs, including removing all areas where outdoor activities could occur, and ensuring that no windows are operable. In addition, a long term maintenance plan needs to be in place to ensure that high efficiency filters are replaced regularly for the life of the building.
4. The proposed 90% efficiency of the filters would not reduce the PM10 levels to less than significant levels (see table). The most recent data available from AQMD studies of filters indicates that even high efficiency filters rated at 90-99% efficiency only achieve approximately 85-90% efficiency in practice. This appears to result in an unreported significant health risk for residents living at the proposed project site.

<b>Averaging Period</b>	<b>PM10 Baseline from HRA</b>	<b>PM10 after 90% filtration</b>	<b>PM10 significance threshold</b>
24 hour	33.82	3.38	2.5
Annual	15.09	1.51	1.0

5. The acute toxics analysis presented in the HRA does not use worst case emission factors. For example, the Total Organic Gas emission factor is 0.086 grams per mile for the 1 hour acute analysis; however this corresponds to vehicle speeds of 64 mph. Emission factors for congested conditions, for example 5 mph, are 4.5 times higher at 0.387 grams per mile. As congested conditions occur daily at this interchange, the acute analysis should be revisited if the lead agency continues to pursue this project. The vehicle volume should also be revisited for acute conditions as long term rates may underestimate short term rates. AQMD staff notes that the proposed filter mitigation is ineffective at reducing the acute risk impacts from volatile organic compounds, even indoors.
6. The NO<sub>2</sub> analysis presented in the HRA uses a NO<sub>x</sub> to NO<sub>2</sub> conversion factor that may not be valid for this project site. As dispersion modeling was performed for the NO<sub>2</sub> analysis, the NO<sub>x</sub> to NO<sub>2</sub> conversion approaches recommended by the US EPA for use in AERMOD should be used to determine NO<sub>2</sub> impacts if the lead agency chooses to continue with this project.

### **Construction Mitigation Measures**

7. Because the lead agency has determined that construction phase emissions for oxides of nitrogen (NO<sub>x</sub>) and particulate matter (PM<sub>10</sub>) fugitive dust exceed the established significance thresholds, the SCAQMD recommends the following modifications and additions to the mitigation measures listed on page IV.B-74 to further to reduce NO<sub>x</sub> and PM<sub>10</sub> emissions, if applicable and feasible. Additional construction mitigation measure suggestions can also be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html):

#### Recommended Changes:

- |        |   |
|--------|---|
| MM B-2 | Streets shall be swept as needed during construction ( <u>recommend water sweepers with reclaimed water</u> ), but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.   |
| MM B-4 | General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, <u>all trucks and vehicles in loading and unloading queues will have their engines turned off when not in use or idling will be limited to five (5) minutes or less</u> , to reduce vehicle emissions. <u>Ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449</u> . Construction activities should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts. |
| MM B-6 | <del>On site mobile equipment shall be powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.</del>  |

Require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:

- April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

For additional measures to reduce off-road construction equipment and other construction related emissions, the following mitigation measure tables are located at the following website:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

Recommended additions:

NOx

- Configure construction parking to minimize traffic interference;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;

- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site; and
- Reroute construction trucks away from congested streets or sensitive receptor areas.

PM10/PM2.5

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Replace ground cover in disturbed areas as quickly as possible;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph; and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.



ANTONIO R. VILLARAIGOSA  
*Mayor*

Commission  
THOMAS S. SAYLES, *President*  
ERIC HOLOMAN, *Vice-President*  
CHRISTINA E. NOONAN  
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BARBARA E. MOSCHOS, *Secretary*

RONALD O. NICHOLS  
*General Manager*  
RAMAN RAJ  
*Chief Operating Officer*

March 7, 2011

City of Los Angeles, Department of City Planning  
Environmental Review  
200 North Spring Street, Room 750  
Los Angeles, California 90012  
Attention: Hadar Plafkin, City Planner

**Comments to Draft Environmental Impact Report**  
**ENV-2004-6000-EIR for Il Villaggio Toscano**

This is in response to your correspondence of January 24, 2011, requesting comments on the above-referenced draft environmental impact report (DEIR). The Department of Water and Power, Water Distribution Business Unit (LADWP) has the following comments regarding the water availability and facilities for this project.

- Section II Project Design – page II-13:  
The DEIR indicates decorative paving will be installed on the sidewalks as part of this project. This will result in additional costs to LADWP to maintain and/or modify public water facilities located behind the curb in the public right-of-way. Therefore, an agreement between the LADWP and developer may be necessary to identify limitations for repairs of decorative features within the City right-of-way.
- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-20:  
Currently, the City of Los Angeles, Fire Department (LAFD) does not allow new installations of 4x4 double fire hydrants. Please check with LAFD Hydrants and Access Unit for more information at 213-482-6543.
- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-20:  
There are 2 of the same sentence in the first paragraph, "The fire flow required for a high density commercial or industrial use is 12,000 gpm available to any block."

**Water and Power Conservation . . . a way of life**

111 North Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles 90051-5700  
Telephone: (213) 367-4211 Cable address: DEWAPOLA



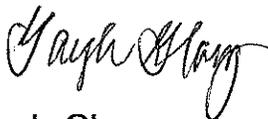
- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-20:  
This sentence in the first paragraph needs to be rewritten, “A minimum residual water pressure of 20 pounds per square inches (psi) is required to remain in the water system in addition to the required gpm flowing.” It needs to indicate that the minimum residual pressure of 20 psi is required for any fire service or hydrant flowing at capacity.
- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-23:  
A fire flow of 4,000 gpm from 4-hydrants may be low for high density residential. Please verify with Inspector McClain of LAFD’s Hydrant and Access Unit at 213-482-6506.
- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-25:  
The EIR indicates that there are currently three hydrants located on the project site. One of these is public hydrant, F-51597, located at the southwest corner of La Maida Street and Peach Avenue. This hydrant will be abandoned when the existing water distribution mains in Peach Avenue and La Maida Street are abandoned, likely prior to grading of the site. The LAFD Hydrants and Access Unit will determine the need for private on-site hydrants during the Department of City Planning’s (DCP) Subdivision process.
- Section IV J.2 Environmental Impact Analysis, Public Services-Fire Protection – page IV.J-25:  
This sentence in the first paragraph needs to be rewritten, “For eight inch water mains, the LAFD requires fire flows of 2,500 gpm with a residual pressure of 20 psi.” It needs to indicate that the minimum residual pressure of 20 psi is required for any fire service or hydrant flowing at capacity, not for the water main. A 2,500 gpm fire flow could normally be provided from an 8-inch fire service. However, a Water Pressure Flow Report, otherwise known as an SAR, will need to be requested when the fire flow requirements are determined for this project.
- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-22:  
In the last paragraph on the page, the existing water demand of 1,800 gpd should be 2.0 AF per year, not 0.2 AF per year.
- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-24:  
Figure IV.L-1 shows existing water infrastructure. The two existing water service meters at on the west side of Sepulveda Boulevard at the north side of the project site are reversed. The water meter closest to La Maida Street should be a 1-1/2” domestic and the next meter north should be a 2” domestic.
- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-37:  
The last bullet paragraph at the bottom of the page indicates the sizes for the water distribution main upgrades. The only hydraulics that have been done for this project is an SAR for an 8” fire service with a 6” domestic combination meter on 3/16/04. Therefore, it may be premature to assume the sizes of any new water mains without

final information about the fire flow requirements for the public and private hydrants. It may be enough to indicate that based on the domestic and fire flow requirements for this project, water distribution main upgrades may be required in Sepulveda Boulevard and Camarillo Street.

- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-39: The first bullet at the top of the page indicates multiple 8" domestic water meters. It might be better to indicate the domestic flow requirement in gpm for the project rather than size the water meters at this time.
- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-39: The first bullet at the top of the page indicates sizes for the water distribution main upgrades. The only hydraulics that have been done for this project is an SAR for an 8" fire service with a 6" domestic combination meter on 3/16/04. Therefore, it may be premature to assume the sizes of any new water mains without final information about the fire flow requirements for the public and private hydrants. It may be enough to indicate that water distribution main upgrades may be required in Sepulveda Boulevard and Camarillo Street.
- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-39: The bullets at the top of the page indicate the sizes for the domestic water and fire service meters. It might be better to indicate the approximate domestic and fire flow requirements in gpm for the proposed commercial establishments rather than the size of the water meters at this time.
- Section IV L.1 Environmental Impact Analysis, Utilities-Water Supply – page IV.L-44: Section (b) Water Infrastructure again indicates the size of water distribution main upgrades in Sepulveda Boulevard and Camarillo Street. As previously stated above, the only hydraulics that have been done for this project is an SAR for an 8" fire service with a 6" domestic combination meter on 3/16/04. Therefore, it may be premature to assume the sizes of any new water mains without final information about the fire flow requirements for the public and private hydrants. It may be enough to indicate that based on the domestic and fire flow requirements for this project, water distribution main upgrades may be required in Sepulveda Boulevard and Camarillo Street. Or something like, this development will require public water system modifications that would accommodate project requirements.

If you or your consultant have any questions, please contact me at 213-367-1244.

Sincerely,



Gayle Glauz  
Engineer of West Valley District



**Los Angeles City Planning Department  
6262 Van Nuys Boulevard, Suite 351  
Van Nuys, CA 91401-2709**

Internet: <http://lacity.org/pln>



**PLAN REVIEW BOARD (PRB)  
Ventura/Cahuenga Boulevard Corridor Specific Plan**

Craig Buck, 2<sup>nd</sup> Council District Appointee (Sherman Oaks)  
Dennis DiBiase, 3<sup>rd</sup> Council District Appointee (Woodland Hills)  
Art Ginsburg, Mayor Appointee (Studio City)  
Kathy Delle Donne, President, 3<sup>rd</sup> Council District Appointee (Tarzana)  
Bryce C. Lowery, Vice-President, 4<sup>th</sup> Council District Appointee (Cahuenga Pass)  
Lisa Sarkin, 2<sup>nd</sup> Council District Appointee (Studio City)  
Diane Rosen, 5<sup>th</sup> Council District Appointee (Encino)  
Gerald Silver, 5<sup>th</sup> Council District Appointee (Encino)

March 4, 2011

Mr. Hadar Plafkin - Environmental Review Coordinator  
Los Angeles City Planning Department  
200 N. Spring St. Room 750  
Los Angeles, CA 90012

Case No CASE NO. EIR 10-039-PL, ENV-2004-6000-EIR

Project Location: 4827 N. Sepulveda Blvd., Sherman Oaks, CA 91403

The Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board (PRB) is concerned that the II Vilaggio Toscano Draft Environmental Impact Report (DEIR) does not conform to the Ventura/Cahuenga Boulevard Corridor Specific Plan (Specific Plan) and includes several proposed exceptions that could be detrimental to the Corridor and neighboring areas. Here are our primary concerns:

- The DEIR specifies major traffic impacts (see Appendix H, Table 10 of the Traffic Study) that affect the area. This is especially true of the already taxed 101 and 405 freeway ramps and the intersection of Sepulveda and Ventura, a crowded commuter route from all directions that is already rated F. None of the Applicant's proposed mitigations address these major areas of concern.

According to DOT's Revised Traffic Study of 2007, "...the proposed project will have significant impacts at the following intersections":

- Burbank Blvd. and Sepulveda Blvd.
- Camarillo St. and Sepulveda Blvd.
- Sherman Oaks Ave., San Diego Freeway S/B ramps and Ventura Blvd.
- Sepulveda Blvd. and Ventura Blvd.
- Van Nuys Blvd. and Ventura Blvd.
- Beverly Glen and Ventura Blvd.
- Dickens and Sepulveda Blvd.

Except for the first and the last, all of these intersections are within the Specific Plan.

- The DEIR specifies that the Il Vilaggio Toscano project is "mixed-use," and all requests for exceptions are based on this assumption. But Section 4 of the Specific Plan clearly defines a Mixed-Use Project as "A Project which combines office or other commercial uses with a residential use with at least 25% of the total Project floor area as residential and at least 33% of the total Project floor area as commercial." The commercial use of Il Vilaggio Toscano comprises only about 8% of the total space, thus it does not meet the Specific Plan's definition of a mixed-use project and should not be considered as such for the purpose of exception requests.
- The Applicant is requesting an exception to the Plan's height restrictions in Section 7.E.1.b4 in order to build to a height of 100 feet, exceeding the limit by 33%. The Specific Plan limits the height in this sub-area to 75 feet. Even if, for the sake of argument, this were a mixed-use project, the limit would still be only 82 feet. The PRB believes height limit exceptions should be rare, minimal and made only in cases where the applicant can show a benefit to the Corridor and the community. Due to the traffic impact expected from the scale of the project, the PRB believes this exception is both unjustified and detrimental.
- The project developer is requesting an exception to significantly exceed the Plan's Floor Area Ratio restrictions in Section 6.B.4. The Specific Plan restricts the FAR of a project to 1.5 to 1. The applicant wants to execute an FAR of 3.3 to 1. This exceeds the Specific Plan by more than double. The PRB believes FAR exceptions should be rare, minimal and made only in cases where the applicant can show a benefit to the community. Due to the traffic impact expected from the scale of the project, the PRB believes this exception is both unjustified and detrimental to the community.
- The Applicant requests an exception from the Specific Plan's 18-inch setback requirement in Section 7.A.2.a. The PRB sees no reason to grant this exception.

Until these issues are specifically addressed, or the scale of the project significantly reduced, the Ventura/Cahuenga Boulevard Corridor Specific PRB recommends the City oppose granting these discretionary approvals. We also strenuously oppose any amendments to the Ventura/Cahuenga Boulevard Corridor Specific Plan.

Approved unanimously\* by the Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board on March 3, 2011.



Kathy Delle Donne, President  
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Gerald Silver  
5<sup>th</sup> Council District Appointee

\*Art Ginsburg was not present at March 3, 2011 meeting



**Los Angeles City Planning Department  
6262 Van Nuys Boulevard, Suite 430  
Van Nuys, CA 91401-2709**

**Internet:** <http://planning.lacity.org/>



**PLAN REVIEW BOARD (PRB)  
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Gerald Silver, 5<sup>th</sup> Council District Appointee (Encino)

March 7, 2011

Mr. Hadar Plafkin - Environmental Review Coordinator  
Los Angeles City Planning Department  
200 N. Spring St. Room 750  
Los Angeles, CA 90012

**Case No. ENV-2004-6000-EIR, City Clerk No. EIR 10-039-PL**

**Project Location:** 4827 N. Sepulveda Blvd., Sherman Oaks, CA 91403

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- The Applicant is requesting an exception to the Plan's height restrictions in Section 7.E.1.b4 in order to build to a height of 100 feet, exceeding the limit by 33%. The Specific Plan limits the height in this sub-area to 75 feet. Even if, for the sake of argument, this were a mixed-use project, the limit would still be only 82 feet. The PRB believes height limit exceptions should be rare, minimal and made only in cases where the applicant can show a benefit to the Corridor and the community. Due to the traffic impact expected from the scale of the project, the PRB believes this exception is both unjustified and detrimental.
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Approved unanimously\* by the Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board on March 3, 2011.



Kathy Delle Donne, President  
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Gerald Silver  
5<sup>th</sup> Council District Appointee

\*Art Ginsburg was not present at March 3, 2011 meeting

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CALIFORNIA



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Jill Banks Barad, President, Res. 6  
Jeff Ebenstein, 1<sup>st</sup> Vice Pres. Bus-3  
Arthur Fields, 2<sup>nd</sup> Vice Pres. Res. 7  
Howard Katchen, Treasurer Res. 3  
Shanna Coburn, Secretary Bus. 2

**Sherman Oaks Neighborhood Council**

March 3, 2011

Hadar Plafkin  
Los Angeles City Planning Department, Room 750  
City Hall  
200 N. Spring Street  
Los Angeles, CA 90012

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MAR 09 2011

ENVIRONMENTAL  
COUNCIL

Re: EIR 10-039-PL, ENV-2004-6000-EIR

Dear Mr. Plafkin:

The Sherman Oaks Neighborhood Council Land Use Committee has studied the Draft Environmental Impact Report for the M. David Paul Project "Il Vilaggio Toscano" proposed for 4827 Sepulveda Blvd. in Sherman Oaks and presented its findings to the Sherman Oaks Neighborhood Council Board (SONC). The Board voted the adoption of the attached Comments on the Il Vilaggio Toscano Draft EIR.

The comments are grouped in four categories: Aesthetics and Visual Quality; Traffic Impacts; Project Alternatives; and Issues Omitted from the Draft EIR That Were Not Addressed and Why SONC did not Address Them.

Thank you,

*Jill B. Barad*

Jill Banks Barad  
President  
Sherman Oaks Neighborhood Council

*Ronald Ziff*

Ronald Ziff  
Chair Land Use Committee  
Sherman Oaks Neighborhood Council

# **Sherman Oaks Neighborhood Council Comments on Il Vilaggio Toscano Environmental Impact Report**

**EIR 10-039-PL, ENV-2004-6000-EIR**

## **Aesthetics, and Visual Quality**

The Draft EIR fails to properly analyze the project's impacts to aesthetics. Regulations regarding required setbacks, limitations on lot coverage and floor area ratio, and buffering between uses all contribute to the visual quality and walkability of an area. However, the Draft EIR fails to consider the potential impacts on the area's visual quality that would be the result of the applicant's proposal to eliminate the front yard setback and increase the lot coverage from the 75% allowed under the Specific Plan to 83%.

The Draft EIR also fails to consider the project's proposed FAR of 3.3 to 1 on the area's visual quality. The proposed FAR is more than twice that allowed by the Specific Plan, resulting in a very dense project that negatively impacts the area's aesthetics.

The architectural drawings show a wall of 100 feet in height for the building at the sidewalk along Sepulveda Boulevard. Such a wall will loom over pedestrians visiting the project, detracting from the visual quality and walkability of the project.

Similarly, the lack of a front yard setback eliminates opportunities for perimeter landscaping which would contribute to the visual quality.

Finally, the project's open space should be visible to the street, so as to contribute to the visual quality and walkability of the project.

## **Traffic Impacts**

**The Draft EIR fails to adequately analyze the project's impacts on traffic.** The traffic study does not address morning congestion on Sepulveda and the traffic that will go east on Camarillo and then attempt to go south via Noble or Kester.

Additionally, the traffic study does not consider the feasibility of "scrambled" pedestrian crossings, whereby pedestrians may cross in all directions while traffic is stopped, at Ventura and Sepulveda. Such crossings have been shown to have positive impacts on traffic flow in areas such as Westwood, Beverly Hills, and Pasadena.

The Draft EIR proposes to mitigate the removal and/or restriction of street parking during peak traffic hours by requiring that the applicant allocate \$300,000 to a parking congestion zone. However, the Draft EIR fails to identify with any specificity what those funds will be used for or how that will mitigate the removal and/or restriction of street parking spaces. The effectiveness of the allocation of such funds as a mitigation measure is unpredictable at best.

(continued on page 2)

# **Sherman Oaks Neighborhood Council Comments on Il Vilaggio Toscano Environmental Impact Report**

(continued from page 1)

Finally, the Draft EIR concludes that the project would result in significant and unavoidable impacts at five intersections, even if all proposed mitigation measures are determined to be feasible. What are the overriding considerations the applicant intends to rely on to justify the adverse impacts under CEQA?

## **Project Alternatives**

The Draft EIR's analysis of Project Alternatives is incomplete. The Draft EIR fails to consider a project that would not require vacation of public streets and would comply with the zoning, Q conditions and Specific Plan requirements as those requirements exist today.

Additionally, the Draft EIR's analysis of Project Alternatives fails to consider alternate uses for the vacation of public streets such as realigning the streets to serve the public access or turning them into landscaped "park like" public open space.

## **Issues Omitted from the DEIR That Were Not Addressed and Why SONC Did Not Address Them.**

SONC has not addressed the following issues in its comments on the Draft EIR based upon representations by the applicant's representatives:

- The off ramp from the 405 Freeway behind the project is not expected to be pursued.
- The peak hour parking prohibition on Ventura Boulevard has been rejected by DOT.
- Parking for the retail employees will be in the resident parking areas.
- Loading for the 10,000 square feet of community retail will be allowed off hours in the customer parking area.



Officers

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**January 26, 2011**

**Mr. Hadar Plafkin - Environmental Review Coordinator  
Los Angeles City Planning Department  
200 N. Spring St. Room 750  
Los Angeles, CA 90012**

**Case No CASE NO. EIR 10-039-PL, ENV-2004-6000-EIR**

**Project Name: Il Villaggio Toscano**

**Project Location: 4827 N. Sepulveda Blvd., Sherman Oaks, CA 91403**

**Proposed Project: The proposed project includes 500 multi-family residential units and 55,000 square feet of neighborhood-serving commercial uses in a series of six-story buildings built over a parking podium. Maximum height of the buildings would be 100 feet above finished grade. The combined gross floor area for the residential and neighborhood-serving commercial uses for the proposed project would total 708,659 square feet, with a floor area ratio (FAR) of 3.3:1. The proposed project would provide 1,470 parking spaces, consisting of 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for retail visitors. The proposed project is located within the boundaries of the Ventura/Cahuenga Boulevard Corridor Specific Plan.**

***On January 26, 2011, the Encino Neighborhood Council passed the following Motion***

**MOTION**

**"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 for the Il Villaggio Toscano, 8-story, 500 unit apartment projects at 4827 Sepulveda Blvd. 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."**

*Cordially yours,*



**Louis Krokover**

**President, Encino Neighborhood Council**

ENCINO PROPERTY OWNERS ASSN.  
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Encino, CA 91416

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SHERMAN OAKS HOMEOWNERS ASSN.  
PO Box 5223  
Sherman Oaks, CA 91413

January 14, 2011

Mr. Hadar Plafkin - Environmental Review Coordinator  
Los Angeles City Planning Department  
200 N. Spring St. Room 750  
Los Angeles, CA 90012

Case No CASE NO. EIR 10-039-PL, ENV-2004-6000-EIR

Project Location: 4827 N. Sepulveda Blvd., Sherman Oaks, CA 91403

Proposed Project: The proposed project includes 500 multi-family residential units and 55,000 square feet of neighborhood-serving commercial uses in a series of six-story buildings built over a parking podium. Maximum height of the buildings would be 100 feet above finished grade. The combined gross floor area for the residential and neighborhood-serving commercial uses for the proposed project would total 708,659 square feet, with a floor area ratio (FAR) of 3.3:1. The proposed project would provide 1,470 parking spaces, consisting of 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for retail visitors. The proposed project is located within the boundaries of the Ventura/Cahuenga Boulevard Corridor Specific Plan.

We object to the traffic, noise, congestion, infrastructure damage and pollution that six massive 8-story, apartment buildings, totaling 500 units, 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 draft EIR for this project. The draft EIR prepared by Matrix Environmental is "authoritative" looking on the surface, but is grossly inadequate and fails in its findings. The draft 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 ignoring mitigation measures that are required by CEQA. Throughout the draft 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 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:

We oppose the Applicant's request for a Vesting Zone and Height District change from (Q) CR-1L, (Q) P-1L, R3-1L and R1-1L to the C2 zone and to Height District 2D to permit the construction of a new mixed use project containing a maximum of 500 residential units and 55,000 square feet of neighborhood serving retail space on a currently vacant 5.1 acre property.

We oppose the Applicant's request for Exceptions from the Ventura-Cahuenga Boulevard Corridor Specific Plan ("Specific Plan") sections to build a project with a floor area ratio of 3.3 to 1. Section 6.B.4 restricts the floor area ratio of a project to 1.5 to 1.

We oppose the Applicant's request for a zero setback along the front lot line, in violation of Section 7.A.2.a which requires an 18-inch setback along the front lot line defined by the Specific Plan to be Sepulveda Boulevard.

We oppose Applicant's request for an exception to Section 7.B.1 which restricts the maximum lot coverage to 75 % in order to design a project whose lot coverage 83% at grade, but drops to 62% percent lot coverage on the podium level.

We oppose the Applicant request for a 10-foot buffer along the Camarillo frontage for its mixed use project that combines residential and neighborhood serving retail uses as well as parking for each use in a single structure. Section 7.D.2.b requires parking structures to have a landscape buffer of 10 feet around the surface perimeter.

We oppose the Applicant's request to build a 100 foot tall building in violation of Section 7.E.1.b4 which limits the building height in this sub-area to 75 feet and 82 feet for mixed use projects.

We oppose the Applicant's request that the Director of Planning approve the project for compliance with the Ventura/Cahuenga Boulevard Corridor Specific Plan with the exceptions identified herein.

We oppose the Applicant's request for permission to sell a full line of alcoholic beverages for off-site consumption in conjunction with a retail grocery store. We also oppose the Applicant's request that subsequent to this application, an Administrative Plan Approval process be required once the future tenant of the grocery is selected.

We oppose the Applicant's request for approval of a 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 500 residential condominiums units with 55,000 square feet of commercial space.

We oppose the Applicant's request for permission to vacate La Maida Street and Peach Avenue.

We oppose the Applicant's request for approval of a Haul Route

We oppose the Applicant's request that Sepulveda be defined as the front yard and the remaining two yards be defined as side yards.

We oppose the Applicant's request that the decision-maker make the Site Plan Review findings.

We oppose granting the Applicant's procuring various permits from the City of Los Angeles Department of Building and Safety and other municipal agencies for project construction activities, including but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, and building permits.

Our members strongly oppose granting any zone changes, height district changes, vesting zone changes, general plan amendments, specific plan amendments, variances, exceptions or conditional use permits for this project because it is in violation of the Ventura/Cahuenga Boulevard Corridor Specific Plan. We ask that you deny the applicant's requests, based in part upon the following facts:

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 the developer purchased the property. The developer 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 in the future to circumvent the Specific Plan. The Specific Plan only provides minimal protection to the communities of Sherman Oaks and Encino. It must not be degraded further.

On behalf of our members, and the thousands of Encino and other Sherman Oaks residents that are daily impacted by noise, traffic and congestion along Ventura Blvd. and Sepulveda Blvd., we ask that you not approve the zone changes, height district changes, variances and exceptions that are requested.

Cordially yours,

ENCINO PROPERTY OWNERS ASSN.

Diane Rosen, Vice President

PO Box 16279

Encino, CA 91416

HOMEOWNERS OF ENCINO

Gerald A. Silver, President

PO Box 260205

Encino, CA 91436

SHERMAN OAKS HOMEOWNERS ASSN.

Marshall Long, PhD., PE

Board Member and Land Use Chair

Sherman Oaks Homeowners Association

PO Box 5223

Sherman Oaks, CA 91413

Attachment

ENCINO PROPERTY OWNERS ASSN.  
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SHERMAN OAKS HOMEOWNERS ASSN.  
PO Box 5223  
Sherman Oaks, CA 91413

LOS ANGELES CITY PLANNING DEPARTMENT

Il Villaggio Toscano Project

RESPONSE TO

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

CASE NO. EIR 10-039-PL  
ENV-2004-6000-EIR

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

(CEQA, SEC. 21000 et. seq. and GUIDELINES SEC. 15087)

RESPONSE to the Draft Environmental Impact Report (DEIR) for a project known as:

Il Villaggio Toscano

The project will be located at:

4827 N. Sepulveda Blvd., Sherman Oaks, CA 91403

The proposed project affects transportation, earth, air, water, plant life, population, energy, utilities, land use, and other environmental elements in Sherman Oaks, Encino, and their surrounding communities. This document contains our response to the scope and content of the draft environmental information which is germane to your environmental evaluation of this project.

I.

ENCINO PROPERTY OWNERS ASSN.  
HOMEOWNERS OF ENCINO  
SHERMAN OAKS HOMEOWNERS ASSN.

This Response is filed by the Encino Property Owners Assn., Homeowners of Encino, and the Sherman Oaks Homeowners Assn., California non-profit corporations duly organized and existing under the laws of the State of California. They 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 500 multi-family residential units and approximately 55,000 square feet of neighborhood-serving commercial uses in a series of six-story buildings built over a parking podium. Maximum height of the buildings would be approximately 100 feet above finished grade. The combined gross floor area for the residential and neighborhood-serving commercial uses for the proposed project would total approximately 708,659 square feet, with a floor area ratio (FAR) of 3.3:1.

The proposed project would provide a total of 1,470 parking spaces, consisting of 1,000 parking spaces for project residents, 250 parking spaces for residential guests, and 220 parking spaces for retail visitors.

The Applicant requests a Vesting Zone and Height District change from (Q) CR-1L, (Q) P-1L, R3-1L and R1-1L to the C2 zone and to Height District 2D to permit the construction of a new mixed use project containing a maximum of 500 residential units and approximately 55,000 square feet of neighborhood serving retail space on a currently vacant 5.1 acre property.

The Applicant requests Exceptions from the Ventura-Cahuenga Boulevard Corridor Specific Plan ("Specific Plan") sections as follows:

Exception to Section 6.B.4 which restricts the floor area ratio of a project to 1.5 to 1. The Applicant is requesting permission to build a project with a floor area ratio of 3.3 to 1.

Exception to Section 7.A.2.a which requires an 18-inch setback along the front lot line, which is defined by the Specific Plan to be Sepulveda Boulevard. The Applicant requests a zero setback along the front lot line.

Exception to Section 7.B.1 which restricts the maximum lot coverage to 75 %. The Applicant requests an exception from this provision in order to design a project whose lot coverage 83% at grade, but drops to 62% percent lot coverage on the podium level which is also the first residential level.

Exception to Section 7.D.2.b which requires parking structures to have a landscape buffer of 10 feet around the surface perimeter. The Applicant is requesting a 10-foot buffer along the Camarillo frontage for its mixed use project that combines residential and neighborhood serving retail uses as well as parking for each use in a single structure.

Exception to Section 7.E.1.b4 which limits the building heights in this sub-area to 75 feet and 82 feet for mixed use projects. The Applicant is requesting permission to build a 100 foot tall building.

Pursuant to L.A.M.C. Section 11.5.7 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.

Pursuant to L.A.M.C. Section 12.24 W the Applicant requests permission to sell a full line of alcoholic beverages for off-site consumption in conjunction with a retail grocery store. The Applicant also requests that subsequent to this application, an Administrative Plan Approval process be required once the future tenant of the grocery is selected. Future store layouts

must be in substantial compliance, in terms of percent of floor area dedicated to alcohol sales, with the floor plans submitted with this application.

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 condominiums units with approximately 55,000 square feet of commercial space.

The Applicant requests permission to vacate La Maida Street and Peach Avenue.

The Applicant requests approval of a Haul Route

The Applicant is requesting that Sepulveda be defined as the front yard and the remaining two yards be defined as side yards.

Pursuant to L.A.M.C. Section 16.05, the Applicant requests that the decision-maker make the Site Plan Review findings. In addition to the specific discretionary actions listed above, the Applicant will also need to procure various permits from the City of Los Angeles Department of Building and Safety and other municipal agencies for project construction activities, including but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, and building permits. The Applicant will be required to provide for construction of on- and off-site street improvements and other infrastructure as required as a condition of project approval.

### 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 draft EIR. It will have a significant impact on air quality, water, natural resources, population, noise, geology, energy, and population growth.

The draft EIR prepared by Matrix Environmental is “authoritative” looking on the surface, but is grossly inadequate and fails in its findings. The draft 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 draft EIR the preparer reaches faulty conclusions claiming that 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 draft EIR the Applicant 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 the final EIR, the Applicant must recognize that any proposed mitigations 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. The Applicant must include verifiable mitigations in the final EIR, not merely a recital of legal requirements or standard operating

practices. We ask that the Applicant revise the findings and address the following environmental concerns which we believe have been overlooked or inadequately mitigated within the draft EIR:

#### IV. IMPACTS ON EARTH

The draft EIR's geological impact mitigation Measure D-1 is inadequate and does not reduce the earth impacts to insignificance.

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. Haul 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

The air impacts mitigation Measures B-1 through B-11 are inadequate and do not reduce the air impacts to insignificance, as is claimed in the draft EIR.

The draft 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. The Applicant should 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.

The 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. The 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.

The assessment should also address the air impacts at both the local level, and within the region. It should 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.

The final EIR should explain 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

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

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. The final EIR should impose more extensive measures to deal with the water consumption issue. The Applicant must 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. Applicant must also detail the amount of water necessary for the 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

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.

The mitigation Measures C-1 through C-6 are inadequate and do not reduce the impacts to insignificance, as is claimed in the draft EIR.

## VIII. NOISE IMPACTS

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. The draft EIR should 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 noise impact mitigation Measures H-1 through H-6 are inadequate and do not reduce the noise impacts to insignificance, as is claimed in the draft EIR.

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.

The noise impacts must include future delivery trucks including refrigerated trucks at loading docks associated with the proposed markets and other shops. Mitigation measures must address truck and refrigeration units which will continue to run during unloading and their impact of both residential neighbors and residences within the project.

Since its passage in 1974 the City of Los Angeles has refused to enforce the State Law (Title 24) and UBC Appendix Subchapter 35 requiring that multifamily dwellings be constructed so that interior noise levels from exterior sources is limited to a CNEL of 45 or below. The law also requires that party walls and floor ceilings be constructed with minimum Sound Transmission Class (STC) and Impact Insulation Class (IIC) ratings of fifty. The project is located immediately adjacent to the 405 and 101 freeways which generate elevated levels of noise. These will require specially rated windows, doors, and dwelling unit separations as well as certified acoustical analyses.

## IX. LIGHT AND GLARE IMPACTS

The draft EIR does not contain any Land Use mitigation measures and do not reduce the Land Use impacts to insignificance.

Light and glare were not adequately mitigated in the draft 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

The draft 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. The draft EIR does not include any mitigation measures for population, housing and employment, and such measures need to be provided.

Changes in population will occur if this project is approved. These 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 the final EIR, the Applicant must show how the project adheres to the job/housing balance. Provide a detailed assessment of the growth and job impacts. Describe 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 Alteration (Form 7660-1) 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 draft EIR. The final EIR should fully cover all air safety, and building height issues.

## XII. TRAFFIC AND CIRCULATION

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.

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 draft EIR. Only seven of the eleven intersections are mitigated, and then only minimally, while others remain with serious impacts.

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 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, the long term impacts must be described and mitigated. Estimate the number of trips generated, and provide documentation on the assumptions. Describe how the project will affect public transportation in the region, and locally. Describe how the project will impact the nearby freeways and the need to widen or 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. Explain thoroughly the methods to arrive at trip generation rates, trip distributions, time of day analysis, effects on A.M. and P.M. traffic conditions, etc.

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. Provide an appendix with all necessary and supporting documentation, including the paper trail that will allow concerned citizens, or decision makers to trace the steps, and resultant conclusions with regard to traffic impacts.

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 food market, post

office, drug store and other services to discourage employees from leaving during working hours.

### XIII. PUBLIC SERVICE IMPACTS

The public service impact mitigation Measures J-1 through J-7, are inadequate and do not reduce the public service impacts to insignificance, as is claimed in the draft EIR.

The draft EIR fails to mitigate how adding 500 new apartments with thousands of new residents will impact local schools, parks and libraries. The draft 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-7 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) 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 draft 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.

The 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. It 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 should also analyze police services and crime rates in the area, and the impact of this project on these rates. 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

The mitigation Measures L-1 through L-5, are inadequate and do not reduce the energy and utility impacts to insignificance, as is claimed in the draft EIR.

The Applicant offers 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. Show 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. Describe how much electrical energy will be needed to operate the project, once it is in operation. Will backup energy sources be used?

Describe the impacts 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. The 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 the steps, and resultant conclusions with regard to energy, sewage and utility impacts.

#### XV. AESTHETIC IMPACTS

The Applicant 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. Explain the impacts this project will have on the other business establishments, access to businesses and the present viewscape. Explain the impact it will impact will it have on the marketability of homes nearby?

#### XVI. GROWTH INDUCING IMPACTS

The 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. The final EIR 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. Describe 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." 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.

Since the project includes requested variances from the Ventura Boulevard Specific Plan specifically in the areas of density and height, the EIR must address the impacts of applying similar variances to current and future projects throughout the area. Should these variances be granted they could lead to precedent setting increases in density, height, traffic, air quality and service requirements whose impacts must be included and mitigated.

## XVII. ADDITIONAL ENVIRONMENTAL MITIGATIONS ARE NEEDED

In the preparation of the final EIR, 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 concrete 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 clubs, 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 and even amended 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 after 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 totally 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) 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. The Applicant 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. 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

## XIX. REQUIREMENTS REGARDING PUBLIC NOTICE AND INPUT

The draft EIR should be sent to all organizations and individuals who have previously requested such notice and shall also be given by at least one of the following procedures (Guidelines, Sec. 15087): “(1) Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed project; 2) Posting of notice by the public agency on and off the site in the area where the project is to be located; 3) Direct mailing to owners of contiguous property owners to the parcel or parcels on which the project is located ... The alternatives for providing notice specified in subsection (a) shall not preclude a public agency from providing additional notice by other means.”

We ask that the Applicant be required to notify a broader range of affected property owners, and present multiple public workshops to explain the project’s impacts to the public and to provide for public input.

We ask that the Applicant provide notice by using all three of the above, in notifying the public, regarding this project. We also request that the City extend the period for public review to a full 90 days, as permitted under the Guidelines, Sec. 15087 (c). This will encourage greater public participation, and is strongly advised by CEQA. We also ask that you hold public hearings on this project. Guidelines, Sec. 15087 (g) states: Public hearings may be conducted on the environmental documents, either in separate proceedings or in conjunction with other proceedings of the public agency. Public hearings are encouraged, but not required as an element of the CEQA process.

These requirements must be interpreted broadly, consistent with the principle that "CEQA must be interpreted in such manner as to afford the fullest possible protection to the environment within their reasonable scope of the statutory language," (Friends of Mammoth v. Board of Supervisors, 8 Cal.3d 247, 259) CEQA Sec. 21153, also requires the Lead Agency to consult prior to completion of an environmental impact report with "any city or county which borders on a city or county within which the project is located..." Please see that this is done, in order to assure congruity of the project with neighboring communities. In light of these statutory requirements, we ask that the Applicant make every possible effort to involve the public, community groups and interested citizens in this phase of the CEQA process, and in evaluating the final EIR you will be preparing.

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 ask that the lead agency prepare a final EIR that interprets CEQA in a manner that affords the fullest possible protection for the environment within the reasonable scope of the

statutory language. (Friends of Mammoth v. Board of Supervisors (1972) 8 Cal.3d. 247) 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 draft 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. CONCLUSION

We appreciate your allowing us the opportunity to comment on the draft EIR. We look forward to receiving a detailed and comprehensive final EIR, fully in compliance with CEQA, State and local Guidelines.

Executed at Encino, California on

January 14, 2011

by

ENCINO PROPERTY OWNERS ASSN.  
Diane Rosen, Vice President  
PO Box 16279  
Encino, CA 91416

HOMEOWNERS OF ENCINO  
Gerald A. Silver, President  
PO Box 260205  
Encino, CA 91436

SHERMAN OAKS HOMEOWNERS ASSN.  
Marshall Long, PhD., PE  
Board Member and Land Use Chair  
Sherman Oaks Homeowners Association  
PO Box 5223  
Sherman Oaks, CA 91413

## Ashley Wright

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**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:44 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Objections to Il Villaggio Toscano Project

----- Forwarded message -----

From: <[gsilver4@sbcglobal.net](mailto:gsilver4@sbcglobal.net)>  
Date: Fri, Feb 11, 2011 at 7:56 AM  
Subject: Objections to Il Villaggio Toscano Project  
To: Michael LoGrande <[michael.logrande@lacity.org](mailto:michael.logrande@lacity.org)>  
Cc: Hadar Plafkin <[Hadar.Plafkin@lacity.org](mailto:Hadar.Plafkin@lacity.org)>, Louis Krokover <[lk2newday@gmail.com](mailto:lk2newday@gmail.com)>

To: Michael LoGrande:- LA City Planning Dept.  
cc: Homeowner Assns.

From: Gerald A. Silver, Pres. Homeowners of Encino

Subject: Planning Dept. Receipt of Letters Opposing Il Villaggio Project

In a discussion I recently had with Louis Krokover, ENC President, I was told that you -- the Planning Dept. -- had received only two letters objecting to the proposed Il Villaggio Toscano, 500 unit apartment project at Sepulveda Blvd. and Camarillo in Sherman Oaks.

Please refer to the official correspondence file managed by Hadar Plafkin. That file should contain an extensive number of emails and letters vociferously objecting to this project. There has been an extensive public outcry in opposition to this project over-sized project. There is little or no public support for this project, and certainly no community support for granting exceptions to the Ventura Blvd. Specific Plan.

I would be happy to forward copies of this correspondence to you. Do you want to be cc'd on all future correspondence on this matter? If so, I would be happy to place you in the receipt loop.

Please be advised that the Encino Property Owners Assn., Homeowners of Encino and the Sherman Oaks Homeowners Assn. all have had extensive dialog with the public on this matter, and virtually everyone has raised strong objections to the City granting any exceptions to the Ventura Blvd. Specific Plan for this project.

On January 26, 2011, the Encino NC approved the following motion:

"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 for the Il Villaggio Toscano, 8-story, 500 unit apartment projects at 4827 Sepulveda Blvd. 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."

To give you a flavor for the significant public objections to this project, I will send you, under separate email, several previous Encino Updates that include public comments in objection. If you desire, I can forward the original emails to you for review.

Please don't assume that there is little or no objection to this project. Questions will soon be asked by the public, "How was this allowed to happened?" and "Who is responsible?" The Planning Dept. needs to be on right side of this issue.

