

## **II. Responses to Comments**

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### **A. Introduction**

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft Supplemental EIR. CEQA Guidelines Section 15088(a) states that "[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the notice comment period and any extensions and may respond to late comments." In accordance with these requirements, this section of the Final Supplemental EIR provides the responses prepared by the City of Los Angeles Department of City Planning (City) to each of the written comments received regarding the Draft Supplemental EIR. Topical responses have been prepared to address commonly raised topics. These topical responses are provided in Section II.B, Topical Responses, of this section of the Final Supplemental EIR and include the following:

**Topical Response No. 1:** Warner Center 2035 Specific Plan

**Topical Response No. 2:** Entertainment and Sports Center

**Topical Response No. 3:** Traffic and Parking

**Topical Response No. 4:** The Village at Westfield Topanga

**Topical Response No. 5:** Public Services

**Topical Response No. 6:** Infrastructure

**Topical Response No. 7:** Open Space

Section II.C, Matrix of Comments Received on the Draft Supplemental EIR, includes a table that summarizes the environmental issues raised by each commenter regarding the Draft Supplemental EIR. Section II.D, Comment Letters, provides the City's responses to each of the written comments raised in the comment letters received on the Draft Supplemental EIR. Copies of the original comment letters are provided in Appendix FSEIR-1, of this Final Supplemental EIR.

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### **B. Topical Responses**

#### **1. Warner Center 2035 Specific Plan**

The Warner Center 2035 Specific Plan (the “Warner Center Plan”) establishes zoning regulations and development standards for all properties within the geographic boundaries of Warner Center. The Plan organizes Warner Center into eight districts, with different development standards and permitted uses for each district. The Project is located within the Downtown District, which is identified in the Plan as “Warner Center’s primary employment and entertainment center.” As such, the Downtown District was specifically regulated for high density mixed uses, including commercial, residential and entertainment. The Warner Center Plan was developed by the City of Los Angeles (“City”) Department of City Planning in coordination with community stakeholders and was approved in 2013.

Comments on the Project’s Draft Supplemental EIR included questions about the community’s participation in the development of the Warner Center Plan and the Project’s consistency with its requirements. The discussion below provides information about the Plan’s development, a review of the Project’s compliance with the Plan’s objectives and requirements, and an overview of the relationship between the Project’s Draft Supplemental EIR and the EIR prepared for the Warner Center Plan.

##### **a. Community Participation in Development of the Warner Center Plan**

The Warner Center Plan was developed over an approximately six-year time period with extensive public participation. The Warner Center Citizen’s Advisory Committee (“CAC”) was established to work in concert with the City on the appropriate standards for future development in Warner Center. Many Warner Center community groups were represented on the CAC, including the Woodland Hills Warner Center Neighborhood Council, the Canoga Park Neighborhood Council, and the Warner Center Association. Therefore, the Plan was a collaborative effort between the City and the stakeholders, which included numerous opportunities for public outreach.

More than 120 public meetings were held with the community prior to adoption of Warner Center Plan. The CAC held more than 100 public meetings between 2006 and 2012 to discuss the community’s vision for the future of Warner Center and how to best craft a plan to implement that vision. The City hosted two public workshops in the summer

of 2008 that were collectively attended by more than 450 persons. An open house was hosted in September 2012 for the public. Prior to public hearings, the City sent notices to approximately 8,000 Warner Center residents and property owners to provide information about the upcoming public hearings.<sup>1</sup>

The City worked closely with the community to develop the Warner Center Plan and provided the community with numerous opportunities to review and comment on the Plan and its EIR. In November 2012, the Woodland Hills–Warner Center Neighborhood Council unanimously voted to recommend approval of the Warner Center Plan and commended the six-year effort by all parties dedicated to the development of the Warner Center Plan including the CAC and the City.<sup>2</sup> The Warner Center Association and Valley Industry and Commerce Association (VICA) also voted to support the Warner Center Plan. When the Warner Center Plan was eventually adopted in 2013 by the Los Angeles City Council, there was no testimony in opposition.

## **b. The Project is Consistent with the Purpose and Intent of the Warner Center Plan**

The Project is consistent with the goals of the Warner Center Plan, including the following objectives:<sup>3</sup>

- The [Warner Center] Plan looks to development as fundamental to supporting the regional transportation investment with the Metro Orange Line and as a result creating a vibrant TOD [transit oriented development] area based upon sustainability, community connectedness, accessible public transit, and promotion of innovative businesses, job diversity, and a safe and friendly pedestrian environment.<sup>4</sup>

The Project achieves this objective by proposing an infill, mixed use TOD development adjacent to the Warner Center Transit Hub, which includes bus service provided by Metro, LADOT, Santa Clarita Transit, and the Antelope Valley Transit Authority, as well as Metro's new Warner Center circulator connection to the Orange Line. The Project encourages community connectivity and pedestrian access through the

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<sup>1</sup> *Department of City Planning Staff Report to the City Planning Commission, Dated February 12, 2013, pp. P1–P-5*

<sup>2</sup> *Department of City Planning Staff Report to the City Planning Commission, Dated November 29, 2012, p. P5.*

<sup>3</sup> *An analysis of the Project's consistency with the Warner Center Plan is provided on pages IV.G-62 through IV.G-73 of Section IV.G, Land Use, of the Draft Supplemental EIR.*

<sup>4</sup> *Warner Center Plan, Chapter 4, Specific Plan, p. 4-3.*



incorporation of New Streets breaking up the large blocks as well as walking paths through the Site. The Project's work-live units and creative office spaces encourage innovative businesses and job diversity.<sup>5</sup> Finally, the Project has incorporated Activity Nodes and Active Street Frontages<sup>6</sup> to enliven the pedestrian experience along the public street frontage.

- *The proposed [Warner Center] Plan is intended to help to concentrate a mix of uses that are within walking distance of one another so people can easily walk rather than drive.*<sup>7</sup>

The Project proposes a mix of uses that complement and support one another, allowing residents, office workers, and visitors the opportunity to walk thereby reducing their dependence on vehicles. Project and Warner Center residents will have local access to community-serving retail like dry cleaners and pharmacies; a grocery store; restaurants and other food options; and entertainment uses. Office workers at the Project Site will also be able to take advantage of these uses, doing food shopping or getting lunch within walking distance of their office. Visitors to Warner Center will be able to stay at the Project's hotels and enjoy the retail, restaurant and entertainment options on-site. Finally, large public open space areas are proposed at the center of the Project providing a gathering space for the community.