Thank you, and please feel free to call me to discuss this matter.

Gerald A. Silver  
818-990-2757

## Ashley Wright

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**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:50 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Toscano Project

----- Forwarded message -----

From: <[Aratot@aol.com](mailto:Aratot@aol.com)>  
Date: Tue, Feb 22, 2011 at 7:32 PM  
Subject: Toscano Project  
To: [hadar.plafkin@lacity.org](mailto:hadar.plafkin@lacity.org)  
Cc: [councilmember.krekorian@lacity.org](mailto:councilmember.krekorian@lacity.org)

We would like to express our strong opposition to the Toscano Project in the present form . As it is obvious , even now we have a serious saturation/parking/ street traffic/noise problems .

The way this project is presently presented - it is clear that our problems would grow exponentially simply to benefit this project's financial goals. This would be very unfair to our community and would ruin our remaining peace of living here ( it is getting worse and noisier and saturated as it is now..)

Please express our deep concern to our councilman and other officials concerned as above.  
We vote our councilmen and other officials to represent us and our rightful basic interests.

We are not unreasonably opposing any reasonable request but when there is no consideration to our peace of life, to our homes which are our life's savings , then our officials should do everything in their power to help us to stop any project which would ruin the quality of our lives eventually.

We discussed this issue with a good number of neighbors and friends here, - as well and we represent their opinions as well ( some of them will not email etc)

We follow up the progress of this project and the actions ( or lack of them) - from our representing officials starting with our councilman.

Please forward our concerns to whom it may concern - and try to make sure that our life here remains liveable and with emphasis on our life and not strictly on any profit factor for any project.

We have no objection to any undertaking as such - - but it always should have our peace and basic interests in their view . At this project this does not seem to be the case at all - in our opinion.

We thank our councilman and others for the help we expect here.

We live in our house for 17 years now and it is our only and most major investment , and the remaining " island" to ,live peacefully. Please help us to maintain this .

Respectfully and with thanks

The *Arato's*  
4640 Burnet Ave Sherman Oaks Ca. 91403

Ps: Please do not use our address for any marketing or mailing list or otherwise - we strictly provided the address to identify ourselves strictly for the purpose to express our opinion above. Only correspondence from United Neighbors should be addressed to us to follow up the progress of our protests etc.. However if possible - any email update is even

better, hence to save paper etc and keep our environment cleaner and healthier,, After all the purpose of our email above is the same in essence ..

Thank You

T. Arato

----- Forwarded message -----

From: **michael ball** <[michael54@aol.com](mailto:michael54@aol.com)>

Date: Thu, Jan 13, 2011 at 12:35 PM

Subject: Il Villagio Toscano Project ENV-2004-6000-EIR

To: [Hadar.Plafkin@lacity.org](mailto:Hadar.Plafkin@lacity.org)

As a nearby resident of this project (1/2 block directly east of Sepulveda on Camarillo), **I strongly object to both the height and density of this project.**

I do not object to this type of project, as I think mixed use of residential and retail will serve the community well, but height will be imposing to the street (much taller than the adjacent Grand Apartments) and the density will make the traffic even worse than it is presently. I think that this project **should comply** with the Ventura-Cahuenga Boulevard Corridor Specific Plan, including a FAR of 1.5 to 1.

Sincerley,

Michael Ball  
4761 Halbrent Avenue  
Sherman Oaks, CA 91403  
818-783-8027

## Ashley Wright

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**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:41 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Il Vilaggio - Sherman Oaks

----- Forwarded message -----

**From:** joann benjamin <[joannbenjamin@vdn.com](mailto:joannbenjamin@vdn.com)>  
**Date:** Fri, Jan 14, 2011 at 8:07 AM  
**Subject:** Il Vilaggio - Sherman Oaks  
**To:** [Hadar.Plafkin@lacity.org](mailto:Hadar.Plafkin@lacity.org)

All I ask is that current zoning is maintained for the proposed project at Sepulveda and the 101, Il Vilaggio. As I sat in traffic yesterday morning, taking 15 minutes to get from my home on Halbrent/Camarillo to Valley Vista and Sepulveda, approximately .2 miles, there is just way too much traffic in that area on a very consistent basis. Development is fine, over development with buildings exceeding the current height variances is not.

Personally, I don't see why we would need a large grocery (if Pavillions and Ralphs are all going to enlarge) nor a lot of new apartments (when there are for lease and for rent signs all over the neighborhood) and I don't see that the developers are really looking out for the environment (their construction plans are not incorporating enough environmentally friendly ideas). They claim that walking/bicycle friendly development would be good for the neighborhood, but I see nothing in their plans to encourage bicycle lanes or access on the neighboring roads. It is currently not safe to ride a bicycle on Sepulveda and would be less so with increased traffic flow.

Please review these plans. The developers have not thought this one out particularly well.

Always,

Joann Benjamin

4736 Halbrent Avenue

Sherman Oaks 91403

## Ashley Wright

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**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:50 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Il Villagio Toscano

----- Forwarded message -----

From: <[TBoulet123@aol.com](mailto:TBoulet123@aol.com)>  
Date: Sun, Feb 20, 2011 at 4:22 PM  
Subject: Il Villagio Toscano  
To: [hadar.plafkin@lacity.org](mailto:hadar.plafkin@lacity.org)

I am writing to express my concerns about the Il Villagio Toscano development proposed for the corner of Sepulveda and Camarillo in Sherman Oaks. I understand the current proposal requires waivers of the Ventura Blvd Specific Plan, around height, density and other aspects.

As a resident of the neighborhood adjacent to the project, I strongly object to the developer's request to build any project that requires alteration of the Ventura Blvd Specific Plan. The Plan allows for development and there is no reason why this developer should be afforded special dispensation to ignore the height, street set-back, or other aspects of the Plan. We already have a large number of vehicles driving through our neighborhood on a daily basis to cut through and around the congestion of the Sepulveda/Ventura intersection and to get around other challenges. The proposed project will only worsen matters.

It is my hope that our City Council stands up for the voters and residents of Sherman Oaks and denies any request for a waiver from the Plan, instead going back to the developer and having him reduce the size of the project to fit within the Plan guidelines. And, if he does not wish to comply with the Plan, then I suggest he leave the space vacant.

Please feel free to contact me if you would like to discuss or have questions.

Tom Boulet  
818 259 0452  
4623 Burnet Avenue

C. ROBERT BROOKS  
4737 HALBRENT AVENUE  
SHERMAN OAKS, CALIFORNIA 91403-2421  
TEL. (310) 273-0055

RECEIVED  
CITY OF LOS ANGELES

January 17, 2011

JAN 20 2011

ENVIRONMENTAL  
IMPACT

Mr. Hadar Plafkin - Environmental Review Coordinator  
Los Angeles City Planning Department  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

Re: Case No. EIR 10-039-PL, ENV 2004-6000-EIR  
Project at: 4827 N. Sepulveda Blvd., Sherman Oaks, CA 91403

Dear Mr. Plafkin:

I would like to have my disapproval of the above-referenced project considered by the City Planning Department.

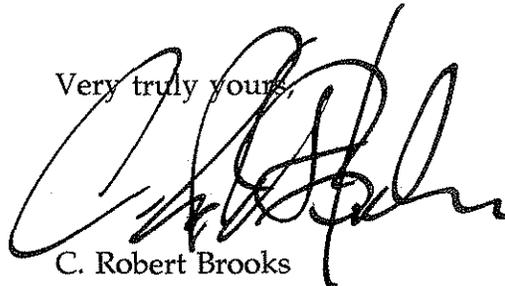
I live around the corner from this proposed development. During normal morning commute, traveling on Sepulveda Blvd., from Camarillo Street to Ventura Blvd. takes fifteen minutes. That is a distance of only two blocks!

It is my understanding that the intersection of Sepulveda and Ventura Boulevards is the second busiest in the entire city.

How could any rationale person who cares for the neighborhood possibly consider adding hundreds of more daily commuters to this already overcrowded traffic disaster?

Please do not let this overly ambitious project proceed.

Very truly yours,



C. Robert Brooks

CRB:sm

## Ashley Wright

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**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:41 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Please stop La VillaToscano

----- Forwarded message -----

**From:** eC <[ececho@yahoo.com](mailto:ececho@yahoo.com)>  
**Date:** Sun, Jan 16, 2011 at 7:18 PM  
**Subject:** Please stop La VillaToscano  
**To:** [Hadar.Plafkin@lacity.org](mailto:Hadar.Plafkin@lacity.org)  
**Cc:** Paul Koretz <[paul.koretz@lacity.org](mailto:paul.koretz@lacity.org)>

**Eliot & Julie Cohen**

**5021 Densmore Ave.**

**Encino, CA 91436**

**Mr. Hadar Plafkin**

**City Planning Dept, Room 750**

**CITY HALL**

**200 N. Spring Street**

**Los Angeles, CA 90012**

**RE: EIR 10-039-PL, ENV-2004-6000-EIR**

**Project Location: 4827 N. Sepulveda Blvd., Sherman Oaks, CA 91403**

**This is a dream project for the developer and nightmare for everybody else.**

**This project is an insult to the well thought out zoning ordinances, the Ventura-Cahuenga Specific Plan, Good Environmental Practices, the scale of the buildings around it and common sense. It would create more traffic, by adding 1000's of extra car trips a day, along a vital North-South Artery, further making it**

**much harder to access the 101 Freeway going east. During rush hour, it would clog Sherman Oak residential streets.**

**It is unreasonable as the developer asks the City to secede 2 Streets with no compensation back to the adjoining Neighborhoods or the Cities finances.**

**Should it be approved in it's present form would become the new poster project for bad mixed-use developments.**

**As residents of the Valley for the last 10 years we are shocked by the continued over development and lack of attention to traffic, noise, density, quality of life issues, congestion. It is time for the City to just say no to unreasonable projects and to protect the neighborhoods from unwanted Urbanization.**

**Sincerely,**

**Eliot & Julie**

**Cc; Paul Koretz**

## Ashley Wright

---

**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:49 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Comments Re: Il Villaggio Toscano Project (Sherman Oaks)

Stephanie,

this one referenced an attached letter. I never got the attached letter.

Hadar

----- Forwarded message -----

**From:** Leslie Dodson <[lesliedodson@gmail.com](mailto:lesliedodson@gmail.com)>  
**Date:** Wed, Feb 16, 2011 at 5:44 PM  
**Subject:** Comments Re: Il Villaggio Toscano Project (Sherman Oaks)  
**To:** [hadar.plafkin@lacity.org](mailto:hadar.plafkin@lacity.org)

Dear Mr. Plafkin:

The attached comments were drafted by me to address the proposed Il Villaggio Toscano project in Sherman Oaks (corner of Camarillo and Sepulveda).

I cannot make Thursday's Sherman Oaks Neighborhood Council Land Use Committee, but have provided these comments to Samantha Foley, a representative from the Il Villaggio Toscano Outreach Team. Samantha will be sharing my comments at the meeting.

Samantha also advised that I submit these comments to the City of Los Angeles to ensure they are taken into consideration during the formal approval process, and provided me with your contact information.

I thank you in advance for your consideration of these comments. I can be contacted using the information below if there are any questions.

Best,

Leslie Dodson

---

Leslie Dodson

E-mail: [lesliedodson@gmail.com](mailto:lesliedodson@gmail.com)

Mobile: 310.948.1973

----- Forwarded message -----

From: **yevgeny igdal** <[igdal@sbcglobal.net](mailto:igdal@sbcglobal.net)>

Date: Thu, Jan 27, 2011 at 12:33 PM

Subject: Sepulveda Blvd. and Camarillo St.

To: [hadar.plafkin@lacity.org](mailto:hadar.plafkin@lacity.org)

Hello Hadar,

My name is, Gene Igdal, I am representing investors from Ukraine. We would like to present the ice skating rink project for the site on Sepulveda Blvd. and Camarillo St.

Please consider this project. We think it would benefit the community.

Thank you for your time.

Gene Igdal

310.689.8179







19.04.2007 02:13



19.04.2007 02:13



19.04.2007 02:14



19.04.2007 02:15

January 14, 2011

Mr. Hadar Plafkin - Environmental Review Coordinator  
Los Angeles City Planning Department  
200 N. Spring St. Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

JAN 19 2011

ENVIRONMENTAL  
LIMIT

Natalie & Pat Kater  
16149 Otsego St.  
Encino, CA 91436  
(818) 788-1682  
Fax (818) 990-1592

Case No CASE NO. EIR 10-039-PL, ENV-2004-6000-EIR  
Il Villaggio Toscano project,

Dear Mr. Plafkin:

Just looking at the architects rendering of Il Villaggio Toscano absolutely boggles the mind!

It is like looking at the MONSTER on the corner of Sepulveda & Ventura Blvd. and wondering just how much our Community will suffer Environmentally!

However, the location of this new project is quite different than the development to its south.

It is overwhelming!

It totally ignores the Ventura Blvd. Corridor Specific Plan!

NOTHING NEW HERE, BUT ENOUGH IS ENOUGH!

Going up eight stories is outrageous!

Traffic on Sepulveda is daunting and with another, up to 1,000 cars or more added to the already, impossible at times, traffic would be unforgivable....no matter what a paid traffic study might say!

Mr Plafkin, we understand that you have to look at a developers request for approval to build, but just one glance at what the developer is asking for, is like looking at a disaster waiting to happen!

This project is just too big and will have a very detrimental impact on this entire community!

The Architectural rendering looks like, to me, that it is purposely made to look overwhelming so they can come back with a new plan, still asking for more than the Corridor Specific Plan would allow for, but it would look more reasonable in comparison...Tricks of the Trade!

Please, Please treat this project with the Community in mind.

We need relief from increased Traffic and Over Building, so we can enjoy life in the Valley!

With Great Concern,

  
Mr. & Mrs. Pat Kater

cc: Councilmen Koretz & Krekorian

## Ashley Wright

---

**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:43 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Il Villaggio Toscano

----- Forwarded message -----

**From:** **Kater Pat** <[pfknat@gmail.com](mailto:pfknat@gmail.com)>  
**Date:** Thu, Feb 3, 2011 at 11:28 PM  
**Subject:** Il Villaggio Toscano  
**To:** [Hadar.Plafkin@lacity.org](mailto:Hadar.Plafkin@lacity.org)

This is a very simple situation-----

Il Villaggio Toscano is Too Big...Totally out of the question for the community it is planned for.

The impact on the traffic on Sepulveda and Ventura Blvd. alone, should make any positive decision to move forward on this project completely outrageous.

After the environmental impact of the TRAFFIC, the size of the physical project is, as stated above, is obviously simply TOO BIG for the community!

We urge a GREAT BIG NO VOTE!!!!

Thank You

Mr. & Mrs Pat Kater  
16149 Otsego St  
Encino, CA 91436  
[pfknat@gmail.com](mailto:pfknat@gmail.com)

# MDPA

M. David Paul Associates

VIA U.S.MAIL & EMAIL  
[Michael.LoGrande@lacity.org](mailto:Michael.LoGrande@lacity.org)

January 11, 2011

Mr. Michael LoGrande, Director  
Department of City Planning  
City of Los Angeles  
200 N. Spring Street, Room 525  
Los Angeles, California 90012-4801

RECEIVED  
CITY OF LOS ANGELES

JAN 12 2011

CITY PLANNING DEPT  
EXECUTIVE OFFICE  
ROOM 525

RE: II Villaggio Toscano – 4827 Sepulveda Boulevard, Sherman Oaks, CA 91403  
ENV-2004-6000-EIR & State Clearinghouse No. 2004111068

Dear Mr. LoGrande:

We are writing today to formally request an extension of the public comment period for the above mentioned Draft Environmental Impact Report. Originally we requested and received approval from staff to increase the public comment period for a total of 60 days which is set to expire on February 7, 2011.

Based on a request from the Sherman Oaks Neighborhood Council's Land Use Committee, they have requested that the comment period be extend for another 30 days to afford them the opportunity to provide written comments following their scheduled meeting on February 17, 2011. Thus, we respectfully appeal for your consideration of our request to extend the comment period for the additional 30 days to allow the community's Neighborhood Council the opportunity to officially comment.

We look forward to your approval of our request and are available for any questions you may have.

Very truly yours,



Paul W. Krueger  
Development Manager

C: David Weintraub, Sr. City Planner, via U.S. Mail & Email ([david.weintraub@lacity.org](mailto:david.weintraub@lacity.org))

R. Russell Meyer  
4755 Burnet Avenue  
Sherman Oaks, California 91403  
(818) 784-7712

March 5, 2011

The Honorable Paul Krekorian  
Member, Los Angeles City Council  
North Hollywood  
6350 Laurel Canyon Blvd., Suite 201  
North Hollywood, CA 91606

**RE: Il Villaggio Toscano Project**  
**SCH. No. 2004111068**  
**ENV-2004-6000-EIR**

Dear Councilmember Krekorian:

I am writing you in regards to the proposed **Il Villaggio Toscano Project**, a 700,000 sq. ft. project in Sherman Oaks located near the intersections of Sepulveda and Ventura Boulevards and adjacent to the Sherman Oaks Galleria.

I am requesting that the City of Los Angeles **place a moratorium on any future development at the site until (1) adequate measures are taken to mitigate the traffic at intersections whose level of service (LOS) is rated "F"; (2) where no current mitigation measures have been identified by either the city or prospective developers to eliminate such rating; and (3) a proposed project will further adversely affect such designated intersections.** For example, the intersections of Sepulveda and Ventura Boulevards are currently rated "F" and the developer and City have no plans to mitigate the "F" rating. In fact, the proposed project will only exacerbate the traffic and associated environmental situation (as contained in the Draft Environmental Impact Report). Such a proposed moratorium should remain in place until at such time the City and the developer create a plan to mitigate such adversely rated intersections as cited above.

Based on the Draft Environmental Impact Report of the project, other intersections are rated "F", or as a result of the project deteriorate to lower ratings, including "F", but I bring to your

The Honorable Paul Krekorian  
RE: Il Villaggio Toscano Project

Page 2 of 2

attention in the interest of your time the largest intersection. It's illustrative of such a large scale project being introduced to areas where prior inadequate traffic planning has resulted in highly congested conditions warranting an "F". First, there is the matter of hard and soft costs to the citizenry. The hard costs of increased congestion include increased consumption of motor fuel and associated increased auto emissions. Soft costs include increased travel time to and from work, changes in commute patterns that might adversely affect neighborhood communities and a negative impact on "general livability" which might have very long-term impact on the City. I ask the Councilman not to assume that an "F" rating for an intersection be interrupted as merely the "worst". It merely reflects an existing grading standard. Although the intersection in question is rated "F", it could get much worse with the introduction of this project and the associated costs. In fact, I would not be surprised that if a complete cost and benefit analysis were to be undertaken the costs of the project would far outweigh any benefits.

There are also numerous other problems with the project, such as failure to adequately address the impact on a local, adjacent residential neighborhood of increased traffic, the impact of heavy haulers and other equipment during the minimum of two year construction, etc. I believe these matters have been addressed by others to your office and the Planning Commission so I will not dwell on these matters here.

On a somewhat related note, I would like to thank your North Hollywood office. They have been attentive to the community's concern and very responsive. Thank you.

Yours Truly,



R. Russell Meyer

CC:

The Honorable Eric Garcetti, President, Los Angeles City Council (via mail)  
The Honorable Wendy Greuel, Controller, City of Los Angeles (via mail)  
Patricia Davenport, Field Deputy for Councilmember Krekorian (via e-mail)  
Hadar Plafkin, City Planner/Environmental Review Coordinator (via e-mail)

## Ashley Wright

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**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:51 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Toscano project - Sepulveda/ Camarillo

----- Forwarded message -----

**From:** Melissa <[melmiamich@yahoo.com](mailto:melmiamich@yahoo.com)>  
**Date:** Wed, Feb 23, 2011 at 3:21 PM  
**Subject:** Toscano project - Sepulveda/ Camarillo  
**To:** [councilmember.krekorian@lacity.org](mailto:councilmember.krekorian@lacity.org)  
**Cc:** [hadar.plafkin@lacity.org](mailto:hadar.plafkin@lacity.org), [unitedneighbors818@gmail.com](mailto:unitedneighbors818@gmail.com)

Dear Councilmember and Hadar Plafkin:

As a concerned member of the Sherman Oaks community, I would like to implore you to ensure that Toscano developers adhere to the city regulations on height, density, and traffic when pursuing their latest project on the corner of Sepulveda and Camarillo, and consider scaling down their project.

I am appalled and outraged that the developers want to build such an enormous structure on that corner. The closest 405 freeway entrance doesn't even have an entrance to or exit from the west, only east; this means in order to go west on 134, the traffic will have to be diverted north on Sepulveda to the other side of Ventura, increasing congestion in all directions. The only bus around is the north-south line on Sepulveda and there isn't even a light transit light servicing the area into Los Angeles along the 405. I don't see why that area needs such a large complex. It's not like the residents of those units will be working in the shops below - how much will single residence cost????

Furthermore, I don't understand what makes the developers believe that being tucked in between 2 freeways is a desirable location. Similar structures in Downtown LA overlooking the 101 and 110 freeways are hardly filled to capacity. The last thing the neighborhood needs is empty units in an undesirable corner. It should be scaled back to a reasonable size.

Thank you for your kind consideration, and I look forward to the next council meeting.

Melissa Michelson

## Ashley Wright

---

**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:50 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Toscano Project

----- Forwarded message -----

**From:** <[tailfeathersmpk@aol.com](mailto:tailfeathersmpk@aol.com)>  
**Date:** Tue, Feb 22, 2011 at 6:53 PM  
**Subject:** Toscano Project  
**To:** [hadar.plafkin@lacity.org](mailto:hadar.plafkin@lacity.org), [councilmember.krekorian@lacity.org](mailto:councilmember.krekorian@lacity.org), [patricia.davenport@lacity.org](mailto:patricia.davenport@lacity.org)

I am a resident of Burnet Ave. in Sherman Oaks. I am outraged at the audacity of the Toscano Project on Sepulveda and Camarillo. Currently the traffic capacity is totally maximized on Sepulveda. Why should Toscano be allowed to build anything. They should have developed this site years ago when traffic could have been mitigated. Today there is no way to lessen the congestion. The whole of Sherman Oaks, Encino, Studio City, Van Nuys will be impacted. Why should we approve this. This project is too high, too dense, and we do not want any more street widening to happen. The city has in the past, approved the closing of Moorpark so that the current location of CVS complex, the Pavilion property, etc. could be built. That action prevented the flow of traffic on Moorpark and thus increased Ventura Blvd. traffic. The City approved The Galleria that has added enormous traffic problems during rush hour and has turned the intersection to an F rating. It is time for the city to take responsibility for its past actions and start saying no to projects that benefit only the developer. We need a city that will stand a chance of being a place we will want to live in for the next 5-10-15-20 years. Toscano has no right to build unless it has a net zero affect on our community.

The Toscano EIR does not take into consideration the impact of the proposed Universal City expansion. Universal is another large project that will add considerable traffic to Sherman Oaks, including the Ventura/Sepulveda intersection. It is time for the City to look at the total impact not just a project by project approach.

As a homeowner, I and my neighbors have to follow zoning rules. We would like to see Toscano do the same.

Maria Pavlou

4737 Burnet Ave.  
Sherman Oaks, Ca.  
91403

## Ashley Wright

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**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:51 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Objections to Draft EIR for Proposed "Il Villagio Toscana" Project at Sepulveda and Camarillo (SCH. No. 2004111068, ENV-2004-6000-EIR)

----- Forwarded message -----

**From:** MARCY SHAFFER <[marcyshaffer@roadrunner.com](mailto:marcyshaffer@roadrunner.com)>  
**Date:** Sun, Mar 6, 2011 at 11:39 AM  
**Subject:** Objections to Draft EIR for Proposed "Il Villagio Toscana" Project at Sepulveda and Camarillo (SCH. No. 2004111068, ENV-2004-6000-EIR)  
**To:** Hadar Plafkin <[hadar.plafkin@lacity.org](mailto:hadar.plafkin@lacity.org)>  
**Cc:** Councilmember Paul Krekorian <[councilmember.krekorian@lacity.org](mailto:councilmember.krekorian@lacity.org)>, Patricia Davenport <[patricia.davenport@lacity.org](mailto:patricia.davenport@lacity.org)>

Mr. Plafkin:

I am a homeowner on the section of Burnet Avenue bounded by Moorpark Avenue and Camarillo Street. I write to voice my objections to the Draft EIR for the proposed "Il Villagio Toscana" project.

I attended the meeting of the Land Use Committee of the Sherman Oaks Neighborhood Council on February 17, 2011. I join in the objections to the Draft EIR for the proposed "Il Villagio Toscana" project adopted by the Land Use Committee at that meeting.

Thank you.

Marcy Shaffer

4755 Burnet Avenue

Sherman Oaks, CA 91403

Phone: 818.784.6784

Email: [marcyshaffer@roadrunner.com](mailto:marcyshaffer@roadrunner.com)

## Ashley Wright

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**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:42 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Il Villago Project

----- Forwarded message -----

From: **Elaine Shapiro** <[elainेशa@aol.com](mailto:elainेशa@aol.com)>  
Date: Thu, Feb 3, 2011 at 10:08 PM  
Subject: Fwd: Il Villago Project  
To: [Hadar.Plafkin@lacity.org](mailto:Hadar.Plafkin@lacity.org)

See our comments below strongly opposing this project and supporting the Encino Community opposition vote voiced this week

-----Original Message-----

From: Elaine Shapiro [elainेशa@aol.com](mailto:elainेशa@aol.com)  
To: stopilvillagio [stopilvillagio@sbcglobal.net](mailto:stopilvillagio@sbcglobal.net)  
Cc: karo.torossian [karo.torossian@lacity.org](mailto:karo.torossian@lacity.org); shawn.bayliss [shawn.bayliss@lacity.org](mailto:shawn.bayliss@lacity.org); councilmember.krekorian [councilmember.krekorian@lacity.org](mailto:councilmember.krekorian@lacity.org); paul.koretz [paul.koretz@lacity.org](mailto:paul.koretz@lacity.org)  
Sent: Thu, Jan 13, 2011 1:33 pm  
Subject: Il Villago Project

We live near Haskell and Ventura Blvd.and have been Encino residents for over 30 years. We have seen a steady decline in the quality of our community life because those in charge have allowed business interests to circumvent the plan approved long ago protecting the community against oversize business projects.

The project proposed for Ventura and Sepulveda will be the biggest fiasco for the San Fernando Valley. To add 500 residences to an area that is already heavily congested is unbelievable. It does not seem to concern those in charge that Sherman Oaks and Encino are massively opposed to this project. Do we not matter? This development should not be allowed to have any exceptions to the plan. The community could well have used the land for cultural and community purposes instead of a means to make money for a massive development firm. We have attended meetings in opposition to this project and to date have not seen our concerns addressed. Is anyone of our elected representatives willing to listen to those who elected them and step up in opposition to a project that will completely ruin our community with tons of added cars and congestion?

Elaine and Philip Shapiro

## Ashley Wright

---

**From:** Hadar Plafkin [hadar.plafkin@lacity.org]  
**Sent:** Wednesday, March 09, 2011 12:40 PM  
**To:** Stephanie Eyestone-Jones  
**Subject:** Fwd: Il Villagio Toscano Project ENV-2004-6000-EIR

----- Forwarded message -----

**From:** Winkelmann, William <[William.Winkelmann@anheuser-busch.com](mailto:William.Winkelmann@anheuser-busch.com)>  
**Date:** Fri, Jan 14, 2011 at 7:20 AM  
**Subject:** Il Villagio Toscano Project ENV-2004-6000-EIR  
**To:** [Hadar.Plafkin@lacity.org](mailto:Hadar.Plafkin@lacity.org)

Dear Sir:

As a long time and nearby resident of this project , **I strongly object to both the height and density of this project.**

I do not object to this type of project, as I think mixed use of residential and retail will serve the community well, but height will be imposing to the street (much taller than the adjacent Grand Apartments) and the density will make the traffic even worse than it is presently. I think that this project **should comply** with the Ventura-Cahuenga Boulevard Corridor Specific Plan, including a FAR of 1.5 to 1.

Sincerely,

Bill Winkelmann  
4736 Halbreant Avenue  
Sherman Oaks, CA 91403

818- 907-0971

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Anheuser-Busch InBev Email Disclaimer [www.ab-inbev.com](http://www.ab-inbev.com)

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Appendix FEIR-B  
Revised Traffic Assessment

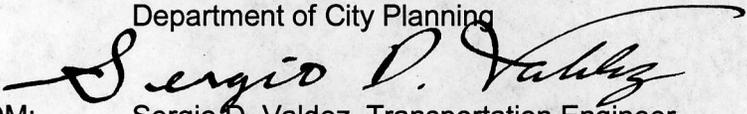


**CITY OF LOS ANGELES  
INTER-DEPARTMENTAL CORRESPONDENCE**

Camarillo Street & Sepulveda Boulevard  
DOT Case No. Ven 04-026

DATE: February 15, 2012

TO: Robert Duenas, Senior City Planner  
Department of City Planning

FROM:   
Sergio D. Valdez, Transportation Engineer  
Department of Transportation

SUBJECT: **REVISED TRAFFIC ASSESSMENT FOR PROPOSED IL VILLAGGIO  
TOSCANO MIXED-USE PROJECT AT CAMARILLO STREET AND  
SEPULVEDA BOULEVARD**

The Department of Transportation (DOT) issued a traffic assessment on April 21, 2010, for the proposed Il Villaggio Toscano mixed-use project, consisting of 500 multiple-family dwelling units, a 45,000 square-foot grocery store, and 10,000 square feet of retail use at the northwest corner of Camarillo Street and Sepulveda Boulevard. In paragraph 2 of Section H of that traffic assessment, DOT required that the applicant contribute \$300,000 to implement a Special Parking Congestion Zone that will implement new on- and off-street parking technology in City-operated spaces in the vicinity of Sepulveda and Ventura Boulevards.

After further consideration, including other transportation and circulation concerns in this area, DOT recommends that paragraph 2 of Section H be replaced by the following paragraph:

"In addition, the applicant will contribute \$300,000 to a fund for the identification and implementation of local parking, transportation and circulation improvements in the following areas: the area bounded clockwise by Haskell Avenue beginning at Valley Vista Boulevard and extending northerly to SR-101 (on the west), from that point extending easterly along SR-101 to I-405, and from that point extending northerly along I-405 freeway to westernmost prolongation of Magnolia Boulevard, and from that point extending easterly on Magnolia Boulevard prolongation to Kester Avenue, and from that point extending southerly along Kester Avenue to the prolongation of Moorpark Street, from that point extending easterly along the prolongation of Moorpark Street to Beverly Glen Boulevard-Tyrone Avenue, from that point extending southerly along Beverly Glen Boulevard-Tyrone Avenue to Dickens Street, from that point extending westerly along Dickens Street to Kester Avenue, from that point extending southerly along Kester Avenue to Valley Vista Boulevard, and from that point extending westerly back to Haskell Avenue. The \$300,000 payment will be guaranteed through cash, bond or

irrevocable letter of credit, payable to DOT. The fund will be used for measures that include but are not limited to parking improvements intended to increase parking availability, reduce search times and relieve traffic congestion; neighborhood traffic calming; transit-related improvements and amenities; bicycle-related improvements and amenities; pedestrian-related improvements and amenities; and streetscape improvements and amenities.”

No other revisions to the April 21, 2010 traffic assessment are recommended by DOT at this time. If you have any questions, please call me at (818) 374-4690.

cc: Second Council District  
Jay Kim, DOT  
Roy Nakamura, Crain & Associates

Appendix FEIR-C

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Duration of Residence in the  
Rental Housing Market



# **Duration of Residence in the Rental Housing Market**

Report

to the

Real Estate Research Institute

by

Yongheng Deng\*, Stuart A. Gabriel\*, and Frank E. Nothaft\*\*

January 2002

\*Lusk Center for Real Estate, School of Policy, Planning and Development and Marshall School of Business, University of Southern California, 331 Lewis Hall, Los Angeles, California, 90089-0626.

\*\*Housing Economics and Financial Research Department, Freddie Mac, 8200 Jones Branch Drive, McLean, Virginia 22102-3107.

Yongheng Deng and Stuart Gabriel acknowledge the financial support of the Real Estate Research Institute. The authors further wish to thank Frank Ptacek and Steve Henderson of the Bureau of Labor Statistics for many discussions regarding the CPI housing sample, and Stephen Cauley, Greg Schwann for helpful comments. The authors are grateful to Lihong Yang for excellent research assistance. The views expressed are those of the authors and do not necessarily reflect those of Freddie Mac or the Bureau of Labor Statistics.

# **Duration of Residence in the Rental Housing Market**

**Yongheng Deng, Stuart A. Gabriel, and Frank E. Nothhaft**  
**University of Southern California and Freddie Mac**

## **Abstract**

This paper estimates a proportional hazard model of duration of residence in rental housing. The study employs unique data from the BLS-CPI housing sample to construct the duration of rental occupancy for metropolitan areas over the 1987-1998 period. American Housing Survey and other metropolitan economic data are used to proxy time-varying covariates of duration of residence. The paper employs an innovative semi-parametric estimation approach for group duration analysis of the proportional hazard model, as originally proposed by Ryu (1994) and then modified by Deng [(1995), (1997)].

Results of the analysis indicate that the duration of residence in rental housing varies significantly across individual units and market segments. In fact, the duration of residence is highly time dependent, given significant intertemporal variation in many of the housing and market covariates. The paper provides evidence of high tenant turnover rates at about 3 years of residence. However, the turnover hazard curve depends as well on market conditions and housing policy. For example, imposition of rent control can shift the peak of the tenant turnover hazard curve to the left. Research findings further indicate that median housing costs, public housing share of the rental stock, poverty rate, and African-American and Hispanic share of tenant households are among those factors that positively affect tenant turnover hazard rates and hence are negatively related to tenant residence duration. Elevator buildings, unemployment rate, population growth and central city share of the rental stock negatively affect tenant turnover hazard rates and hence are positively related with tenant residence duration. Further, the estimated pattern of duration of residence was shown to vary substantially across 33 large metropolitan markets.

Simulation results further indicate the sensitivity of duration of residence to housing locational and structural characteristics. For example, findings for New York City indicate that increased geographic dispersion of rental housing, as reflected in a reduction in the share of rental stock in the central city to national average levels, would serve to boost cumulative tenant turnover rates by 12 percent by the end of year three of the rental lease. Similarly, simulated reduction in the density of rental housing, as reflected in downward adjustment in the share of NYC buildings with seven or more stories to that of the national average level, would serve to increase cumulative tenant turnover rates by 13 percent. The research provides new evidence as regards tenant and market characteristics that determine the duration of residency. Clearly, an improved understanding thereof offers new insights as regards fluctuations in tenant turnover, building occupancy, and rent flows, as well as new confidence in pro forma assumptions critical to rental housing development.

## **I. Introduction**

Recent years have witnessed ongoing research and policy debate as regards cyclical fluctuations in rental housing markets. In many cases, market fluctuations are not well predicted, suggesting relatively high levels of risk as regards anticipated returns to investment in rental property. Accordingly, investors, regulators and analysts alike have focused on improved understanding of the fundamentals of rental housing market dynamics. To that end, academic analyses have assessed the role of equilibrium vacancy rates in determination of the price adjustment mechanism for rental housing [see, for example, Blank and Winnick (1953), Rosen and Smith (1983), Gabriel and Nothaft (1988), Muller (1991), Wheaton and Torto (1994), and Belsky and Goodman (1996)]. Those models suggest the importance of deviations between observed and equilibrium vacancy rates in the determination of rent fluctuations. More recently, Gabriel and Nothaft (2001) provided new estimation and assessment of rental vacancy incidence and duration and indicated the importance of those measures to an improved understanding of the rental price adjustment mechanism. That aside, little is known about duration dependence in rental housing, particularly as regards duration of occupancy.

The limited literature on duration of residence in rental housing owes in part to lack of appropriate data. Indeed, the Bureau of Labor Statistics' (BLS) Consumer Price Index (CPI) housing sample employed in this analysis is expansive in both geographic and intertemporal detail and appears uniquely qualified for such an inquiry. Yet that data has been utilized only in one prior study of incidence and duration of rental vacancies [Gabriel and Nothaft (2001)]. Prior analyses rely on limited data resources and/or more restrictive models and specifications [see, for example, Guasch and Marshall (1987), Rosenthal (1988) and Gronberg and Reed (1992)].

The literature does contain a few analyses of duration dependence in the housing market. A number of authors, including Belkin et al (1976), Zuehlke (1987), Haurin (1988), and Kluger and Miller (1990) have modeled time-on-market and its hazard rate. Other studies have focused on the duration of rental housing vacancies [see Sternberg (1994) and Gabriel and Nothaft (2001)]. Sternberg (1994) modeled the probability of exiting vacancy status; that analysis employed a restrictive constant hazard framework, which implies a

constant vacancy rate over time. Such a restriction is apparently inappropriate in the rental housing markets. The focus of the Gabriel and Nothaft (2001) analysis was decomposition of rental vacancies into their incidence and duration components, and then evaluating the decomposed incidence and duration separately, particularly as regards estimation of equilibrium vacancy rates. Data structure did not permit focus on the time-varying nature of the duration dependence in rental housing.

This paper presents estimates of a proportional hazard model for duration of residence in rental housing. The hazard rate for this model is the conditional probability that residence in a rental unit is terminated at time  $t$ , given that it was occupied prior to  $t$ . Thus, the survivor function summarizes the conditional probability of continued occupancy over time. To estimate the proportional hazard function of residence duration, the study employs unique and particularly rich data from the CPI housing sample to construct the duration of residence in rental housing market. That data set is combined with information from the American Housing Survey and other metropolitan economic information in order to proxy time-varying covariates of duration of residence. Accordingly, the paper evaluates both time-invariant as well as time-varying determinants of duration of rental housing occupancy. In so doing, the paper employs an innovative semi-parametric estimation approach for group duration analysis of the proportional hazard model, as originally proposed by Ryu (1994) and then modified by Deng [(1995), (1997)].

Results of the analysis indicate that the duration of residence in rental housing varies significantly across individual units and market segments. In fact, the duration of residence is highly time dependent, given significant intertemporal variation in many of the housing and market covariates. For example, during periods of relatively low mortgage interest rates and/or increasing house prices, duration of rental occupancy is reduced. The paper provides evidence of high tenant turnover rates at about 3 years of residence. However, the turnover hazard curve depends as well on market conditions and housing policy. For example, imposition of rent control can shift the peak of the tenant turnover hazard curve to the left. Furthermore, consumers' expectations regarding housing supply and demand may also change the shape of the duration curve. Research findings further indicate that median housing costs, public housing share of the rental stock, poverty rate, and African-American and Hispanic share of tenant households are among those

factors that positively affect tenant turnover hazard rates and hence are negatively related to tenant residence duration. Elevator buildings, unemployment rate, population growth and central city share of the rental stock negatively affect tenant turnover hazard rates and hence are positively related with tenant residence duration. Further, the estimated pattern of duration of residence was shown to vary substantially across 33 large metropolitan markets.

Simulation results further indicate the sensitivity of duration of residence to housing locational and structural characteristics. For example, findings for New York City indicate that increased intra-metropolitan dispersion of rental housing, as reflected in reduction in the share of rental stock in the central city to national average levels, would serve to boost cumulative tenant turnover rates by 12 percent by the end of year three of the rental lease. Similarly, simulated reduction in the density of rental housing, as reflected in downward adjustment in the share of NYC buildings with seven or more stories to that of the national average level, would serve to increase cumulative tenant turnover rates by 13 percent. These results provide new evidence as regards tenant and market characteristics that determine the duration of residency. Clearly, an improved understanding thereof offers new insights as regards fluctuations in tenant turnover, building occupancy, and rent flows, as well as new confidence in pro forma assumptions critical to rental housing development.

The plan of the paper is as follows. Section II discusses the proportional hazard model as well as the semi-parametric estimation approach used in this study. Section III describes the construction of the housing unit event-history sample based on data from the CPI housing sample, the American Housing Survey, and other regional economic information. Section IV discusses model specification and reports on econometric evaluation of the duration of rental housing occupancy. Finally, section V discusses conclusions and policy implications of the research.

## II. The Model

The proportional hazard model introduced by Cox (1972) provides a coherent framework in which to analyze the duration of residence in rental housing. The hazard function in this model is defined as the product of a baseline hazard function and a set of proportional factors, such that

$$h(\tau, X) = h_0(\tau) \left[ \exp(X(\tau) \beta) \right], \quad (1)$$

where  $h_0(\tau)$  is the baseline hazard function,  $X(\tau)$  is a vector of proportional factors. The baseline hazard function describes the overall shape of the hazard rate for termination of rental housing occupancy over time, with the proportional factors capturing time-constant as well as time-varying covariate effects across individual rental housing units. These covariates include housing structural characteristics as well as other economic and demographic determinants of duration of residence that vary over time.

The proportional hazard model evaluates the probability of termination of rental housing occupancy conditional on occupancy of the unit to that point in time. Therefore, the model not only evaluates the determinants of occupancy termination at the time of termination, but also analyzes tenant behavior over the entire event history of rental unit occupancy. In other words, the model not only evaluates the determinants of current termination of rental housing occupancy, but also analyzes why the tenant did not terminate occupancy in prior periods.

Cox developed a partial likelihood estimation technique that can estimate the covariate effects without specifying the baseline hazard function (see Cox (1975), Kalbfleisch and Prentice (1980), and Cox and Oakes (1984) for a detailed discussion). The original Cox proportional hazard model was designed for applications in continuous time. However, economic data are typically collected in discrete time intervals. For example, the CPI housing survey is conducted in an interval of six-month periods. The housing survey and economic data collected in discrete time intervals make it difficult to apply the Cox partial likelihood approach to estimate the proportional hazard model, because more than one failure (termination) may be reported within the same interval and the Cox partial likelihood technique cannot

identify failure observations with ties. In addition, housing market analysts often are interested in the changing pattern of the baseline hazard over time, as it may reveal important determinants of rental housing market activity. Therefore, it is neither appropriate nor desirable to ignore the baseline hazard function, as implied by the Cox partial likelihood technique.

In this study, we adopt a semi-parametric estimation approach for group duration analysis of the proportional hazard model proposed by Ryu (1994) and modified by Deng [(1995), (1997)]. In this context, we define  $\tau \in R^+$  as a duration variable. Let  $\tau_t$  ( $t = 1, 2, \dots, T$ ) be the discrete time intervals that partition the support of  $\tau$ .

Let  $S_1$  be the probability that  $\tau$  survives the discrete time period 1, let  $S_2$  be the conditional probability that  $\tau$  survives the discrete time period 2 conditional on that it has already survived period 1, and  $S_t$  be the conditional probability that  $\tau$  survives the discrete time period  $t$  conditional on that it has already survived period  $t - 1$ , where  $t = 1, 2, \dots, T$ . The proportional hazard function in equation (1) can be expressed into follow discrete survivor function, such that

$$S_1 = \exp\left[-\int_0^1 h(\tau, x) d\tau\right] = \exp\left[-\exp(\gamma_1 + x\beta)\right], \quad (2)$$

and

$$S_t = \exp\left[-\int_{t-1}^t h(\tau, x) d\tau\right] = \exp\left[-\exp(\gamma_t + x\beta)\right], \quad (3)$$

where  $\gamma_t = \log\left[\int_{t-1}^t h_0(\tau) d\tau\right]$  is a log value of flexible baseline hazard, which may be estimated non-parametrically following Han and Hausman (1990).

The left-hand side of equations (2) and (3),  $S$ 's, are typically not directly observable in micro data. We can, however, use the 'local smoothing' technique developed in the literature on non-parametric methods to estimate individual survival functions based on the empirical distribution of the survival functions. We partition the survival data sample into  $K$  distinct synthetic pools; the  $k$ th pool contains  $M_k$

observations, and  $M_1 + M_2 + \dots + M_k = N$ , where  $N$  is the total sample size. For each pool, we estimate the survival probability in period  $t$  such that  $\hat{S}_{k,t} = n_{k,t}/n_{k,t-1}$ , where  $n_{k,t}$  is the number of observations in the  $k$ th pool that survive period  $t$ . The discrete proportional hazard model can therefore be estimated in following regression:

$$\log\left[-\log\left(\hat{S}_{i,k,t}\right)\right] = \gamma_t + x_{i,k,t}\beta. \quad (4)$$

Selection of the value of the smoothing parameter is analogous to parameter selection in non-parametric estimation.  $M_k$  is chosen to reduce the noise as well as to keep the approximation error (bias) low. Noise will be reduced by letting  $M_k$  approach infinity as a function of the sample size. Approximation error will be eliminated if the neighborhood around  $S_k$  shrinks asymptotically to zero. Unfortunately, these prescriptions conflict. A standard proposition in the non-parametric literature suggests that as  $M_k \rightarrow \infty$ ,  $M_k/N \rightarrow 0$ , and  $N \rightarrow \infty$ , a balance between these two goals can be achieved in an asymptotic sense by setting  $M_k \sim N^{4/5}$ . A consequence is that the mean squared error itself converges to zero at a rate of  $M_k^{-1} \sim N^{-(4/5)}$ . In other words, the rate of convergence for this non-parametric estimation is  $N^{-(2/5)}$ .<sup>1</sup>

### III. The Data

#### 3.1 The CPI Housing Sample

The CPI housing sample is the source of information on changes in the price of housing services for the CPI's two principle shelter indexes--the residential rent index and the owners' equivalent rent index. The CPI housing sample is a stratified cluster sample of approximately 40,000 rental units and 20,000 owner

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<sup>1</sup> See Härdle (1990), section 3.2 for a discussion.

units.<sup>2</sup> The overall sample is divided into six panels with rental units surveyed every six months, resulting in two data collections per year per apartment in the sample. The sample is comprised of 1,077,703 survey records.<sup>3</sup>

In any given month, the BLS field representatives visit that month's housing panel and gather information on, among other items, the tenure status of the dwelling unit (owner or rental), current occupancy status (vacant or occupied), duration in months of occupancy (if occupied), and, for rental units, the rent. The resulting dataset is well suited to the analysis of the duration of residence in rental housing, given its high sampling frequency and the detail of information collected over the between-survey period. The analysis undertaken in this paper uses the CPI housing sample over the January 1987 to December 1998 period.

The survey data include information reporting current occupancy status of the housing unit, the length of occupant residency, whether the unit is currently renter occupied or owner occupied as well as the tenure of the unit at initiation, the building structure type (which include the following seven categories: single-family detached, single-family semi-detached, single-family attached, mobile home/trailer, multi-unit with elevator, multi-unit without elevator, and other),<sup>4</sup> the metropolitan area where the housing unit is located, and the month and year in which the data were collected.

### *3.2 The American Housing Survey Sample*

The American Housing Survey (AHS) sample includes metropolitan area level housing market information for the 1984-1998 period. There are 44 MSAs represented, surveyed approximately every fourth year. The AHS provides a rich set of housing market and population indicators, including total rental housing stock, housing stock by race/ethnicity, age, poverty status, and recent mover status of occupants, and

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<sup>2</sup> The CPI housing panels used in this paper were initiated in January 1987 and terminated in December 1998. For additional information, see U.S. Department of Labor (1992). In order to ensure that the CPI housing sample remains current, the BLS augments the dataset based on building permit data obtained from the Census Bureau and from canvassing of areas not requiring building permits.

<sup>3</sup> Thus there is a "January-July" rental panel which is surveyed in each of those months, a "February-August" panel, a "March-September" panel, and so on. Note, however, that only half of the owner units are surveyed in each of the panel survey months, resulting in the collection of owner data only once during the year (e.g., half of the owner units in the "January-July" panel are surveyed in January and the other half in July).

distribution of the housing stock by rent control status, public housing status, location (central city), number of bedrooms, number of stories, and median (MSA) housing costs (see U.S. Department of Commerce, various dates).

### *3.3 Other MSA Economic Data*

We also include MSA-level economic indicators such as nonfarm payroll employment, unemployment rate, single-family and multifamily building permits, income and population. These data were tabulated by the Census Bureau and the BLS and provided to us by *Economy.com*.

### *3.4 The Housing Units Event History Sample*

Our empirical analysis is based on a housing units event-history sample constructed from the CPI housing sample, the AHS housing sample and the regional economic data files. We use linear techniques to extrapolate the regional economic and AHS housing data to semi-annual frequency, so that they can be matched to the CPI sample of rental housing units.<sup>5</sup> The sample contains the event history of individual housing units until the termination of the rental occupancy. This rich data set provides a unique opportunity to conduct a time-varying analysis of the factors determining the duration of residence in rental housing. The final sample used in the duration analysis contains 21,191 units with 301,467 event-history records in 33 MSAs.

For each housing unit event-history record, a tenant occupancy duration variable is constructed based on the following criteria: at the time of survey, if the respondent reports that the housing unit is occupied and the tenant has lived in the current unit for more than six months, then the duration increases by one period. However, if the surveyor finds either that the unit is vacant at the time of the survey, or that the tenant has been living in the unit for less than or equal to six months (which implies that a spell of vacancy has occurred), then the previous tenant's occupancy duration is terminated. In other words,

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<sup>4</sup> Other includes mixed commercial and residential structures, such as an apartment above a store front or professional office, and apartments in or above garages. Mobile homes that are not on permanent foundations or blocks, and houseboats that are not permanently moored are excluded from the survey.

<sup>5</sup> The CPI survey data with missing building structure types were also excluded.

duration equal to one (period) implies that the unit has been continuously occupied for more than six months but less than twelve months.<sup>6</sup> Duration equal to two (periods) implies that the unit has been continuously occupied for more than twelve months but less than eighteen months, and so forth. Because the housing-unit panels are surveyed semi-annually over 12 years, the maximum value for duration is 23 (periods).<sup>7</sup>

Table I compares duration of residence among rental structure types for the BLS housing sample and the 1997 American Housing Survey. Despite some differences in survey design and time frame, findings are roughly consistent. AHS results suggest that some 36 percent of the occupants of rental housing had moved during the prior year; in comparison, 45 percent of units surveyed by the BLS had been occupied for less than one year. Among structure types, among single-family attached units, 46 percent of BLS units surveyed over the 1987-1998 period had been occupied for less than one year. Among single-family attached housing units surveyed by the AHS in 1997, 41 percent of the occupants had moved during the prior year. Similar values were evidenced among other structure types.

Table II provides a comparison of duration of residence in rental housing between the BLS sample and the 1990 Census of Population and Housing. As is evidenced, results confirm a close correspondence between our computed 1987-1998 BLS duration of residence of less than one year (45 percent) and the portion of tenants that moved into rental housing during the 1989-1990 period (42 percent). In general, results reported in Table II indicated a relatively close correspondence in duration of residence for short- and mid-term duration; however, in the case of very long-term duration of residence

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<sup>6</sup> Because the survey is conducted every six months, this data set does not permit us to identify occupancy of less than six months.

<sup>7</sup> One feature of the rental housing occupancy duration data is the possibility of left censoring. Left censoring occurs when the residential occupancy starts prior to the starting point of the sample. Concerns regarding left censoring of sample data have been well documented in the labor economics literature. Here we assume that the mechanisms associated with the left censoring of our housing occupancy duration data are random and therefore will not bias our estimates.

in rental housing, computations of the data sets diverge, with substantially higher levels of ten-or-more years of occupancy indicated in the Census.

Exhibit I illustrates the distribution of duration residence in rental housing for units in the BLS sample with occupancy greater than six months.<sup>8</sup> For the overall sample, close to five percent have duration equal to one (more than six months but less than 12 months), whereas ten percent of sampled units have duration equal to five (upwards to 3 years). The Exhibit II reports the distribution of residency duration in rental housing by building structure type. Results indicate higher rates of turnover for single-family housing and mobile homes during the first two to three years of observation; thereafter, little difference in duration of residence was evidenced among structure types. Exhibit III displays the distribution of residency duration in rental housing for selected sample MSAs. As is evidenced in the chart, there exist considerable variation among cities in pattern of residence duration. Such is particularly evident in comparison of San Francisco with such east coast cities as Philadelphia, New York, and Pittsburgh.

### *3.5 Computation of Empirical Survival Rates*

Following the discussion in Section II, we partitioned our housing sample into over 5,500 synthetic pools (by 33 MSAs, 7 building structure types, and 24 starting periods of rental housing occupancy). For each synthetic pool, we computed empirical survival rates such that  $\hat{S}_{k,t} = n_{k,t}/n_{k,t-1}$ ,  $t = 1, 2, \dots, T$ , where  $n_{k,t}$  is the number of observations in the  $k$ th pool with computed rental housing occupancy duration greater or equal to  $t$ . We then assign empirical survival rates to each observation in the rental housing event-history sample (in accordance to the pool in which the event-history record is located).

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<sup>8</sup> Because the survival rate for duration equal to zero (that is, occupancy of less than six months) is not well defined in the discrete data set, the event history records with duration equal to zero were excluded in the statistical analysis. However, these records were included in the Table I and Table II calculations for comparison with the American Housing Survey and the decennial census distributions.

Table III reports the means and standard deviations of the computed duration and survival rates in the sample. It also reports means and standard deviations of the covariates (the proportional factors,  $X(\tau)$ ) of the proportional hazard model. Since many of the covariates are time varying, we report the statistics from the entire event-history sample as well as at the time when the rental housing occupancy terminates. As is evident, the summary statistics for the covariates at termination and event history samples are highly similar. The rental-housing sample is relatively diverse; some 4 percent of units are comprised of 4-or-more bedrooms and some 6 percent of units are buildings with 7-or-more stories. Public housing and rent-controlled units comprise about 6 and 4 percent of the sample, respectively. Some 43 percent of surveyed units are located in the central city.

#### **IV. Empirical Estimation and Results**

This section reports on econometric evaluation of duration of residence in rental housing based on discrete proportional hazard model specified in equations (1) to (4). As suggested above, controls for renter population and rental housing stock characteristics were obtained from the metropolitan area files of the American Housing Survey, whereas local market and economic indicators were obtained from *Economy.com*. Table IV reports on the estimation of two proportional hazard models of rental housing duration of residence. Model I is specified with a common baseline hazard function for the entire sample, but includes MSA-specific fixed effects together with a group of covariates that serve as proportional factors to adjust the survival curve. Model II is specified with 33 MSA-specific baseline hazard functions together with a group of covariates. All models are estimated using OLS approach. The baseline hazard functions are estimated non-parametrically following Han and Hausman (1990).<sup>9</sup>

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<sup>9</sup> A third model was estimated that contained no MSA fixed effects nor variation in MSA baseline hazards; this model fit the data less well (R-square equal to 0.4890). The structure type variables had the same sign and rank ordering as in Models 1 and 2. Some of the tenant demographic and rental stock characteristics had different signs and larger coefficients, indicating that they were capturing various MSA effects; for example, the rent control variable had an estimated coefficient of  $-2.9$  and a t-statistic of  $178.9$ .

As suggested in estimates from Model I, our computations indicate significant cross-city and intertemporal variation in duration of rental occupancy. In general, the MSA fixed-effects, housing market and economic characteristics are statistically significant; overall, the models explain about two-thirds of the variation in the duration of residence in rental housing. Estimates from both Model I and Model II support earlier findings by Gabriel and Nothaft (2001).

As evidenced in Table IV, rent levels have a statistically significant and positive impact on the hazard rate of occupancy, or in other words, have a negative effect on duration of rental occupancy. Rent levels are represented by tenants' median housing costs for each metropolitan area as computed in the American Housing Survey. Markets with higher rental costs experience shorter tenant occupancy; as higher rental costs may accelerate tenant switches into ownership. Duration of residence is increased in high-rise multifamily apartments, as indicated by the significant negative coefficient on the proportion of units in buildings with seven or more stories.<sup>10</sup> As anticipated, duration of residence is significantly damped among renters of large single-family units (4-or-more bedrooms). Results also vary significantly among structure types, with increased residency duration in multifamily elevator buildings and the opposite in mobile rental homes. Consistent with the above discussion, a sizable and highly significant negative coefficient is attached to the multi-story (with elevator) multifamily structure type.

The duration of residence should reflect the mobility characteristics of the renter population, together with measures of change in the size of renter populations and the availability of below-market rental units. Population mobility is proxied directly by the percentage of population that moved in the prior year. Additional regressors include the percentage of elderly and poverty level households. The effects of lower-income status on mobility are unclear a priori. While those households often experience relatively high rates of job change, their residential mobility may be adversely affected by transactions costs associated with household moves. Similarly, household move rates typically decline with age, as a variety of concerns,

including health status, social, and family ties may limit the mobility of that group. As expected, Table IV indicates that more mobile households have a higher risk of turnover. Further, tenant turnover rises with the MSA percentage of poverty population. However, contrary to expectations, risk of tenant turnover rises with the percentages of elderly MSA populations. Results also indicate significantly higher risk of turnover in areas characterized by higher proportions of minority households. All things equal, duration of residence is increased in MSAs with higher proportions of central city rental housing stock.

It is further hypothesized that the duration of residence will increase in metropolitan areas with greater proportions of rent-controlled or public housing units. Those units typically are available at below-market rents that provide a disincentive for households occupying the units to move. As expected, estimation results indicate increased duration of residence in metropolitan areas characterized by a higher percentage of rent-controlled units.<sup>11</sup> In contrast, greater proportions of public housing served to reduce duration of residence.

Population growth as derived from indigenous sources and from interregional migration should affect the duration of rental housing occupancy. On the one hand, unanticipated population increases may lead to lower levels of short-run rental unit vacancies and increased duration of residence; alternatively, areas characterized by relatively high rates of anticipated population growth may have a higher incidence of rental vacancies and a lower duration of residence. Our results are consistent with the former hypothesis, as a negative and significant coefficient is associated with the rate of MSA population growth. Similarly, we hypothesize that expansion in the stock of rental housing, as reflected in multifamily building permit issuance, may reflect a higher demand of rental housing in short run, hence result in reduced incidence of vacancy and increased duration of residence. Results indicate the anticipated negative and significant coefficient associated with the issuance of multifamily building permits. Finally, MSA-specific economic

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<sup>10</sup> There is substantial variation across MSAs in the share of the rental housing stock that is in buildings with seven-or-more stories. The share averaged 7.1 percent over our sample, and varied from 0.4 percent in the Houston and Dallas-Fort Worth MSAs to 36.9 percent in the New York MSA.

<sup>11</sup> Rent controlled units comprised only 4.9 percent of rental units in the event-history sample. The states of California, Connecticut, New Jersey, New York, and the District of Columbia are the only areas that have MSAs with rent control.

cycles are proxied by unemployment rates, which serve to indicate the occurrence and timing of local economic downturns. As is well appreciated, voluntary job switching is damped during a period of economic downturn. As expected, increases in MSA unemployment rates exert a negative and highly significant effect on hazard rate of residence duration.

As suggested above, the analysis further includes MSA-level fixed effects so as to account for locational deviations in the baseline survival function. For the most part, results here are highly significant, suggesting the appropriateness of estimation of MSA-specific hazard functions.

Table V reports predicted cumulative turnover rates for selected MSAs, based on the estimated model 2 evaluated at the sample means of the time-varying and time-invariant covariates. Panels A, B, and C present cumulative rental housing turnover rates at the end of 3<sup>rd</sup>, 5<sup>th</sup>, and 10<sup>th</sup> year for mobile home, single family detached houses, and multifamily elevator units in New York City, Los Angeles, and Dallas, respectively. The results show that cumulative turnover rates at the end of year 3 of the lease in Dallas were 17% higher than in New York City, and about 11% higher than in Los Angeles. Cumulative turnover rates for mobile home renters at the end of 3<sup>rd</sup> year were about 8% higher than renters in multi-story multifamily units. Cumulative turnover rates for renters in single-family detached houses were about 4% higher than in multifamily units. Similar patterns persist over the time; however, the magnitudes of the estimated differences decline significantly by the end of 10<sup>th</sup> year.

Table VI simulates the impacts of changes in housing policy and regional economics on rental housing turnover rates. The analysis indicates that on average, cumulative rental housing tenant turnover rates in New York City at the end of years 3, 5, and 10 would increase by about 1 percent if rent control was repealed. The simulation further indicates that NYC cumulative tenant turnover rates (by the end of year 3) would increase by 12 percent if rental housing were more geographically dispersed, as indicated by a reduction in the central city share of the rental stock to that of the national average level. Similarly, a decline in the density of NYC rental housing, as simulated in the reduction in the metropolitan share of buildings with seven or more stories to the national average level, would result in a 13 percent increase in the cumulative tenant turnover rates by the end of year 3 of lease. A simulated reduction to the national

average level in the percentage of NYC rental households in poverty would serve to reduce cumulative tenant turnover rates by about 4 percent. Finally, an adjustment in the NYC unemployment rate to national average levels would result in a modest 0.8% increase in cumulative tenant turnover rates by the end of year 10.

## **V. Conclusion**

Occupancy duration in rental housing has a wide distribution that is heavily skewed toward shorter durations: median duration is between one and two years, with some tenants staying in their homes well over a decade. Because tenant turnover is relatively high, analysis of duration of residence requires a similarly high-frequency data series. Further, hazard-rate models are especially applicable to duration analyses, but require a sufficiently long time-series to accurately model the underlying dynamics.

The data used in this paper, collected by the BLS for its CPI calculations, are uniquely well suited to the analysis of tenant occupancy duration. The data are high frequency (semi-annual), cover a long time series (12 years), span all structure types, and are national in scope. By applying innovative hazard-rate estimation techniques, the resulting model identifies a variety of time-varying and time-invariant determinants of residency duration.

This paper provides new evidence as regards tenant and market characteristics that determine the duration of residency. Results indicate that the duration of residence is highly time dependent, given significant intertemporal variation in many of the housing and market covariates. Research findings further reveal that median housing costs, public housing share of the rental stock, poverty rate, and African-American and Hispanic share of tenant households are among those factors that positively affect tenant turnover hazard rates and hence are negatively related to tenant residence duration. Elevator buildings, unemployment rate, population growth and central city share of the rental stock negatively affect tenant turnover hazard rates and hence are positively related with

tenant residence duration. Further, the estimated pattern of duration of residence was shown to vary substantially across 33 large metropolitan markets.

The empirical analysis offers an improved understanding of tenant turnover, building occupancy, and rent flows critical to investment property valuation and development. In that regard, elevator high-rises tend to attract longer-duration tenants, whereas the opposite is evidenced for garden apartments. Also, occupancy duration varies significantly across metropolitan areas, after controlling for important housing stock, tenant, and macroeconomic factors. In general, metropolitan areas in the Mid-West tend to have higher turnover among tenants than cities in other parts of the nation. The empirical analysis also sheds light on the duration implications of changes in the metropolitan geographic dispersion and density of rental housing. Findings for New York City indicate that increased dispersion of rental housing, as reflected in reduction in the share of rental stock in the central city to national average levels, would serve to boost cumulative tenant turnover rates by 12 percent by the end of year three of the rental lease. Similarly, simulated reduction in the density of rental housing, as reflected in downward adjustment in the share of NYC buildings with seven or more stories to national average levels, would serve to increase cumulative tenant turnover rates by 13 percent.

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TABLE I. TENANT OCCUPANCY OF LESS THAN ONE YEAR BY STRUCTURE TYPE:  
AHS AND BLS COMPARISON

American Housing Survey: 1997		Bureau of Labor Statistics: 1987-1998	
Structure Type	Percent Moved In Past Year	Structure Type	Percent Occupied Less Than One Year
1-unit detached	32	One-family detached	45
1-unit attached	41	One-family semi-attached	46
2 to 4 units	35	One-family attached	46
5 to 9 units	41	Multifamily: no elevator	37
10 to 19 units	46		
20 to 49 units	35	Multifamily: with elevator	46
50 units or more	27		
Mobile home	40	Mobile home	59
		Other	46
All rental units	36	All rental units	45

Source: *American Housing Survey for the United States 1997*, Current Housing Reports H150/97, Table 4-1, p. 178, and authors' calculations of BLS data.

TABLE II. LENGTH OF TENANT OCCUPANCY: DECENNIAL CENSUS AND BLS COMPARISON

Census of Population and Housing: 1990		Bureau of Labor Statistics: 1987-1998	
Year Tenant Moved In	Percent of Rental Housing Stock	Length of Tenant Occupancy	Percent of Rental Housing Stock
1989-March 1990	42	Less than 1 year	45
1985-1988	35	1 to 5 years	44
1980-1984	12	6 to 10 years	10
Before 1980	12	10 years or more	1

Note: Columns may not sum to 100 because of rounding.

Source: *1990 Census of Population and Housing*, Table H29 (<http://homer.ssd.census.gov/cdrom/lookup>), and authors' calculations of BLS data.

TABLE III. MEANS AND STANDARD DEVIATIONS OF DURATION, SURVIVAL RATES, AND COVARIATES AT TERMINATION AND IN EVENT HISTORY SAMPLE

Variable	At Termination	Event History
Duration	1.464 (3.908)	
Survive	0.675 (0.165)	
Log Value of Multifamily Building Permit	7.462 (0.934)	7.485 (0.899)
Unemployment Rate (percent)	5.641 (1.640)	5.661 (1.670)
Population Growth (percent)	0.005 (0.005)	0.005 (0.005)
Black and Hispanic Population (percent)	0.262 (0.121)	0.260 (0.123)
Elder Population (percent)	0.147 (0.106)	0.152 (0.118)
Recent Mover (percent)	0.181 (0.046)	0.175 (0.044)
Poverty (percent)	0.121 (0.041)	0.121 (0.041)
4 + Bedrooms (percent)	0.042 (0.015)	0.043 (0.014)
7 + Stories (percent)	0.063 (0.081)	0.071 (0.088)
Public Housing (percent)	0.057 (0.027)	0.060 (0.027)
Rent Control (percent)	0.043 (0.075)	0.049 (0.080)
Log Value of Median Housing Cost	6.311 (0.223)	6.330 (0.229)
Central City (percent)	0.432 (0.176)	0.439 (0.179)
No. of Observations	120,396	301,467

Note: Standard deviations are in parentheses.

TABLE IV. ESTIMATES OF PROPORTIONAL HAZARD MODEL  
OF RENTAL HOUSING OCCUPANCY DURATION

	Model 1	Model 2
Black and Hispanic Population (percent)	1.718 (29.06)	1.823 (29.75)
4 + Bedrooms (percent)	4.518 (29.56)	5.026 (31.58)
7 + Stories (percent)	-0.996 (10.33)	-1.144 (11.33)
Recent Mover (percent)	2.044 (20.37)	2.310 (22.11)
Elder Population (percent)	0.039 (3.64)	0.033 (3.02)
Poverty (percent)	3.052 (65.49)	3.127 (64.29)
Central City (percent)	-0.795 (41.31)	-0.841 (42.84)
Public Housing (percent)	3.140 (33.67)	3.019 (31.23)
Rent Control (percent)	-0.313 (5.06)	-0.155 (2.38)
Log Value of Median Housing Cost	2.557 (257.00)	2.552 (251.54)
Log Value of Building Permit	-0.023 (15.09)	-0.019 (11.94)
Unemployment Rate (percent)	-0.081 (111.43)	-0.080 (107.94)
Population Growth (percent)	-11.307 (38.90)	-10.913 (36.56)
Single Family Detached	-0.067 (5.03)	-0.066 (5.02)
Single Family Semi-Detached	-0.046 (3.45)	-0.046 (3.43)
Single Family Attached	-0.042 (3.15)	-0.043 (3.24)
Mobile Home	0.040 (2.71)	0.037 (2.54)
Multifamily with Elevator	-0.192 (14.43)	-0.188 (14.28)
Multifamily without Elevator	-0.036 (2.69)	-0.035 (2.65)

TABLE IV. ESTIMATES OF PROPORTIONAL HAZARD MODEL  
OF RENTAL HOUSING OCCUPANCY DURATION (CONTINUED)

	Model 1	Model 2
Atlanta	-0.635 (54.51)	
Baltimore	-0.304 (32.97)	
Boston	-0.853 (51.59)	
Charlotte	-0.342 (26.02)	
Chicago	-0.261 (19.38)	
Cincinnati	0.358 (24.91)	
Cleveland	0.248 (16.05)	
Dallas	0.148 (10.74)	
Denver	-0.025 (1.89)	
Detroit	0.067 (5.03)	
Hartford	-0.607 (45.61)	
Houston	-0.065 (5.05)	
Indianapolis	0.523 (36.25)	
Kansas City	0.342 (28.17)	
Los Angeles City	-0.934 (49.10)	
Los Angeles metro (excludes city)	-0.952 (65.30)	
Miami	-0.985 (47.43)	
Milwaukee	-0.012 (0.99)	

TABLE IV. ESTIMATES OF PROPORTIONAL HAZARD MODEL  
OF RENTAL HOUSING OCCUPANCY DURATION (CONTINUED)

	Model 1	Model 2
Minneapolis	0.057 (3.23)	
New Jersey (northern metro areas)	-0.746 (48.57)	
New Orleans	-0.024 (2.41)	
New York City	-0.262 (6.62)	
Norfolk	-0.365 (27.05)	
Philadelphia	-0.371 (29.77)	
Pittsburgh	0.529 (29.17)	
Portland	0.042 (2.56)	
St. Louis	0.296 (25.77)	
San Diego	-0.611 (41.26)	
San Francisco	-2.050 (124.12)	
Seattle	-0.042 (2.63)	
Tampa	0.153 (11.87)	
Washington	-0.955 (57.20)	
R-Square	0.6314	0.6399

Note: T-ratios are in parentheses. The number of observations in each model is 301,467. Model 1 is specified with a common baseline hazard function. Model 2 is specified with MSA-specific baseline hazard functions.

TABLE V. PREDICTED CUMULATIVE RENTAL HOUSING TENANT TURNOVER RATES

	Cumulative Turnover Rates		
	End of 3 <sup>rd</sup> Year	End of 5 <sup>th</sup> Year	End of 10 <sup>th</sup> Year
New York City			
Mobile Home/Trailer	58.63%	75.09%	96.47%
Single Family Detached	54.88%	71.44%	95.10%
Multifamily with Elevator	50.56%	67.02%	93.07%
Los Angeles			
Mobile Home/Trailer	65.19%	82.36%	97.91%
Single Family Detached	61.39%	79.08%	96.94%
Multifamily with Elevator	56.92%	74.96%	95.44%
Dallas			
Mobile Home/Trailer	75.85%	88.57%	99.14%
Single Family Detached	72.23%	85.86%	98.63%
Multifamily with Elevator	67.82%	82.29%	97.75%

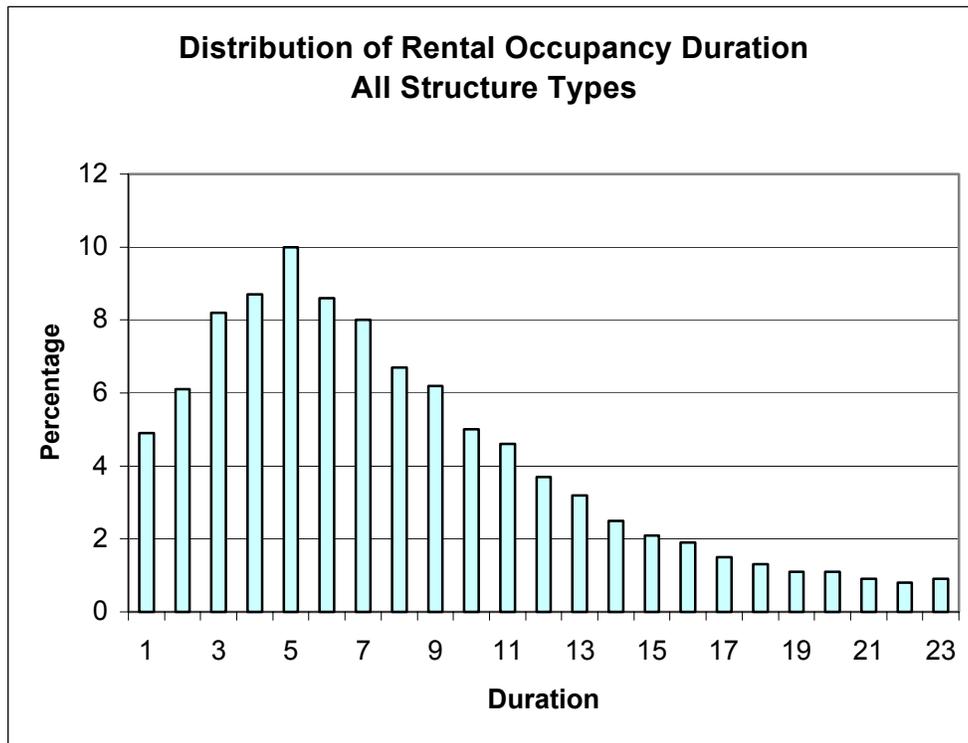
Note: The predicted cumulative turnover rates are computed based on estimated model 2 reported in Table IV evaluated at the sample means of time-varying and time-invariant covariates at the MSA level.

TABLE VI. IMPACTS OF CHANGES IN HOUSING POLICY OR REGIONAL ECONOMY  
ON PREDICTED CUMULATIVE RENTAL HOUSING TENANT TURNOVER RATES  
(NEW YORK CITY)

	Change in Cumulative Turnover Rates		
	End of 3 <sup>rd</sup> Year	End of 5 <sup>th</sup> Year	End of 10 <sup>th</sup> Year
<b>No Rent Control</b>			
Mobile Home/Trailer	0.99%	1.02%	1.04%
Single Family Detached	0.97%	1.02%	1.05%
Multifamily with Elevator	0.94%	1.00%	1.05%
<b>Central City % Reduced to National Average Level</b>			
Mobile Home/Trailer	11.75%	11.55%	11.19%
Single Family Detached	11.74%	11.72%	11.51%
Multifamily with Elevator	11.57%	11.74%	11.71%
<b>Poverty % Reduced to National Average Level</b>			
Mobile Home/Trailer	-3.75%	-3.76%	-3.71%
Single Family Detached	-3.67%	-3.73%	-3.72%
Multifamily with Elevator	-3.55%	-3.65%	-3.68%
<b>Unemployment Rate Adjusted to National Level</b>			
Mobile Home/Trailer	-0.06%	0.41%	0.83%
Single Family Detached	-0.06%	0.40%	0.83%
Multifamily with Elevator	-0.06%	0.40%	0.83%
<b>7+ Stories % Reduced to National Average Level</b>			
Mobile Home/Trailer	12.50%	12.27%	11.86%
Single Family Detached	12.50%	12.46%	12.22%
Multifamily with Elevator	12.34%	12.50%	12.45%

Note: Difference in predicted cumulative turnover rates are computed based on estimated model 2 reported in Table IV evaluated at the sample means of time-varying and time-invariant covariates for New York City, excepted for the control variable specified in each panel that was replaced by national average level or otherwise specified level.

EXHIBIT I. DISTRIBUTION OF RENTAL HOUSING OCCUPANCY DURATION



**EXHIBIT II. DISTRIBUTION OF RENTAL HOUSING OCCUPANCY DURATION  
BY BUILDING STRUCTURE TYPES**

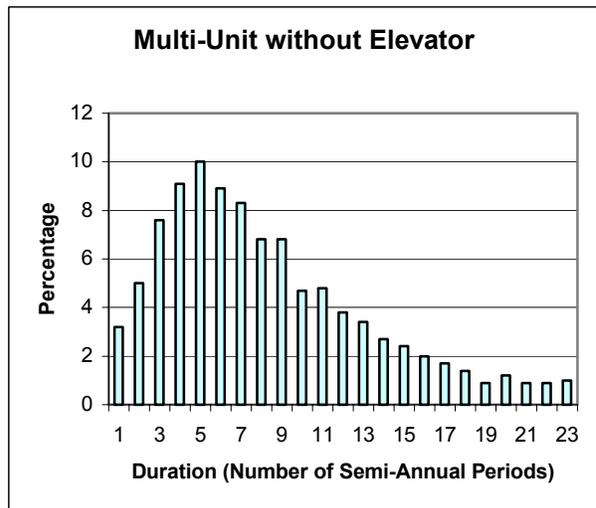
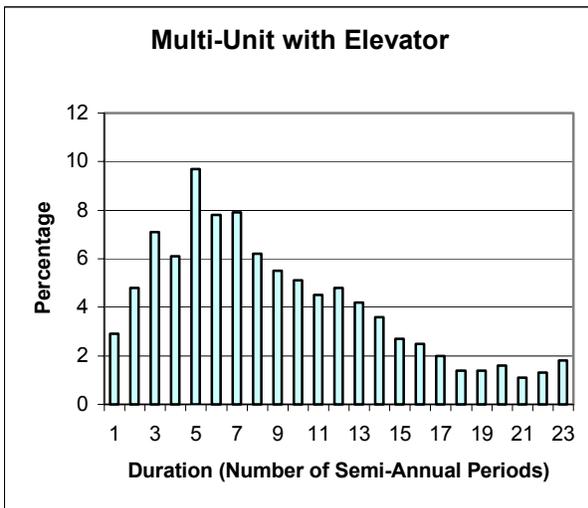
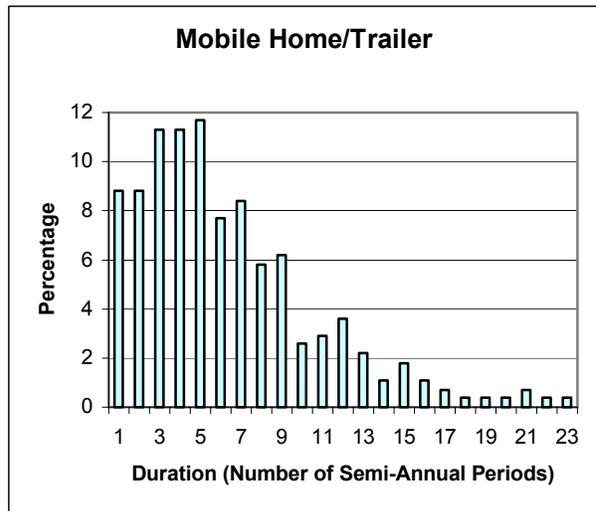
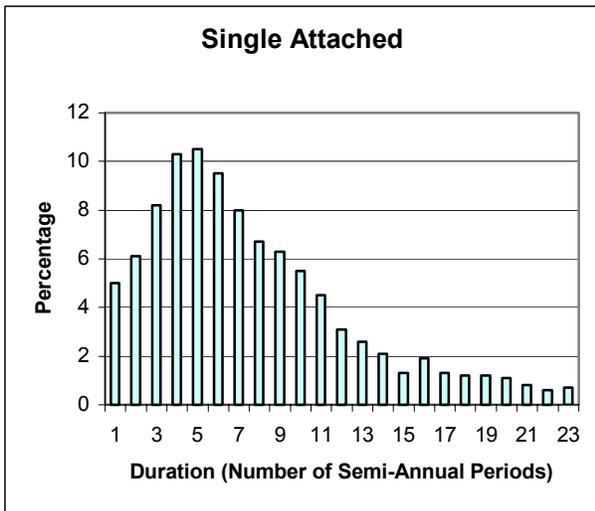
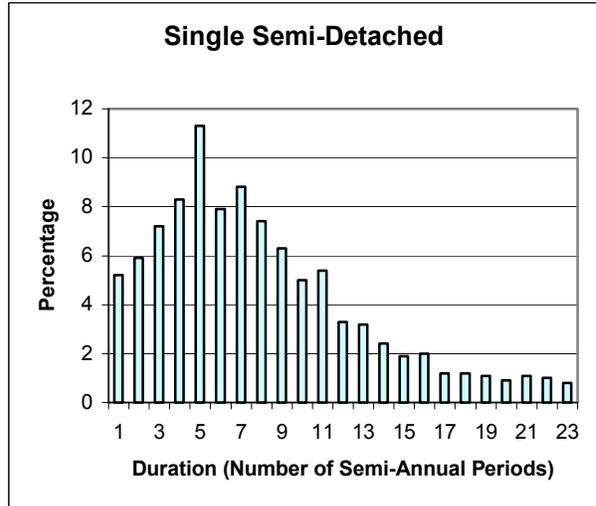
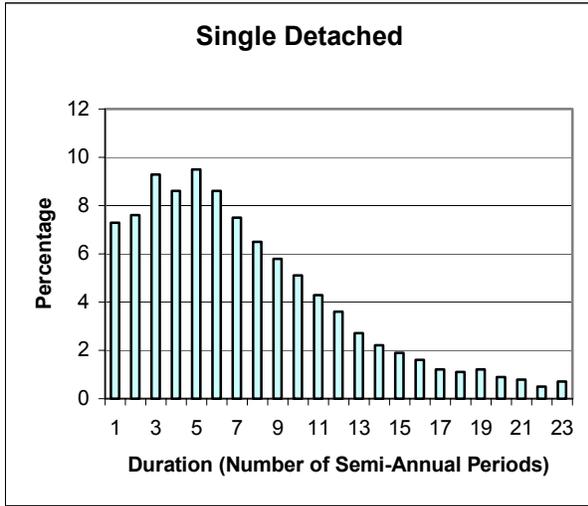
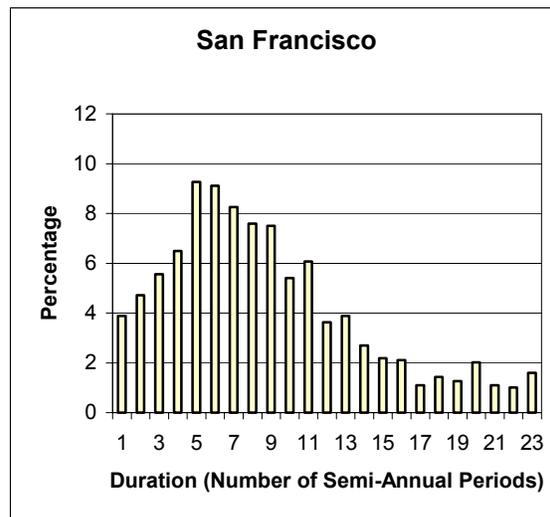
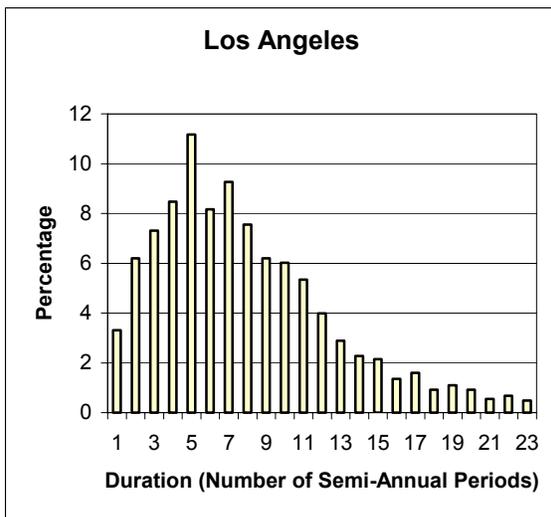
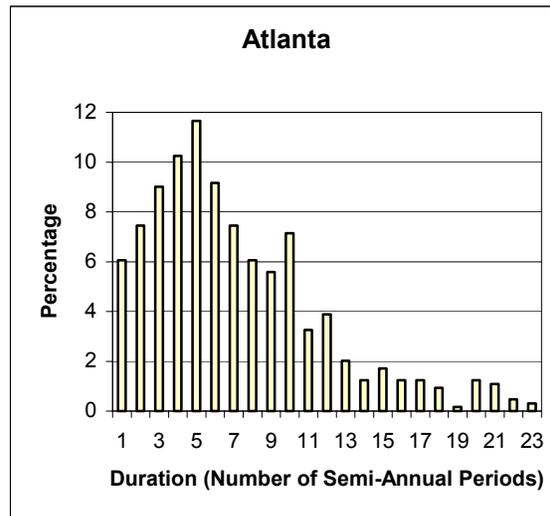
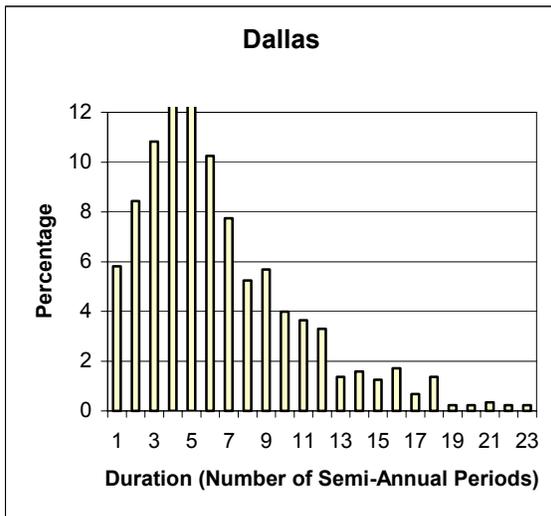
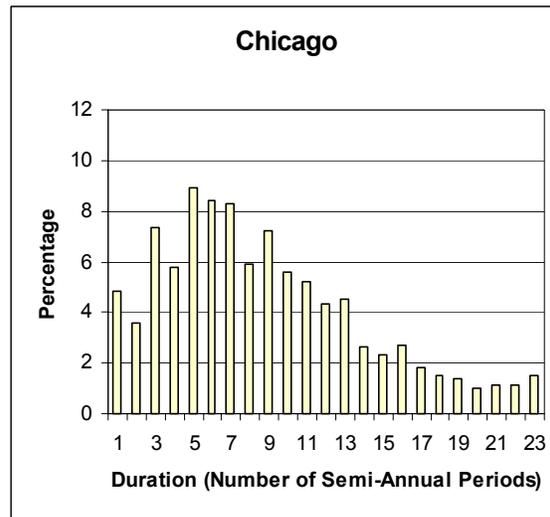
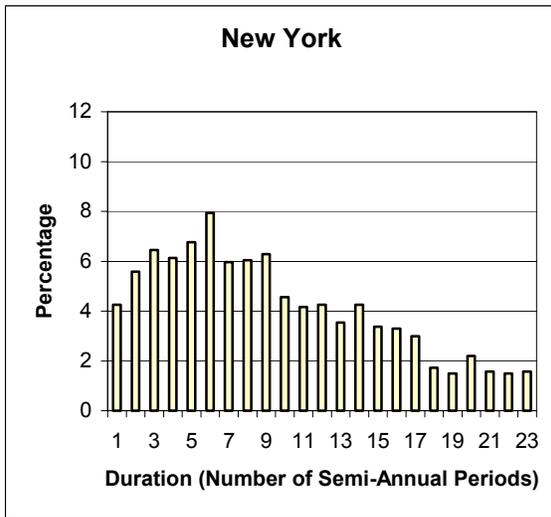


EXHIBIT III. DISTRIBUTION OF RENTAL HOUSING OCCUPANCY DURATION BY MSAs



Appendix FEIR-D

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Evaluation of Revised Building Elevations



August 22, 2012

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

Re: IL Villaggio Toscano – Evaluation of Revised Building Elevations

Mr. Goldberg:

Per your request, Air Quality Dynamics has prepared a subsequent assessment to identify discrete heating, ventilation and air conditioning (HVAC) requirements for the Project based upon consideration of revised residential building setbacks and elevations above local terrain and more refined specifications for the location of air filtration systems.