- The Warner Center Plan is intended to “create conditions that offer... walking or transit access to shopping, jobs, and entertainment, and a vibrant, 24-hour neighborhood...”<sup>8</sup> and “encourage entertainment and nightlife uses in the Downtown and Uptown Districts of Warner Center...”<sup>9</sup>

The Project's proposed restaurants would help activate Warner Center in the evening, and the proposed entertainment uses would create nighttime opportunities within the designated Downtown District. These uses would be accessible by walking and transit, as the Project is well-served by Metro, LADOT, Santa Clarita Transit, and the Antelope Valley Transit Authority and Metro's new Warner Center circulator. In addition, the existing Westfield trolley serving Topanga and the Village would be expanded to the Project Site.

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<sup>5</sup> Warner Center Plan, Community Vision Statement, p. 3-3.

<sup>6</sup> “Activity Node” is defined by the Warner Center Plan as an activity focal point located at the intersection of streets where pedestrian-serving uses are concentrated. “Active Street Frontage” is defined by the Warner Center Plan as streets where buildings incorporate features and elements that are human scaled and can be used and enjoyed by pedestrians.

<sup>7</sup> Warner Center Plan, Chapter 4, Specific Plan, p. 4-3.

<sup>8</sup> Warner Center Plan, Community Vision Statement, p. 3-3.

<sup>9</sup> Warner Center Plan, Chapter 4, Section 6.2.9.1: Establishment of Entertainment Uses, p. 4-109.

The Project would transform an underutilized surface parking area and vacant mall into a mixed-use development with residential, retail/restaurant, office, hotel and entertainment uses that would activate the Project Site in the daytime and evening, fulfilling the Warner Center Plan's vision for the Downtown District.

### **c. The Project's Consistency with the Warner Center Plan Requirements**

The Project is located in the Downtown District of the Warner Center Plan which is designated for high-density and mixed-use development including residential, commercial and entertainment uses. The intent of the Downtown District is, in part, to protect nearby low-density residential communities from development by designating a downtown area where new density can be located. The Downtown District is therefore described in the Warner Center Plan as:

*Warner Center's primary employment and entertainment center providing a mix of restaurant and specialty retail uses that will attract office workers during the day and area residents and families in the evenings and on weekends. New pathways and New Streets are expected to improve automotive and pedestrian circulation within the District and bring destinations closer together.<sup>10</sup>*

The Downtown District permits a much larger development density than what is proposed by the Project. The Warner Center Plan permits a floor area ratio ("FAR") of 5:1 by right, and an FAR of 6:1 with approved incentives, for the Project Site. The Project's proposed FAR of 2.3:1 is less than half of what is allowed under the Plan.

Similarly, while there is no height limit for buildings within the Downtown District, the Project proposes a mix of one-story, mid-level, and high-rise building elements, rather than constructing all towers. The Project's varied heights also reflect a transition in building heights, from the lower-rise structures on the north side to the Project's tallest building at the corner of Owensmouth Avenue and Oxnard Street, opposite similarly tall office towers on the south side of Oxnard Street.

The Project's mix of uses is also consistent with the Warner Center Plan's requirement that projects within the Downtown District include a balance of non-residential to residential uses. Specifically, for an FAR of 2.3:1, the Plan limits residential uses to a maximum 48 percent of the allowable FAR and requires at least 52 percent of the required

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<sup>10</sup> Warner Center Plan, Section 6.1.2.3.

FAR be non-residential uses. In compliance with this requirement, the Project proposes 48 percent residential development and 52 percent non-residential development.<sup>11</sup> This ratio of non-residential to residential floor area would be achieved at buildout, consistent with the Warner Center Plan.<sup>12</sup> In addition, non-residential uses are proposed with every phase of the Project. Additionally, the Project's phasing plan is intended to describe the geographic area covered by each phase of the Project, with the order of buildout of these geographic phases subject to change.

The Project's types of uses are both allowed and encouraged within the Downtown District. The proposed residential, work-live, retail, office, hotel and entertainment uses are all allowed in the Downtown District. With regard to the Entertainment and Sports Center, Topical Response No. 2 provides further discussion regarding the Entertainment and Sports Center and the Warner Center Plan. The Project also incorporates two uses incentivized by the Plan, including a grocery store at least 7,500 square feet in size, and at least five local-serving retail businesses. The Project's retail will primarily be smaller, local-serving retail establishments catering to the everyday needs of on-site and community residents, in contrast to the large shops already existing at the Village at Westfield Topanga, and at Westfield Topanga. These uses will ensure that residents have access to the goods and services needed as part of day-to-day life within walking distance.

The Project complies with all other development standards specific to the Downtown District. The Project incorporates New Streets through the Project Site to break up the large blocks, as well as Activity Nodes, and Active Street Frontages to activate the pedestrian experience. The Project includes approximately 10.6 acres or 466,000 square feet of open space, including 5.6 acres of ground-level, publicly accessible open space. The Project's proposed open space would exceed both the 154,325 square feet of residential open space required by the Los Angeles Municipal Code (LAMC) and the 107,941 square feet of publicly accessible open space required in the Warner Center Plan.

The Project is also consistent with the Warner Center Plan's parking requirements for its residential, office, retail, and hotel uses. The Entertainment and Sports Center's parking demand will be met through 2,820 parking spaces on-site (of the Project's total on-site parking of 5,610 spaces), in addition to sharing parking with the on-site office and retail uses (which utilize parking at different times of day than the Entertainment and Sports Center) and using available off-site parking in adjacent office buildings. This is consistent

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<sup>11</sup> *At buildout, the Project would provide 3,271,050 square feet of floor area, comprising 1,726,050 square feet of Non-Residential Floor Area (approximately 52 percent) and 1,545,000 square feet of Residential Floor Area (approximately 48 percent)*

<sup>12</sup> *Appendix B, Graduated FAR table, Note 6, of the Warner Center Plan provides that "[m]ulti-phased projects may reserve floor area for the required non-residential component in a future phase on-site."*

with the Warner Center Plan's purpose to "Provide a comprehensive parking strategy that limits the over-production of parking and encourages both existing and proposed parking to be shared amongst many developments."<sup>13</sup> More information regarding the Project's compliance with parking requirements is provided in Topical Response No. 3, Traffic and Parking.)

#### **d. The Relationship of the Project's Draft Supplemental EIR to the Warner Center Plan's Certified EIR**

An EIR was prepared for the Warner Center Plan which analyzed all anticipated development under the Plan through 2035, including development of the Project.

The Project's Draft Supplemental EIR analysis tiers off of the approved and certified Warner Center Plan EIR by analyzing Project-specific environmental impacts for the Project Site that may not have been covered under the Warner Center Plan EIR, including impacts associated with the Entertainment and Sports Center. For each impact area, the Draft Supplemental EIR relies on the Warner Center Plan EIR analysis to the extent that it accounts for the Project's potential environmental impacts. For each impact area where the Warner Center Plan EIR did not address the Project's impacts, the Draft Supplemental EIR provides a supplemental analysis. The Project's Draft Supplemental EIR incorporates mitigation from the Warner Center Plan EIR as well as additional mitigation measures that are specific to the Project.