The report entitled *Il Villaggio Toscano Project - Pollutant Exposure Assessment*<sup>1</sup> prepared for the Project recommends as mitigation limiting the infiltration of particulates into residential occupancies associated with the adjoining freeway interchange to reduce carcinogenic risk estimates to within acceptable limits and reduce particulate exposures below South Coast Air Quality Management District significance thresholds. This was accomplished by locating HVAC control systems that service residential occupancies at specified heights above local terrain and installing corresponding particulate filters that conform to the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2-1999. The report provided elevations and associated filter requirements for HVAC control equipment located at building heights commensurate with roof top/parapet locations.

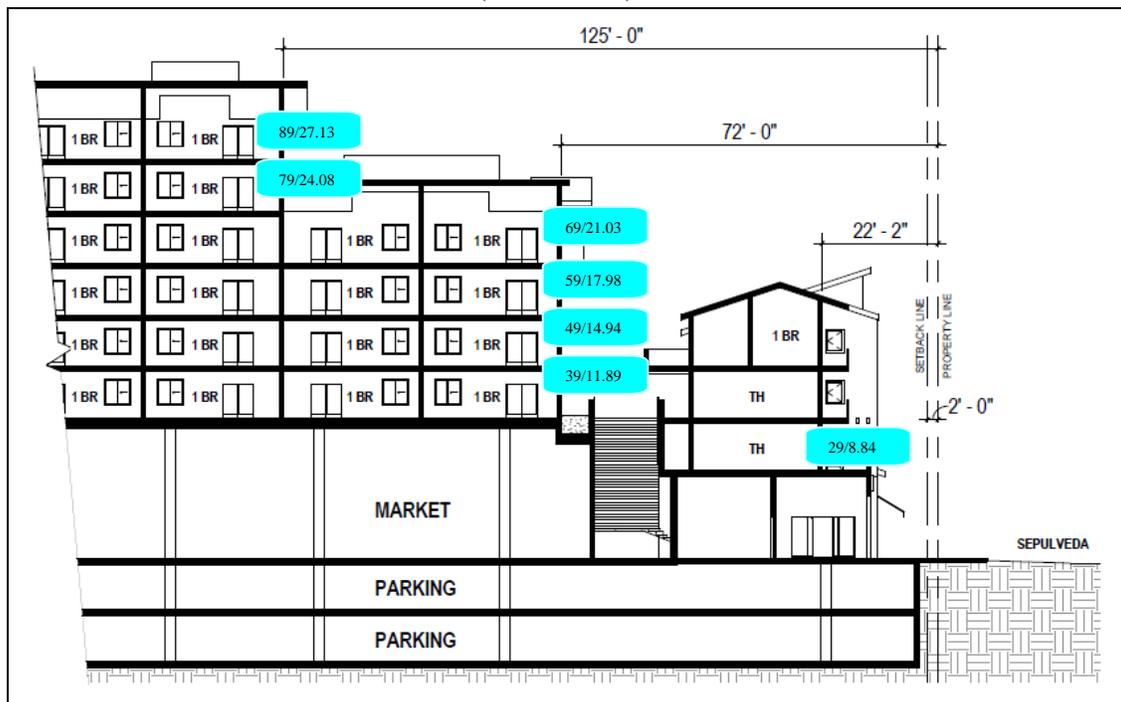
Proposed revisions to initial building setbacks and elevations and refinements to the location of filtration systems prompted consultation with project designers as to the location of proposed HVAC control systems. It was reported that system design would now incorporate individual filtration systems whereby the location of outside air ducting would correspond with the location of individual residential units. The following figure presents a graphical representation of identified HVAC control system heights.

To determine HVAC control requirements, a dispersion analysis was performed for diesel particulate, PM<sub>10</sub> and PM<sub>2.5</sub> emissions corresponding to the HVAC control system heights and

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<sup>1</sup> Air Quality Dynamics, May 2011. IL Villaggio Toscano Project – Pollutant Exposure Assessment.

HVAC Control System Heights Above Local Terrain  
(Feet/Meters)



locations. The dispersion modeling exercise was conducted in a manner consistent with the methodology presented in *Il Villaggio Toscano Project - Pollutant Exposure Assessment*. Only on-site receptor heights (i.e., flagpole) were revised to identify vertical concentration gradients above local terrain.

Results of the dispersion analysis confirmed that all residential occupancies can continue to be serviced with available HVAC control equipment to reduce pollutant exposures below significance thresholds. A copy of the dispersion model input/output files are available via electronic format and will be disseminated per your direction.

Attachment A identifies discrete HVAC control efficiencies per floor and building location. The reported minimum efficiency reporting values (MERV) can be achieved with the installation of whole-house systems utilizing either traditional media or electronic air cleaning devices. Media air cleaners capture particles as air flows through a woven filter. Electronic air cleaners utilize electricity to charge particles as they pass through the air cleaner where they are subsequently trapped on collector plates. Hybrid electronic cleaners are also available and provide exceptional performance (MERV 16 equivalent) by incorporating disposable filter media thereby eliminating the need for conventional collector plates. For reference, Attachment B provides a listing of MERV ratings and efficiencies as reported in ASHRAE Standard 52.2.

Regardless of choice, care must be taken as to the degradation of system performance over time and ensure that air cleaning devices are serviced and maintained per manufacturers specifications.

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

Sincerely,

Bill Piazza

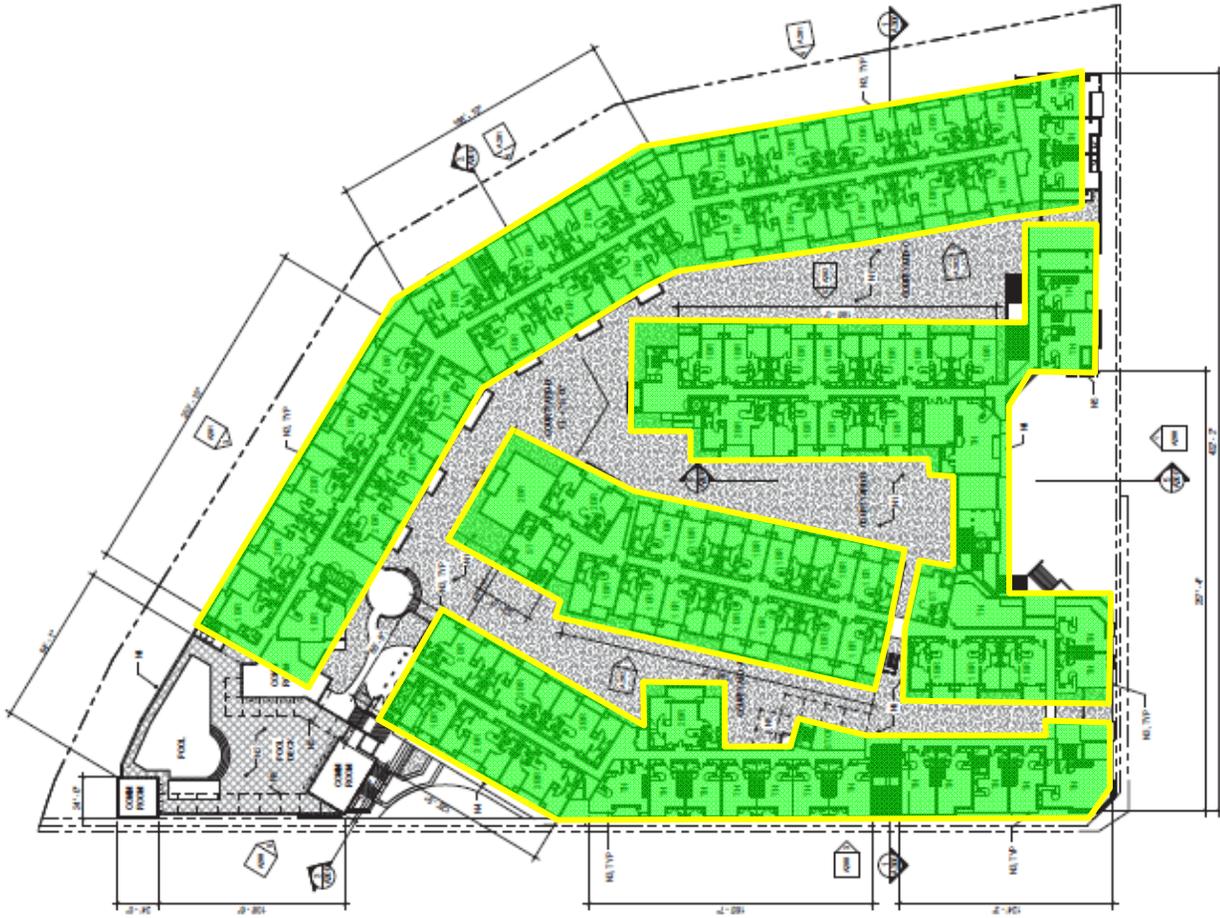
Attachments: as stated

## Attachment A



# IL VILLAGGIO TOSCANO

Minimum Efficiency Reporting Values (MERV)  
3rd Floor (39 Feet/11.89 Meters Above Local Terrain)

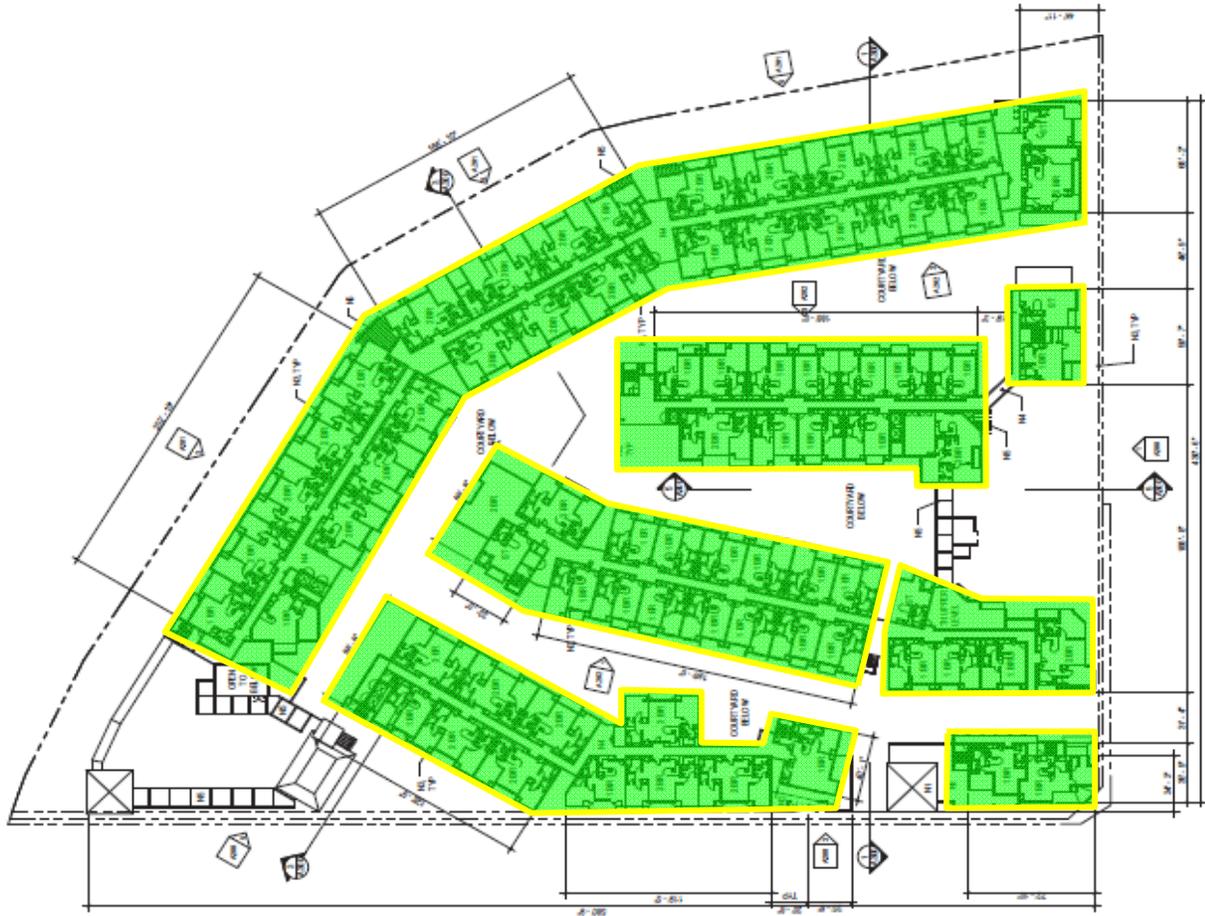


Legend:

- MERV 15 or Equivalent ■
- MERV 16 or Equivalent ■

# IL VILLAGGIO TOSCANO

Minimum Efficiency Reporting Values (MERV)  
4th Floor (49 Feet/14.94 Meters Above Local Terrain)



Legend:

- MERV 15 or Equivalent ■
- MERV 16 or Equivalent ■

# IL VILLAGGIO TOSCANO

Minimum Efficiency Reporting Values (MERV)  
5th Floor (59 Feet/17.98 Meters Above Local Terrain)



Legend:

- MERV 15 or Equivalent
- MERV 16 or Equivalent

# IL VILLAGGIO TOSCANO

Minimum Efficiency Reporting Values (MERV)  
6th Floor (69 Feet/21.03 Meters Above Local Terrain)



Legend:

- MERV 15 or Equivalent
- MERV 16 or Equivalent

# IL VILLAGGIO TOSCANO

Minimum Efficiency Reporting Values (MERV)  
7th Floor (79 Feet/24.08 Meters Above Local Terrain)



Legend:

- MERV 15 or Equivalent
- MERV 16 or Equivalent

# IL VILLAGGIO TOSCANO

Minimum Efficiency Reporting Values (MERV)  
8th Floor (89 Feet/27.13 Meters Above Local Terrain)



Legend:

- MERV 15 or Equivalent
- MERV 16 or Equivalent

## Attachment B



**Minimum Efficiency Reporting Values (MERV)/Average Particle Size Efficiency (PSE)  
ASHRAE Standard 52.2**

Group Number	MERV	E <sub>1</sub>	E <sub>2</sub>	E <sub>3</sub>	Average Arrestance	Minimum Final Resistance (Inches w.g.)
		Average Particle Size Efficiency (PSE) 0.3 - 1.0 Micrometers	Average Particle Size Efficiency (PSE) 1.0 - 3.0 Micrometers	Average Particle Size Efficiency (PSE) 3.0 - 10.0 Micrometers		
1	MERV 1	-	-	Less than 20%	Less than 65%	0.3"
	MERV 2	-	-	Less than 20%	65 - 69.9%	0.3"
	MERV 3	-	-	Less than 20%	70 - 74.9%	0.3"
	MERV 4	-	-	Less than 20%	75% or greater	0.3"
2	MERV 5	-	-	20 - 34.9%	-	0.6"
	MERV 6	-	-	35 - 49.9%	-	0.6"
	MERV 7	-	-	50 - 69.9%	-	0.6"
	MERV 8	-	-	70 - 84.9%	-	0.6"
3	MERV 9	-	Less than 50%	85% or greater	-	1.0"
	MERV 10	-	50% - 64.9%	85% or greater	-	1.0"
	MERV 11	-	65% - 79.9%	85% or greater	-	1.0"
	MERV 12	-	80% - 89.9%	90% or greater	-	1.0"
4	MERV 13	Less than 75%	90% or greater	90% or greater	-	1.4"
	MERV 14	75% - 84.9%	90% or greater	90% or greater	-	1.4"
	MERV 15	85% - 94.9%	90% or greater	90% or greater	-	1.4"
	MERV 16	95% or Greater	95% or greater	95% or greater	-	1.4"

Revised Draft EIR Appendix B-5  

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**Revised Pollutant Exposure Assessment**



**IL VILLAGGIO TOSCANO PROJECT  
POLLUTANT EXPOSURE ASSESSMENT**

*Prepared For:*

**Armbruster Goldsmith and Delvac LLP**  
10940 Wilshire Boulevard, Suite 2100  
Los Angeles, California 90024

*Prepared By:*

**Air Quality Dynamics**  
**(818) 703-3294**

May 2011

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## 1.0 INTRODUCTION

The City of Los Angeles, Department of City Planning requires special consideration for residential developments located in close proximity to freeways whereby appropriate mitigation measures be provided to reduce local air quality impacts associated with vehicular emissions. This requirement is largely based upon recent studies and recommendations from agencies such as the California Air Resources Board (ARB) which promulgated an advisory recommendation to avoid siting sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day or rural roads with 50,000 vehicles per day. According to the ARB, the increased cancer risk is 300 to 1,700 per million within this domain. The strongest association of traffic related emissions with adverse health outcomes was seen within 300 feet of roadways with high truck densities.

Notwithstanding, the ARB notes that a site specific analysis would be required to determine the actual risk near a particular land use and should consider factors such as prevailing wind direction, local topography and climate. Additionally, the California Code of Regulations, Title 14, Section 15126.2(a) requires that significant environmental effects of a project be assessed whereby an analysis is required when the project brings development and people into an affected area. For the proposed project, adjoining freeway emissions are a potential concern and relevant thresholds and standards exist to determine the impact of vehicular emissions on an exposed population. As such, a pollutant exposure assessment was prepared to assess the impact of these emissions on individuals residing at the proposed project site. The analysis also serves to provide a nexus between identified impacts and the effectiveness of available mitigation measures.

In 2003, the California State Legislature enacted a state law to assess a school's "fitness for occupancy" associated with exposures to heavy freeway traffic. As such, the assessment methodology utilized for public school construction serves as a conservative (i.e., health protective) standard of care to assess the impacts of pollutants on a non-public school occupancy.

Specifically, for a site located within 500 feet from the edge of a freeway traffic lane or busy traffic corridor, an analysis pursuant to paragraph (2) of subdivision (b) of Section 44360 of the Health and Safety Code, based on appropriate air dispersion modeling, be prepared to quantify local pollutant concentrations and determine the impact on the health of exposed individuals.

In consideration of the above referenced requirement, the assessment and dispersion modeling methodologies used in the preparation of this report were composed of all relevant and appropriate procedures presented by the U.S. Environmental Protection Agency, California Environmental Protection Agency and South Coast Air Quality Management District (SCAQMD). The methodologies and assumptions offered under this regulatory guidance were used to ensure that the assessment effectively quantified residential exposures associated with the generation of contaminant emissions from adjacent mobile source activity.

This report summarizes the protocol used to evaluate contaminant exposures and presents the results of the pollutant exposure assessment.

## 2.0 SITE DESCRIPTION

The proposed mix use development is located at 4827 Sepulveda Boulevard, Los Angeles, California in the community of Sherman Oaks. The project is situated on approximately 5.1 acres and is currently designed to accommodate an eight story commercial and residential structure consisting of 500 housing units and 55,000 square feet of retail/commercial space.

The project site is bounded by U.S. Highway 101 (Ventura Freeway) to the north, Camarillo Street to the south, Sepulveda Boulevard to the east and Interstate 405 (San Diego Freeway) to the west. Figure 1 presents an aerial photograph of the proposed project location and adjoining community.

Figure 1  
Site Location /Vicinity Aerial Photograph



The project's residential uses are served by several six-story buildings, located on top of a structural podium. The podium includes ground level commercial uses fronting Sepulveda Boulevard and Camarillo Street and four levels of parking within an enclosed parking facility.

The project site is designated for Regional Center land uses by the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan. Currently, the project site includes various land use designations including Limited Commercial ([Q]CR-1L), Multiple Dwelling (R3-1L), Single

Family (R1-1L) and Automobile Parking [Q]P-1L. Figure 1 presents an aerial photograph of the proposed project location and adjoining community.

### 3.0 SOURCE IDENTIFICATION

The California Department of Transportation (Caltrans), Traffic and Vehicle Data Systems Unit collects and maintains traffic volume counts for vehicles traversing the California state highway system. Discrete data sets are available for main highway segments, truck traffic and adjoining freeway ramp volumes. Table 1 presents the annual average daily traffic volumes (AADT) for the roadway segments considered in the assessment.

Table 1  
Freeway Traffic Volumes

Roadway Segment	Postmile	Annual Average Daily Traffic (AADT)
101 NB Main	17.170	160,500
101 SB Main	17.170	160,500
101 NB to 405	16.917	49,300
101 NB to 405 NB	39.596	24,500
101 NB to 405 SB	39.402	24,800
101 SB to 405 NB	17.202	22,200
101 NB off Sepulveda Blvd.	16.723	10,200
101 SB on Sepulveda Blvd.	16.789	11,600
405 Main	39.432	219,000
405 NB to 101	38.919	66,300
405 NB to 101 NB	17.114	42,000
405 NB to 101 SB	16.985	24,300
405 SB from 101 SB	39.188	46,000
405 SB off Ventura Blvd.	16.900	3,250
405 SB on Ventura Blvd.	39.091	6,600

Note: Postmile designations from 16.723 to 17.202 and 38.919 to 39.596 are based on assignments reported by Caltrans for the 101 and 405 freeway segments, respectively.

Source: California Department of Transportation, 2011. Traffic and Vehicle Data Systems Unit. Website: <http://www.dot.ca.gov/hq/traffops/saferesr/trafdata/>.

For chronic (long term) and acute (e.g., 1-hour) exposures, AADT values were averaged to produce hourly traffic volumes. As recommended by the SCAQMD, an additional acute scenario was considered to address reduced vehicular speeds. As such, available traffic counts from the California Department of Transportation Freeway Performance Measurement System database for the hour representing the lowest route speeds and corresponding traffic volumes were utilized. If

data were unavailable, averaged AADT counts were utilized. Tables 2 presents the hourly traffic volumes for the identified scenarios considered in the assessment.

Table 2  
Hourly Freeway Traffic Volumes

Roadway Segment	Average Traffic Volumes			Reduced Speed Traffic Volumes		
	All	Gas	Diesel	All	Gas	Diesel
101 NB Main	6,687.5	6,490.9	196.6	609.0	591.1	17.9
101 SB Main	6,687.5	6,490.9	196.6	3,324.0	3,241.8	82.2
101 NB to 405	2,054.2	1,993.8	60.4	2,054.2	1,993.8	60.4
101 NB to 405 NB	1,020.8	990.8	30.0	1,020.8	990.8	30.0
101 NB to 405 SB	1,033.3	1,003.0	30.4	1,033.3	1,003.0	30.4
101 SB to 405 NB	925.0	897.8	27.2	925.0	897.8	27.2
101 NB off Sepulveda Blvd.	425.0	412.5	12.5	425.0	412.5	12.5
101 SB on Sepulveda Blvd.	483.3	469.1	14.2	483.3	469.1	14.2
405 Main	9,125.0	8,899.3	225.7	12,501.0	12,191.8	309.2
405 NB to 101	2,762.5	2,694.2	68.3	2,762.5	2,694.2	68.3
405 NB to 101 NB	1,750.0	1,706.7	43.3	1,750.0	1,706.7	43.3
405 NB to 101 SB	1,012.5	987.5	25.0	1,012.5	987.5	25.0
405 SB from 101 SB	1,916.7	1,869.3	47.4	1,916.7	1,869.3	47.4
405 SB off Ventura Blvd.	135.4	132.1	3.3	135.4	132.1	3.3
405 SB on Ventura Blvd.	275.0	268.2	6.8	275.0	268.2	6.8

Note: Documentation associated with the above segregation of gas and diesel traffic volumes is reported in the *Emfac2007 Population Profile Worksheet* presented in Appendix B.

Source: California Department of Transportation, 2011. Traffic and Vehicle Data Systems Unit. Website: <http://www.dot.ca.gov/hq/traffops/saferesr/trafdata/>.

California Department of Transportation, Freeway Performance Measurement System, 2011. Website: <http://pems.dot.ca.gov>.

#### 4.0 SOURCE CHARACTERIZATION

In urban communities, vehicle emissions contribute significantly to localized concentrations of air contaminants. Typically, emissions generated from these sources are characterized by vehicle mix, the rate pollutants are generated during the course of travel and the number of vehicles traversing the roadway network.

To produce a representative vehicle fleet distribution, the assessment utilized the methodology recommended by the Institute of Transportation, University California, Davis. This approach provides an estimate of vehicle mix based upon annual truck traffic reports and time period adjustments consistent with on-road operational profiles associated with heavy duty truck activity. Table 3 lists the identified fleet mix percentages considered in the assessment.

Table 3  
Vehicle Fleet Mix Profile

Vehicle Class	U.S. Highway 101 (Percent)	Interstate 405 (Percent)
Light Duty Auto (LDA)	76.7	77.3
Light Duty Truck (LDT)	13.4	13.5
Medium Duty Truck (MDT)	4.8	4.8
Heavy Duty Truck/Gas (HDTG)	1.4	0.9
Heavy Duty Truck/Diesel (HDTD)	2.8	2.5
Motorcycle (MCY)	1.0	1.0

Note: Documentation associated with the above profile is reported in the *Vehicle Fleet Mix Computation Worksheet* presented in Appendix B.

Currently, emission factors are generated from a series of computer based programs to produce a composite emission rate for vehicles traveling at various speeds within a defined geographical area or along a discrete roadway segment. To account for the emission standards imposed on the California fleet, the ARB has developed the EMFAC2007 emission factor model. EMFAC2007 was utilized to identify pollutant emission rates for total organic gases (TOG), diesel particulates, carbon monoxide (CO) and nitrogen oxide (NO<sub>x</sub>) compounds.

Programmed vehicle speeds were based upon available data from the California Department of Transportation Freeway Performance Measurement System database for the roadway segments considered in the assessment. For the average traffic scenario, if data were unavailable for a discrete roadway segment, posted route speeds were utilized. For the reduced speed scenario, the lowest identified route speeds and/or posted route speeds were assigned to all adjoining roadway segments. Emissions associated with deceleration and acceleration (i.e., on/off ramps) were based upon the modal algorithms presented in the California Line Source Dispersion Model (Caline4).

For particulates (PM<sub>10</sub> and PM<sub>2.5</sub>), emissions were quantified through the reentrainment of paved roadway dust. The predictive emission equation developed by the U.S. Environmental Protection Agency (AP-42, Section 13.2.1) was utilized to generate PM<sub>10</sub> source strength. However, to account for the mass rate of emissions entrained from the roadway surface, the assumed contribution from exhaust, break and tire wear were not subtracted from the emission estimate. For PM<sub>2.5</sub>, the emission rate was based upon the California Emission Inventory Data and Reporting System (CEIDARS) profile for paved road dust whereby the reported PM<sub>2.5</sub> to PM<sub>10</sub> size fraction of 0.169 was applied to the PM<sub>10</sub> emission rate.

A list of compounds associated with mobile source emissions is presented in Table 4. Appendix B presents the on-road emission rate calculation worksheets and related technical documentation for the freeway segments considered in the assessment.

Table 4  
Compounds Emitted From On-Road Mobile Source Activity

Source	Pollutant
U.S. Highway 101 / Interstate 405	Benzene Formaldehyde 1,3-Butadiene Acetaldehyde Acrolein Diesel Particulates Reentrained Particulates Carbon Monoxide Nitrogen Dioxide

### 5.0 EXPOSURE QUANTIFICATION

In order to assess the impact of emitted compounds on individuals who reside at the proposed condominium complex, air quality modeling utilizing the Industrial Source Complex-Short Term (ISCST3) model was performed. The model is a steady state Gaussian plume model and utilized by the California Environmental Protection Agency for estimating ground level impacts from point and fugitive sources in simple and complex terrain. Notwithstanding, as recommended by the SCAQMD, the AMS/EPA Regulatory Model AERMOD was utilized to assess the downwind extent of NO<sub>x</sub> emissions produced by EMFAC2007 and determine their subsequent conversion to ambient nitrogen dioxide (NO<sub>2</sub>) concentrations. AERMOD's air dispersion algorithms are based upon a planetary boundary layer turbulence structure and scaling concepts, including the treatment of surface and elevated sources in simple and complex terrain.

Both models offer additional flexibility by allowing the user to assign initial vertical and lateral dispersion parameters for sources representative of a localized mobile fleet. For this assessment, the volume source algorithm was utilized to model the emissions generated from on-road mobile source activity. As such, vertical (sigma z) dispersion parameters were developed by approximating mixing zone residence time and quantifying the initial vertical term as performed in the U.S. Environmental Protection Agency guideline model Caline3. The horizontal (sigma y) parameters were generated by dividing the source separation distance by a standard deviation of 2.15.

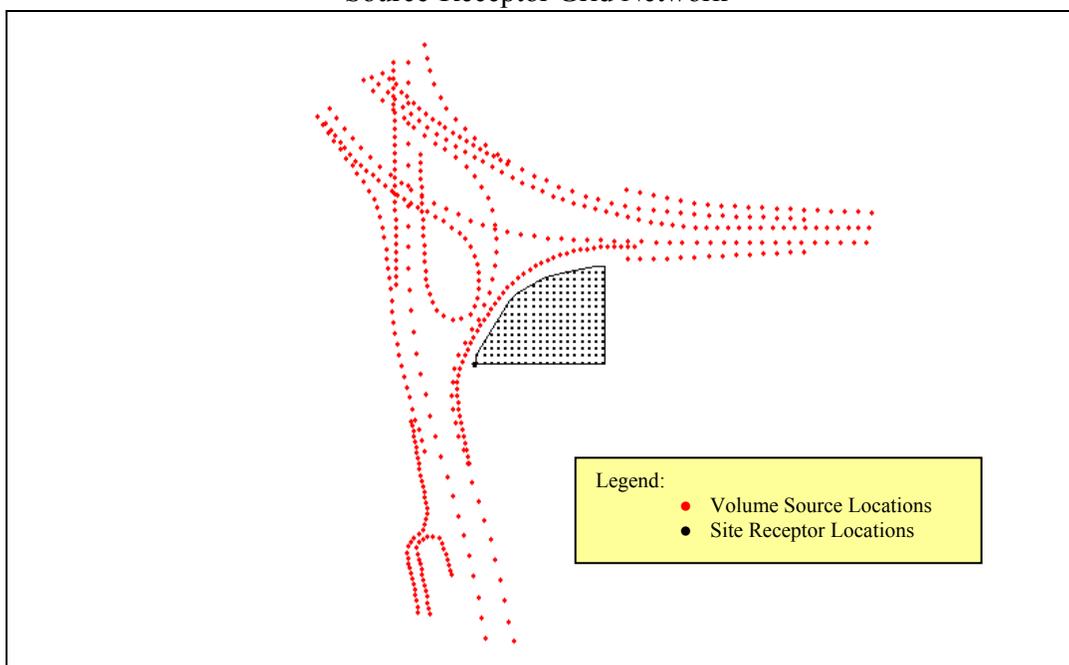
For PM<sub>10</sub> and PM<sub>2.5</sub>, plume depletion due to dry removal mechanisms was assumed (i.e., DRYDPLT). Reentrained PM<sub>10</sub> emissions were separated into the three aerodynamic diameter sizes of 1.0, 2.5 and 10 microns (µm) with weight fractions of 0.0787, 0.1292, and 0.7922, respectively. PM<sub>2.5</sub> emissions were separated into the two particle sizes of 1.0 and 2.5 µm with corresponding weight fractions of 0.3785 and 0.6215. A particle density of 2.3 grams per cubic centimeter was assigned to all size bins.

The dispersion models require additional input parameters including pollutant emission data and local meteorology. Inputs for each emitting source were based on the characterizations referenced

in Section 4.0. Due to their sensitivity to individual meteorological parameters such as wind speed and direction, the U.S. Environmental Protection Agency recommends that meteorological data used as input into dispersion models be selected on the basis of relative spatial and temporal conditions that exist in the area of concern. As such, meteorological data from the SCAQMD Reseda monitoring station located approximately 4.67 miles northwest of the project site was used to represent local weather conditions and prevailing winds.

The modeling analysis also considered the spatial distribution of mobile source activity traversing the freeway in relation to the proposed site. To accommodate a Cartesian grid format, direction dependent calculations were obtained by identifying the universal transverse mercator (UTM) coordinates for each volume source location. On-site receptors were uniformly placed to provide coverage across the identified project boundary. To identify maximum pollutant concentrations associated with both acute and chronic exposures, on-site receptors were placed at a flagpole height commensurate with the outdoor courtyard located on the proposed plaza level (i.e., 8.2 meters). A graphical representation of the source-receptor grid network is presented in Figure 2.

Figure 2  
Source-Receptor Grid Network



A dispersion model input summary table is provided in Appendix C. A complete listing of model input/output files are provided in electronic format in Appendix D.

## 6.0 RISK CHARACTERIZATION

### 6.1 Carcinogenic Chemical Risk

Carcinogenic compounds are not considered to have threshold levels (i.e., dose levels below which there are no risks). Any exposure, therefore, will have some associated risk. As a result,

the State of California has established a threshold of one in one hundred thousand (1.0E-05) as a level posing no significant risk for exposures to carcinogens regulated under the Safe Drinking Water and Toxic Enforcement Act (Proposition 65). This threshold is also consistent with the maximum incremental cancer risk established by the SCAQMD for projects prepared under the auspices of the California Environmental Quality Act (CEQA).

Health risks associated with exposure to carcinogenic compounds can be defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration. Under a deterministic approach (i.e., point estimate methodology), the cancer risk probability is determined by multiplying the chemical's annual concentration by its unit risk factor (URF). The URF is a measure of the carcinogenic potential of a chemical when a dose is received through the inhalation pathway. It represents an upper bound estimate of the probability of contracting cancer as a result of continuous exposure to an ambient concentration of one microgram per cubic meter ( $\mu\text{g}/\text{m}^3$ ) over a 70 year lifetime. The URF's utilized in the assessment and corresponding cancer potency factors were obtained from the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values*.

To effectively quantify dose, the procedure requires the incorporation of several discrete exposure variates. Once determined, contaminant dose is multiplied by the cancer potency factor (CPF) in units of inverse dose expressed in milligrams per kilogram per day ( $\text{mg}/\text{kg}/\text{day}$ )<sup>-1</sup> to derive the cancer risk estimate. Therefore, to assess exposures associated with the proposed residential population, the following dose algorithm was utilized.

$$CDI = (C_{air} \times EF \times ED \times IR) / (BW \times AT)$$

Where:

- CDI = chronic daily intake ( $\text{mg}/\text{kg}/\text{day}$ )
- $C_{air}$  = concentration of contaminant in air ( $\text{mg}/\text{m}^3$ )
- EF = exposure frequency (days/year)
- ED = exposure duration (years)
- IR = inhalation rate ( $\text{m}^3/\text{day}$ )
- BW = body weight (kg)
- AT = averaging time (days)

To represent residential exposures, the assessment employed the U.S. Environmental Protection Agency's guidance to develop viable dose estimates based on reasonable maximum exposures (RME). Specifically, activity patterns for population mobility recommended by the U.S. Environmental Protection Agency and presented in the *Exposure Factors Handbook* were utilized. As a result, lifetime risk values for residents were adjusted to account for an exposure duration of 350 days per year for 30 years (i.e., 95<sup>th</sup> percentile). A 9 year exposure duration was additionally assessed to identify risk estimates associated with the average time individuals are reported to reside at a given residence. These values are consistent with the California Environmental Quality Act which considers the evaluation of environmental effects of proposed projects in a manner that reflects both reasonable and feasible assumptions. For body weight and inhalation,

the assessment utilized average adult values of 70 kilograms and 20 cubic meters per day, respectively.

Appendix A, Tables A1 and A2, columns f-g, present the URF's and corresponding cancer potency factors for carcinogens considered in the assessment. The cancer risk attributed to each compound and summation of those risks are presented in column h.

## **6.2 Noncarcinogenic Hazards**

An evaluation of the potential noncancer effects of contaminant exposures was also conducted. Under the point estimate approach, adverse health effects are evaluated by comparing the concentration of each compound with the appropriate Reference Exposure Level (REL). Available REL's presented in the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values* were considered in the assessment.

To quantify noncarcinogenic impacts, the hazard index approach was used. The hazard index assumes that subthreshold exposures adversely affect a specific organ or organ system (i.e., toxicological endpoint). For each discrete pollutant exposure, target organs presented in regulatory guidance were utilized.

To calculate the hazard index, the pollutant concentration or dose is divided by the appropriate toxicity value. For compounds affecting the same toxicological endpoint, this ratio is summed. Where the total equals or exceeds one (i.e., unity), a health hazard is presumed to exist. For chronic exposures, REL's were converted to units expressed in mg/kg/day to accommodate the above referenced intake algorithm. To assess acute noncancer impacts, the maximum pollutant concentration is divided by the REL for the corresponding averaging time (e.g., 1-hour). No exposure adjustments are considered for short duration exposures.

Appendix A, Tables A1 and A2, columns i-j, present the REL's and corresponding reference dose values used in the evaluation of chronic noncarcinogenic exposures. The noncancer hazard quotient for identified compounds generated from each source and a summation for each toxicological endpoint are presented in columns k-r. Tables A3 through A5, column e present the REL's for the assessment of acute exposures. Columns f-m identify each compound's hazard quotient and corresponding index for each endpoint.