## **2. Entertainment and Sports Center**

As described in Section II, Project Description, of the Draft Supplemental EIR, the Entertainment and Sports Center is proposed to be developed in the Southwest Area of the Project Site. The Entertainment and Sports Center would be comprised of approximately 320,050 square-feet and designed to accommodate up to 15,000 seats. The Entertainment and Sports Center is proposed to be a flexible space to accommodate a variety of entertainment uses within the Project Site. Events envisioned for this space include professional, youth, and community sports; live music, concerts, and performing arts; and fairs and exhibitions. The building's main pedestrian entrances are proposed at the corner of Topanga Canyon Boulevard and Oxnard Street; midway along the Project's Topanga Canyon Boulevard frontage at the northwest corner of the building; and from the center of the Project Site at the northeast corner of the building. The Entertainment and Sports Center would also have a strong landscaped pedestrian connection to the adjacent Promenade Square, within the Project Site.

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<sup>13</sup> Warner Center Plan, Section 2: Purpose, p. 4-6.

The Project includes the option for constructing the Entertainment and Sports Center with a closed roof or a partial roof. As noted above in Topical Response No. 2, Entertainment and Sports Center, the “no roof” or “open roof” option described in the Draft Supplemental EIR is more accurately described as a partial roof, as it includes an overhang extending over the seating areas of the Entertainment and Sports Center to provide shade, which would have additional benefits of providing some lighting and noise shielding. The partial roof would extend approximately 86 feet interior to the Entertainment and Sports Center from the exterior wall, as shown in Figure II-1 in Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR. Therefore, the Final Supplemental EIR more accurately uses the term “partial roof” for this option, which applies everywhere to the Draft Supplemental EIR’s analysis of the “no roof” or “open roof” option.

The Draft Supplemental EIR’s analysis of the Entertainment and Sports Center was comprehensive and conservative throughout. For each environmental impact area, the Draft Supplemental EIR analyzed the potential use and design of the Entertainment and Sports Center that would generate the greatest potential environmental impacts, to provide full information and disclosure to the public and decision-makers. Therefore, the impacts disclosed in the Draft Supplemental EIR are conservative and may overstate the environmental impacts ultimately generated by the Entertainment Center. For instance, while the final size of the Entertainment and Sports Center may be smaller than 15,000 seats, the Draft Supplemental EIR analyzed a sold-out, 15,000-seat event condition for every applicable impact area. The Draft Supplemental EIR analyzed the impacts associated with the partial roof option wherever that would result in greater impacts than the closed roof option. Finally, as the Entertainment and Sports Center may be used primarily as a concert or sporting venue, to be conservative, the use which results in the greater environmental impact was assumed for each impact area. Additionally, the operator ultimately identified for the Entertainment and Sports Center will be required to operate within the scope of environmental impacts identified in the Draft Supplemental EIR and implement all required project design features and mitigation measures included in the Mitigation Monitoring Program, provided in Section IV, Mitigation Monitoring Program, of this Final Supplemental EIR.

In response to comments regarding the Draft Supplemental EIR, this topical response provides an overview of the environmental impacts associated with the Entertainment and Sports Center, as well as an overview of the Entertainment and Sports Center’s consistency with the Warner Center Plan.

All applicable and feasible mitigation measures from the Warner Center Plan EIR would be incorporated and implemented by the Project, including the Entertainment and Sports Center.

## **a. Summary of Environmental Impacts of the Entertainment and Sports Center**

The Draft Supplemental EIR includes a comprehensive analysis of the potential impacts associated with operation of the Entertainment and Sports Center. A summary of the environmental impacts of the Entertainment and Sports Center is provided below.

### **(1) Aesthetics**

As discussed in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, the Project is located in a transit priority area pursuant to SB 743 and as defined by ZI 2452. As such, pursuant to SB 743 and ZI 2452, the Project's aesthetic impacts shall not be considered a significant impact on the environment. Nevertheless, Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, provides a comprehensive analysis of the aesthetic, views, light/glare, and shading impacts for the Project, including the Entertainment and Sports Center.

With regard to aesthetics, the height of the Entertainment and Sports Center would be compatible with the existing character of the area by locating the proposed buildings adjacent to existing buildings of similar scale. Specifically, the Entertainment and Sports Center includes a stepped roof that features a lower roof line along the Topanga Canyon Boulevard frontage (approximately 58 feet along the northern portion of the building and approximately 85 feet along the southern portion of the building), consistent with adjacent buildings. The highest point of the roof (approximately 155 feet) would be located internal to the structure and within the vicinity of the taller buildings on the Project Site. Overall, the height, design, massing, and scale of the Entertainment and Sports Center would be compatible with the existing uses that set the aesthetic character of the vicinity.

With regard to impacts related to light/glare, as discussed further in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, the Lighting Technical Report provided in Appendix B, of the Draft Supplemental EIR, was conservative in its analysis, as it analyzed the following: both a partial roof and closed roof scenario for the Entertainment and Sports Center; assumed simultaneous use of all Project-related building and site lighting; assumed light levels required to provide professional sports or entertainment facility illumination (100 foot-candles at sports field surface within the Entertainment and Sports Center); and measured lighting impacts at the centerline of the adjacent public streets (to ensure compliance with CALGreen) which is closer to the light source and would result in higher light levels than required by the LAMC, which measures lighting thresholds at the property line of the nearest sensitive receptor.

The Draft Supplemental EIR determined that impacts from Project lighting are less than significant with both a partial roof and a closed roof for the Entertainment and Sports

Center. Lighting with a partial roof generates up to 0.7 foot-candle at the centerline of the public street (where CALGreen is measured); therefore, impacts would be substantially lower at the property line of residential receptors, where the LAMC's 2.0-foot-candle threshold is measured.

The Draft Supplemental EIR also evaluated light impacts associated with illuminated signage. Using conservative assumptions, such as simultaneous use of all Project signage and a maximum luminance of 300 candelas/m<sup>2</sup> (the maximum permitted for nighttime under the Warner Center Plan Sign Ordinance), the Project's signage would result in a maximum illuminance of 0.30 foot-candle, well below the 3.0-foot-candle significance threshold. Therefore, impacts would be less than significant.

With regard to shading, the areas shaded by the Project, including the Entertainment and Sports Center, during the winter and summer solstice and spring and fall equinox would not include potentially routinely useable outdoor spaces. As discussed further in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, and as depicted in Figure IV.A-25 through Figure IV.A-58 on pages IV.A-76 through IV.A-109, depending on the time of year, Project shadows would generally extend across Topanga Canyon Boulevard and Erwin Street toward the northeastern corner of the Keyes Woodland Hills auto dealership, the Village at Westfield Topanga, and the additional retail, restaurant, and office uses along Erwin Street in the morning, with shadows extending across Owensmouth Avenue to the surface parking area of the Anthem Blue Cross property. Therefore, shading impacts would be less than significant.

## (2) Air Quality

As discussed in Section IV.B, Air Quality, of the Draft Supplemental EIR, operation of the Entertainment and Sports Center would contribute to significant and unavoidable impacts related to regional operational air quality. Specifically, the electricity and natural gas generation as well as the number of mobile trips associated with the Project, including the Entertainment and Sports Center, would contribute to the significant and unavoidable regional air quality impacts. However, the Entertainment and Sports Center, and the Project as a whole would not result in significant localized impacts, localized CO hot spot impacts, or significant impacts associated with toxic air contaminants.

## (3) Noise

### *(i) Operational Noise*

As discussed in Section IV.H, Noise, of the Draft Supplemental EIR, the noise analysis was conservative, as it assumed: a partial roof rather than a closed roof; a concert event, which generates greater noise than a sporting event; a sold-out event of

15,000 seats; speakers on the north side of the venue facing south (towards the nearest residential receptors); crowd cheering noise; and to represent a conservative scenario for the voice level of concert goers, the upper range noise levels for a male and female shouting. Additionally, the actual measured sound spectrum from typical concerts was used for the Entertainment and Sports Center noise analysis (as discussed on page IV.H-53 of the Draft Supplemental EIR). Finally, the noise analysis was based on the nighttime ambient noise levels, which represent the worst-case condition, as the nighttime ambient noise levels are lower and therefore lead to a higher noise impacts (see Table IV.H-7 of the Draft Supplemental EIR).

As indicated in Table IV.H-23 on page IV.H-55 of the Draft Supplemental EIR, the estimated noise levels from the Entertainment and Sports Center would be below the significance threshold at all off-site receptor locations. Therefore, noise impacts from the Entertainment and Sports Center would be less than significant. Project Design Feature H-5 in Section IV.H, Noise, of the Draft Supplemental EIR, also imposes a maximum noise level for all amplified sound systems within the Entertainment and Sports Center, which would be monitored and enforced through the Mitigation Monitoring Program, provided in Section IV, Mitigation Monitoring Program, of this Final Supplemental EIR. Project Design Feature H-5 requires that if the roof of the Entertainment and Sports Center is a partial roof, the temporary/touring amplified sound system would be designed, using a line-array speaker system, so as not to exceed a maximum noise level of 95 dBA ( $L_{eq-1hr}$ ) at a distance of 130 feet from the amplified sound systems (main array and delay speakers).

A site specific sound propagation test was also conducted to establish the site specific acoustic propagation (sound reduction as a function of distance) from the Project Site to the residential community to the southwest. The sound propagation test was conducted to identify any potential sound amplification due to the existing natural land topography and the intervening landscape in the existing hills southwest of the Project Site. The results of the site specific sound propagation test are provided in Figure IV.H-3 and Table IV.H-10 of the Draft Supplemental EIR. As discussed on page IV.H-22 and presented on Figure IV.H-3 of the Draft Supplemental EIR, the empirical measured noise levels from the sound propagation test are actually lower than the estimated results from computer noise model. As such, the Project noise analysis is conservative, as actual noise levels should be even lower than the levels estimated in the Draft Supplemental EIR.

To provide a further conservative analysis, the Draft Supplemental EIR also analyzed the simultaneous operation of the Entertainment and Sports Center and all other on-site and off-site noise sources on the Project Site, including mechanical equipment, outdoor areas, parking facilities, loading docks/trash compactors, and off-site traffic. As indicated in Table IV.H-30 on page IV.H-76, of the Draft Supplemental EIR, the composite noise levels from Project operation at all off-site sensitive receptor locations would be below significance thresholds. Therefore, composite noise level impacts due to Project



operations, including operation of the Entertainment and Sports Center, would be less than significant.

*(ii) Off-Site Mobile Noise*

With regard to off-site operational noise impacts, the Draft Supplemental EIR determined that the number of vehicle trips generated by the Entertainment and Sports Center contribute to a significant and unavoidable off-site operational noise impacts during evenings after sold-out events of 15,000 seats. This is not generated by amplified noise at the Entertainment Center, but rather from noise generated by cars leaving the Project Site in the evenings. Specifically, this significant impact would be generated adjacent to the Project Site on Oxnard Street, along a street segment where a hotel is located, but no residential uses. As discussed in Section IV.H, Noise, of the Draft Supplemental EIR, the estimated noise increase along Oxnard Street between Topanga Boulevard and Owensmouth Avenue during the post-event hour would exceed the significance threshold by up to 0.3 dBA during the weekday and by up to 0.6 dBA during the weekend, after sold-out events in the evenings.

In response to commenters' concerns regarding operational noise from the Entertainment and Sports Center, supplemental analysis was conducted since publication of the Draft Supplemental EIR to determine whether additional operational measures could reduce the off-site significant noise impacts after sold-out events in the evenings to less than significant levels. The identified significant noise impact is generated by Project traffic exiting from the south driveway at Warner Drive South and Oxnard Street on nights with a sold-out event, i.e., 15,000 seats. Therefore, operational measures for the Event Management Plan (EMP) were analyzed which would redirect traffic to other driveways where no sensitive uses are located. Based on analysis by both Gibson Transportation, with respect to traffic volumes and operational measures, and Acoustical Engineering Services, with respect to traffic-generated noise, the following additional operational measures were determined to reduce off-site (traffic) noise impacts to less than significant levels:<sup>14</sup>

- Delaying access to the Warner Drive South & Oxnard Street driveway to exiting vehicles by approximately 15 minutes after the end of the event (or another period to be identified in consultation with LADOT), using the combination of internal traffic controls (traffic control officers/LADOT's Traffic Action Team, staff,

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<sup>14</sup> *Supplemental Off-Site (Traffic) Noise Analysis from Acoustical Engineering Services, December 19, 2018, see added Appendix I.4, of this Final Supplemental EIR. Additional Late-Night Operational Measures to the Event Management Plan from Gibson Transportation Consulting, December 13, 2018, see added Appendix M.7, of this Final Supplemental EIR, as approved by LADOT.*

signage, and/or barriers) to divert exiting traffic to the Promenade Boulevard & Topanga Canyon Boulevard driveway during this period.