## **6.3 Criteria Pollutant Exposures**

The State of California has promulgated strict ambient air quality standards for various pollutants. These standards were established to safeguard the public's health and welfare with specific emphasis on protecting those individuals susceptible to respiratory distress, such as asthmatics, the young, the elderly and those with existing conditions which may be affected by increased pollutant concentrations. However, recent research has shown that unhealthful respiratory responses occur with exposures to pollutants at levels that only marginally exceed clean air

standards. Table 5 presents the California Ambient Air Quality Standards (CAAQS) for the criteria pollutants considered in the assessment.

Table 5  
California Ambient Air Quality Standards

Pollutant	Standard	Health Effects
Particulates (PM <sub>10</sub> )	>50 µg/m <sup>3</sup> (24 hr avg.) >20 µg/m <sup>3</sup> (Annual)	1) Excess deaths from short-term exposures and the exacerbation of symptoms in sensitive individuals with respiratory disease. 2) Excess seasonal declines in pulmonary function especially in children.
Particulates (PM <sub>2.5</sub> )	>12 µg/m <sup>3</sup> (Annual)	1) Excess deaths and illness from long-term exposures and the exacerbation of symptoms in sensitive individuals with respiratory and cardio pulmonary disease.
Carbon Monoxide (CO)	>9.0 ppm (8 hr avg.) >20.0 ppm (1 hr avg.)	1) Aggravation of angina pectoris and other aspects of coronary heart disease. 2) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease. 3) Impairment of central nervous system functions. 4) Possible increased risk to fetuses.
Nitrogen Dioxide (NO <sub>2</sub> )	>0.18 ppm (1 hr avg.)	1) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups. 2) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes.

Abbreviations: ppm: parts per million; µg/m<sup>3</sup>: micrograms per cubic meter.

Source: California Code of Regulations, Title 17, Section 70200.

Pollutant emissions are considered to have a significant effect on the environment if they result in concentrations that create either a violation of an ambient air quality standard, contribute to an existing air quality violation or expose sensitive receptors to substantive pollutant concentrations. Should ambient air quality already exceed existing standards, the SCAQMD has established significance criteria for selected compounds to account for the continued degradation of local air quality. Background concentrations are based upon the highest observed value for the most recent three year period.

For PM<sub>10</sub> emissions, background concentrations representative of the project area exceed the CAAQS for the 24-hour and annual averaging times. As a result, a significant impact is achieved when pollutant concentrations produce a measurable change over existing background levels. Although background concentrations exceed the CAAQS annual averaging time for fine particulates, no measurable change criteria currently exists. As a result, the SCAQMD significance threshold of 2.5 µg/m<sup>3</sup> for the 24-hour averaging time was utilized to assess PM<sub>2.5</sub> impacts.

For the CO 1 and 8-hour averaging times and NO<sub>2</sub> 1-hour averaging time, background concentrations are below the current air quality standards. As such, significance is achieved when pollutant concentrations add to existing levels and create an exceedance of the CAAQS. Table 6

shows the pollutant concentrations collected at the San Fernando Valley Monitoring Station (Source-Receptor Area 6) for the last three years of available data. Table 7 outlines the relevant significance thresholds considered to affect local air quality.

Table 6  
San Fernando Valley Monitoring Summary / Source-Receptor Area 6

Pollutant/ Averaging Time	Year			
	2007	2008	2009	Maximum
Particulates (PM <sub>10</sub> ) 24-Hour Annual	109 40.0	66 35.6	80 39.2	109 40.0
Carbon Monoxide (CO) 1-Hour 8-Hour	4 2.8	4 2.9	4 2.8	4 2.9
Nitrogen Dioxide (NO <sub>2</sub> ) 1-Hour	0.08	0.09	0.07	0.09

Note: PM<sub>10</sub> concentrations are from the Source-Receptor Area 7 Monitoring Station. These values are expressed in micrograms per cubic meter (µg/m<sup>3</sup>). All others are expressed in parts per million (ppm).

Source: South Coast Air Quality Management District.

Table 7  
SCAQMD Air Quality Significance Thresholds

Pollutant	Averaging Time	Pollutant Concentration
Particulates (PM <sub>10</sub> ) Particulates (PM <sub>2.5</sub> )	24 Hours	2.5 µg/m <sup>3</sup> (operation)
Particulates (PM <sub>10</sub> )	Annual	1.0 µg/m <sup>3</sup>
Carbon Monoxide (CO)	8 Hours 1 Hour	0.45 ppm 1.0 ppm
Nitrogen Dioxide (NO <sub>2</sub> )	1 Hour	0.01 ppm

Abbreviations: ppm: parts per million; µg/m<sup>3</sup>: micrograms per cubic meter

Source: South Coast Air Quality Management District.

For the maximum exposed residential receptor, results of the analysis predicted freeway emissions will produce PM<sub>10</sub> concentrations of 51.71729 µg/m<sup>3</sup> and 22.68410 µg/m<sup>3</sup> for the 24-hour and annual averaging times, respectively. These values exceed the SCAQMD's significance thresholds. For PM<sub>2.5</sub>, a maximum 24-hour average concentration of 9.20914 µg/m<sup>3</sup> was predicted. This value also exceeds the identified significance threshold.

For the CO average traffic scenario, the maximum predicted 1-hour concentration of 0.60874 parts per million (ppm) and 8-hour value of 0.47054 ppm, when added to existing background levels, do not cause an exceedance of the CAAQS. For the reduced speed scenario, the 1-hour concentration of 0.76939, when added to existing background levels, does not exceed the CAAQS.

For the NO<sub>2</sub> average traffic and reduced speed scenarios, maximum 1-hour concentrations of 155.31078 µg/m<sup>3</sup> (0.08255 ppm ) and 132.27913 µg/m<sup>3</sup> (0.07031 ppm) were predicted. These concentrations, when added to existing background levels, will not cause an exceedance of the CAAQS.

## **7.0 CONCLUSION**

For carcinogenic exposures, the summation of risk for the maximum exposed residential receptor totaled 1.1E-04 (1.1 in ten thousand) for the 30 year and 3.3E-05 (3.3 in one hundred thousand) for the 9 year exposure scenarios. In comparison to the threshold level referenced in Section 6.1, carcinogenic risks exceed the level posing no significant risk for both exposure scenarios. Particulate emissions from trucks and related diesel fueled vehicles contribute to more than 95 percent of the identified risk value.

For chronic noncarcinogenic effects, the hazard index identified for each toxicological endpoint totaled less than one for both the 30 year and 9 year exposure scenarios. For acute exposures associated with the average traffic and reduced speed scenarios, the hazard indices for the identified averaging times did not exceed unity. Therefore, noncarcinogenic hazards were predicted to be within acceptable limits.

For criteria pollutants, the assessment revealed that PM<sub>10</sub> emissions generated from the adjacent freeway produce an exceedance of the 24-hour and annual significance thresholds. PM<sub>2.5</sub> concentrations were also predicted to exceed the 24-hour significance threshold. Without mitigation, these emissions may impact the health of sensitive individuals. For CO and NO<sub>2</sub>, maximum predicted concentrations are within acceptable limits.

## **8.0 MITIGATION OF PARTICULATE IMPACTS**

Please note, short duration (i.e., 1 and 8 hour) exposures associated with both toxic and criteria pollutants are within acceptable limits. As such, no impacts are anticipated to residents who access and utilize amenities such as the pool and related courtyard locations. Exceedance of the identified significance thresholds are associated with particulate exposures from diesel exhaust and the reentrainment of paved roadway dust. As a result, mitigation of particulate impacts may be accomplished by reducing pollutant concentrations within residential occupancies. By restricting the rate of infiltration, pollutant exposures can be controlled to reduce carcinogenic risk estimates to within acceptable limits, as well as reduce particulate exposures below SCAQMD significance thresholds.

Limiting particulate infiltration can be accomplished by locating the heating, ventilation and air conditioning (HVAC) control systems that service residential occupancies at specified heights above local terrain and installing corresponding particulate filters that conform to the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2-1999. Table 8 lists the identified elevations and associated filter requirements for the HVAC control equipment.

Table 8  
Structural Elevations / Particulate Filter Efficiencies

Elevation (feet)	Height above Terrain feet (meters)	Removal Efficiency (percent)	MERV
764	77 (23.5)	90	16
774	87 (26.5)	90	16
784	97 (29.5)	85	14

Abbreviation: MERV: Minimum Efficiency Reporting Value.

With the implementation of the above mitigation measures, particulate exposures will be reduced to a level of insignificance.

Dispersion model output files associated with particulate emissions (i.e., diesel particulate, PM<sub>10</sub> and PM<sub>2.5</sub>) at flagpole heights commensurate with floor elevations accommodating residential occupancies are presented in Appendix D.

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**APPENDIX A**  
Risk Calculation Worksheets

Table A1  
Quantification of Carcinogenic Risks and Noncarcinogenic Hazards  
Residential Exposure Scenario (30 Year)

Source (a)	Concentration		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk			Noncarcinogenic Hazards / Toxicological Endpoints*										
	(ug/m3) (b)	(mg/m3) (c)			URF (ug/m3) (f)	CPF (mg/kg/day) (g)	RISK (h)	REL (ug/m3) (i)	RfD (mg/kg/day) (j)	RESP (k)	CNS/PNS (l)	CV/BL (m)	IMMUN (n)	KIDN (o)	GI/LV (p)	REPRO (q)	EYES (r)	
Freeway	0.32718	3.3E-04	4.60E-01	Benzene	2.9E-05	1.0E-01	1.8E-06	6.0E+01	1.7E-02	1.2E-02	2.4E-03	2.4E-03					2.4E-03	
			3.32E-01	Formaldehyde	6.0E-06	2.1E-02	2.7E-07	9.0E+00	2.6E-03									
			1.05E-01	1,3-Butadiene	1.7E-04	6.0E-01	2.4E-06	2.0E+01	5.7E-03									
			7.80E-02	Acetaldehyde	2.7E-06	1.0E-02	3.0E-08	1.4E+02	4.0E-02									
			2.50E-02	Acrolein	3.0E-04	1.1E+00	1.0E-04	3.5E-01	1.0E-04									
0.84486	8.4E-04	1.00E+00	Diesel Particulates	3.0E-04	1.1E+00	1.0E-04	5.0E+00	1.4E-03	1.6E-01									
Total						1.1E-04			2.0E-01	2.4E-03	2.4E-03	0.0E+00	0.0E+00	0.0E+00	4.1E-03	0.0E+00		

\* Key to Toxicological Endpoints

RESP            Respiratory System  
CNS/PNS        Central/Peripheral Nervous System  
CV/BL          Cardiovascular/Blood System  
IMMUN         Immune System  
KIDN            Kidney  
GI/LV          Gastrointestinal System/Liver  
REPRO         Reproductive System (e.g., teratogenic and developmental effects)  
EYES            Eye irritation and/or other effects

Note:            Exposure factors used to calculate contaminant intake

exposure frequency (days/year)            350  
exposure duration (years)                    30  
inhalation rate (m3/day)                      20  
average body weight (kg)                      70  
averaging time<sub>(cancer)</sub> (days)                25550  
averaging time<sub>(noncancer)</sub> (days)            10950



Table A3  
Quantification of Noncarcinogenic Acute Hazards  
1-Hour Exposure / Average Traffic Scenario

Source	Concentration (ug/m3)	Weight Fraction	Contaminant	Noncarcinogenic Hazards / Toxicological Endpoints*								
				REL (ug/m3)	RESP	CNS/PNS	CV/BL	IMMUN	KIDN	GI/LV	REPRO	EYES
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
Freeway TOG	1.57797	4.60E-01	Benzene	1.3E+03			5.6E-04	5.6E-04			5.6E-04	
		3.32E-01	Formaldehyde	5.5E+01								9.5E-03
		7.80E-02	Acetaldehyde	4.7E+02	2.6E-04							2.6E-04
		2.50E-02	Acrolein	2.5E+00	1.6E-02							1.6E-02
Freeway Diesel/TOG	1.72992	8.20E-02	Benzene	1.3E+03			1.1E-04	1.1E-04			1.1E-04	
		6.07E-01	Formaldehyde	5.5E+01								1.9E-02
		3.03E-01	Acetaldehyde	4.7E+02	1.1E-03							1.1E-03
Total					1.7E-02	0.0E+00	6.7E-04	6.7E-04	0.0E+00	0.0E+00	6.7E-04	4.6E-02

\* Key to Toxicological Endpoints

RESP            Respiratory System  
 CNS/PNS       Central/Peripheral Nervous System  
 CV/BL          Cardiovascular/Blood System  
 IMMUN          Immune System  
 KIDN            Kidney  
 GI/LV            Gastrointestinal System/Liver  
 REPRO          Reproductive System (e.g., teratogenic and developmental effects)  
 EYES            Eye irritation and/or other effects

Table A4  
Quantification of Noncarcinogenic Acute Hazards  
1-Hour Exposure / Reduced Speed Scenario

Source	Concentration (ug/m3)	Weight Fraction	Contaminant	Noncarcinogenic Hazards / Toxicological Endpoints*								
				REL (ug/m3)	RESP	CNS/PNS	CV/BL	IMMUN	KIDN	GI/LV	REPRO	EYES
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
Freeway TOG	2.55068	4.60E-01	Benzene	1.3E+03			9.0E-04	9.0E-04			9.0E-04	
			Formaldehyde	5.5E+01								1.5E-02
			Acetaldehyde	4.7E+02	4.2E-04							4.2E-04
			Acrolein	2.5E+00	2.6E-02							2.6E-02
Freeway Diesel/TOG	3.37585	8.20E-02	Benzene	1.3E+03			2.1E-04	2.1E-04			2.1E-04	
			Formaldehyde	5.5E+01								3.7E-02
			Acetaldehyde	4.7E+02	2.2E-03							2.2E-03
Total					2.8E-02	0.0E+00	1.1E-03	1.1E-03	0.0E+00	0.0E+00	1.1E-03	8.1E-02

\* Key to Toxicological Endpoints

RESP           Respiratory System  
 CNS/PNS       Central/Peripheral Nervous System  
 CV/BL          Cardiovascular/Blood System  
 IMMUN         Immune System  
 KIDN           Kidney  
 GI/LV          Gastrointestinal System/Liver  
 REPRO         Reproductive System (e.g., teratogenic and developmental effects)  
 EYES           Eye irritation and/or other effects

Table A5  
Quantification of Noncarcinogenic Acute Hazards  
8-Hour Exposure / Average Traffic Scenario

Source (a)	Concentration (ug/m3) (b)	Weight Fraction (c)	Contaminant (d)	Noncarcinogenic Hazards / Toxicological Endpoints*								
				REL (ug/m3) (e)	RESP (f)	CNS/PNS (g)	CV/BL (h)	IMMUN (i)	KIDN (j)	GI/LV (k)	REPRO (l)	EYES (m)
Freeway TOG	1.20664	3.32E-01	Formaldehyde	9.0E+00	4.5E-02							
		7.80E-02	Acetaldehyde	3.0E+02	3.1E-04							
		2.50E-02	Acrolein	7.0E-01	4.3E-02							
Freeway Diesel/TOG	1.22012	6.07E-01	Formaldehyde	9.0E+00	8.2E-02							
		3.03E-01	Acetaldehyde	3.0E+02	1.2E-03							
Total				1.7E-01	0.0E+00	0.0E+00	0.0E+00	0.0E+00	0.0E+00	0.0E+00	0.0E+00	0.0E+00

\* Key to Toxicological Endpoints

RESP	Respiratory System
CNS/PNS	Central/Peripheral Nervous System
CV/BL	Cardiovascular/Blood System
IMMUN	Immune System
KIDN	Kidney
GI/LV	Gastrointestinal System/Liver
REPRO	Reproductive System (e.g., teratogenic and developmental effects)
EYES	Eye irritation and/or other effects

## **APPENDIX B**

### On-Road Emission Rate Calculations

## Vehicle Fleet Mix Computation Worksheet

U.S. HIGHWAY 101

AADT Total	Total Trucks	Truck %/100	2 axle vol	3 axle vol	4 axle vol	5 axle vol	2 axle %	3 axle %	4 axle %	5 axle %
325000	14723	0.0453	8077	1503	589	4552	0.549	0.102	0.040	0.309

### Fleet Mix Computation w/ Truck Volume Adjustment

Non-HDT	0.955
2-axle	0.025
3-axle	0.005
4-axle	0.002
5-axle	0.014

1.000

### Fleet Mix Computation w/ Time of Day Adjustment

Non-HDT	1.32	1.260	0.959
2-axle	1.30	0.032	0.025
3-axle	1.23	0.006	0.004
4-axle	1.07	0.002	0.001
5-axle	1.04	0.015	0.011

1.315      1.000

### Corrected Fleet Mix (EMFAC7F Vehicle Classes)

LDA	0.767
LDT	0.134
MDT	0.048
HDGT	0.014
HDDT	0.028
MCY	0.010

Total                      1.000

Note: 325,000 is the available AADT for the freeway link nearest the project site for the most recent year (i.e., 2007) for which truck counts are available.

Source: UCD, Institute of Transportation Studies, *Transportation Project-Level Carbon Monoxide Protocol* UCD-ITS-RR-96-1

## Vehicle Fleet Mix Computation Worksheet

INTERSTATE 405

AADT Total	Total Trucks	Truck %/100	2 axle vol	3 axle vol	4 axle vol	5 axle vol	2 axle %	3 axle %	4 axle %	5 axle %
222000	8414	0.0379	3581	1139	334	3360	0.426	0.135	0.040	0.399

Fleet Mix Computation w/ Truck Volume Adjustment

Non-HDT	0.962
2-axle	0.016
3-axle	0.005
4-axle	0.002
5-axle	0.015

1.000

Fleet Mix Computation w/ Time of Day Adjustment

Non-HDT	1.32	1.270	0.966
2-axle	1.30	0.021	0.016
3-axle	1.23	0.006	0.005
4-axle	1.07	0.002	0.001
5-axle	1.04	0.016	0.012

1.315      1.000

Corrected Fleet Mix (EMFAC7F Vehicle Classes)

LDA	0.773
LDT	0.135
MDT	0.048
HDGT	0.009
HDDT	0.025
MCY	0.010

Total                      1.000

Note: 222,000 is the available AADT for the freeway link nearest the project site for the most recent year (i.e., 2007) for which truck counts are available.

Source: UCD, Institute of Transportation Studies, *Transportation Project-Level Carbon Monoxide Protocol* UCD-ITS-RR-96-1

## Emfac2007 Population Profile Worksheet

Model Version : Emfac 2007 V2.3  
 Run Date : 01/03/2010  
 Scen Year : 2013 - Model Years 1969-2013  
 Location : Los Angeles County  
 Season : Annual  
 Temperature : NA  
 Relative Humidity : NA  
 Route : 101

Table A: Estimated Travel Fractions

	LDA NCAT	LDA CAT	LDA DSL	LDA ALL	LDT1 NCAT	LDT1 CAT	LDT1 DSL	LDT1 ALL	LDT2 NCAT	LDT2 CAT	LDT2 DSL	LDT2 ALL
%VEH	0.002	0.531	0.001	0.535	0.001	0.065	0.001	0.068	0.001	0.229	0.000	0.230
	MDV NCAT	MDV CAT	MDV DSL	MDV ALL	LHD1 NCAT	LHD1 CAT	LHD1 DSL	LHD1 ALL	LHD2 NCAT	LHD2 CAT	LHD2 DSL	LHD2 ALL
%VEH	0.001	0.100	0.000	0.101	0.000	0.012	0.002	0.015	0.000	0.003	0.002	0.005
	MHD NCAT	MHD CAT	MHD DSL	MHD ALL	HHD NCAT	HHD CAT	HHD DSL	HHD ALL	OBUS NCAT	OBUS CAT	OBUS DSL	OBUS ALL
%VEH	0.000	0.002	0.007	0.009	0.000	0.000	0.004	0.005	0.000	0.000	0.001	0.001
	UBUS NCAT	UBUS CAT	UBUS DSL	UBUS ALL	MCY NCAT	MCY CAT	MCY DSL	MCY ALL	SBUS NCAT	SBUS CAT	SBUS DSL	SBUS ALL
%VEH	0.000	0.000	0.001	0.001	0.013	0.010	0.000	0.023	0.000	0.000	0.001	0.001
	MH NCAT	MH CAT	MH DSL	MH ALL	ALL NCAT	ALL CAT	ALL DSL	ALL ALL				
%VEH	0.000	0.007	0.001	0.008	0.019	0.961	0.021	1.000				

Table B: Travel Fractions (Emfac2007 Format/Emfac7F Vehicle Classifications)

Class	NCAT	CAT	DSL
LDA	0.002	0.531	0.001
LDT	0.002	0.294	0.001
MDT	0.001	0.115	0.004
HDTG	0.000	0.009	0.000
HDTD	0.000	0.000	0.015
MCY	0.013	0.01	0.000

Table C: Travel Fractions (Emfac7F Format)

Class	NCAT	CAT	DSL
LDA	0.375	99.438	0.187
LDT	0.673	98.990	0.337
MDT	0.833	95.833	3.333
HDTG	0.000	100.000	0.000
HDTD	0.000	0.000	100.000
MCY	56.522	43.478	0.000

## Emfac2007 Population Profile Worksheet, continued

Table D: Vehicle Fleet Mix

Class	Fraction
LDA	0.767
LDT	0.134
MDT	0.048
HDTG	0.014
HDTD	0.028
MCY	0.010

Table E: Population Profile (Emfac2007 Format)

AADT 321000

Class	All	Gas	Diesel
LDA	246154.2	245693.2	461.0
LDT1	9717.7	9572.7	145.0
LDT2	33359.3	33359.3	0.0
MDV	12948.7	12948.7	0.0
LHD1	1794.9	1538.5	256.4
LHD2	641.0	384.6	256.4
MHD	4990.2	1108.9	3881.3
HHD	2217.9	0.0	2217.9
OBUS	554.5	0.0	554.5
UBUS	554.5	0.0	554.5
MCY	3076.9	3076.9	0.0
SB	554.5	0.0	554.5
MH	4435.7	3881.3	554.5
<b>Total</b>	<b>321000.0</b>	<b>311564.1</b>	<b>9435.9</b>

Table F: Vehicle Fraction

Class	Fraction All	Fraction Gas	Fraction Diesel
LDA	1.000	0.998	0.002
LDT1	0.226	0.985	0.015
LDT2	0.774	1.000	0.000
MDV	0.842	1.000	0.000
LHD1	0.117	0.857	0.143
LHD2	0.042	0.600	0.400
MHD	0.375	0.222	0.778
HHD	0.167	0.000	1.000
OBUS	0.042	0.000	1.000
UBUS	0.042	0.000	1.000
MCY	1.000	1.000	0.000
SB	0.042	0.000	1.000
MH	0.333	0.875	0.125
<b>Gas Vehicle Fraction</b>		<b>0.9706048</b>	
<b>Diesel Vehicle Fraction</b>		<b>0.0293952</b>	

Note: 321,000 is the highest available AADT for the freeway link nearest the project site for the baseline year (i.e., 2008).

## Emfac2007 Population Profile Worksheet

Model Version : Emfac 2007 V2.3  
 Run Date : 01/03/2010  
 Scen Year : 2013 - Model Years 1969-2013  
 Location : Los Angeles County  
 Season : Annual  
 Temperature : NA  
 Relative Humidity : NA  
 Route : 405

Table A: Estimated Travel Fractions

	LDA NCAT	LDA CAT	LDA DSL	LDA ALL	LDT1 NCAT	LDT1 CAT	LDT1 DSL	LDT1 ALL	LDT2 NCAT	LDT2 CAT	LDT2 DSL	LDT2 ALL
%VEH	0.002	0.531	0.001	0.535	0.001	0.065	0.001	0.068	0.001	0.229	0.000	0.230
	MDV NCAT	MDV CAT	MDV DSL	MDV ALL	LHD1 NCAT	LHD1 CAT	LHD1 DSL	LHD1 ALL	LHD2 NCAT	LHD2 CAT	LHD2 DSL	LHD2 ALL
%VEH	0.001	0.100	0.000	0.101	0.000	0.012	0.002	0.015	0.000	0.003	0.002	0.005
	MHD NCAT	MHD CAT	MHD DSL	MHD ALL	HHD NCAT	HHD CAT	HHD DSL	HHD ALL	OBUS NCAT	OBUS CAT	OBUS DSL	OBUS ALL
%VEH	0.000	0.002	0.007	0.009	0.000	0.000	0.004	0.005	0.000	0.000	0.001	0.001
	UBUS NCAT	UBUS CAT	UBUS DSL	UBUS ALL	MCY NCAT	MCY CAT	MCY DSL	MCY ALL	SBUS NCAT	SBUS CAT	SBUS DSL	SBUS ALL
%VEH	0.000	0.000	0.001	0.001	0.013	0.010	0.000	0.023	0.000	0.000	0.001	0.001
	MH NCAT	MH CAT	MH DSL	MH ALL	ALL NCAT	ALL CAT	ALL DSL	ALL ALL				
%VEH	0.000	0.007	0.001	0.008	0.019	0.961	0.021	1.000				

Table B: Travel Fractions (Emfac2007 Format/Emfac7F Vehicle Classifications)

Class	NCAT	CAT	DSL
LDA	0.002	0.531	0.001
LDT	0.002	0.294	0.001
MDT	0.001	0.115	0.004
HDTG	0.000	0.009	0.000
HDTD	0.000	0.000	0.015
MCY	0.013	0.01	0.000

Table C: Travel Fractions (Emfac7F Format)

Class	NCAT	CAT	DSL
LDA	0.375	99.438	0.187
LDT	0.673	98.990	0.337
MDT	0.833	95.833	3.333
HDTG	0.000	100.000	0.000
HDTD	0.000	0.000	100.000
MCY	56.522	43.478	0.000

## Emfac2007 Population Profile Worksheet, continued

Table D: Vehicle Fleet Mix

Class	Fraction
LDA	0.773
LDT	0.135
MDT	0.048
HDTG	0.009
HDTD	0.025
MCY	0.010

Table E: Population Profile (Emfac2007 Format)

AADT	219000			
Class	All	Gas	Diesel	
LDA	169251.9	168935.0	317.0	
LDT1	6681.7	6582.0	99.7	
LDT2	22937.3	22937.3	0.0	
MDV	8903.4	8903.4	0.0	
LHD1	1234.1	1057.8	176.3	
LHD2	440.8	264.5	176.3	
MHD	2788.2	619.6	2168.6	
HHD	1239.2	0.0	1239.2	
OBUS	309.8	0.0	309.8	
UBUS	309.8	0.0	309.8	
MCY	2115.6	2115.6	0.0	
SB	309.8	0.0	309.8	
MH	2478.4	2168.6	309.8	
Total	219000.0	213583.8	5416.2	

Table F: Vehicle Fraction

Class	Fraction	Fraction	Fraction
	All	Gas	Diesel
LDA	1.000	0.998	0.002
LDT1	0.226	0.985	0.015
LDT2	0.774	1.000	0.000
MDV	0.842	1.000	0.000
LHD1	0.117	0.857	0.143
LHD2	0.042	0.600	0.400
MHD	0.375	0.222	0.778
HHD	0.167	0.000	1.000
OBUS	0.042	0.000	1.000
UBUS	0.042	0.000	1.000
MCY	1.000	1.000	0.000
SB	0.042	0.000	1.000
MH	0.333	0.875	0.125
Gas Vehicle Fraction	0.9752685		
Diesel Vehicle Fraction	0.0247315		

Note: 219,000 is the highest available AADT for the freeway link nearest the project site for the baseline year (i.e., 2008).













## Emission Factor Rate Adjustment Worksheet / 101

### TOG Emissions

Acceleration / On-Ramp (15 - 45 mph)

$$Emfac (gr/mi) = (emfac \text{ at average link speed} \times 16/60) \times (0.027) \times (exp (.098 \times \text{acceleration speed product})) \times (60 \text{ min/hr}) / (\text{average link speed})$$

emfac at link speed	0.062
speed (mph)	45.0
acceleration time (sec)	18.0
acceleration rate (mph/sec)	2.50

Emfac (gr/mi)	<input type="text" value="0.147"/>
---------------	------------------------------------

Deceleration / Off-Ramp

$$Emfac (gr/mi) = (emfac \text{ at idle speed} \times 1.5)$$

emfac at idle speed (gr/mi)	0.362
-----------------------------	-------

Emfac (gr/mi)	<input type="text" value="0.543"/>
---------------	------------------------------------

### Diesel Particulate

Acceleration / On-Ramp (15 - 45 mph)

$$Emfac (gr/mi) = (emfac \text{ at average link speed} \times 16/60) \times (0.027) \times (exp (.098 \times \text{acceleration speed product})) \times (60 \text{ min/hr}) / (\text{average link speed})$$

emfac at link speed	0.273
speed (mph)	45.0
acceleration time (sec)	18.0
acceleration rate (mph/sec)	2.50

Emfac (gr/mi)	<input type="text" value="0.649"/>
---------------	------------------------------------

Deceleration / Off-Ramp

$$Emfac (gr/mi) = (emfac \text{ at idle speed} \times 1.5)$$

emfac at idle speed (gr/mi)	1.225
-----------------------------	-------

Emfac (gr/mi)	<input type="text" value="1.838"/>
---------------	------------------------------------

## Emission Factor Rate Adjustment Worksheet / 101

### Diesel TOG

Acceleration / On-Ramp (15 - 45 mph)

$$\text{Emfac (gr/mi)} = (\text{emfac at average link speed} \times 16/60) \times (0.027) \times (\exp (.098 \times \text{acceleration speed product})) \times (60 \text{ min/hr}) / (\text{average link speed})$$

emfac at link speed	0.450
speed (mph)	45.0
acceleration time (sec)	18.0
acceleration rate (mph/sec)	2.50

Emfac (gr/mi)	<input type="text" value="1.070"/>
---------------	------------------------------------

Deceleration / Off-Ramp

$$\text{Emfac (gr/mi)} = (\text{emfac at idle speed} \times 1.5)$$

emfac at idle speed (gr/mi)	6.040
-----------------------------	-------

Emfac (gr/mi)	<input type="text" value="9.060"/>
---------------	------------------------------------

### CO Emissions

Acceleration / On-Ramp (15 - 45 mph)

$$\text{Emfac (gr/mi)} = (\text{emfac at average link speed} \times 16/60) \times (0.027) \times (\exp (.098 \times \text{acceleration speed product})) \times (60 \text{ min/hr}) / (\text{average link speed})$$

emfac at link speed	1.748
speed (mph)	45.0
acceleration time (sec)	18.0
acceleration rate (mph/sec)	2.50

Emfac (gr/mi)	<input type="text" value="4.158"/>
---------------	------------------------------------

Deceleration / Off-Ramp

$$\text{Emfac (gr/mi)} = (\text{emfac at idle speed} \times 1.5)$$

emfac at idle speed (gr/mi)	4.545
-----------------------------	-------

Emfac (gr/mi)	<input type="text" value="6.818"/>
---------------	------------------------------------

## Emission Factor Rate Adjustment Worksheet / 101

### NOX Emissions

Acceleration / On-Ramp (15 - 45 mph)

$Emfac (gr/mi) = (emfac \text{ at average link speed} \times 16/60) \times (0.027) \times (exp (.098 \times \text{acceleration speed product})) \times (60 \text{ min/hr}) / (\text{average link speed})$

emfac at link speed	0.851
speed (mph)	45.0
acceleration time (sec)	18.0
acceleration rate (mph/sec)	2.50

Emfac (gr/mi)	<input type="text" value="2.024"/>
---------------	------------------------------------

Deceleration / Off-Ramp

$Emfac (gr/mi) = (emfac \text{ at idle speed} * 1.5)$

emfac at idle speed (gr/mi)	1.924
-----------------------------	-------

Emfac (gr/mi)	<input type="text" value="2.886"/>
---------------	------------------------------------

Source: California Department of Transportation, 1989. Division of New Technology and Research. Caline4 – A Dispersion Model for Predicting Air Pollution Concentrations Near Roadways (Revised). FHWA/CA/TL-84/15.

## Emission Factor Rate Adjustment Worksheet / 405

### TOG Emissions

Acceleration / On-Ramp (15 - 45 mph)

$$Emfac (gr/mi) = (emfac \text{ at average link speed} \times 16/60) \times (0.027) \times (exp (.098 \times \text{acceleration speed product})) \times (60 \text{ min/hr}) / (\text{average link speed})$$

emfac at link speed	0.062
speed (mph)	45.0
acceleration time (sec)	18.0
acceleration rate (mph/sec)	2.50

Emfac (gr/mi)	<input type="text" value="0.147"/>
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Deceleration / Off-Ramp

$$Emfac (gr/mi) = (emfac \text{ at idle speed} \times 1.5)$$

emfac at idle speed (gr/mi)	0.362
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Emfac (gr/mi)	<input type="text" value="0.543"/>
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### Diesel Particulate

Acceleration / On-Ramp (15 - 45 mph)

$$Emfac (gr/mi) = (emfac \text{ at average link speed} \times 16/60) \times (0.027) \times (exp (.098 \times \text{acceleration speed product})) \times (60 \text{ min/hr}) / (\text{average link speed})$$

emfac at link speed	0.273
speed (mph)	45.0
acceleration time (sec)	18.0
acceleration rate (mph/sec)	2.50

Emfac (gr/mi)	<input type="text" value="0.649"/>
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Deceleration / Off-Ramp

$$Emfac (gr/mi) = (emfac \text{ at idle speed} \times 1.5)$$

emfac at idle speed (gr/mi)	1.225
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Emfac (gr/mi)	<input type="text" value="1.838"/>
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## Emission Factor Rate Adjustment Worksheet / 405

### Diesel TOG

Acceleration / On-Ramp (15 - 45 mph)

$$\text{Emfac (gr/mi)} = (\text{emfac at average link speed} \times 16/60) \times (0.027) \times (\exp (.098 \times \text{acceleration speed product})) \times (60 \text{ min/hr}) / (\text{average link speed})$$

emfac at link speed	0.450
speed (mph)	45.0
acceleration time (sec)	18.0
acceleration rate (mph/sec)	2.50

Emfac (gr/mi)	<input type="text" value="1.070"/>
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Deceleration / Off-Ramp

$$\text{Emfac (gr/mi)} = (\text{emfac at idle speed} \times 1.5)$$

emfac at idle speed (gr/mi)	6.040
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Emfac (gr/mi)	<input type="text" value="9.060"/>
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### CO Emissions

Acceleration / On-Ramp (15 - 45 mph)

$$\text{Emfac (gr/mi)} = (\text{emfac at average link speed} \times 16/60) \times (0.027) \times (\exp (.098 \times \text{acceleration speed product})) \times (60 \text{ min/hr}) / (\text{average link speed})$$

emfac at link speed	1.748
speed (mph)	45.0
acceleration time (sec)	18.0
acceleration rate (mph/sec)	2.50

Emfac (gr/mi)	<input type="text" value="4.158"/>
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Deceleration / Off-Ramp

$$\text{Emfac (gr/mi)} = (\text{emfac at idle speed} \times 1.5)$$

emfac at idle speed (gr/mi)	4.545
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Emfac (gr/mi)	<input type="text" value="6.818"/>
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## Emission Factor Rate Adjustment Worksheet / 405

### NOX Emissions

Acceleration / On-Ramp (15 - 45 mph)

$Emfac (gr/mi) = (emfac \text{ at average link speed} \times 16/60) \times (0.027) \times (exp (.098 \times \text{acceleration speed product})) \times (60 \text{ min/hr}) / (\text{average link speed})$

emfac at link speed	0.851
speed (mph)	45.0
acceleration time (sec)	18.0
acceleration rate (mph/sec)	2.50

Emfac (gr/mi)	<input type="text" value="2.024"/>
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Deceleration / Off-Ramp

$Emfac (gr/mi) = (emfac \text{ at idle speed} * 1.5)$

emfac at idle speed (gr/mi)	1.924
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Emfac (gr/mi)	<input type="text" value="2.886"/>
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Source: California Department of Transportation, 1989. Division of New Technology and Research. Caline4 – A Dispersion Model for Predicting Air Pollution Concentrations Near Roadways (Revised). FHWA/CA/TL-84/15.

Emission Factor Profile Worksheet  
Chronic Exposure  
Average Traffic Scenario / 101

TOG -Toxic Emissions

Gasoline/Toxic Fractions/Hot Stabilized Exhaust

Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2004	0.028414	0.021422	0.006603	0.005511	0.001533
2005	0.028205	0.021200	0.006551	0.005450	0.001520
2006	0.027938	0.021000	0.006483	0.005350	0.001510
2007	0.027660	0.020700	0.006410	0.005250	0.001490
2008	0.027338	0.020300	0.006326	0.005120	0.001470
2009	0.026849	0.019800	0.006190	0.004870	0.001450
2010	0.026521	0.019400	0.006105	0.004750	0.001430
2011	0.026521	0.019400	0.006105	0.004750	0.001430
2012	0.025656	0.018500	0.005873	0.004370	0.001380
2013	0.025656	0.018500	0.005873	0.004370	0.001380
2014	0.025656	0.018500	0.005873	0.004370	0.001380
2015	0.024349	0.017100	0.005530	0.003850	0.001310
2016	0.024349	0.017100	0.005530	0.003850	0.001310
2017	0.024349	0.017100	0.005530	0.003850	0.001310
2018	0.022182	0.014700	0.004944	0.002860	0.001190
2019	0.022182	0.014700	0.004944	0.002860	0.001130
2020	0.021079	0.013600	0.004659	0.002450	0.001130
2021	0.021079	0.013600	0.004659	0.002450	0.001130
2022	0.021079	0.013600	0.004659	0.002450	0.001130
2023	0.021079	0.013600	0.004659	0.002450	0.001130
2024	0.021079	0.013600	0.004659	0.002450	0.001130
2025	0.021079	0.013600	0.004659	0.002450	0.001130
2026	0.021079	0.013600	0.004659	0.002450	0.001130
2027	0.021079	0.013600	0.004659	0.002450	0.001130
2028	0.021079	0.013600	0.004659	0.002450	0.001130
2029	0.021079	0.013600	0.004659	0.002450	0.001130
2030	0.021079	0.013600	0.004659	0.002450	0.001130

Analysis Year					
2013	0.025656	0.018500	0.005873	0.004370	0.001380

TOG Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.147
	Deceleration	0.543
	20	0.129
	30	0.083
	64	0.080
	0	0.000

Toxic Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.008200
	Deceleration	0.030288
	20	0.007195
	30	0.004630
	64	0.004462
	0	0.000000

Weight Fraction / Speciation

Benzene	0.460
Formaldehyde	0.332
1,3-Butadiene	0.105
Acetaldehyde	0.078
Acrolein	0.025

Emission Factor Profile Worksheet  
Chronic Exposure  
Average Traffic Scenario / 101

Diesel Particulate Emissions - PM10

PM10 Emission Rate - gr/mi	Acceleration	0.649
Speed (MPH)	Deceleration	1.838
	20	0.444
	30	0.323
	64	0.404
	0	0.000

Source: TOG/toxic fractions from UC Davis-Caltrans Air Quality Project, *Estimating Mobile Source Air Toxic Emissions: A Step-by-Step Project Analysis Methodology*. Task Order No. 61.

Emission Factor Profile Worksheet  
Chronic Exposure  
Average Traffic Scenario / 405

TOG -Toxic Emissions

Gasoline/Toxic Fractions/Hot Stabilized Exhaust

Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2004	0.028414	0.021422	0.006603	0.005511	0.001533
2005	0.028205	0.021200	0.006551	0.005450	0.001520
2006	0.027938	0.021000	0.006483	0.005350	0.001510
2007	0.027660	0.020700	0.006410	0.005250	0.001490
2008	0.027338	0.020300	0.006326	0.005120	0.001470
2009	0.026849	0.019800	0.006190	0.004870	0.001450
2010	0.026521	0.019400	0.006105	0.004750	0.001430
2011	0.026521	0.019400	0.006105	0.004750	0.001430
2012	0.025656	0.018500	0.005873	0.004370	0.001380
2013	0.025656	0.018500	0.005873	0.004370	0.001380
2014	0.025656	0.018500	0.005873	0.004370	0.001380
2015	0.024349	0.017100	0.005530	0.003850	0.001310
2016	0.024349	0.017100	0.005530	0.003850	0.001310
2017	0.024349	0.017100	0.005530	0.003850	0.001310
2018	0.022182	0.014700	0.004944	0.002860	0.001190
2019	0.022182	0.014700	0.004944	0.002860	0.001130
2020	0.021079	0.013600	0.004659	0.002450	0.001130
2021	0.021079	0.013600	0.004659	0.002450	0.001130
2022	0.021079	0.013600	0.004659	0.002450	0.001130
2023	0.021079	0.013600	0.004659	0.002450	0.001130
2024	0.021079	0.013600	0.004659	0.002450	0.001130
2025	0.021079	0.013600	0.004659	0.002450	0.001130
2026	0.021079	0.013600	0.004659	0.002450	0.001130
2027	0.021079	0.013600	0.004659	0.002450	0.001130
2028	0.021079	0.013600	0.004659	0.002450	0.001130
2029	0.021079	0.013600	0.004659	0.002450	0.001130
2030	0.021079	0.013600	0.004659	0.002450	0.001130

Analysis Year					
2013	0.025656	0.018500	0.005873	0.004370	0.001380

TOG Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.147
	Deceleration	0.539
	30	0.083
	35	0.071
	63	0.078
	0	0.000

Toxic Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.008200
	Deceleration	0.030065
	30	0.004630
	35	0.003960
	63	0.004351
	0	0.000000

Weight Fraction / Speciation

Benzene	0.460
Formaldehyde	0.332
1,3-Butadiene	0.105
Acetaldehyde	0.078
Acrolein	0.025

Emission Factor Profile Worksheet  
Chronic Exposure  
Average Traffic Scenario / 405

Diesel Particulate Emissions - PM10

PM10 Emission Rate - gr/mi	Acceleration	0.645
Speed (MPH)	Deceleration	1.821
	30	0.321
	35	0.288
	63	0.389
	0	0.000

Source: TOG/toxic fractions from UC Davis-Caltrans Air Quality Project, *Estimating Mobile Source Air Toxic Emissions: A Step-by-Step Project Analysis Methodology*. Task Order No. 61.