- Utilization of additional wayfinding signage and arterial Changeable Message Signs, which can be updated based on the traffic control metering/monitoring at the Warner Drive South Driveway, at the Promenade Boulevard and Topanga Canyon Boulevard, and Warner Drive North and South driveways to direct exiting traffic to preferred routes away from the sensitive noise receptors.
  - Traffic travelling to eastbound/southbound US-101 will be directed to the Canoga Avenue and De Soto Avenue ramps via Victory Boulevard along Topanga Canyon Boulevard.
  - Traffic travelling to westbound/northbound US-101 will continue to utilize the Topanga Canyon Boulevard ramp, by exiting from the Promenade Boulevard and Topanga Canyon Boulevard driveway rather than exiting from the Warner Drive South driveway.
- Utilization of traffic control officers to reconfigure driveway/intersection lanes at the following locations to facilitate outbound event operations:
  - Promenade Boulevard & Topanga Canyon Boulevard—Operate with an additional outbound lane by temporarily utilizing an inbound lane. This will result in a total of five outbound lanes (operating as three left-turn lanes, a single shared through/right-turn lane, and one exclusive right-turn lane onto Topanga Canyon Boulevard) and one inbound lane.
  - Erwin Street & Topanga Canyon Boulevard—Reconfigure the westbound approach to provide two left-turn lanes, a single through lane, and two right-turn lanes.

It was also determined that these measures would not generate new or greater significant off-site noise or traffic impacts compared to the impacts identified in the Draft Supplemental EIR. As discussed in Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR, the information added to the Draft Supplemental EIR is not significant because the Draft Supplemental 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 Project. Therefore, recirculation of the Draft Supplemental EIR is not warranted.<sup>15</sup>

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<sup>15</sup> *Supplemental Off-Site (Traffic) Noise Analysis from Acoustical Engineering Services, December 19, 2018, see added Appendix I.4, of this Final Supplemental EIR. Additional Late-Night Operational Measures to the Event Management Plan from Gibson Transportation Consulting, December 13, 2018, see added Appendix M.7, of this Final Supplemental EIR, as approved by LADOT.*

As identified in Section V, Alternatives, of the Draft Supplemental EIR, a 7,500 seat and 10,000 seat Entertainment and Sports Center would have less than significant off-site noise impacts. Therefore, the late-night operational measures identified above would be required for events with more than 10,000 attendees ending in the evenings. The additional requirement of late-night operational measures for events with more than 10,000 attendees has been added to Project Design Feature K-6, and is included in Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR. With implementation of these additional measures, impacts related to off-site noise during operations would be reduced to less than significant levels.

#### (4) Public Services—Police Protection

As discussed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, the potential impacts of the Entertainment and Sports Center on police protection services was thoroughly analyzed. Conservatively assuming daily sold-out events of 15,000 seats in the Entertainment and Sports Center, the increase in people and vehicles in the area generated by the Entertainment and Sports Center during an event could potentially generate approximately 9 new crimes per year,<sup>16</sup> for an increase in the annual number of crimes reported in the Topanga Area from 110 to 119.<sup>17</sup> This likely overstates the increase, as daily sold-out events (i.e., a sold out event every day of the year) are not anticipated. Furthermore, as discussed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, the Project would have private, on-site security throughout the Project Site, including at the Entertainment and Sports Center, to reduce reliance on public services.

Crowd management and control are addressed through the provision of Project Design Features J-1 through J.1-5, as provided in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR. These project design features would provide for private, on-site security for the Entertainment and Sports Center. Specifically, as stated in Project Design Feature J.1-1, security personnel for the Entertainment and Sports Center would patrol the property during hours of operation, as well as before and after events; the security personnel would also coordinate with the proper authorities regarding any unusual disturbances in the area including loitering, trespassing, and/or criminal activity such as

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<sup>16</sup> *Total crimes generated by the Entertainment and Sports Center = estimated crime rate of 0.0006 crime per capita x Entertainment and Sports Center service population of 15,000 persons = 9 crimes. Crime per capita is based on the 2017 Year to Date Crimes for the Topanga Area, as discussed further in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR.*

<sup>17</sup> *The percent increase in crimes per year = number of proposed reported crimes 9 ÷ current annual reported crimes 110 x 100 = 8 percent. Crime per capita is based on the 2017 Year to Date Crimes for the Topanga Area, as discussed further in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR.*

vehicle-related crimes. As specifically set forth in Project Design Features J.1-2 and J.1-3, a security plan would be developed and implemented for the Entertainment and Sports Center, which would ensure appropriate public safety and security deployment based upon identified objective standards, including, but not limited to: anticipated crowd size, historical data associated with crowd or fan behavior, event type, etc. In addition, as part of the crowd control plans, pedestrian, vehicular, and bicycle patrols would be utilized during all hours of operation. Furthermore, a closed-circuit television surveillance system would be installed, along with locks and alarms on entryways to reduce criminal activity onsite.

In consultation with LAPD, and as part of the security plan, a First Responder Communications Plan and an Emergency Procedures Plan would also be prepared pursuant to Project Design Features J.1-2 and J.1-4. These plans would provide planned routes for emergency personnel, staging locations, detailed diagrams of the facility, and identify procedures for employees to follow in the event of a fire, medical emergency, civil disturbance, evacuation, and/or other emergency.

Based on the *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, the need for or deficiency in adequate police protection services in and of itself is not a CEQA impact. (See Topical Response No. 5, Public Services, for additional information.) Where a project causes a need for additional police protection services resulting in a need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this Draft Supplemental EIR.

With the implementation of a comprehensive on-site private security plan for the Entertainment and Sports Center, including Project Design Features J.1-1 through J.1-5, the Entertainment and Sports Center is not anticipated to generate the need for additional police protection services that would require construction of new or additions to existing facilities, therefore, impacts would be less than significant.

## (5) Public Services—Fire Protection

As discussed in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, the population increase on the Project Site was conservative as the Draft Supplemental EIR assumed that the Entertainment and Sports Center would contribute a maximum of 15,000 persons to the Project's population. As discussed further in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, the Project would implement Project Design Feature J.1-2, which requires preparation of a Security Plan that would be developed in consultation with LAPD and LAFD outlining the security services and features to be provided in conjunction with the proposed Entertainment and Sports Center. In addition, Project Design Feature J.1-4 would require the development of an Emergency Procedures Plan for the Entertainment and Sports

Center and would outline employee guidelines and procedures in event of fire, medical emergency, civil disturbance, injuries to multiple individuals, evacuation, and other times of emergencies. The Emergency Procedures Plan would be subject to review by LAPD and LAFD. Additionally, implementation of Warner Center Plan Mitigation Measures PS-1 through PS-10, which include measures to ensure adequate fire protection service levels are maintained by the City, submittal of plans to LAFD, and consultation with LAFD to incorporate fire prevention and suppression features appropriate to the design of the Project, among others, would further reduce impacts to fire protection and emergency medical services. The Entertainment and Sports Center would not generate the need for additional fire protection services that would require construction of new or additions to existing facilities, therefore, impacts would be less than significant.

## (6) Traffic, Access, and Parking

### (a) Traffic

As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, analysis of the Project traffic impacts tiered off of the Warner Center Plan EIR, which analyzed full buildout of the Warner Center Plan and assigned vehicle trips to the Project Site based on a prescribed set of uses. Using the Project-specific program for the Site, the *Transportation Impact Study for Promenade 2035* dated March 2018 (Traffic Study) conservatively analyzed trips generated by the Project on both days with sold-out events at the Entertainment and Sports Center, and non-event days. Assuming a sold-out, 15,000-seat event, the Project would generate 22 percent and 24 percent fewer trips (during the A.M. and P.M. peak hours, respectively) than analyzed under the Warner Center Plan EIR for the Project Site. During non-event days, the Project would generate 36 percent and 56 percent fewer trips (during the A.M. and P.M. peak hours, respectively) than analyzed under the Warner Center Plan EIR.

The Draft Supplemental EIR also conservatively looked at a total of six different time periods to fully analyze the potential environmental impacts of the Entertainment and Sports Center, beyond the standard peak hour periods. The Traffic Study analyzed trip generation from sold-out events at the Entertainment and Sports Center during the following six time periods: three weekday evening times (pre-event time periods of 5:00 P.M.–6:00 P.M. AND 6:00 P.M.–7:00 P.M., and post-event time period of 10:00 P.M.–11:00 P.M.); Saturday midday (12:00 P.M.–1:00 P.M. and 1:00 P.M.–2:00 P.M.) and Saturday evening (10:00 P.M.–11:00 P.M.). Additionally, traffic growth associated with full buildout under the Warner Center Plan was assumed.

The Traffic Study determined that, assuming a sold-out, 15,000-seat event at the Entertainment and Sports Center, plus the additional remaining Project uses as well as full buildout of other projects under the Warner Center Plan, the Project would not result in

significant impacts after implementation of the project design features, including an EMP described further below, and the Warner Center Plan mitigation measures (the Warner Center Mitigation Program).

For informational purposes, the Traffic Study also analyzed the phased buildout of the Project with the Entertainment and Sports Center. The Traffic Study analyzed buildout of the Northeast Area (Phase 1), Northwest Area (Phase 2), and Southwest Area (Phase 3, which includes the Entertainment and Sports Center). As stated in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, if ultimate buildout of the Project changes the order or overlaps any of the Project phases, then LADOT shall request an updated analysis confirming that the impacts identified in the Traffic Study remain unchanged.

On a non-event day with the operation of Phases 1-3, one intersection is projected to be significantly impacted. In addition, assuming a sold-out, 15,000-seat event and operation of Phases 1–3, two intersections are projected to be significantly impacted. Each of the three significantly impacted intersections has a planned physical improvement<sup>18</sup> as part of the Warner Center Mitigation Program, which would reduce impacts to less-than-significant levels. In the event that the mitigation measures associated with each of these intersections are implemented by the City prior to operation of Phases 1–3, the three intersections would not be significantly impacted. In the event that the associated mitigation measures have not been implemented by the operation of Phases 1–3, then the significantly impacted intersections would remain significantly impacted until implementation of the Warner Center Mitigation Program. For additional information on the Warner Center Mitigation Program, see Topical Response No. 3, Traffic and Parking, below.

*(i) Event Management Plan for the Entertainment and Sports Center*

The Project will be implementing a number of physical roadway improvements and paying Mobility Fees towards implementation of the Warner Center Mitigation Program to address traffic, which are discussed further in Topical Response No. 3, Traffic and Parking, above.

In addition to these measures, an EMP, included as Project Design Feature K-6, will be implemented as part of regular operation of the Entertainment and Sports Center. The

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<sup>18</sup> The Warner Center Mitigation Program measures at the intersections include: Intersection No. 22, Shoup Avenue and Oxnard Street, add northbound right-turn lane (WC Mitigation TR-40); Intersection No. 24, Topanga Canyon Boulevard and Oxnard Street, additional westbound left-turn lane & add northbound right-turn lane (WC Mitigation TR-11); Intersection No. 27, Canoga Avenue and Oxnard Street, additional northbound left-turn lane & add southbound, westbound, northbound right-turn lanes (WC Mitigation TR-12).

measures included in the EMP have been successfully employed by LADOT as part of an event management toolbox for operations at other venues in the City of Los Angeles, including LA Live/Staples Center, and the Hollywood Bowl, among others. The EMP will implement a comprehensive set of both on-site and off-site measures to address the operation of the Entertainment and Sports Center. On-site measures include both physical elements of the Project's design, and operational elements.

The on-site physical elements are proposed to include:

- Vehicular access along all of the Project's street frontages, to distribute traffic flow;
- The addition of a northbound lane on the Topanga Canyon Boulevard across the site frontage (resulting in a total of four northbound lanes);
- A dedicated entry speed ramp into the subterranean Entertainment and Sports Center parking garage on Topanga Canyon Boulevard between Oxnard Street and Promenade Boulevard;
- Multiple above ground and subterranean parking facilities across the Project Site that will be managed by a single parking operator;
- Subterranean parking that is designed to be connected and operated as a single facility; and
- Centrally located pick-up/drop-off and bus zones.

The on-site operational elements are proposed to include:

- A guest communications system that will provide the location of the purchased parking space to visitors with the advance purchase of an event ticket;
- Identification of preferred traffic routes to the assigned parking facility prior to the event, at the time of ticket purchase and on the parking ticket;
- Traffic announcements and updates made in the Entertainment and Sports Center and to guest cell phones at the end of the event; and
- Coordination of traffic information and ridesharing services.

Off-site measures are proposed to include:

- Identification of specific routing to distribute event traffic away from already congested locations along with the use/installation of changeable message signs

at select freeway and arterial locations to communicate to visitors the preferred routing to the Project Site;

- Coordinated traffic control adjacent to the Project Site;
- Coordination with the LADOT Traffic Action Team, which oversees and/or implements special event traffic operations in the City;
- Coordination with the citywide Traffic Management Center to facilitate the real-time monitoring of event traffic conditions along with real-time adjustments to traffic control equipment, including allowing adjustments to signal timing and synchronization;
- Deployment of traffic control officers to selected locations for the purposes of directing traffic; and
- Facilitation of the utilization and integration of transit services during events, including by coordinating with Metro to optimize transit service and frequency to the Entertainment and Sports Center during events.