Emission Factor Profile Worksheet  
Acute Exposure  
Average Traffic Scenario / 101

TOG -Toxic Emissions

Gasoline/Toxic Fractions/Hot Stabilized Exhaust

Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2004	0.028414	0.021422	0.006603	0.005511	0.001533
2005	0.028205	0.021200	0.006551	0.005450	0.001520
2006	0.027938	0.021000	0.006483	0.005350	0.001510
2007	0.027660	0.020700	0.006410	0.005250	0.001490
2008	0.027338	0.020300	0.006326	0.005120	0.001470
2009	0.026849	0.019800	0.006190	0.004870	0.001450
2010	0.026521	0.019400	0.006105	0.004750	0.001430
2011	0.026521	0.019400	0.006105	0.004750	0.001430
2012	0.025656	0.018500	0.005873	0.004370	0.001380
2013	0.025656	0.018500	0.005873	0.004370	0.001380
2014	0.025656	0.018500	0.005873	0.004370	0.001380
2015	0.024349	0.017100	0.005530	0.003850	0.001310
2016	0.024349	0.017100	0.005530	0.003850	0.001310
2017	0.024349	0.017100	0.005530	0.003850	0.001310
2018	0.022182	0.014700	0.004944	0.002860	0.001190
2019	0.022182	0.014700	0.004944	0.002860	0.001130
2020	0.021079	0.013600	0.004659	0.002450	0.001130
2021	0.021079	0.013600	0.004659	0.002450	0.001130
2022	0.021079	0.013600	0.004659	0.002450	0.001130
2023	0.021079	0.013600	0.004659	0.002450	0.001130
2024	0.021079	0.013600	0.004659	0.002450	0.001130
2025	0.021079	0.013600	0.004659	0.002450	0.001130
2026	0.021079	0.013600	0.004659	0.002450	0.001130
2027	0.021079	0.013600	0.004659	0.002450	0.001130
2028	0.021079	0.013600	0.004659	0.002450	0.001130
2029	0.021079	0.013600	0.004659	0.002450	0.001130
2030	0.021079	0.013600	0.004659	0.002450	0.001130

Analysis Year					
2013	0.025656	0.018500	0.005873	0.004370	0.001380

TOG Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.147
	Deceleration	0.543
	20	0.129
	30	0.083
	64	0.080
	0	0.000

Toxic Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.008200
	Deceleration	0.030288
	20	0.007195
	30	0.004630
	64	0.004462
	0	0.000000

Weight Fraction / Speciation

Benzene	0.460
Formaldehyde	0.332
1,3-Butadiene	0.105
Acetaldehyde	0.078
Acrolein	0.025

Emission Factor Profile Worksheet  
Acute Exposure  
Average Traffic Scenario / 101

TOG -Toxic Emissions

Diesel/Toxic Fractions/Hot Stabilized Exhaust

Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2004	0.020009	0.147133	0.001900	0.073526	0
2005	0.020009	0.147133	0.001900	0.073526	0
2006	0.020009	0.147133	0.001900	0.073526	0
2007	0.020009	0.147133	0.001900	0.073526	0
2008	0.020009	0.147133	0.001900	0.073526	0
2009	0.020009	0.147133	0.001900	0.073526	0
2010	0.020009	0.147133	0.001900	0.073526	0
2011	0.020009	0.147133	0.001900	0.073526	0
2012	0.020009	0.147133	0.001900	0.073526	0
2013	0.020009	0.147133	0.001900	0.073526	0
2014	0.020009	0.147133	0.001900	0.073526	0
2015	0.020009	0.147133	0.001900	0.073526	0
2016	0.020009	0.147133	0.001900	0.073526	0
2017	0.020009	0.147133	0.001900	0.073526	0
2018	0.020009	0.147133	0.001900	0.073526	0
2019	0.020009	0.147133	0.001900	0.073526	0
2020	0.020009	0.147133	0.001900	0.073526	0
2021	0.020009	0.147133	0.001900	0.073526	0
2022	0.020009	0.147133	0.001900	0.073526	0
2023	0.020009	0.147133	0.001900	0.073526	0
2024	0.020009	0.147133	0.001900	0.073526	0
2025	0.020009	0.147133	0.001900	0.073526	0
2026	0.020009	0.147133	0.001900	0.073526	0
2027	0.020009	0.147133	0.001900	0.073526	0
2028	0.020009	0.147133	0.001900	0.073526	0
2029	0.020009	0.147133	0.001900	0.073526	0
2030	0.020009	0.147133	0.001900	0.073526	0

Analysis Year					
2013	0.020009	0.147133	0.001900	0.073526	0

TOG Emission Rate - gr/mi

Speed (MPH)	Acceleration	1.070
	Deceleration	9.060
	20	0.993
	30	0.668
	64	0.598
	0	0.000

Toxic Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.259548
	Deceleration	2.197666
	20	0.240870
	30	0.162035
	64	0.145056
	0	0.000000

Weight Fraction / Speciation

Benzene	0.082
Formaldehyde	0.607
1,3-Butadiene	0.008
Acetaldehyde	0.303
Acrolein	0.000

# Emission Factor Profile Worksheet

## Acute Exposure

### Reduced Speed Scenario / 101

TOG -Toxic Emissions

Gasoline/Toxic Fractions/Hot Stabilized Exhaust

Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2004	0.028414	0.021422	0.006603	0.005511	0.001533
2005	0.028205	0.021200	0.006551	0.005450	0.001520
2006	0.027938	0.021000	0.006483	0.005350	0.001510
2007	0.027660	0.020700	0.006410	0.005250	0.001490
2008	0.027338	0.020300	0.006326	0.005120	0.001470
2009	0.026849	0.019800	0.006190	0.004870	0.001450
2010	0.026521	0.019400	0.006105	0.004750	0.001430
2011	0.026521	0.019400	0.006105	0.004750	0.001430
2012	0.025656	0.018500	0.005873	0.004370	0.001380
2013	0.025656	0.018500	0.005873	0.004370	0.001380
2014	0.025656	0.018500	0.005873	0.004370	0.001380
2015	0.024349	0.017100	0.005530	0.003850	0.001310
2016	0.024349	0.017100	0.005530	0.003850	0.001310
2017	0.024349	0.017100	0.005530	0.003850	0.001310
2018	0.022182	0.014700	0.004944	0.002860	0.001190
2019	0.022182	0.014700	0.004944	0.002860	0.001130
2020	0.021079	0.013600	0.004659	0.002450	0.001130
2021	0.021079	0.013600	0.004659	0.002450	0.001130
2022	0.021079	0.013600	0.004659	0.002450	0.001130
2023	0.021079	0.013600	0.004659	0.002450	0.001130
2024	0.021079	0.013600	0.004659	0.002450	0.001130
2025	0.021079	0.013600	0.004659	0.002450	0.001130
2026	0.021079	0.013600	0.004659	0.002450	0.001130
2027	0.021079	0.013600	0.004659	0.002450	0.001130
2028	0.021079	0.013600	0.004659	0.002450	0.001130
2029	0.021079	0.013600	0.004659	0.002450	0.001130
2030	0.021079	0.013600	0.004659	0.002450	0.001130

Analysis Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2013	0.025656	0.018500	0.005873	0.004370	0.001380

TOG Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.147
	Deceleration	0.543
	9	0.263
	20	0.129
	29	0.086
	0	0.000

Toxic Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.008200
	Deceleration	0.030288
	9	0.014670
	20	0.007195
	29	0.004797
	0	0.000000

Weight Fraction / Speciation

Benzene	0.460
Formaldehyde	0.332
1,3-Butadiene	0.105
Acetaldehyde	0.078
Acrolein	0.025

Emission Factor Profile Worksheet  
Acute Exposure  
Reduced Speed Scenario / 101

TOG -Toxic Emissions

Diesel/Toxic Fractions/Hot Stabilized Exhaust

Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2004	0.020009	0.147133	0.001900	0.073526	0
2005	0.020009	0.147133	0.001900	0.073526	0
2006	0.020009	0.147133	0.001900	0.073526	0
2007	0.020009	0.147133	0.001900	0.073526	0
2008	0.020009	0.147133	0.001900	0.073526	0
2009	0.020009	0.147133	0.001900	0.073526	0
2010	0.020009	0.147133	0.001900	0.073526	0
2011	0.020009	0.147133	0.001900	0.073526	0
2012	0.020009	0.147133	0.001900	0.073526	0
2013	0.020009	0.147133	0.001900	0.073526	0
2014	0.020009	0.147133	0.001900	0.073526	0
2015	0.020009	0.147133	0.001900	0.073526	0
2016	0.020009	0.147133	0.001900	0.073526	0
2017	0.020009	0.147133	0.001900	0.073526	0
2018	0.020009	0.147133	0.001900	0.073526	0
2019	0.020009	0.147133	0.001900	0.073526	0
2020	0.020009	0.147133	0.001900	0.073526	0
2021	0.020009	0.147133	0.001900	0.073526	0
2022	0.020009	0.147133	0.001900	0.073526	0
2023	0.020009	0.147133	0.001900	0.073526	0
2024	0.020009	0.147133	0.001900	0.073526	0
2025	0.020009	0.147133	0.001900	0.073526	0
2026	0.020009	0.147133	0.001900	0.073526	0
2027	0.020009	0.147133	0.001900	0.073526	0
2028	0.020009	0.147133	0.001900	0.073526	0
2029	0.020009	0.147133	0.001900	0.073526	0
2030	0.020009	0.147133	0.001900	0.073526	0

Analysis Year					
2013	0.020009	0.147133	0.001900	0.073526	0

TOG Emission Rate - gr/mi

Speed (MPH)	Acceleration	1.070
	Deceleration	9.060
	9	3.875
	20	0.993
	29	0.693
	0	0.000

Toxic Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.259548
	Deceleration	2.197666
	9	0.939951
	20	0.240870
	29	0.168100
	0	0.000000

Weight Fraction / Speciation

Benzene	0.082
Formaldehyde	0.607
1,3-Butadiene	0.008
Acetaldehyde	0.303
Acrolein	0.000

Emission Factor Profile Worksheet  
Acute Exposure  
Average Speed Scenario / 405

TOG -Toxic Emissions

Gasoline/Toxic Fractions/Hot Stabilized Exhaust

Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2004	0.028414	0.021422	0.006603	0.005511	0.001533
2005	0.028205	0.021200	0.006551	0.005450	0.001520
2006	0.027938	0.021000	0.006483	0.005350	0.001510
2007	0.027660	0.020700	0.006410	0.005250	0.001490
2008	0.027338	0.020300	0.006326	0.005120	0.001470
2009	0.026849	0.019800	0.006190	0.004870	0.001450
2010	0.026521	0.019400	0.006105	0.004750	0.001430
2011	0.026521	0.019400	0.006105	0.004750	0.001430
2012	0.025656	0.018500	0.005873	0.004370	0.001380
2013	0.025656	0.018500	0.005873	0.004370	0.001380
2014	0.025656	0.018500	0.005873	0.004370	0.001380
2015	0.024349	0.017100	0.005530	0.003850	0.001310
2016	0.024349	0.017100	0.005530	0.003850	0.001310
2017	0.024349	0.017100	0.005530	0.003850	0.001310
2018	0.022182	0.014700	0.004944	0.002860	0.001190
2019	0.022182	0.014700	0.004944	0.002860	0.001130
2020	0.021079	0.013600	0.004659	0.002450	0.001130
2021	0.021079	0.013600	0.004659	0.002450	0.001130
2022	0.021079	0.013600	0.004659	0.002450	0.001130
2023	0.021079	0.013600	0.004659	0.002450	0.001130
2024	0.021079	0.013600	0.004659	0.002450	0.001130
2025	0.021079	0.013600	0.004659	0.002450	0.001130
2026	0.021079	0.013600	0.004659	0.002450	0.001130
2027	0.021079	0.013600	0.004659	0.002450	0.001130
2028	0.021079	0.013600	0.004659	0.002450	0.001130
2029	0.021079	0.013600	0.004659	0.002450	0.001130
2030	0.021079	0.013600	0.004659	0.002450	0.001130

Analysis Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2013	0.025656	0.018500	0.005873	0.004370	0.001380

TOG Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.147
	Deceleration	0.539
	30	0.083
	35	0.071
	63	0.078
	0	0.000

Toxic Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.008200
	Deceleration	0.030065
	30	0.004630
	35	0.003960
	63	0.004351
	0	0.000000

Weight Fraction / Speciation

Benzene	0.460
Formaldehyde	0.332
1,3-Butadiene	0.105
Acetaldehyde	0.078
Acrolein	0.025

Emission Factor Profile Worksheet  
Acute Exposure  
Average Speed Scenario / 405

TOG -Toxic Emissions

Diesel/Toxic Fractions/Hot Stabilized Exhaust

Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2004	0.020009	0.147133	0.001900	0.073526	0
2005	0.020009	0.147133	0.001900	0.073526	0
2006	0.020009	0.147133	0.001900	0.073526	0
2007	0.020009	0.147133	0.001900	0.073526	0
2008	0.020009	0.147133	0.001900	0.073526	0
2009	0.020009	0.147133	0.001900	0.073526	0
2010	0.020009	0.147133	0.001900	0.073526	0
2011	0.020009	0.147133	0.001900	0.073526	0
2012	0.020009	0.147133	0.001900	0.073526	0
2013	0.020009	0.147133	0.001900	0.073526	0
2014	0.020009	0.147133	0.001900	0.073526	0
2015	0.020009	0.147133	0.001900	0.073526	0
2016	0.020009	0.147133	0.001900	0.073526	0
2017	0.020009	0.147133	0.001900	0.073526	0
2018	0.020009	0.147133	0.001900	0.073526	0
2019	0.020009	0.147133	0.001900	0.073526	0
2020	0.020009	0.147133	0.001900	0.073526	0
2021	0.020009	0.147133	0.001900	0.073526	0
2022	0.020009	0.147133	0.001900	0.073526	0
2023	0.020009	0.147133	0.001900	0.073526	0
2024	0.020009	0.147133	0.001900	0.073526	0
2025	0.020009	0.147133	0.001900	0.073526	0
2026	0.020009	0.147133	0.001900	0.073526	0
2027	0.020009	0.147133	0.001900	0.073526	0
2028	0.020009	0.147133	0.001900	0.073526	0
2029	0.020009	0.147133	0.001900	0.073526	0
2030	0.020009	0.147133	0.001900	0.073526	0

Analysis Year					
2013	0.020009	0.147133	0.001900	0.073526	0

TOG Emission Rate - gr/mi

Speed (MPH)	Acceleration	1.063
	Deceleration	8.975
	30	0.663
	35	0.557
	63	0.574
	0	0.000

Toxic Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.257850
	Deceleration	2.177048
	30	0.160823
	35	0.135110
	63	0.139234
	0	0.000000

Weight Fraction / Speciation

Benzene	0.082
Formaldehyde	0.607
1,3-Butadiene	0.008
Acetaldehyde	0.303
Acrolein	0.000

Emission Factor Profile Worksheet  
Acute Exposure  
Reduced Speed Scenario / 405

TOG -Toxic Emissions

Gasoline/Toxic Fractions/Hot Stabilized Exhaust

Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2004	0.028414	0.021422	0.006603	0.005511	0.001533
2005	0.028205	0.021200	0.006551	0.005450	0.001520
2006	0.027938	0.021000	0.006483	0.005350	0.001510
2007	0.027660	0.020700	0.006410	0.005250	0.001490
2008	0.027338	0.020300	0.006326	0.005120	0.001470
2009	0.026849	0.019800	0.006190	0.004870	0.001450
2010	0.026521	0.019400	0.006105	0.004750	0.001430
2011	0.026521	0.019400	0.006105	0.004750	0.001430
2012	0.025656	0.018500	0.005873	0.004370	0.001380
2013	0.025656	0.018500	0.005873	0.004370	0.001380
2014	0.025656	0.018500	0.005873	0.004370	0.001380
2015	0.024349	0.017100	0.005530	0.003850	0.001310
2016	0.024349	0.017100	0.005530	0.003850	0.001310
2017	0.024349	0.017100	0.005530	0.003850	0.001310
2018	0.022182	0.014700	0.004944	0.002860	0.001190
2019	0.022182	0.014700	0.004944	0.002860	0.001130
2020	0.021079	0.013600	0.004659	0.002450	0.001130
2021	0.021079	0.013600	0.004659	0.002450	0.001130
2022	0.021079	0.013600	0.004659	0.002450	0.001130
2023	0.021079	0.013600	0.004659	0.002450	0.001130
2024	0.021079	0.013600	0.004659	0.002450	0.001130
2025	0.021079	0.013600	0.004659	0.002450	0.001130
2026	0.021079	0.013600	0.004659	0.002450	0.001130
2027	0.021079	0.013600	0.004659	0.002450	0.001130
2028	0.021079	0.013600	0.004659	0.002450	0.001130
2029	0.021079	0.013600	0.004659	0.002450	0.001130
2030	0.021079	0.013600	0.004659	0.002450	0.001130

Analysis Year					
2013	0.025656	0.018500	0.005873	0.004370	0.001380

TOG Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.147
	Deceleration	0.539
	22	0.116
	0	0.000
	0	0.000
	0	0.000

Toxic Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.008200
	Deceleration	0.030065
	22	0.006470
	0	0.000000
	0	0.000000
	0	0.000000

Weight Fraction / Speciation

Benzene	0.460
Formaldehyde	0.332
1,3-Butadiene	0.105
Acetaldehyde	0.078
Acrolein	0.025

Emission Factor Profile Worksheet  
Acute Exposure  
Reduced Speed Scenario / 405

TOG -Toxic Emissions

Diesel/Toxic Fractions/Hot Stabilized Exhaust

Year	Benzene	Formaldehyde	1,3-Butadiene	Acetaldehyde	Acrolein
2004	0.020009	0.147133	0.001900	0.073526	0
2005	0.020009	0.147133	0.001900	0.073526	0
2006	0.020009	0.147133	0.001900	0.073526	0
2007	0.020009	0.147133	0.001900	0.073526	0
2008	0.020009	0.147133	0.001900	0.073526	0
2009	0.020009	0.147133	0.001900	0.073526	0
2010	0.020009	0.147133	0.001900	0.073526	0
2011	0.020009	0.147133	0.001900	0.073526	0
2012	0.020009	0.147133	0.001900	0.073526	0
2013	0.020009	0.147133	0.001900	0.073526	0
2014	0.020009	0.147133	0.001900	0.073526	0
2015	0.020009	0.147133	0.001900	0.073526	0
2016	0.020009	0.147133	0.001900	0.073526	0
2017	0.020009	0.147133	0.001900	0.073526	0
2018	0.020009	0.147133	0.001900	0.073526	0
2019	0.020009	0.147133	0.001900	0.073526	0
2020	0.020009	0.147133	0.001900	0.073526	0
2021	0.020009	0.147133	0.001900	0.073526	0
2022	0.020009	0.147133	0.001900	0.073526	0
2023	0.020009	0.147133	0.001900	0.073526	0
2024	0.020009	0.147133	0.001900	0.073526	0
2025	0.020009	0.147133	0.001900	0.073526	0
2026	0.020009	0.147133	0.001900	0.073526	0
2027	0.020009	0.147133	0.001900	0.073526	0
2028	0.020009	0.147133	0.001900	0.073526	0
2029	0.020009	0.147133	0.001900	0.073526	0
2030	0.020009	0.147133	0.001900	0.073526	0

Analysis Year					
2013	0.020009	0.147133	0.001900	0.073526	0

TOG Emission Rate - gr/mi

Speed (MPH)	Acceleration	1.063
	Deceleration	8.975
	22	0.908
	0	0.000
	0	0.000
	0	0.000

Toxic Emission Rate - gr/mi

Speed (MPH)	Acceleration	0.257850
	Deceleration	2.177048
	22	0.220252
	0	0.000000
	0	0.000000
	0	0.000000

Weight Fraction / Speciation

Benzene	0.082
Formaldehyde	0.607
1,3-Butadiene	0.008
Acetaldehyde	0.303
Acrolein	0.000



On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**101 NB MAIN (Sources 1 to 50)**

**TOG Emissions**

Number of Sources	50
Link Length (meters)	762.0
Volume/Baseline (VPH)	6490.9
TOG Mass Emission Rate (gr/mi)	0.004462

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00381
TOG Emission Rate (gr/sec/source)	7.62E-05

**101 SB MAIN (Sources 51 to 95)**

**TOG Emissions**

Number of Sources	45
Link Length (meters)	823.0
Volume/Baseline (VPH)	6490.9
TOG Mass Emission Rate (gr/mi)	0.004462

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00411
TOG Emission Rate (gr/sec/source)	9.14E-05

**101 NB TO 405 (Sources 96 to 117)**

**TOG Emissions**

Number of Sources	22
Link Length (meters)	402.3
Volume/Baseline (VPH)	1993.8
TOG Mass Emission Rate (gr/mi)	0.004462

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00062
TOG Emission Rate (gr/sec/source)	2.81E-05

**101 NB TO 405 NB (Sources 118 to 129)**

**TOG Emissions**

Number of Sources	12
Link Length (meters)	219.5
Volume/Baseline (VPH)	990.8
TOG Mass Emission Rate (gr/mi)	0.004462

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00017
TOG Emission Rate (gr/sec/source)	1.40E-05

**101 NB TO 405 SB (Sources 130 to 177)**

**TOG Emissions**

Number of Sources	48
Link Length (meters)	565.9
Volume/Baseline (VPH)	1003.0
TOG Mass Emission Rate (gr/mi)	0.007195

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00070
TOG Emission Rate (gr/sec/source)	1.47E-05

**101 SB TO 405 NB (Sources 178 to 232)**

**TOG Emissions**

Number of Sources	55
Link Length (meters)	670.6
Volume/Baseline (VPH)	897.8
TOG Mass Emission Rate (gr/mi)	0.004630

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00048
TOG Emission Rate (gr/sec/source)	8.75E-06

**101 NB OFF/SEPULVEDA (Sources 233 to 251)**

**TOG Emissions**

Number of Sources	19
Link Length (meters)	347.5
Volume/Baseline (VPH)	412.5
TOG Mass Emission Rate (gr/mi)	0.030288

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00075
TOG Emission Rate (gr/sec/source)	3.94E-05

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

101 SB ON/SEPULVEDA (Sources 252 to 265)

TOG Emissions

Number of Sources	14
Link Length (meters)	256.0
Volume/Baseline (VPH)	469.1
TOG Mass Emission Rate (gr/mi)	0.008200

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00017
TOG Emission Rate (gr/sec/source)	1.21E-05

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**405 MAIN (Sources 266 to 294)**

**TOG Emissions**

Number of Sources	29
Link Length (meters)	883.9
Volume/Baseline (VPH)	8899.3
TOG Mass Emission Rate (gr/mi)	0.004351

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00591
TOG Emission Rate (gr/sec/source)	2.04E-04

**405 NB TO 101 (Sources 295 to 303)**

**TOG Emissions**

Number of Sources	9
Link Length (meters)	274.3
Volume/Baseline (VPH)	2694.2
TOG Mass Emission Rate (gr/mi)	0.004351

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00056
TOG Emission Rate (gr/sec/source)	6.17E-05

**405 NB TO 101 NB (Sources 304 to 337)**

**TOG Emissions**

Number of Sources	34
Link Length (meters)	621.8
Volume/Baseline (VPH)	1706.7
TOG Mass Emission Rate (gr/mi)	0.003960

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00073
TOG Emission Rate (gr/sec/source)	2.13E-05

**405 NB TO 101 SB (Sources 338 to 386)**

**TOG Emissions**

Number of Sources	49
Link Length (meters)	448.1
Volume/Baseline (VPH)	987.5
TOG Mass Emission Rate (gr/mi)	0.004630

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00035
TOG Emission Rate (gr/sec/source)	7.22E-06

**405 SB FROM 101 SB (Sources 387 to 421)**

**TOG Emissions**

Number of Sources	35
Link Length (meters)	595.0
Volume/Baseline (VPH)	1869.3
TOG Mass Emission Rate (gr/mi)	0.004351

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00084
TOG Emission Rate (gr/sec/source)	2.39E-05

**405 SB OFF/VENTURA (Sources 422 to 458)**

**TOG Emissions**

Number of Sources	37
Link Length (meters)	270.8
Volume/Baseline (VPH)	132.1
TOG Mass Emission Rate (gr/mi)	0.030065

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00019
TOG Emission Rate (gr/sec/source)	5.02E-06

**405 SB ON/VENTURA (Sources 459 to 483)**

**TOG Emissions**

Number of Sources	25
Link Length (meters)	183.0
Volume/Baseline (VPH)	268.2
TOG Mass Emission Rate (gr/mi)	0.008200

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00007
TOG Emission Rate (gr/sec/source)	2.78E-06



On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**101 NB MAIN (Sources 1 to 50)**

**Diesel Particulate Emissions**

Number of Sources	50
Link Length (meters)	762.0
Volume/Baseline (VPH)	196.6
Particulate Mass Emission Rate (gr/mi)	0.404

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.01045
Particulate Emission Rate (gr/sec/source)	2.09E-04

**101 SB MAIN (Sources 51 to 95)**

**Diesel Particulate Emissions**

Number of Sources	45
Link Length (meters)	823.0
Volume/Baseline (VPH)	196.6
Particulate Mass Emission Rate (gr/mi)	0.404

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.01128
Particulate Emission Rate (gr/sec/source)	2.51E-04

**101 NB TO 405 (Sources 96 to 117)**

**Diesel Particulate Emissions**

Number of Sources	22
Link Length (meters)	402.3
Volume/Baseline (VPH)	60.4
Particulate Mass Emission Rate (gr/mi)	0.404

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.00169
Particulate Emission Rate (gr/sec/source)	7.70E-05

**101 NB TO 405 NB (Sources 118 to 129)**

**Diesel Particulate Emissions**

Number of Sources	12
Link Length (meters)	219.5
Volume/Baseline (VPH)	30.0
Particulate Mass Emission Rate (gr/mi)	0.404

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Particulate Emission Rate (gr/sec)	0.00046
Particulate Emission Rate (gr/sec/source)	3.83E-05

**101 NB TO 405 SB (Sources 130 to 177)**

**Diesel Particulate Emissions**

Number of Sources	48
Link Length (meters)	565.9
Volume/Baseline (VPH)	30.4
Particulate Mass Emission Rate (gr/mi)	0.444

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Particulate Emission Rate (gr/sec)	0.00132
Particulate Emission Rate (gr/sec/source)	2.75E-05

**101 SB TO 405 NB (Sources 178 to 232)**

**Diesel Particulate Emissions**

Number of Sources	55
Link Length (meters)	670.6
Volume/Baseline (VPH)	27.2
Particulate Mass Emission Rate (gr/mi)	0.323

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Particulate Emission Rate (gr/sec)	0.00102
Particulate Emission Rate (gr/sec/source)	1.85E-05

**101 NB OFF/SEPULVEDA (Sources 233 to 251)**

**Diesel Particulate Emissions**

Number of Sources	19
Link Length (meters)	347.5
Volume/Baseline (VPH)	12.5
Particulate Mass Emission Rate (gr/mi)	1.838

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Particulate Emission Rate (gr/sec)	0.00138
Particulate Emission Rate (gr/sec/source)	7.25E-05

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**101 SB ON/SEPULVEDA (Sources 252 to 265)**

**Diesel Particulate Emissions**

Number of Sources	14
Link Length (meters)	256.0
Volume/Baseline (VPH)	14.2
Particulate Mass Emission Rate (gr/mi)	0.649

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.00041
Particulate Emission Rate (gr/sec/source)	2.91E-05

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**405 MAIN (Sources 266 to 294)**

**Diesel Particulate Emissions**

Number of Sources	29
Link Length (meters)	883.9
Volume/Baseline (VPH)	225.7
Particulate Mass Emission Rate (gr/mi)	0.389

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.01340
Particulate Emission Rate (gr/sec/source)	4.62E-04

**405 NB TO 101 (Sources 295 to 303)**

**Diesel Particulate Emissions**

Number of Sources	9
Link Length (meters)	274.3
Volume/Baseline (VPH)	68.3
Particulate Mass Emission Rate (gr/mi)	0.389

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.00126
Particulate Emission Rate (gr/sec/source)	1.40E-04

**405 NB TO 101 NB (Sources 304 to 337)**

**Diesel Particulate Emissions**

Number of Sources	34
Link Length (meters)	621.8
Volume/Baseline (VPH)	43.3
Particulate Mass Emission Rate (gr/mi)	0.288

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.00134
Particulate Emission Rate (gr/sec/source)	3.94E-05

**405 NB TO 101 SB (Sources 338 to 386)**

**Diesel Particulate Emissions**

Number of Sources	49
Link Length (meters)	448.1
Volume/Baseline (VPH)	25.0
Particulate Mass Emission Rate (gr/mi)	0.321

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.00062
Particulate Emission Rate (gr/sec/source)	1.27E-05

**405 SB FROM 101 SB (Sources 387 to 421)**

**Diesel Particulate Emissions**

Number of Sources	35
Link Length (meters)	595.0
Volume/Baseline (VPH)	47.4
Particulate Mass Emission Rate (gr/mi)	0.389

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.00189
Particulate Emission Rate (gr/sec/source)	5.41E-05

**405 SB OFF/VENTURA (Sources 422 to 458)**

**Diesel Particulate Emissions**

Number of Sources	37
Link Length (meters)	270.8
Volume/Baseline (VPH)	3.3
Particulate Mass Emission Rate (gr/mi)	1.821

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.00028
Particulate Emission Rate (gr/sec/source)	7.59E-06

**405 SB ON/VENTURA (Sources 459 to 483)**

**Diesel Particulate Emissions**

Number of Sources	25
Link Length (meters)	183.0
Volume/Baseline (VPH)	6.8
Particulate Mass Emission Rate (gr/mi)	0.645

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Particulate Emission Rate (gr/sec)	0.00014
Particulate Emission Rate (gr/sec/source)	5.54E-06



On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**101 NB MAIN (Sources 1 to 50)**

**CO Emissions**

Number of Sources	50
Link Length (meters)	762.0
Volume/Baseline (VPH)	6687.5
Pollutant Mass Emission Rate (gr/mi)	1.800

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	1.58326
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">3.17E-02</span>

**101 SB MAIN (Sources 51 to 95)**

**CO Emissions**

Number of Sources	45
Link Length (meters)	823.0
Volume/Baseline (VPH)	6687.5
Pollutant Mass Emission Rate (gr/mi)	1.800

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	1.71000
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">3.80E-02</span>

**101 NB TO 405 (Sources 96 to 117)**

**CO Emissions**

Number of Sources	22
Link Length (meters)	402.3
Volume/Baseline (VPH)	2054.2
Pollutant Mass Emission Rate (gr/mi)	1.800

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.25676
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">1.17E-02</span>

**101 NB TO 405 NB (Sources 118 to 129)**

**CO Emissions**

Number of Sources	12
Link Length (meters)	219.5
Volume/Baseline (VPH)	1020.8
Pollutant Mass Emission Rate (gr/mi)	1.800

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.06962
Pollutant Emission Rate (gr/sec/source)	5.80E-03

**101 NB TO 405 SB (Sources 130 to 177)**

**CO Emissions**

Number of Sources	48
Link Length (meters)	565.9
Volume/Baseline (VPH)	1033.3
Pollutant Mass Emission Rate (gr/mi)	2.670

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.26949
Pollutant Emission Rate (gr/sec/source)	5.61E-03

**101 SB TO 405 NB (Sources 178 to 232)**

**CO Emissions**

Number of Sources	55
Link Length (meters)	670.6
Volume/Baseline (VPH)	925.0
Pollutant Mass Emission Rate (gr/mi)	2.153

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.23052
Pollutant Emission Rate (gr/sec/source)	4.19E-03

**101 NB OFF/SEPULVEDA (Sources 233 to 251)**

**CO Emissions**

Number of Sources	19
Link Length (meters)	347.5
Volume/Baseline (VPH)	425.0
Pollutant Mass Emission Rate (gr/mi)	6.818

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.17380
Pollutant Emission Rate (gr/sec/source)	9.15E-03

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**101 SB ON/SEPULVEDA (Sources 252 to 265)**

**CO Emissions**

Number of Sources	14
Link Length (meters)	256.0
Volume/Baseline (VPH)	483.3
Pollutant Mass Emission Rate (gr/mi)	4.158

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.08880
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">6.34E-03</span>

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**405 MAIN (Sources 266 to 294)**

**CO Emissions**

Number of Sources	29
Link Length (meters)	883.9
Volume/Baseline (VPH)	9125.0
Pollutant Mass Emission Rate (gr/mi)	1.755

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	2.44328
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">8.43E-02</span>

**405 NB TO 101 (Sources 295 to 303)**

**CO Emissions**

Number of Sources	9
Link Length (meters)	274.3
Volume/Baseline (VPH)	2762.5
Pollutant Mass Emission Rate (gr/mi)	1.755

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.22954
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">2.55E-02</span>

**405 NB TO 101 NB (Sources 304 to 337)**

**CO Emissions**

Number of Sources	34
Link Length (meters)	621.8
Volume/Baseline (VPH)	1750.0
Pollutant Mass Emission Rate (gr/mi)	1.960

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.36813
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">1.08E-02</span>

**405 NB TO 101 SB (Sources 338 to 386)**

**CO Emissions**

Number of Sources	49
Link Length (meters)	448.1
Volume/Baseline (VPH)	1012.5
Pollutant Mass Emission Rate (gr/mi)	2.132

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.16696
Pollutant Emission Rate (gr/sec/source)	3.41E-03

**405 SB FROM 101 SB (Sources 387 to 421)**

**CO Emissions**

Number of Sources	35
Link Length (meters)	595.0
Volume/Baseline (VPH)	1916.7
Pollutant Mass Emission Rate (gr/mi)	1.755

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.34547
Pollutant Emission Rate (gr/sec/source)	9.87E-03

**405 SB OFF/VENTURA (Sources 422 to 458)**

**CO Emissions**

Number of Sources	37
Link Length (meters)	270.8
Volume/Baseline (VPH)	135.4
Pollutant Mass Emission Rate (gr/mi)	6.584

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.04167
Pollutant Emission Rate (gr/sec/source)	1.13E-03

**405 SB ON/VENTURA (Sources 459 to 483)**

**CO Emissions**

Number of Sources	25
Link Length (meters)	183.0
Volume/Baseline (VPH)	275.0
Pollutant Mass Emission Rate (gr/mi)	4.127

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.03585
Pollutant Emission Rate (gr/sec/source)	1.43E-03



On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**101 NB MAIN (Sources 1 to 50)**

**CO Emissions**

Number of Sources	50
Link Length (meters)	762.0
Volume/Baseline (VPH)	609.0
Pollutant Mass Emission Rate (gr/mi)	2.194

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.17574
Pollutant Emission Rate (gr/sec/source)	3.51E-03

**101 SB MAIN (Sources 51 to 95)**

**CO Emissions**

Number of Sources	45
Link Length (meters)	823.0
Volume/Baseline (VPH)	3324.0
Pollutant Mass Emission Rate (gr/mi)	3.842

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	1.81417
Pollutant Emission Rate (gr/sec/source)	4.03E-02

**101 NB TO 405 (Sources 96 to 117)**

**CO Emissions**

Number of Sources	22
Link Length (meters)	402.3
Volume/Baseline (VPH)	2054.2
Pollutant Mass Emission Rate (gr/mi)	2.194

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.31296
Pollutant Emission Rate (gr/sec/source)	1.42E-02

**101 NB TO 405 NB (Sources 118 to 129)**

**CO Emissions**

Number of Sources	12
Link Length (meters)	219.5
Volume/Baseline (VPH)	1020.8
Pollutant Mass Emission Rate (gr/mi)	2.194

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.08485
Pollutant Emission Rate (gr/sec/source)	7.07E-03

**101 NB TO 405 SB (Sources 130 to 177)**

**CO Emissions**

Number of Sources	48
Link Length (meters)	565.9
Volume/Baseline (VPH)	1033.3
Pollutant Mass Emission Rate (gr/mi)	2.670

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.26949
Pollutant Emission Rate (gr/sec/source)	5.61E-03

**101 SB TO 405 NB (Sources 178 to 232)**

**CO Emissions**

Number of Sources	55
Link Length (meters)	670.6
Volume/Baseline (VPH)	925.0
Pollutant Mass Emission Rate (gr/mi)	2.194

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.23491
Pollutant Emission Rate (gr/sec/source)	4.27E-03

**101 NB OFF/SEPULVEDA (Sources 233 to 251)**

**CO Emissions**

Number of Sources	19
Link Length (meters)	347.5
Volume/Baseline (VPH)	425.0
Pollutant Mass Emission Rate (gr/mi)	6.818

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.17380
Pollutant Emission Rate (gr/sec/source)	9.15E-03

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**101 SB ON/SEPULVEDA (Sources 252 to 265)**

**CO Emissions**

Number of Sources	14
Link Length (meters)	256.0
Volume/Baseline (VPH)	483.3
Pollutant Mass Emission Rate (gr/mi)	4.158

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.08880
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">6.34E-03</span>

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**405 MAIN (Sources 266 to 294)**

**CO Emissions**

Number of Sources	29
Link Length (meters)	883.9
Volume/Baseline (VPH)	12501.0
Pollutant Mass Emission Rate (gr/mi)	2.512

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	4.79102
Pollutant Emission Rate (gr/sec/source)	1.65E-01

**405 NB TO 101 (Sources 295 to 303)**

**CO Emissions**

Number of Sources	9
Link Length (meters)	274.3
Volume/Baseline (VPH)	2762.5
Pollutant Mass Emission Rate (gr/mi)	2.512

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.32856
Pollutant Emission Rate (gr/sec/source)	3.65E-02

**405 NB TO 101 NB (Sources 304 to 337)**

**CO Emissions**

Number of Sources	34
Link Length (meters)	621.8
Volume/Baseline (VPH)	1750.0
Pollutant Mass Emission Rate (gr/mi)	2.512

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.47181
Pollutant Emission Rate (gr/sec/source)	1.39E-02

**405 NB TO 101 SB (Sources 338 to 386)**

**CO Emissions**

Number of Sources	49
Link Length (meters)	448.1
Volume/Baseline (VPH)	1012.5
Pollutant Mass Emission Rate (gr/mi)	2.512

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.19672
Pollutant Emission Rate (gr/sec/source)	4.01E-03

**405 SB FROM 101 SB (Sources 387 to 421)**

**CO Emissions**

Number of Sources	35
Link Length (meters)	595.0
Volume/Baseline (VPH)	1916.7
Pollutant Mass Emission Rate (gr/mi)	2.512

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.49448
Pollutant Emission Rate (gr/sec/source)	1.41E-02

**405 SB OFF/VENTURA (Sources 422 to 458)**

**CO Emissions**

Number of Sources	37
Link Length (meters)	270.8
Volume/Baseline (VPH)	135.4
Pollutant Mass Emission Rate (gr/mi)	6.584

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.04167
Pollutant Emission Rate (gr/sec/source)	1.13E-03

**405 SB ON/VENTURA (Sources 459 to 483)**

**CO Emissions**

Number of Sources	25
Link Length (meters)	183.0
Volume/Baseline (VPH)	275.0
Pollutant Mass Emission Rate (gr/mi)	4.127

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.03585
Pollutant Emission Rate (gr/sec/source)	1.43E-03



On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**101 NB MAIN (Sources 1 to 50)**

**NO2 Emissions**

Number of Sources	50
Link Length (meters)	762.0
Volume/Baseline (VPH)	6687.5
Pollutant Mass Emission Rate (gr/mi)	1.141

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	1.00361
Pollutant Emission Rate (gr/sec/source)	2.01E-02

**101 SB MAIN (Sources 51 to 95)**

**NO2 Emissions**

Number of Sources	45
Link Length (meters)	823.0
Volume/Baseline (VPH)	6687.5
Pollutant Mass Emission Rate (gr/mi)	1.141

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	1.08395
Pollutant Emission Rate (gr/sec/source)	2.41E-02

**101 NB TO 405 (Sources 96 to 117)**

**NO2 Emissions**

Number of Sources	22
Link Length (meters)	402.3
Volume/Baseline (VPH)	2054.2
Pollutant Mass Emission Rate (gr/mi)	1.141

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.16276
Pollutant Emission Rate (gr/sec/source)	7.40E-03

**101 NB TO 405 NB (Sources 118 to 129)**

**NO2 Emissions**

Number of Sources	12
Link Length (meters)	219.5
Volume/Baseline (VPH)	1020.8
Pollutant Mass Emission Rate (gr/mi)	1.141