Late-night measures for the purpose of reducing off-site noise for events with more than 10,000 attendees ending after 10 P.M. are proposed to include:

- Delaying access to the Warner Drive South & Oxnard Street driveway to exiting vehicles by approximately 15 minutes after the end of the event (or another period to be identified in consultation with LADOT) using internal traffic control (traffic control officers, staff, signage, and/or barriers);
- Utilization of additional wayfinding signage and changeable message signs to direct exiting traffic to preferred routes; and
- Utilization of traffic control officers to reconfigure driveway/intersection lanes to facilitate outbound event operations.

Additionally, during the holiday period defined as the day after Thanksgiving through January 2, for weekday or weekend events with 7,500 or more attendees, the EMP will be supplemented with additional measures to account for higher background traffic volumes. The holiday measures would include additional intersection operation adjustments and an expanded deployment of traffic control officers.

These and other measures would be implemented in accordance with a tiered operational plan that is scaled commensurate to event attendance and projected traffic levels as set forth in the Traffic Study. The EMP is intended to be an evolving document that is subject to refinement over time in coordination and consultation with LADOT and



Caltrans, in order to respond to changes in traffic patterns and mobility/parking technologies that may alter the travel to and attendance of events.

*(b) Parking*

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, in accordance with SB 743, impacts associated with parking are not considered significant impacts. However, an analysis of parking was provided in the Draft Supplemental EIR for informational purposes. The Entertainment and Sports Center would require 3,000 parking spaces for sold-out events under the LAMC (1 space per 5 seats).

As described in Section II, Project Description, of the Draft Supplemental EIR, the Project would provide a total of 5,610 parking spaces. After subtracting the parking spaces required for the Project's other uses (2,790 parking spaces), 2,820 parking spaces on the Project Site would be utilized to fulfill the majority of the required parking for the Entertainment and Sports Center; however, a deficit of 180 on-site parking spaces would remain. In order to make up the remainder of the required parking, and to provide for peak demand parking of a maximum of 2,380 parking spaces, a combination of on-site shared parking (shared with the office and retail uses only) and off-site parking located at adjacent office buildings is proposed, and would require approval through the Project's requested entitlements.

Shared parking takes into account the peak parking demand patterns of the land uses on a project site. Each land use has a distinct parking demand pattern and the concept of shared parking maximizes the relationships of these parking demand patterns. A shared parking analysis was conducted for the Project to determine the peak parking demand, taking into consideration the different parking patterns associated with the Project's various land uses. The peak parking demand for the Entertainment and Sports Center conservatively assumed its use as a concert venue, which has a higher parking demand rate than a sporting event. Should the Entertainment and Sports Center be primarily used as a sports venue, the projected peak parking demand is anticipated to be lower than the projected parking demands that were analyzed in the Draft Supplemental EIR.

The shared parking study determined that, as office and retail parking spaces are most heavily utilized during the daytime, and office parking spaces are largely vacant on weekends, shared parking would permit the Entertainment and Sports Center visitors to use those available on-site spaces. This would avoid overparking the Project Site, which would have greater construction impacts. Similarly, the Entertainment and Sports Center would use off-site office parking spaces which are typically available on weeknights and weekends.

As discussed above, the Project would include the development of an EMP pursuant to Project Design Feature K-6. The EMP would address the on-site shared use and off-site parking required for the Entertainment and Sports Center, depending on the time of year, day/time of the event, and the number of event attendees. The EMP would require that sufficient parking be provided through a combination of on-site shared parking and available off-site parking to meet event demand. The Applicant would be required to provide annual evidence to LADOT of agreements that identify/secure the location and quantity of available off-site parking prior to the issuance of a temporary or permanent certificate of occupancy for the Entertainment and Sports Center, and annually thereafter.

### **(7) Other Impact Areas**

The Draft Supplemental EIR found that the operation of the Project together with the Entertainment and Sports Center would result in less than significant impacts for all other topics, including aesthetics and views; cultural resources; greenhouse gas emissions; hazards and hazardous materials; hydrology, water quality, and groundwater; land use, public services (including police protection, fire protection, schools, parks and libraries, tribal cultural resources; utilities and service systems (water supply and infrastructure, wastewater, and solid waste); and energy conservation.

### **b. Entertainment Uses as a Permitted Use in the Downtown District of the Warner Center Plan**

As analyzed in Section IV.G, Land Use, of the Draft Supplemental EIR, the Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. The Downtown District is described in the Warner Center Plan as being Warner Center's entertainment center. The Downtown District is:

*"Warner Center's primary employment and entertainment center providing a mix of restaurant and specialty retail uses that will attract office workers during the day and area residents and families in the evenings and on weekends." (Section 6.1.2.3 of the Warner Center Plan)*

Furthermore, the Warner Center Plan states that entertainment uses are encouraged within the Downtown District:

*"The purpose of this section [Establishment of Entertainment Uses] is to encourage entertainment and nightlife uses in the Downtown and Uptown*

*Districts of Warner Center, while also preserving a healthy and safe environment for residents and businesses. This will be accomplished through the establishment of a set of performance and development standards to ensure the safe operation of establishments with entertainment uses. Entertainment uses would be encouraged in the Downtown and Uptown Districts through a simplified Project Permit Compliance process, pursuant to LAMC 11.5.7, if the project meets all of the performance standards set forth in this subsection.” (Section 6.2.9.1 of the Warner Center Plan)*

The Entertainment and Sports Center will provide entertainment uses to the Downtown District, as it would host active and performance uses, such as live music and performances, concerts, and performing arts; professional, youth, and community sports; or fairs and exhibitions. The Entertainment and Sports Center would offer a safe entertainment use that would enhance the vibrancy of the Downtown District.

Further, the Warner Center Plan provides standards that must be met to ensure any proposed entertainment uses are consistent with the Warner Center Plan. The Entertainment and Sports Center would be consistent with those Entertainment Use standards set forth in Section 6.2.9.4 of the Warner Center Plan, as analyzed in Section IV.G, Land Use, of the Draft Supplemental EIR, and would serve as an entertainment destination for families and residents.

Uses like the Entertainment and Sports Center are contemplated by the Warner Center Plan as demonstrated through the simplified approval process in the Warner Center Plan. Whereas Section 12.24.U.2 of the LAMC requires a Conditional Use Permit for “auditoriums, stadiums, arenas and the like,” this requirement is superseded by Section 3.1.5 of the Warner Center Plan. Instead, Entertainment Uses like auditoriums, stadiums and arenas may be approved under the Warner Center Plan as an Entertainment Use through a simplified Project Permit Compliance process.