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.04413
Pollutant Emission Rate (gr/sec/source)	3.68E-03

**101 NB TO 405 SB (Sources 130 to 177)**

**NO2 Emissions**

Number of Sources	48
Link Length (meters)	565.9
Volume/Baseline (VPH)	1033.3
Pollutant Mass Emission Rate (gr/mi)	0.981

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.09901
Pollutant Emission Rate (gr/sec/source)	2.06E-03

**101 SB TO 405 NB (Sources 178 to 232)**

**NO2 Emissions**

Number of Sources	55
Link Length (meters)	670.6
Volume/Baseline (VPH)	925.0
Pollutant Mass Emission Rate (gr/mi)	0.872

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.09336
Pollutant Emission Rate (gr/sec/source)	1.70E-03

**101 NB OFF/SEPULVEDA (Sources 233 to 251)**

**NO2 Emissions**

Number of Sources	19
Link Length (meters)	347.5
Volume/Baseline (VPH)	425.0
Pollutant Mass Emission Rate (gr/mi)	2.886

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.07357
Pollutant Emission Rate (gr/sec/source)	3.87E-03

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**101 SB ON/SEPULVEDA (Sources 252 to 265)**

**NO2 Emissions**

Number of Sources	14
Link Length (meters)	256.0
Volume/Baseline (VPH)	483.3
Pollutant Mass Emission Rate (gr/mi)	2.024

*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

Pollutant Emission Rate (gr/sec)	0.04322
Pollutant Emission Rate (gr/sec/source)	3.09E-03

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**405 MAIN (Sources 266 to 294)**

**NO2 Emissions**

Number of Sources	29
Link Length (meters)	883.9
Volume/Baseline (VPH)	9125.0
Pollutant Mass Emission Rate (gr/mi)	0.953

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	1.32675
Pollutant Emission Rate (gr/sec/source)	4.58E-02

**405 NB TO 101 (Sources 295 to 303)**

**NO2 Emissions**

Number of Sources	9
Link Length (meters)	274.3
Volume/Baseline (VPH)	2762.5
Pollutant Mass Emission Rate (gr/mi)	0.953

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.12465
Pollutant Emission Rate (gr/sec/source)	1.38E-02

**405 NB TO 101 NB (Sources 304 to 337)**

**NO2 Emissions**

Number of Sources	34
Link Length (meters)	621.8
Volume/Baseline (VPH)	1750.0
Pollutant Mass Emission Rate (gr/mi)	0.730

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.13711
Pollutant Emission Rate (gr/sec/source)	4.03E-03

**405 NB TO 101 SB (Sources 338 to 386)**

**NO2 Emissions**

Number of Sources	49
Link Length (meters)	448.1
Volume/Baseline (VPH)	1012.5
Pollutant Mass Emission Rate (gr/mi)	0.752

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.05889
Pollutant Emission Rate (gr/sec/source)	1.20E-03

**405 SB FROM 101 SB (Sources 387 to 421)**

**NO2 Emissions**

Number of Sources	35
Link Length (meters)	595.0
Volume/Baseline (VPH)	1916.7
Pollutant Mass Emission Rate (gr/mi)	0.953

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.18760
Pollutant Emission Rate (gr/sec/source)	5.36E-03

**405 SB OFF/VENTURA (Sources 422 to 458)**

**NO2 Emissions**

Number of Sources	37
Link Length (meters)	270.8
Volume/Baseline (VPH)	135.4
Pollutant Mass Emission Rate (gr/mi)	2.463

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.01559
Pollutant Emission Rate (gr/sec/source)	4.21E-04

**405 SB ON/VENTURA (Sources 459 to 483)**

**NO2 Emissions**

Number of Sources	25
Link Length (meters)	183.0
Volume/Baseline (VPH)	275.0
Pollutant Mass Emission Rate (gr/mi)	1.744

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.01515
Pollutant Emission Rate (gr/sec/source)	6.06E-04



On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**101 NB MAIN (Sources 1 to 50)**

**NO2 Emissions**

Number of Sources	50
Link Length (meters)	762.0
Volume/Baseline (VPH)	609.0
Pollutant Mass Emission Rate (gr/mi)	0.879

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.07041
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">1.41E-03</span>

**101 SB MAIN (Sources 51 to 95)**

**NO2 Emissions**

Number of Sources	45
Link Length (meters)	823.0
Volume/Baseline (VPH)	3324.0
Particulate Mass Emission Rate (gr/mi)	1.523

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.71915
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">1.60E-02</span>

**101 NB TO 405 (Sources 96 to 117)**

**NO2 Emissions**

Number of Sources	22
Link Length (meters)	402.3
Volume/Baseline (VPH)	2054.2
Pollutant Mass Emission Rate (gr/mi)	0.879

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.12538
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">5.70E-03</span>

**101 NB TO 405 NB (Sources 118 to 129)**

**NO2 Emissions**

Number of Sources	12
Link Length (meters)	219.5
Volume/Baseline (VPH)	1020.8
Pollutant Mass Emission Rate (gr/mi)	0.879

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.03400
Pollutant Emission Rate (gr/sec/source)	2.83E-03

**101 NB TO 405 SB (Sources 130 to 177)**

**NO2 Emissions**

Number of Sources	48
Link Length (meters)	565.9
Volume/Baseline (VPH)	1033.3
Pollutant Mass Emission Rate (gr/mi)	0.981

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.09901
Pollutant Emission Rate (gr/sec/source)	2.06E-03

**101 SB TO 405 NB (Sources 178 to 232)**

**NO2 Emissions**

Number of Sources	55
Link Length (meters)	670.6
Volume/Baseline (VPH)	925.0
Pollutant Mass Emission Rate (gr/mi)	0.879

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.09411
Pollutant Emission Rate (gr/sec/source)	1.71E-03

**101 NB OFF/SEPULVEDA (Sources 233 to 251)**

**NO2 Emissions**

Number of Sources	19
Link Length (meters)	347.5
Volume/Baseline (VPH)	425.0
Pollutant Mass Emission Rate (gr/mi)	2.886

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.07357
Pollutant Emission Rate (gr/sec/source)	3.87E-03

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

101 SB ON/SEPULVEDA (Sources 252 to 265)

NO2 Emissions

Number of Sources	14
Link Length (meters)	256.0
Volume/Baseline (VPH)	483.3
Pollutant Mass Emission Rate (gr/mi)	2.024

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.04322
Pollutant Emission Rate (gr/sec/source)	3.09E-03

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**405 MAIN (Sources 266 to 294)**

**NO2 Emissions**

Number of Sources	29
Link Length (meters)	883.9
Volume/Baseline (VPH)	12501.0
Pollutant Mass Emission Rate (gr/mi)	0.822

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	1.56776
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">5.41E-02</span>

**405 NB TO 101 (Sources 295 to 303)**

**NO2 Emissions**

Number of Sources	9
Link Length (meters)	274.3
Volume/Baseline (VPH)	2762.5
Pollutant Mass Emission Rate (gr/mi)	0.822

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.10751
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">1.19E-02</span>

**405 NB TO 101 NB (Sources 304 to 337)**

**NO2 Emissions**

Number of Sources	34
Link Length (meters)	621.8
Volume/Baseline (VPH)	1750.0
Pollutant Mass Emission Rate (gr/mi)	0.822

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

Pollutant Emission Rate (gr/sec)	0.15439
Pollutant Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">4.54E-03</span>

**405 NB TO 101 SB (Sources 338 to 386)**

**NO2 Emissions**

Number of Sources	49
Link Length (meters)	448.1
Volume/Baseline (VPH)	1012.5
Pollutant Mass Emission Rate (gr/mi)	0.822

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.06437
Pollutant Emission Rate (gr/sec/source)	1.31E-03

**405 SB FROM 101 SB (Sources 387 to 421)**

**NO2 Emissions**

Number of Sources	35
Link Length (meters)	595.0
Volume/Baseline (VPH)	1916.7
Pollutant Mass Emission Rate (gr/mi)	0.822

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.16181
Pollutant Emission Rate (gr/sec/source)	4.62E-03

**405 SB OFF/VENTURA (Sources 422 to 458)**

**NO2 Emissions**

Number of Sources	37
Link Length (meters)	270.8
Volume/Baseline (VPH)	135.4
Pollutant Mass Emission Rate (gr/mi)	2.463

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.01559
Pollutant Emission Rate (gr/sec/source)	4.21E-04

**405 SB ON/VENTURA (Sources 459 to 483)**

**NO2 Emissions**

Number of Sources	25
Link Length (meters)	183.0
Volume/Baseline (VPH)	275.0
Pollutant Mass Emission Rate (gr/mi)	1.744

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

Pollutant Emission Rate (gr/sec)	0.01515
Pollutant Emission Rate (gr/sec/source)	6.06E-04



On-Road Mobile Sources  
Emission Rate Computation

**101 NB MAIN (Sources 1 to 50)**

**Particulate Emissions**

Number of Sources	50
Link Length (meters)	762
Volume/Baseline (VPH)	6687.5
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m <sup>2</sup> )	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*

*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.274768
PM10 Reentrainment Emission Rate (gr/sec/source)	5.50E-03
PM2.5 Reentrainment Emission Rate (gr/sec)	4.64E-02
PM2.5 Reentrainment Emission Rate (gr/sec/source)	9.29E-04

**101 SB MAIN (Sources 51 to 95)**

**Particulate Emissions**

Number of Sources	45
Link Length (meters)	823
Volume/Baseline (VPH)	6687.5
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m <sup>2</sup> )	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*

*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.296764
PM10 Reentrainment Emission Rate (gr/sec/source)	6.59E-03
PM2.5 Reentrainment Emission Rate (gr/sec)	5.02E-02
PM2.5 Reentrainment Emission Rate (gr/sec/source)	1.11E-03

**101 NB TO 405 (Sources 96 to 117)**

**Particulate Emissions**

Number of Sources	22	22
Link Length (meters)	402.3	402.3
Volume/Baseline (VPH)	2054.2	2054.2

**On-Road Mobile Sources  
Emission Rate Computation**

Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*  
*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.044559
PM10 Reentrainment Emission Rate (gr/sec/source)	2.03E-03
PM2.5 Reentrainment Emission Rate (gr/sec)	7.53E-03
PM2.5 Reentrainment Emission Rate (gr/sec/source)	3.42E-04

**101 NB TO 405 NB (Sources 118 to 129)**

**Particulate Emissions**

Number of Sources	12
Link Length (meters)	219.5
Volume/Baseline (VPH)	1020.8
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*  
*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.012082
PM10 Reentrainment Emission Rate (gr/sec/source)	1.01E-03
PM2.5 Reentrainment Emission Rate (gr/sec)	2.04E-03
PM2.5 Reentrainment Emission Rate (gr/sec/source)	1.70E-04

**101 NB TO 405 SB (Sources 130 to 177)**

**Particulate Emissions**

Number of Sources	48
Link Length (meters)	565.9
Volume/Baseline (VPH)	1033.3
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

## On-Road Mobile Sources Emission Rate Computation

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x  
(Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*

*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.031529
PM10 Reentrainment Emission Rate (gr/sec/source)	6.57E-04
PM2.5 Reentrainment Emission Rate (gr/sec)	5.33E-03
PM2.5 Reentrainment Emission Rate (gr/sec/source)	1.11E-04

### 101 SB TO 405 NB (Sources 178 to 232)

#### Particulate Emissions

Number of Sources	55
Link Length (meters)	670.6
Volume/Baseline (VPH)	925
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x  
(Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*

*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.033447
PM10 Reentrainment Emission Rate (gr/sec/source)	6.08E-04
PM2.5 Reentrainment Emission Rate (gr/sec)	5.65E-03
PM2.5 Reentrainment Emission Rate (gr/sec/source)	1.03E-04

### 101 NB OFF/SEPULVEDA (Sources 233 to 251)

#### Particulate Emissions

Number of Sources	19
Link Length (meters)	347.5
Volume/Baseline (VPH)	425
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x  
(Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*

*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

On-Road Mobile Sources  
Emission Rate Computation

PM10 Reentrainment Emission Rate (gr/sec)	0.007963
PM10 Reentrainment Emission Rate (gr/sec/source)	4.19E-04
PM2.5 Reentrainment Emission Rate (gr/sec)	1.35E-03
PM2.5 Reentrainment Emission Rate (gr/sec/source)	7.08E-05

**101 SB ON/SEPULVEDA (Sources 252 to 265)**

**Particulate Emissions**

Number of Sources	14
Link Length (meters)	256
Volume/Baseline (VPH)	483.3
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*  
*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.006671
PM10 Reentrainment Emission Rate (gr/sec/source)	4.77E-04
PM2.5 Reentrainment Emission Rate (gr/sec)	1.13E-03
PM2.5 Reentrainment Emission Rate (gr/sec/source)	8.05E-05

On-Road Mobile Sources  
Emission Rate Computation

**405 MAIN (Sources 266 to 294)**

**Particulate Emissions**

Number of Sources	29	29
Link Length (meters)	883.9	883.9
Volume/Baseline (VPH)	9125	9125
Particulate PM10 Base Emission Factor (g/mi)	7.30	
Road Surface Silt Loading (g/m <sup>2</sup> )	0.02	
Gross Vehicle Weight (tons)	2.7	
PM2.5 Fraction of PM10	0.169	
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312	

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*  
*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.434894
PM10 Reentrainment Emission Rate (gr/sec/source)	1.50E-02
PM2.5 Reentrainment Emission Rate (gr/sec)	7.35E-02
PM2.5 Reentrainment Emission Rate (gr/sec/source)	2.53E-03

**405 NB TO 101 (Sources 295 to 303)**

**Particulate Emissions**

Number of Sources	9
Link Length (meters)	274.3
Volume/Baseline (VPH)	2762.5
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m <sup>2</sup> )	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*  
*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.040858
PM10 Reentrainment Emission Rate (gr/sec/source)	4.54E-03
PM2.5 Reentrainment Emission Rate (gr/sec)	6.90E-03
PM2.5 Reentrainment Emission Rate (gr/sec/source)	7.67E-04

**405 NB TO 101 NB (Sources 304 to 337)**

**Particulate Emissions**

Number of Sources	34
Link Length (meters)	621.8
Volume/Baseline (VPH)	1750

On-Road Mobile Sources  
Emission Rate Computation

Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*  
*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.058673
PM10 Reentrainment Emission Rate (gr/sec/source)	1.73E-03
PM2.5 Reentrainment Emission Rate (gr/sec)	9.92E-03
PM2.5 Reentrainment Emission Rate (gr/sec/source)	2.92E-04

**405 NB TO 101 NB (Sources 338 to 386)**

**Particulate Emissions**

Number of Sources	49
Link Length (meters)	448.1
Volume/Baseline (VPH)	1012.5
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*  
*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.024463
PM10 Reentrainment Emission Rate (gr/sec/source)	4.99E-04
PM2.5 Reentrainment Emission Rate (gr/sec)	4.13E-03
PM2.5 Reentrainment Emission Rate (gr/sec/source)	8.44E-05

**405 SB FROM 101 SB (Sources 387 to 421)**

**Particulate Emissions**

Number of Sources	35
Link Length (meters)	595
Volume/Baseline (VPH)	1916.7
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

On-Road Mobile Sources  
Emission Rate Computation

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*  
*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.061492
PM10 Reentrainment Emission Rate (gr/sec/source)	1.76E-03
PM2.5 Reentrainment Emission Rate (gr/sec)	1.04E-02
PM2.5 Reentrainment Emission Rate (gr/sec/source)	2.97E-04

**405 SB OFF/VENTURA (Sources 422 to 458)**

**Particulate Emissions**

Number of Sources	37
Link Length (meters)	270.8
Volume/Baseline (VPH)	135.4
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*  
*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

PM10 Reentrainment Emission Rate (gr/sec)	0.001977
PM10 Reentrainment Emission Rate (gr/sec/source)	5.34E-05
PM2.5 Reentrainment Emission Rate (gr/sec)	3.34E-04
PM2.5 Reentrainment Emission Rate (gr/sec/source)	9.03E-06

**405 SB ON/VENTURA (Sources 459 to 483)**

**Particulate Emissions**

Number of Sources	25
Link Length (meters)	183
Volume/Baseline (VPH)	275
Particulate PM10 Base Emission Factor (g/mi)	7.30
Road Surface Silt Loading (g/m2)	0.02
Gross Vehicle Weight (tons)	2.7
PM2.5 Fraction of PM10	0.169
PM10 Reentrainment Mass Emission Rate (gr/mi)	0.312

*For PM10 Reentrainment: Mass Emission Rate (gr/mile) = (Particulate PM10 Base Emission Factor) x (Road Surface Silt Loading/2)<sup>0.65</sup> x (Gross Vehicle Weight/3)<sup>1.5</sup>*  
*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

On-Road Mobile Sources  
Emission Rate Computation

PM10 Reentrainment Emission Rate (gr/sec)	0.002714
PM10 Reentrainment Emission Rate (gr/sec/source)	1.09E-04
PM2.5 Reentrainment Emission Rate (gr/sec)	4.59E-04
PM2.5 Reentrainment Emission Rate (gr/sec/source)	1.83E-05



On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**101 NB MAIN (Sources 1 to 50)**

**Diesel TOG Emissions**

Number of Sources	50
Link Length (meters)	762.0
Volume/Baseline (VPH)	196.6
TOG Mass Emission Rate (gr/mi)	0.145056

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00375
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">7.50E-05</span>

**101 SB MAIN (Sources 51 to 95)**

**Diesel TOG Emissions**

Number of Sources	45
Link Length (meters)	823.0
Volume/Baseline (VPH)	196.6
TOG Mass Emission Rate (gr/mi)	0.145056

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00405
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">9.00E-05</span>

**101 NB TO 405 (Sources 96 to 117)**

**Diesel TOG Emissions**

Number of Sources	22
Link Length (meters)	402.3
Volume/Baseline (VPH)	60.4
TOG Mass Emission Rate (gr/mi)	0.145056

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00061
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">2.77E-05</span>

**101 NB TO 405 NB (Sources 118 to 129)**

**Diesel TOG Emissions**

Number of Sources	12
Link Length (meters)	219.5
Volume/Baseline (VPH)	30.0
TOG Mass Emission Rate (gr/mi)	0.145056

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00016
TOG Emission Rate (gr/sec/source)	1.37E-05

**101 NB TO 405 SB (Sources 130 to 177)**

**Diesel TOG Emissions**

Number of Sources	48
Link Length (meters)	565.9
Volume/Baseline (VPH)	30.4
TOG Mass Emission Rate (gr/mi)	0.240870

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00072
TOG Emission Rate (gr/sec/source)	1.49E-05

**101 SB TO 405 NB (Sources 178 to 232)**

**Diesel TOG Emissions**

Number of Sources	55
Link Length (meters)	670.6
Volume/Baseline (VPH)	27.2
TOG Mass Emission Rate (gr/mi)	0.162035

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00051
TOG Emission Rate (gr/sec/source)	9.28E-06

**101 NB OFF/SEPULVEDA (Sources 233 to 251)**

**Diesel TOG Emissions**

Number of Sources	19
Link Length (meters)	347.5
Volume/Baseline (VPH)	12.5
TOG Mass Emission Rate (gr/mi)	2.197666

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00165
TOG Emission Rate (gr/sec/source)	8.67E-05

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**101 SB ON/SEPULVEDA (Sources 252 to 265)**

**Diesel TOG Emissions**

Number of Sources	14
Link Length (meters)	256.0
Volume/Baseline (VPH)	14.2
TOG Mass Emission Rate (gr/mi)	0.259548

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00016
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">1.16E-05</span>

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

**405 MAIN (Sources 266 to 294)**

**Diesel TOG Emissions**

Number of Sources	29
Link Length (meters)	883.9
Volume/Baseline (VPH)	225.7
TOG Mass Emission Rate (gr/mi)	0.139234

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00479
TOG Emission Rate (gr/sec/source)	1.65E-04

**405 NB TO 101 (Sources 295 to 303)**

**Diesel TOG Emissions**

Number of Sources	9
Link Length (meters)	274.3
Volume/Baseline (VPH)	68.3
TOG Mass Emission Rate (gr/mi)	0.139234

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00045
TOG Emission Rate (gr/sec/source)	5.00E-05

**405 NB TO 101 NB (Sources 304 to 337)**

**Diesel TOG Emissions**

Number of Sources	34
Link Length (meters)	621.8
Volume/Baseline (VPH)	43.3
TOG Mass Emission Rate (gr/mi)	0.135110

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00063
TOG Emission Rate (gr/sec/source)	1.85E-05

**405 NB TO 101 SB (Sources 338 to 386)**

**Diesel TOG Emissions**

Number of Sources	49
Link Length (meters)	448.1
Volume/Baseline (VPH)	25.0
TOG Mass Emission Rate (gr/mi)	0.160823

On-Road Mobile Sources  
Emission Rate Computation  
Average Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00031
TOG Emission Rate (gr/sec/source)	6.35E-06

**405 SB FROM 101 SB (Sources 387 to 421)**

**Diesel TOG Emissions**

Number of Sources	35
Link Length (meters)	595.0
Volume/Baseline (VPH)	47.4
TOG Mass Emission Rate (gr/mi)	0.139234

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00068
TOG Emission Rate (gr/sec/source)	1.94E-05

**405 SB OFF/VENTURA (Sources 422 to 458)**

**Diesel TOG Emissions**

Number of Sources	37
Link Length (meters)	270.8
Volume/Baseline (VPH)	3.3
TOG Mass Emission Rate (gr/mi)	2.177048

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00034
TOG Emission Rate (gr/sec/source)	9.08E-06

**405 SB ON/VENTURA (Sources 459 to 483)**

**Diesel TOG Emissions**

Number of Sources	25
Link Length (meters)	183.0
Volume/Baseline (VPH)	6.8
TOG Mass Emission Rate (gr/mi)	0.257850

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00006
TOG Emission Rate (gr/sec/source)	2.22E-06



On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**101 NB MAIN (Sources 1 to 50)**

**Diesel TOG Emissions**

Number of Sources	50
Link Length (meters)	762.0
Volume/Baseline (VPH)	17.9
TOG Mass Emission Rate (gr/mi)	0.16810

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00040
TOG Emission Rate (gr/sec/source)	7.92E-06

**101 SB MAIN (Sources 51 to 95)**

**Diesel TOG Emissions**

Number of Sources	45
Link Length (meters)	823.0
Volume/Baseline (VPH)	82.2
TOG Mass Emission Rate (gr/mi)	0.93995

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.01098
TOG Emission Rate (gr/sec/source)	2.44E-04

**101 NB TO 405 (Sources 96 to 117)**

**Diesel TOG Emissions**

Number of Sources	22
Link Length (meters)	402.3
Volume/Baseline (VPH)	60.4
TOG Mass Emission Rate (gr/mi)	0.16810

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00071
TOG Emission Rate (gr/sec/source)	3.20E-05

**101 NB TO 405 NB (Sources 118 to 129)**

**Diesel TOG Emissions**

Number of Sources	12
Link Length (meters)	219.5
Volume/Baseline (VPH)	30.0
TOG Mass Emission Rate (gr/mi)	0.16810

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00019
TOG Emission Rate (gr/sec/source)	1.59E-05

**101 NB TO 405 SB (Sources 130 to 177)**

**Diesel TOG Emissions**

Number of Sources	48
Link Length (meters)	565.9
Volume/Baseline (VPH)	30.4
TOG Mass Emission Rate (gr/mi)	0.240870

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00072
TOG Emission Rate (gr/sec/source)	1.49E-05

**101 SB TO 405 NB (Sources 178 to 232)**

**Diesel TOG Emissions**

Number of Sources	55
Link Length (meters)	670.6
Volume/Baseline (VPH)	27.2
TOG Mass Emission Rate (gr/mi)	0.168100

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00053
TOG Emission Rate (gr/sec/source)	9.62E-06

**101 NB OFF/SEPULVEDA (Sources 233 to 251)**

**Diesel TOG Emissions**

Number of Sources	19
Link Length (meters)	347.5
Volume/Baseline (VPH)	12.5
TOG Mass Emission Rate (gr/mi)	2.197666

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00165
TOG Emission Rate (gr/sec/source)	8.67E-05

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**101 SB ON/SEPULVEDA (Sources 252 to 265)**

**Diesel TOG Emissions**

Number of Sources	14
Link Length (meters)	256.0
Volume/Baseline (VPH)	14.2
TOG Mass Emission Rate (gr/mi)	0.259548

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00016
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">1.16E-05</span>

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**405 MAIN (Sources 266 to 294)**

**Diesel TOG Emissions**

Number of Sources	29
Link Length (meters)	883.9
Volume/Baseline (VPH)	309.2
TOG Mass Emission Rate (gr/mi)	0.220252

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.01039
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">3.58E-04</span>

**405 NB TO 101 (Sources 295 to 303)**

**Diesel TOG Emissions**

Number of Sources	9
Link Length (meters)	274.3
Volume/Baseline (VPH)	68.3
TOG Mass Emission Rate (gr/mi)	0.220252

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00071
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">7.91E-05</span>

**405 NB TO 101 NB (Sources 304 to 337)**

**Diesel TOG Emissions**

Number of Sources	34
Link Length (meters)	621.8
Volume/Baseline (VPH)	43.3
TOG Mass Emission Rate (gr/mi)	0.220252

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00102
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">3.01E-05</span>

**405 NB TO 101 SB (Sources 338 to 386)**

**Diesel TOG Emissions**

Number of Sources	49
Link Length (meters)	448.1
Volume/Baseline (VPH)	25.0
TOG Mass Emission Rate (gr/mi)	0.220252

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00043
TOG Emission Rate (gr/sec/source)	8.69E-06

**405 SB FROM 101 SB (Sources 387 to 421)**

**Diesel TOG Emissions**

Number of Sources	35
Link Length (meters)	595.0
Volume/Baseline (VPH)	47.4
TOG Mass Emission Rate (gr/mi)	0.220252

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00107
TOG Emission Rate (gr/sec/source)	3.06E-05

**405 SB OFF/VENTURA (Sources 422 to 458)**

**Diesel TOG Emissions**

Number of Sources	37
Link Length (meters)	270.8
Volume/Baseline (VPH)	3.3
TOG Mass Emission Rate (gr/mi)	2.177048

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00034
TOG Emission Rate (gr/sec/source)	9.08E-06

**405 SB ON/VENTURA (Sources 459 to 483)**

**Diesel TOG Emissions**

Number of Sources	25
Link Length (meters)	183.0
Volume/Baseline (VPH)	6.8
TOG Mass Emission Rate (gr/mi)	0.257850

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00006
TOG Emission Rate (gr/sec/source)	2.22E-06



On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**101 NB MAIN (Sources 1 to 50)**

**TOG Emissions**

Number of Sources	50
Link Length (meters)	762.0
Volume/Baseline (VPH)	591.1
TOG Mass Emission Rate (gr/mi)	0.004797

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00037
TOG Emission Rate (gr/sec/source)	7.46E-06

**101 SB MAIN (Sources 51 to 95)**

**TOG Emissions**

Number of Sources	45
Link Length (meters)	823.0
Volume/Baseline (VPH)	3241.8
TOG Mass Emission Rate (gr/mi)	0.014670

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00676
TOG Emission Rate (gr/sec/source)	1.50E-04

**101 NB TO 405 (Sources 96 to 117)**

**TOG Emissions**

Number of Sources	22
Link Length (meters)	402.3
Volume/Baseline (VPH)	1993.8
TOG Mass Emission Rate (gr/mi)	0.004797

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00066
TOG Emission Rate (gr/sec/source)	3.02E-05

**101 NB TO 405 NB (Sources 118 to 129)**

**TOG Emissions**

Number of Sources	12
Link Length (meters)	219.5
Volume/Baseline (VPH)	990.8
TOG Mass Emission Rate (gr/mi)	0.004797

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00018
TOG Emission Rate (gr/sec/source)	1.50E-05

**101 NB TO 405 SB (Sources 130 to 177)**

**TOG Emissions**

Number of Sources	48
Link Length (meters)	565.9
Volume/Baseline (VPH)	1003.0
TOG Mass Emission Rate (gr/mi)	0.007195

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00070
TOG Emission Rate (gr/sec/source)	1.47E-05

**101 SB TO 405 NB (Sources 178 to 232)**

**TOG Emissions**

Number of Sources	55
Link Length (meters)	670.6
Volume/Baseline (VPH)	897.8
TOG Mass Emission Rate (gr/mi)	0.004797

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00050
TOG Emission Rate (gr/sec/source)	9.06E-06

**101 NB OFF/SEPULVEDA (Sources 233 to 251)**

**TOG Emissions**

Number of Sources	19
Link Length (meters)	347.5
Volume/Baseline (VPH)	412.5
TOG Mass Emission Rate (gr/mi)	0.030288

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times (Link\ Length)$$

TOG Emission Rate (gr/sec)	0.00075
TOG Emission Rate (gr/sec/source)	3.94E-05

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**101 SB ON/SEPULVEDA (Sources 252 to 265)**

**TOG Emissions**

Number of Sources	14
Link Length (meters)	256.0
Volume/Baseline (VPH)	469.1
TOG Mass Emission Rate (gr/mi)	0.008200

*Emission Rate (gr/sec) = ((Mass Emission Rate x Volume/Baseline)/(1609.3 m/mile) x (3600 sec/hr)) x (Link Length)*

TOG Emission Rate (gr/sec)	0.00017
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">1.21E-05</span>

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

**405 MAIN (Sources 266 to 294)**

**TOG Emissions**

Number of Sources	29
Link Length (meters)	883.9
Volume/Baseline (VPH)	12191.8
TOG Mass Emission Rate (gr/mi)	0.006470

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.01203
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">4.15E-04</span>

**405 NB TO 101 (Sources 295 to 303)**

**TOG Emissions**

Number of Sources	9
Link Length (meters)	274.3
Volume/Baseline (VPH)	2694.2
TOG Mass Emission Rate (gr/mi)	0.006470

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00083
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">9.17E-05</span>

**405 NB TO 101 NB (Sources 304 to 337)**

**TOG Emissions**

Number of Sources	34
Link Length (meters)	621.8
Volume/Baseline (VPH)	1706.7
TOG Mass Emission Rate (gr/mi)	0.006470

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00119
TOG Emission Rate (gr/sec/source)	<span style="border: 1px solid black; padding: 2px;">3.49E-05</span>

**405 NB TO 101 SB (Sources 338 to 386)**

**TOG Emissions**

Number of Sources	49
Link Length (meters)	448.1
Volume/Baseline (VPH)	987.5
TOG Mass Emission Rate (gr/mi)	0.006470

On-Road Mobile Sources  
Emission Rate Computation  
Reduced Speed Scenario

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00049
TOG Emission Rate (gr/sec/source)	1.01E-05

**405 SB FROM 101 SB (Sources 387 to 421)**

**TOG Emissions**

Number of Sources	35
Link Length (meters)	595.0
Volume/Baseline (VPH)	1869.3
TOG Mass Emission Rate (gr/mi)	0.006470

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00124
TOG Emission Rate (gr/sec/source)	3.55E-05

**405 SB OFF/VENTURA (Sources 422 to 458)**

**TOG Emissions**

Number of Sources	37
Link Length (meters)	270.8
Volume/Baseline (VPH)	132.1
TOG Mass Emission Rate (gr/mi)	0.030065

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00019
TOG Emission Rate (gr/sec/source)	5.02E-06

**405 SB ON/VENTURA (Sources 459 to 483)**

**TOG Emissions**

Number of Sources	25
Link Length (meters)	183.0
Volume/Baseline (VPH)	268.2
TOG Mass Emission Rate (gr/mi)	0.008200

$$\text{Emission Rate (gr/sec)} = ((\text{Mass Emission Rate} \times \text{Volume/Baseline}) / (1609.3 \text{ m/mile}) \times (3600 \text{ sec/hr})) \times (\text{Link Length})$$

TOG Emission Rate (gr/sec)	0.00007
TOG Emission Rate (gr/sec/source)	2.78E-06

## **APPENDIX C**

### Dispersion Model Input Summary Table

# Dispersion Model Input Summary Table

source	id	x	y	el	rh	sy	sz	sources distance	sources number	length meters	log average	log speed	dpm average	diesel tog average	diesel tog speed	co average	co speed	no2 average	no2 speed	pm10	pm2.5
101 NB MAIN	1	365211.5	3780612.5	0.0	6.10	7.09	2.68	15.24	50	762.0	7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	2	365195.8	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	3	365182.0	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	4	365166.3	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	5	365150.6	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	6	365134.9	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	7	365119.2	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	8	365103.4	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	9	365087.7	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	10	365072.0	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	11	365056.3	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	12	365040.6	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	13	365024.8	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	14	365009.1	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	15	364993.4	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	16	364977.7	3780612.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	17	364962.0	3780613.5	0.0	6.10	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	18	364946.3	3780615.5	0.0	6.23	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	19	364930.5	3780617.4	0.0	6.36	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	20	364913.8	3780619.4	0.0	6.49	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	21	364897.1	3780621.4	0.0	6.62	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	22	364881.4	3780623.4	0.0	6.75	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	23	364865.5	3780627.6	0.0	6.88	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	24	364849.8	3780631.2	0.0	7.01	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	25	364833.3	3780635.1	0.0	7.16	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	26	364818.5	3780639.0	0.0	7.32	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	27	364801.8	3780643.0	0.0	7.47	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	28	364785.5	3780647.8	0.0	7.62	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	29	364772.1	3780653.2	0.0	7.77	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	30	364757.6	3780658.2	0.0	7.92	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	31	364741.9	3780664.6	0.0	8.08	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	32	364728.8	3780670.3	0.0	8.23	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	33	364713.4	3780677.4	0.0	8.38	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	34	364699.6	3780685.2	0.0	8.53	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	35	364684.9	3780692.1	0.0	8.50	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	36	364670.2	3780700.0	0.0	8.46	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	37	364655.9	3780707.4	0.0	8.42	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	38	364644.5	3780714.3	0.0	8.38	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	39	364631.2	3780722.0	0.0	8.34	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	40	364617.9	3780730.0	0.0	8.31	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	41	364604.2	3780739.1	0.0	8.27	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	42	364591.2	3780747.4	0.0	8.23	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	43	364577.5	3780757.1	0.0	8.19	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	44	364564.7	3780766.6	0.0	8.15	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	45	364553.2	3780776.7	0.0	8.12	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	46	364541.5	3780786.5	0.0	8.08	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	47	364529.7	3780797.3	0.0	8.04	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	48	364519.8	3780807.1	0.0	8.00	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	49	364508.1	3780818.9	0.0	7.96	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
	50	364498.2	3780828.7	0.0	7.92	7.09	2.68				7.62E-05	7.46E-06	2.09E-04	7.50E-05	7.92E-06	3.17E-02	3.51E-03	2.01E-02	1.41E-03	5.50E-03	9.29E-04
101 SB MAIN	51	364436.3	3780784.5	0.0	7.92	8.51	2.81	18.288	45	823.0	9.14E-05	7.46E-06	2.51E-04	9.00E-05	2.44E-04	3.80E-02	4.03E-02	2.41E-02	1.60E-02	6.59E-03	1.11E-03
	52	364447.1	3780770.7	0.0	7.97	8.51	2.81				9.14E-05	7.46E-06	2.51E-04	9.00E-05	2.44E-04	3.80E-02	4.03E-02	2.41E-02			















## **APPENDIX D**

Dispersion Model Input/Output Files (Electronic Format)

Added Draft EIR Appendix C  

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**Added Geotechnical Report Addenda**

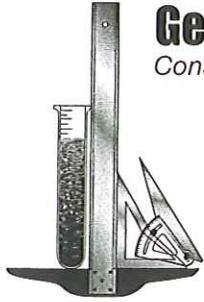


Added Draft EIR Appendix C-3

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Addendum II □ Update of Geotechnical  
Engineering Investigation





**Geotechnologies, Inc.**  
Consulting Geotechnical Engineers

*Celebrating*  
**40 Years**  
*of Service*  
1971-2011

May 21, 2009  
File No. 18123

Krismar Construction  
233 Wilshire Boulevard, Suite 990  
Santa Monica, California 90401

Attention: Paul Krueger

Subject: Addendum II, Update of Geotechnical Engineering Investigation  
Proposed Mixed-Use and Apartment Complex  
Northwest Corner of Camarillo Street and Sepulveda Boulevard  
Sherman Oaks, California

Reference: *Reports by Geotechnologies, Inc.:*  
Geotechnical Engineering Investigation, dated June 6, 2002;  
Addendum I, Additional Exploration, dated March 17, 2003.

*Correspondence by the City of Los Angeles, Department of Building and Safety:*  
Review Letter (Log # 46504), dated January 26, 2005.

Dear Mr. Krueger:

At your request, this letter has been prepared to provide an update to the referenced geotechnical reports. It is the understanding of this firm that the proposed development has remained relatively unchanged from the time of writing of the referenced reports. It is the opinion of this firm that the recommendations provided in the referenced reports remain applicable, except as modified herein.

### **SEISMIC DESIGN CONSIDERATIONS**

According to Table 1613.5.2 of the 2007 California Building Code, the subject site is classified as Site Class D, which corresponds to a "Stiff Soil" Profile. The following Mapped Spectral Accelerations and Site Coefficients may be used for the design and analysis of the proposed structure.

<b>Site Coefficients and Maximum Considered Earthquake Spectral Response Acceleration Parameters</b>	
Site Class	D - Stiff Soil
Mapped Spectral Acceleration at Short Periods ( $S_S$ )	1.500g
Site Coefficient ( $F_a$ )	1.0
Maximum Considered Earthquake Spectral Response for Short Periods ( $S_{MS}$ )	1.500g
Five-Percent Damped Design Spectral Response Acceleration at Short Periods ( $S_{DS}$ )	1.000g
Mapped Spectral Acceleration at One-Second Period ( $S_1$ )	0.600g
Site Coefficient ( $F_v$ )	1.5
Maximum Considered Earthquake Spectral Response for One-Second Period ( $S_{M1}$ )	0.900g
Five-Percent Damped Design Spectral Response Acceleration at Short Periods ( $S_{D1}$ )	0.600g

### **RETAINING WALL DESIGN**

Based on groundwater data supplied by the Seismic Hazard Zone Report of the Van Nuys Quadrangle, by the California Geological Survey (SHZR 08), the historically highest groundwater level for the site is at the ground surface. The City of Los Angeles requires the subterranean structures be designed to resist hydrostatic and uplift pressures based on the historically highest groundwater level, unless a permanent dewatering system is provided below the structure.

Cantilever retaining walls supporting a level backslope may be designed utilizing a triangular distribution of active earth pressure. Cantilever retaining walls may be designed utilizing the following table:



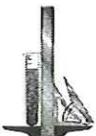
Height of Retaining Wall (feet)	Cantilever Retaining Wall <u>with</u> Permanent Dewatering System Triangular Distribution of Pressure	Cantilever Retaining Wall <u>w/o</u> Permanent Dewatering System Triangular Distribution of Pressure
15 feet	35 pcf	70 pcf
20 feet	42½ pcf	75 pcf
15 feet	48 pcf	80 pcf

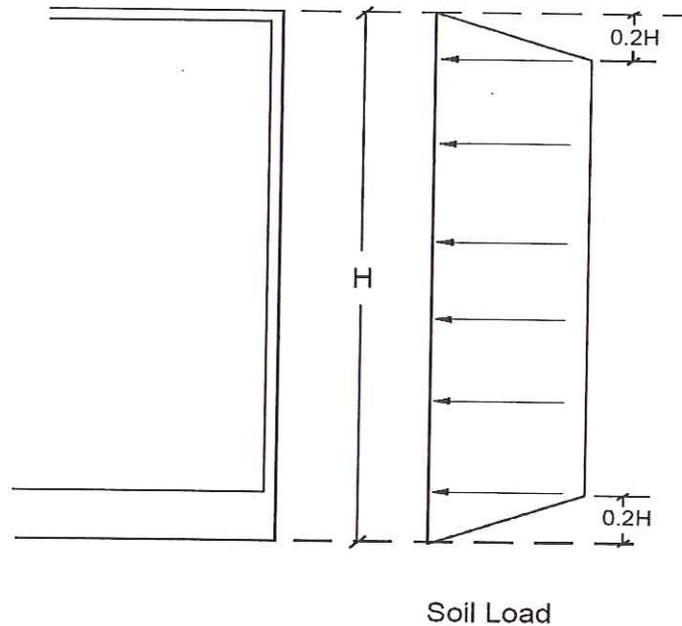
\*Where H is the height of the retaining wall in feet.

Restrained retaining walls may be designed utilizing an at-rest trapezoidal pressure distribution of lateral earth pressure as indicated in the diagram below. Restrained retaining walls may be designed utilizing the following table:

Height of Retaining Wall (feet)	Restrained Retaining Wall <u>with</u> Permanent Dewatering System Trapezoidal Distribution of Pressure	Restrained Retaining Wall <u>w/o</u> Permanent Dewatering System
25 feet	50H psf	25H psf (trapezoidal dist. of pressure) + 62.4H psf (triangular dist. of pressure)

\*Where H is the height of the retaining wall in feet.





H = Height of Retaining Wall

Additional active pressure should be added for a surcharge condition due to sloping ground, vehicular traffic or adjacent structures. Foundations may be designed using the foundation recommendations provided in the "Foundation Design" section of the referenced geotechnical report.

In addition to the recommended earth pressure, the upper ten feet of the retaining wall adjacent to streets, driveways or parking areas should be designed to resist a uniform lateral pressure of 100 pounds per square foot, acting as a result of an assumed 300 pounds per square foot surcharge behind the walls due to normal street traffic. If the traffic is kept back at least ten feet from the retaining walls, the traffic surcharge may be neglected.

### **Dynamic (Seismic) Lateral Forces**

Retaining walls exceeding 12 feet in height shall be designed to resist the additional earth pressure caused by seismic ground shaking. An inverse triangular pressure distribution should be utilized for



**Geotechnologies, Inc.**

439 Western Avenue, Glendale, California 91201-2837 • 818.240.9600 • 818.240.9675 fax

seismic loads, with an equivalent fluid pressure of  $16\frac{1}{2}$  pounds per cubic foot. Utilizing this inverse triangular pressure distribution, the earthquake load would be zero at the base of the wall, and would increase linearly to a maximum of  $16\frac{1}{2}(H)$  pounds per square foot at the top of the wall, where H is the height of the retaining wall.

### **HYDROSTATIC UPLIFT ON FLOOR SLABS**

Due to the high historic groundwater level, the proposed slab-on-grade would have to be designed to resist the potential uplift pressure based on the historically highest groundwater level, unless a permanent dewatering system is installed below the proposed structure. The hydrostatic uplift pressure to be used in the slab design would be  $62.4(H)$  psf, where H is the depth to finished subgrade from the existing site grade.

### **DEWATERING SYSTEM**

Based on groundwater data supplied by the Seismic Hazard Zone Report of the Van Nuys Quadrangle, by the California Geological Survey (SHZR 08), the historically highest groundwater level for the site is at the ground surface. The City of Los Angeles requires the subterranean structures be designed to resist hydrostatic and uplift pressures based on the historically highest groundwater level, unless a permanent dewatering system is provided below the structure.

Flow rates for dewatering systems are very difficult to estimate. It is recommended that a qualified dewatering consultant be consulted in regards to the design of the dewatering system and sizing of the sump pumps for the project..

A typical underslab drainage system installed below the subterranean garage floor slab should consist of a 1-foot thick layer of gravel underlying the entire floor slab, and subdrain pipes placed in gravel-filled drainage trenches leading to a sump pump. The drain lines should consist of 4-inch perforated pipe, perforations down, placed in trenches approximately 1 foot wide and 1 foot in depth below the bottom of the gravel blanket. The pipes would then be covered with gravel, and the entire gravel and pipe system within the trenches would be wrapped in filter fabric. The gravel filled drainage trenches are typically spaced approximately 40-foot on center, depending on the column grid line spacing.



Should you have any questions, please call.

Respectfully submitted,  
GEOTECHNOLOGIES, INC.

  
STANLEY TANG  
R.C.E. 56178



SST:km

xc: (7) Addressee, via email also



**Geotechnologies, Inc.**

439 Western Avenue, Glendale, California 91201-2837 • 818.240.9600 • 818.240.9675 fax

Added Draft EIR Appendix C-4

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City of Los Angeles Grading Division  
Approval Letter



**CITY OF LOS ANGELES  
INTER-DEPARTMENTAL CORRESPONDENCE**

**SOIL REPORT APPROVAL LETTER**

Log # 72746  
SOILS FILE - 2  
LIQ

DATE: January 10, 2010  
TO: David S Weintraub, Deputy Advisory Agency  
Department of City Planning  
FROM: Dana V. Provost, Engineering Geologist III  
Department of Building and Safety

VESTING TENTATIVE TRACT: 61216  
LOT: 1 to 10  
LOCATION: 4805, 4809, 4815, 4827 Sepulveda Boulevard,  
4804, 4810, 4818, Peach Avenue,  
15311, 15339, 15343, 15347, 15353, 15357 Camarillo Street  
15338, 15342, 15346 La Maida Street

<u>CURRENT REFERENCE REPORT/LETTER(S)</u>	<u>REPORT NO.</u>	<u>DATE(S) OF DOCUMENT</u>	<u>PREPARED BY</u>
Soils Report	18123-S	03/17/2003	Geotechnologies
Oversized Documents	"	"	"
Soils Report	18123	05/21/2009	Geotechnologies
Soils Report	18123	11/29/2010	Geotechnologies

<u>PREVIOUS REFERENCE REPORT/LETTER(S)</u>	<u>REPORT NO.</u>	<u>DATE(S) OF DOCUMENT</u>	<u>PREPARED BY</u>
Soils Report	18123-S	06/06/2002	Geotechnologies
Approval	Log #46504	01/26/2005	LADBS

The Grading Division of the Department of Building and Safety has reviewed the Vesting Tentative Tract Map 61216, and the current reports providing supplementary recommendations for the proposed construction of the 6-story mixed-used retail and apartment complex over 2 levels of subterranean parking. The Department has approved a previous tentative tract map and a soil report for a 5-lot subdivision for similar construction.

The report of 3/17/03 provide additional subsurface exploration information down to 100 feet in depth. This report indicates that the groundwater was encountered at 43 feet, and recommends using casing or drill mud for the proposed pile construction. The report of 5/21/09 provides supplementary recommendations, including hydrostatic pressure, on the retaining and basement floor slab design. The report of 11/29/10 confirms the previous recommendations remain applicable.

The reports are acceptable, provided the following conditions are complied with during site development:

Page 2

4805, 4809, 4815, 4827 Sepulveda Boulevard,  
4804, 4810, 4818, Peach Avenue,  
15311, 15339, 15343, 15347, 15353, 15357 Camarillo Street  
15338, 15342, 15346 La Maida Street

1. All the conditions, except superseded herein, in the Department's approval letter of 1/26/05 (Log #46504) shall apply.
2. All the latest recommendations of the reports dated 6/6/2002, 3/17/2003, 5/21/2009, and 11/29/2010 signed by Stanley Siu-Kei Tang (CE 56178), which are in addition to or more restrictive than the conditions contained herein shall be incorporated into the plans.
3. The seismic Site Class is D, as recommended in the report. All the other seismic design parameters shall be reviewed by LADBS building plan check. (1613.5.2)
4. Retaining walls shall be designed for the minimum lateral pressures, as recommended on page 13 of the report of 5/21/09. All the additional surcharge loads shall be included into the retaining wall design.
5. Retaining walls higher than 12 feet shall be designed for the additional seismic lateral pressure, as recommended in the report.
6. Basement retaining walls and floor slabs located below the historical high groundwater shall be designed for the effects of the hydrostatic pressure, unless otherwise a permanent dewatering system is approved for lowering the groundwater from affecting the basement walls and slabs.
7. Where the ground water table is lowered and maintained at an elevation not less than 6 inches below the bottom of the lowest floor, or where hydrostatic pressures will not occur, the floor and basement walls shall be damp-proofed. Where a hydrostatic pressure condition exists, and the design does not include a ground-water control system, the basement walls and floors shall be waterproofed. (1802.2.3, 1807.1.3, 1807.2, 1807.3)

RHC/rhc *RHC*  
Log #72746  
(213) 482-0480

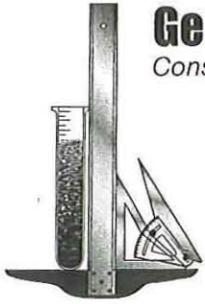
CC Geotechnologies  
VN District Office  
Applicant

Added Draft EIR Appendix C-5

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Addendum III □ Confirmation of  
Previous Analyses





**Geotechnologies, Inc.**  
Consulting Geotechnical Engineers

*Celebrating*  
**40 Years**  
*of Service*  
1971-2011

November 29, 2010  
File No. 18123

Krismar Construction  
100 Wilshire Boulevard, Suite 1600  
Santa Monica, California 90401

Attention: Paul Kruger

Subject: Addendum III, Updated Vesting Tentative Tract Map  
Proposed Mixed-Use Retail and Apartment Complex  
Northwest Corner of Camarillo Street and Sepulveda Boulevard  
Sherman Oaks, California

References: *Reports by Geotechnologies, Inc.:*  
Geotechnical Engineering Investigation, dated June 6, 2002;  
Addendum I, Additional Exploration, dated March 17, 2003;  
Addendum II, Update of Geotechnical Engineering Investigation, dated May 21, 2009.

*Correspondence by the City of Los Angeles, Department of Building and Safety:*  
Soils Report Approval Letter (Log # 46504), dated January 26, 2005.

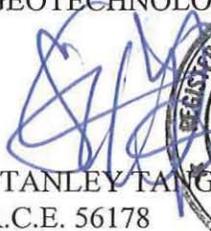
Dear Mr. Kruger:

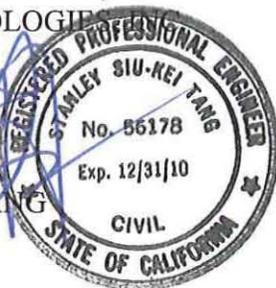
This letter has been prepared to provide an update to the referenced geotechnical reports. Based on review of the Vesting Tentative Tract Maps No. 61216, prepared by Sukow Engineering, dated November 16, 2010, the scope of the proposed development has remained relatively unchanged from the time of writing of the referenced reports. It is the opinion of this firm that the recommendations provided in the referenced reports remain applicable for the proposed development.

Should you have any questions, please call.

Respectfully submitted,

GEOTECHNOLOGIES

  
STANLEY TANG  
R.C.E. 56178



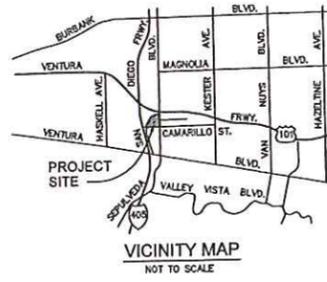
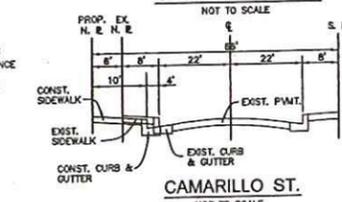
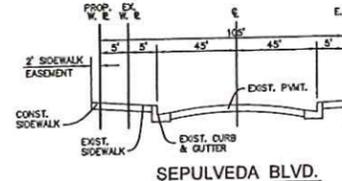
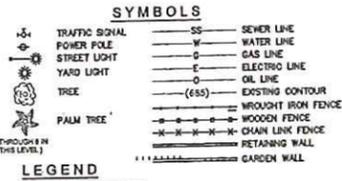
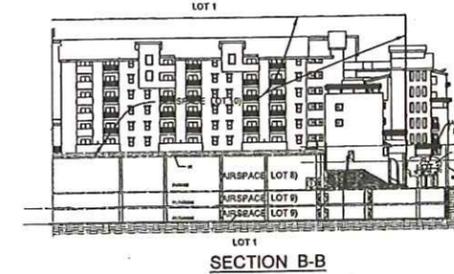
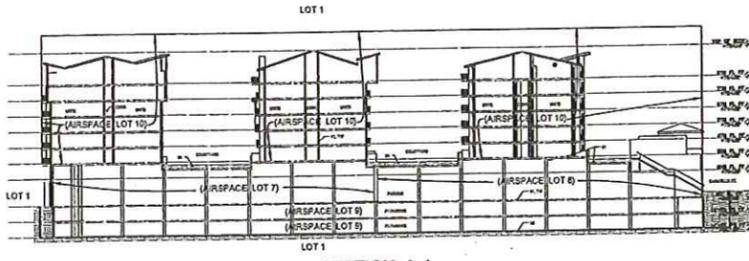
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Enc: Vesting Tentative Tract Maps No. 61215, by Sukow Engineering

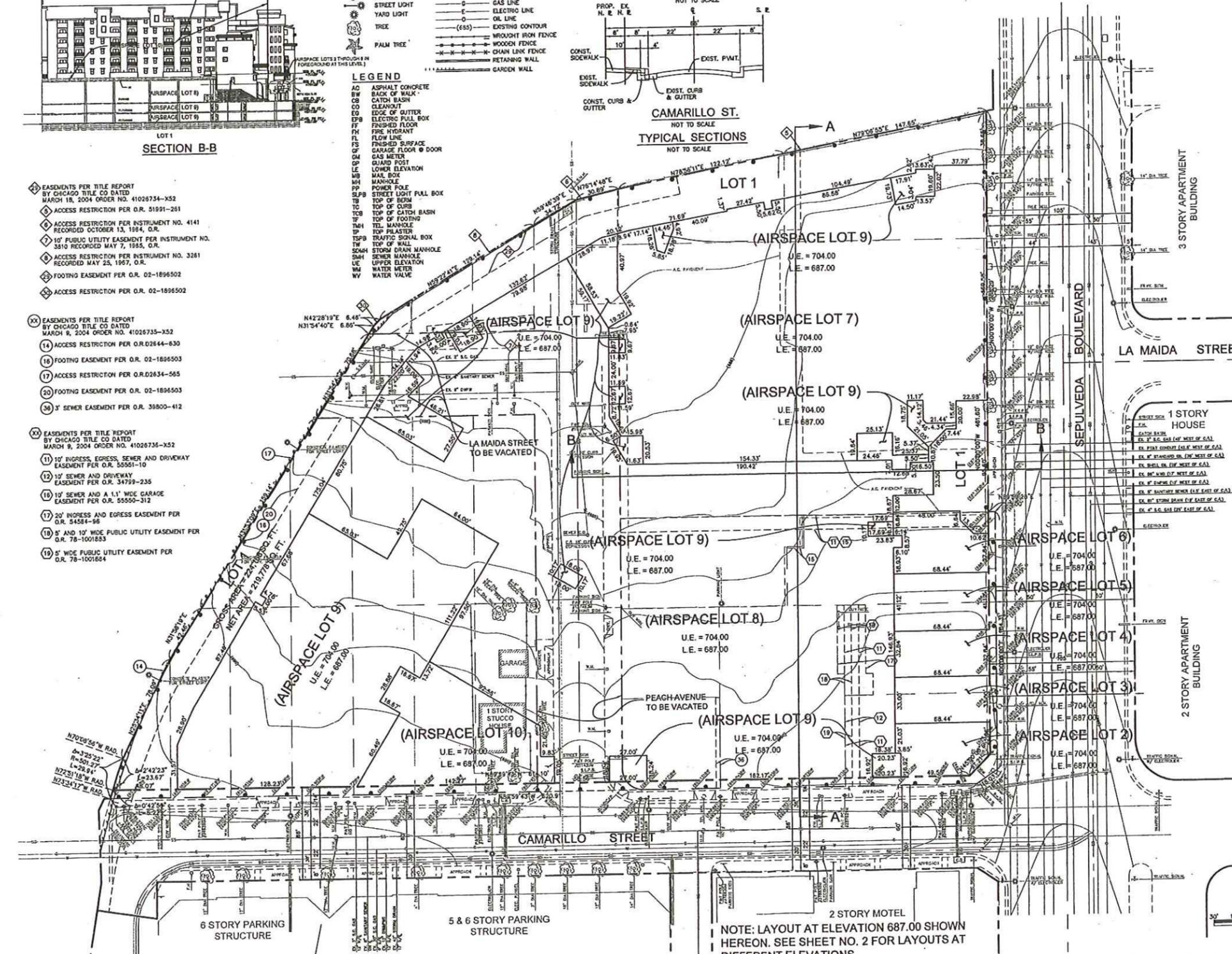
xc: (7) Addressee

# VESTING TENTATIVE TRACT NO. 61216

IN THE CITY OF LOS ANGELES  
STATE OF CALIFORNIA  
MERGER AND RESUBDIVISION FOR CONDOMINIUM  
AND AIRSPACE SUBDIVISION PURPOSES



- 25 EASEMENTS PER TITLE REPORT BY CHICAGO TITLE CO DATED MARCH 9, 2004 ORDER NO. 41026734-X52
- 26 ACCESS RESTRICTION PER O.R. 51991-261
- 27 ACCESS RESTRICTION PER INSTRUMENT NO. 4141 RECORDED OCTOBER 13, 1984, O.R.
- 28 10' PUBLIC UTILITY EASEMENT PER INSTRUMENT NO. 3410 RECORDED MAY 7, 1985, O.R.
- 29 ACCESS RESTRICTION PER INSTRUMENT NO. 3281 RECORDED MAY 25, 1987, O.R.
- 30 FOOTING EASEMENT PER O.R. 02-1896502
- 31 ACCESS RESTRICTION PER O.R. 02-1896502
- 32 EASEMENTS PER TITLE REPORT BY CHICAGO TITLE CO DATED MARCH 9, 2004 ORDER NO. 41026735-X52
- 33 ACCESS RESTRICTION PER O.R. 02844-630
- 34 FOOTING EASEMENT PER O.R. 02-1896503
- 35 ACCESS RESTRICTION PER O.R. 02834-565
- 36 FOOTING EASEMENT PER O.R. 02-1896503
- 37 3' SEWER EASEMENT PER O.R. 39800-412
- 38 EASEMENTS PER TITLE REPORT BY CHICAGO TITLE CO DATED MARCH 9, 2004 ORDER NO. 41026735-X52
- 39 10' INGRESS, EGRESS, SEWER AND DRIVEWAY EASEMENT PER O.R. 55561-10
- 40 10' SEWER AND DRIVEWAY EASEMENT PER O.R. 34759-235
- 41 10' SEWER AND A 1.1' WIDE GARAGE EASEMENT PER O.R. 55550-312
- 42 10' INGRESS AND EGRESS EASEMENT PER O.R. 54584-98
- 43 8' AND 10' WIDE PUBLIC UTILITY EASEMENT PER O.R. 78-1001833
- 44 10' WIDE PUBLIC UTILITY EASEMENT PER O.R. 78-1001834



### LEGAL DESCRIPTION:

ASSESSOR'S PARCEL NO. 2264-002-001 THRU 008; 016 THRU 023; 024 THRU 025; 033 THRU 034

PARCEL A, PARCEL MAP L.A. NO. 3428 PER MAP FILED IN BOOK 85 OF PARCEL MAPS, PAGES 87 AND 88; PORTIONS OF LOT 411, TRACT NO. 1000 PER MAP RECORDED IN BOOK 19, PAGES 1 THROUGH 34 OF MAPS; LOTS 1 THROUGH 5, 22 THROUGH 24 AND PORTIONS OF LOTS 6 THROUGH 19 THROUGH 21, BLOCK 6, TRACT NO. 5558 PER MAP RECORDED IN BOOK 94, PAGES 87 AND 88 OF MAPS; PORTION OF LOTS 1 THROUGH 3, BLOCK 4, TRACT NO. 5558 PER MAP RECORDED IN BOOK 84, PAGES 87 AND 88 OF MAPS. ALL RECORDS OF LOS ANGELES COUNTY, PORTIONS OF PEACH AVENUE VACATED BY VACATION 80-27515 AND PORTIONS OF PEACH AVENUE AND LA MADA STREET TO BE VACATED.

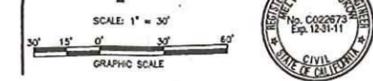
### NOTES:

1. OWNERS:  
FOUR SEASON, A CALIFORNIA LIMITED PARTNERSHIP  
PARKING ASSOCIATES, A CALIFORNIA LIMITED PARTNERSHIP  
VENTANA KEY PARTNERSHIP, A CALIFORNIA LIMITED PARTNERSHIP  
ALL AT: 100 WILSHIRE BLVD., SUITE 1600  
SANTA MONICA, CA 90401  
PH: (310) 393-9553  
FAX: (310) 458-2844
2. SUBDIVIDER:  
M. DAVID PAUL DEVELOPMENT LLC  
100 WILSHIRE BLVD., SUITE 1600  
SANTA MONICA, CA 90401  
PH: (310) 393-9553  
FAX: (310) 458-2844
3. ENGINEER:  
SUKOW ENGINEERING  
13288 CANTARA STREET  
NORTH HOLLYWOOD, CA 91605  
PH: (818) 781-0635  
FAX: (818) 781-7143
4. PROJECT DESCRIPTION:  
PROJECT CONSISTS OF 1 MASTER LOT AND 9 AIR SPACE LOTS FOR RESIDENTIAL PARKING, STORAGE AND COMMERCIAL/RETAIL CONDOMINIUM PURPOSES. IT ALSO INCLUDES THE VACATION OF PEACH AVENUE AND LA MADA STREET.
5. PROPOSED PROJECT:  
PROPERTY GROSS AREA (to centerline of street) = 271,308 S.F. (6.23 AC.)  
PROPERTY DOT BORDER AREA = 224,168 S.F. (5.15 AC.)  
PROJECT IS A MERGER AND RESUBDIVISION FOR CONDOMINIUM AND AIRSPACE SUBDIVISION PURPOSES

LOT	USE	GROSS S.F.	NET S.F.	PARKING PROVIDED
LOT 1	GROUND / CONDOMINIUM LOT 500-CONDOMINIUM UNITS	224,168 S.F. (5.15 AC.)	218,778 S.F. (5.05 AC.)	2 - PARKING PER UNIT 1/2 - GUEST PARKING SPACE PER UNIT
LOT 2	AIRSPACE LOT RETAIL AT ELEV. 687'	2,420 S.F. (0.06 AC.)	2,258 S.F. (0.06 AC.)	4 SPACES PER 1000 S.F. OF FLOOR AREA
LOT 3	AIRSPACE LOT RETAIL AT ELEV. 687'	2,258 S.F. (0.05 AC.)	2,258 S.F. (0.05 AC.)	4 SPACES PER 1000 S.F. OF FLOOR AREA
LOT 4	AIRSPACE LOT RETAIL AT ELEV. 687'	2,248 S.F. (0.05 AC.)	2,248 S.F. (0.05 AC.)	4 SPACES PER 1000 S.F. OF FLOOR AREA
LOT 5	AIRSPACE LOT RETAIL AT ELEV. 687'	2,814 S.F. (0.06 AC.)	2,814 S.F. (0.06 AC.)	4 SPACES PER 1000 S.F. OF FLOOR AREA
LOT 6	AIRSPACE LOT RETAIL AT ELEV. 687'	2,694 S.F. (0.06 AC.)	2,694 S.F. (0.06 AC.)	4 SPACES PER 1000 S.F. OF FLOOR AREA
LOT 7	AIRSPACE LOT RETAIL - MARKET AT ELEV. 687'	47,340 S.F. (1.09 AC.)	47,340 S.F. (1.09 AC.)	4 SPACES PER 1000 S.F. OF FLOOR AREA
LOT 8	AIRSPACE LOT COMMERCIAL PARKING AT ELEV. 687'	94,862 S.F. (2.18 AC.)	94,862 S.F. (2.18 AC.)	4 SPACES PER 1000 S.F. OF FLOOR AREA
LOT 9	AIRSPACE LOT RESIDENTIAL PARKING AT ELEV. 677'	193,247 S.F. (4.44 AC.)	193,247 S.F. (4.44 AC.)	2 - PARKING PER UNIT 1/2 - GUEST PARKING SPACE PER UNIT
LOT 10	AIRSPACE LOT 500 CONDOMINIUMS AT ELEV. 714'	191,058 S.F. (4.39 AC.)	191,058 S.F. (4.39 AC.)	2 - PARKING PER UNIT 1/2 - GUEST PARKING SPACE PER UNIT

HAUL ROUTE APPROVAL REQUESTED

6. PROJECT ADDRESSES:  
4804, 4808, 4815, 4827 SEPULVEDA BOULEVARD  
4804, 4810, 4818 PEACH AVENUE  
15311, 15338, 15341, 15347, 15353, 15357 CAMARILLO STREET  
15338, 15342, 15348 LA MADA STREET  
SHERMAN OAKS, CA 91403
7. ZONING:  
EXISTING = R1-1L  
R3-1L  
R5-1L  
O CR-1L  
P2-1XL  
PROPOSED = C2 HEIGHT DISTRICT 2
8. STRUCTURES:  
ALL STRUCTURES TO BE REMOVED
9. TREES:  
THERE ARE NO OAK, WESTERN SYCAMORE, CALIFORNIA BAY OR SOUTHERN CALIFORNIA BLACK WALNUT TREES ON SITE. TREE DESIGNATION SEE TREE REPORT.
10. GENERAL DATA:  
THE SITE IS RELATIVELY FLAT.  
SEWER AND OTHER PUBLIC UTILITIES ARE AVAILABLE.  
FLOOD HAZARD ZONE: ZONE C; FEMA PANEL NO. 060137 0044 C  
HILLSIDE GRADING: NO  
FIRE DISTRICT: 2  
EARTHQUAKE - INDUCED LIQUEFACTION AREA: YES  
SHOAS GUIDE LOCATION: PAGE 581, GRID H3  
DISTRICT MAP NO.: 1588145  
CENSUS TRACT NO.: 1413.02  
COUNCIL DISTRICT NO.: 2  
COMMUNITY PLAN AREA: SHERMAN OAKS - STUDIO CITY - TOLLUCA LAKE-CANUENGA PASS  
SPECIFIC PLAN AREA: VENTURA / CANUENGA BOULEVARD CORRIDOR



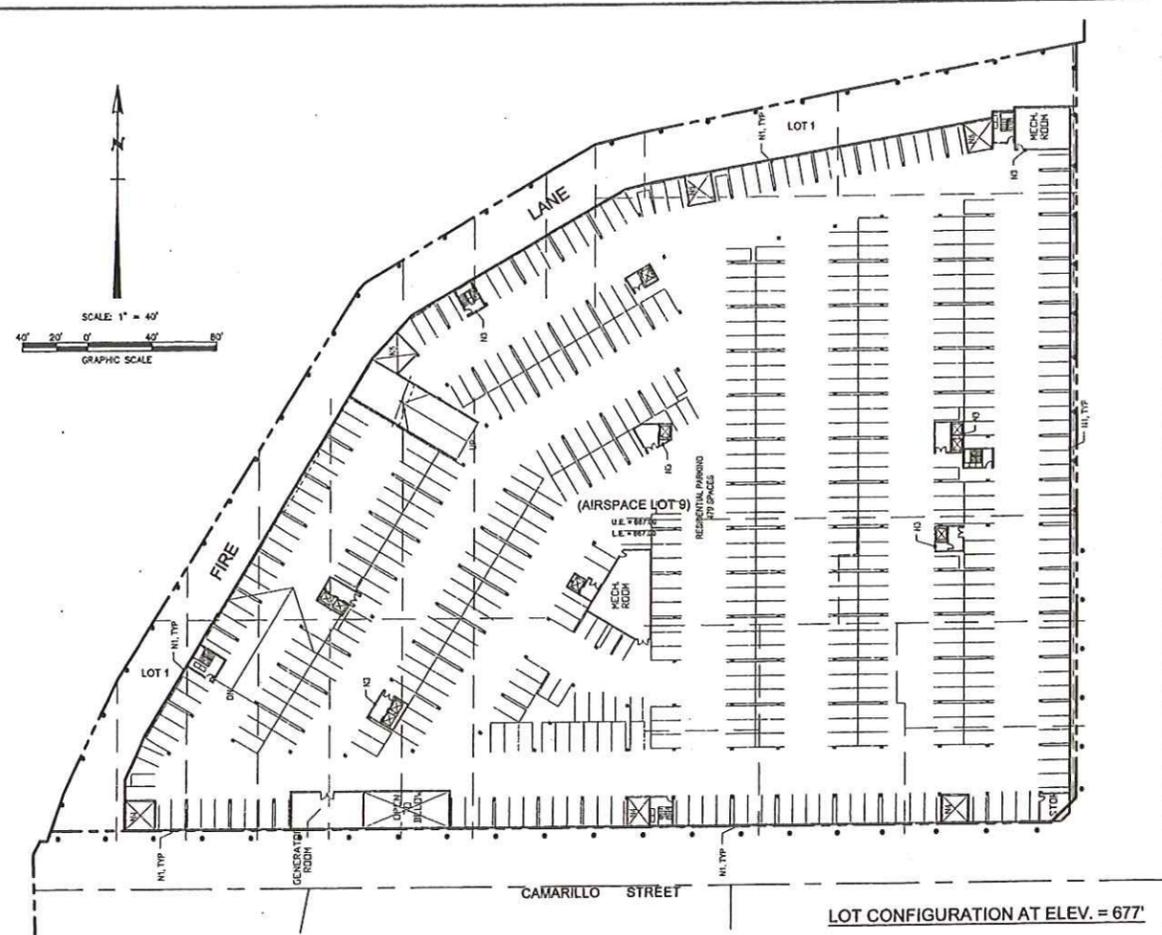
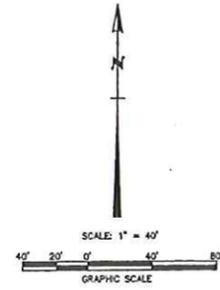
PREPARED UNDER THE DIRECTION OF:  
MELVIN L. SUKOW  
RCE 22873

**SUKOW ENGINEERING**  
 13288 CANTARA STREET, NORTH HOLLYWOOD, CALIFORNIA 91605  
 TEL: (818) 781-0635 FAX: (818) 781-7143  
 LAND PLANNING ENGINEERING  
 SURVEYING

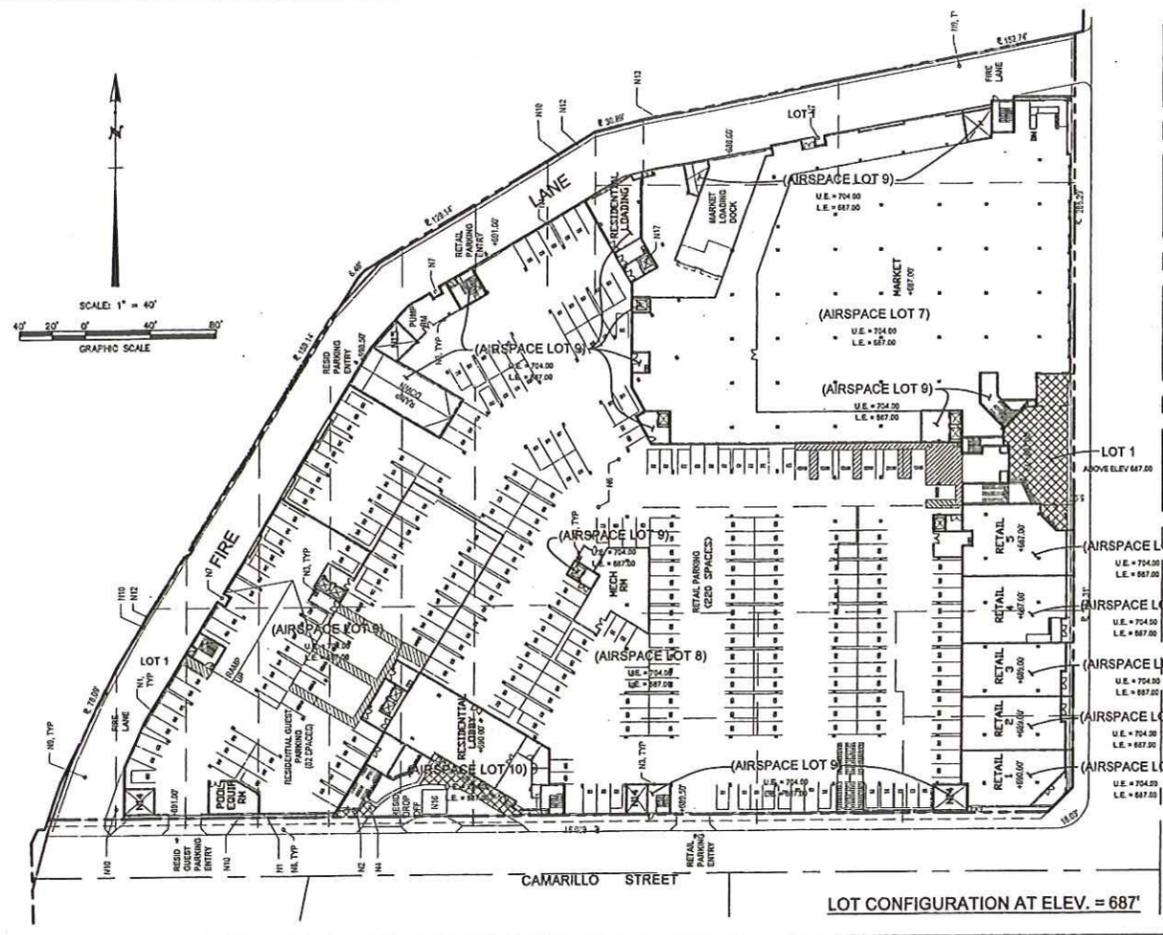
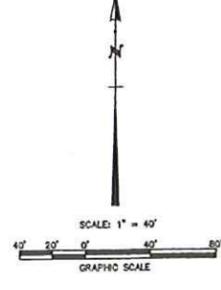
DATE	NO.	REVISIONS

PREPARED EXCLUSIVELY FOR:  
 M. DAVID PAUL DEVELOPMENT, LLC  
 100 WILSHIRE BLVD., SUITE 1600  
 SANTA MONICA, CALIFORNIA 90401  
 (310) 393-9553

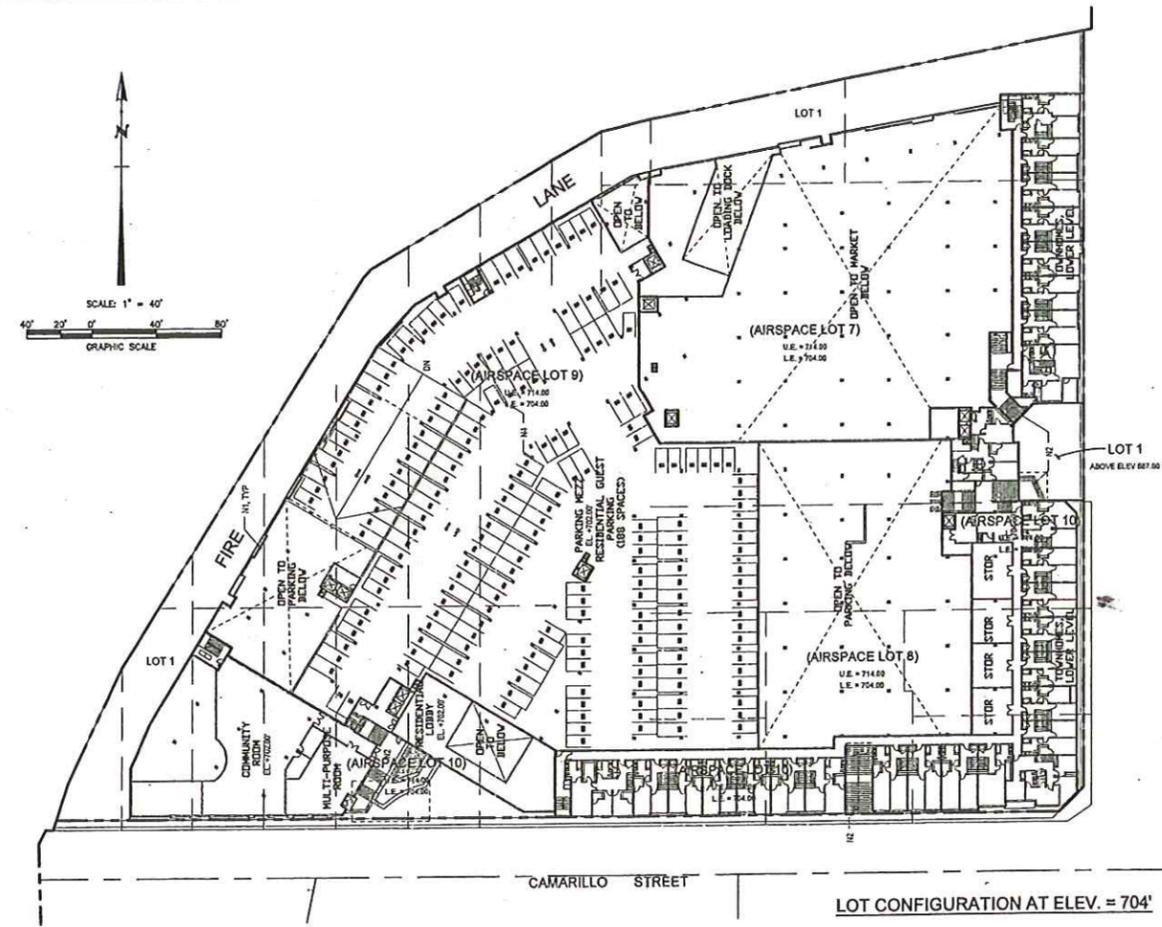
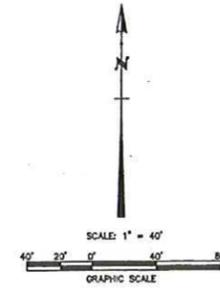
SHEET TITLE:  
**VESTING TENTATIVE TRACT NO. 61216**  
 SHEET NO.  
**1**  
 OF 3 SHEETS



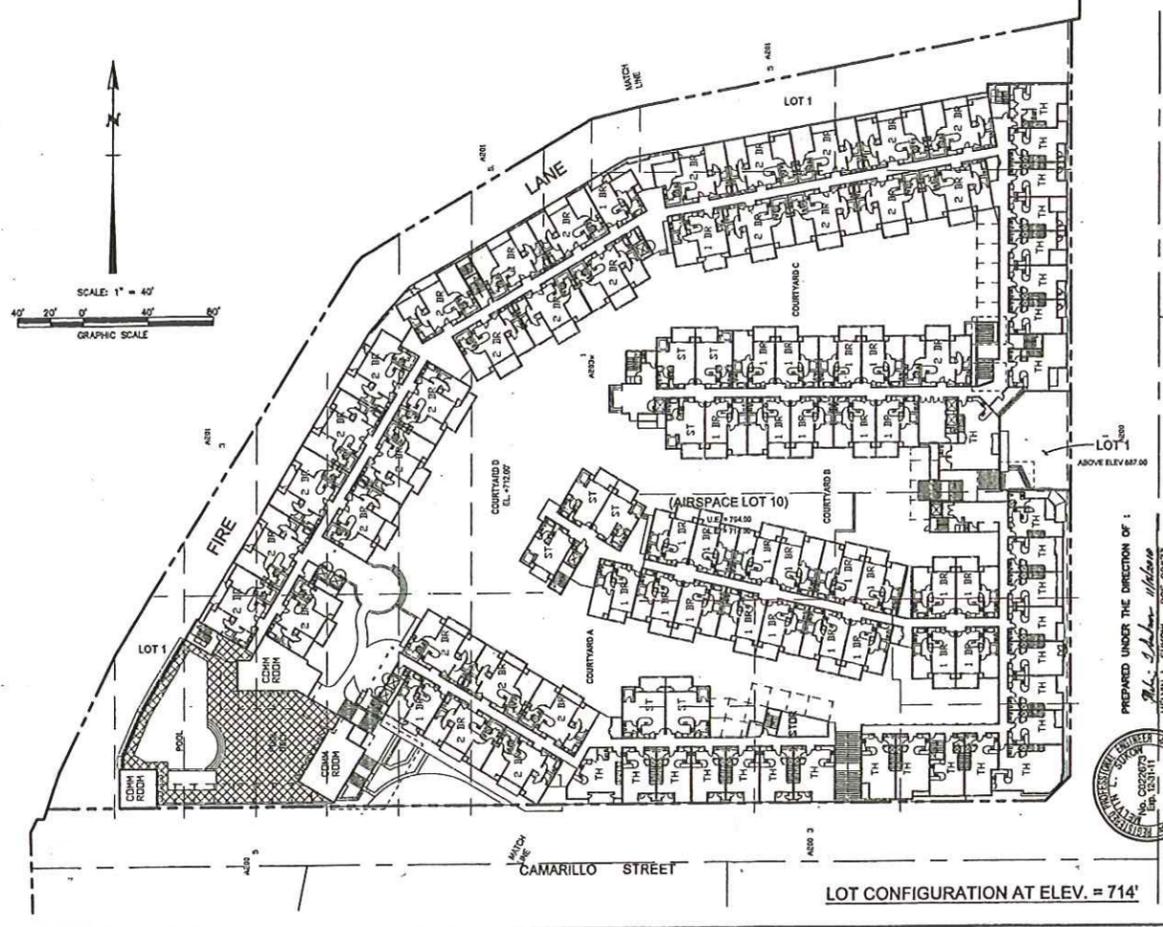
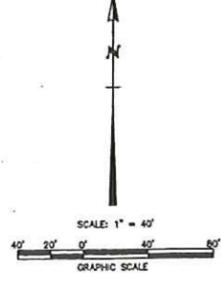
LOT CONFIGURATION AT ELEV. = 677'



LOT CONFIGURATION AT ELEV. = 687'



LOT CONFIGURATION AT ELEV. = 704'



LOT CONFIGURATION AT ELEV. = 714'

**SUKOW ENGINEERING**  
 1226 CANTARA STREET, NORTH HOLLYWOOD, CALIFORNIA 91605  
 (818) 781-9835 FAX: (818) 781-7145  
 LAND PLANNING ARCHITECTURE ENGINEERING SURVEYING

DATE	08-07-09
BY	MS
CHKD	MS
APP'D	MS
PROJECT	61216
SHEET	2
TOTAL SHEETS	3

PREPARED EXCLUSIVELY FOR:  
**M. DAVID PAUL DEVELOPMENT, LLC**  
 100 WILSHIRE BLVD., SUITE 1600  
 SANTA MONICA, CALIFORNIA 90401  
 (310) 393-9653

PREPARED UNDER THE DIRECTION OF:  
**M. L. Sukow**  
 MEVIN L. SUKOW RCE 22875



SHEET TITLE:  
**VESTING TENTATIVE TRACT NO. 61216**

SHEET NO.  
**2**  
 OF 3 SHEETS