Finally, in response to some comments regarding the approval process, approval of the Entertainment and Sports Center will be subject to public review and comment. The Project is requesting a Project Permit Compliance for the Entertainment Use as required by the Warner Center Plan, as well as a Director’s Interpretation to approve the number of seats for the Entertainment and Sports Center. As set forth in Section 10.6.1 of the Warner Center Plan, the Director must find in his or her Director’s Interpretation that the Entertainment and Sports Center will not be detrimental to the public welfare or injurious to property in the immediate vicinity, will not result in practical difficulties or unnecessary hardships inconsistent with the overall intent of the Warner Center Plan, and will protect the best interests of and assure a development more compatible with the surrounding neighborhood. The public will have the opportunity to provide oral and written comments on both of these requested approvals as part of the Project’s noticed public hearings.

As discussed in Section IV.G, Land Use, of the Draft Supplemental EIR, the Project, with the mix of uses proposed, including the Entertainment and Sports Center, would be consistent with the Warner Center Plan. The Project would continue to build upon the commercial development within the existing downtown commercial core, while preserving Warner Center's residential neighborhoods. Additionally, the development of new retail stores, open space areas, and entertainment uses within the Project Site would provide an important opportunity for continued investment in the Warner Center Regional Center and surrounding area.

### **3. Traffic and Parking**

The Draft Supplemental EIR provided a thorough analysis of potential impacts associated with traffic and parking as provided in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. In response to comments regarding the Draft Supplemental EIR, this topical response provides an overview of the environmental impacts associated with the Project's traffic and parking, including the traffic impact analysis methodology, a summary of the traffic intersection impacts, the project design features and mitigation measures implemented by the Project, a summary of impacts to neighborhood street segments, and a summary of the construction impact analysis.

#### **a. Traffic Impact Analysis Methodology**

As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, analysis of Project traffic impacts tiers off of the Warner Center Plan EIR's analysis. The Warner Center Plan EIR and the Project's Draft Supplemental EIR use the same underlying assumptions related to future development, trip generation, area wide traffic growth, traffic volumes, and trip distribution patterns. Both analyses assume full buildout under the Warner Center Plan. While the Warner Center Plan EIR made assumptions regarding the potential future development of the Project Site, the Project's Draft Supplemental EIR updated the Warner Center Plan EIR's analysis to use the Project-specific program for the Site to determine the Project's specific traffic impacts.

In addition, actual traffic counts were conducted in 2016, the year of the Project's NOP, to compare to the Warner Center Plan EIR's projected traffic growth for 2016. As shown in Appendix FSEIR-2, empirical counts were lower than the Warner Center Plan EIR's projected traffic volumes for 2016. Therefore, the area-wide growth used by the Warner Center Plan EIR, and the Project EIR, is conservative.

As discussed further in Topical Response No. 2, the Entertainment and Sports Center, the Transportation Impact Study for Promenade 2035 dated March 2018 (Traffic Study), was conservative in its analysis of the Entertainment and Sports Center use. The

Traffic Study analyzed trips generated by the Project on both days with sold-out, 15,000-seat events at the Entertainment and Sports Center, and on days without events. Additionally, while a standard traffic study analyzes impacts during two time periods, the A.M. and P.M. peak periods, the Project's Traffic Study analyzed six time periods to provide a comprehensive analysis of the Entertainment Center's potential impacts: three weekday evening times (pre-event time periods of 5:00 P.M.–6:00 P.M. and 6:00 P.M.–7:00 P.M., and post-event time period of 10:00 P.M.–11:00 P.M.); Saturday midday (12:00 P.M.–1:00 P.M. and 1:00 P.M.–2:00 P.M.) and Saturday evening (10:00 P.M.–11:00 P.M.).

The Project is proposed to be developed in multiple phases, as described further in Section II, Project Description, of the Draft Supplemental EIR. The Project's phasing plan describes the geographic area covered by each phase of the Project, with the order of buildout of these geographic phases subject to change. In addition, the Project phases have the potential to overlap. For the purposes of the analysis contained in the Traffic Study, LADOT requested an analysis based on a specific grouping of the Project's development phases by quadrant, into: the Northeast Area (anticipated first phase); the Northwest Area (anticipated second phase); the Southwest Area (anticipated third phase); and the Southeast Area (anticipated fourth phase).

If ultimate buildout of the Project changes the order or overlaps any of the Project phases described above, then LADOT shall request an updated analysis confirming that the impacts identified in this analysis remain unchanged. For informational purposes, in addition to analyzing full buildout of the Project, the Traffic Study also analyzed the phased buildout of the Project.

The Traffic Study analyzed a Study Area which included 49 intersections with the greatest potential to experience significant traffic impacts due to the Project. This Study Area was developed in consultation with both LADOT and Caltrans, and tiers off of the Warner Center Plan EIR, which analyzed 152 intersections. Intersections at the periphery of the Project's Study Area were determined to have less than significant impacts as a result of the addition of Project traffic, with implementation of the Warner Center Mitigation Program and Project specific project design features. Therefore, the intersections beyond the Study Area would not experience significant impacts, given that Project traffic dissipates farther from the Project Site.

## **b. Summary of the Project's Trip Generation and Impacts to Intersections**

The Warner Center Plan EIR trip generation analysis was based on the allocation of trips to 26 Traffic Analysis Zones (TAZs) in Warner Center; those trip allocations were based on the growth projections from the total development anticipated from the Warner

Center Plan buildout. The Project is located in TAZ 9, which forms the boundaries of the Project Site.

As detailed in the Traffic Study and described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the operation of the Northeast Area (anticipated Phase 1) and Northwest Area (anticipated Phase 2) are projected to generate a net reduction of daily trips on a typical weekday and Saturday, as compared to existing conditions. Therefore, the operation of the first two phases would result in less than significant impacts. The Southeast Area (anticipated Phase 3), would be the initial phase with potential significant impacts.

Assuming full buildout of the Project, as well as a sold-out event at the Entertainment and Sports Center, the Project would generate 22 percent and 24 percent fewer trips (during the A.M. and P.M. peak hours respectively<sup>19</sup>) than assumed under the Warner Center Plan EIR for the Project Site. During non-event days, the Project would generate 36 percent and 56 percent fewer trips (during the A.M. and P.M. peak hours respectively) than analyzed under the Warner Center Plan EIR. Therefore the Project, even with a sold-out event at the Entertainment and Sports Center, is anticipated to generate fewer trips than projected by Warner Center Plan EIR for the Project Site.

The Traffic Study analyzed 49 intersections at the six time periods described above, assuming full buildout of the Warner Center Plan, and analyzed both days with sold-out events at the 15,000 seat Entertainment and Sports Center and days with no events. Under both conditions, impacts at all 49 intersections were determined to be less than significant with implementation of the Project specific project design features and the Warner Center Mitigation Program, both of which are discussed further below.

For informational purposes, the Traffic Study also analyzed the phased buildout of the Project. The Traffic Study analyzed buildout of the Northeast Area (Phase 1), Northwest Area (Phase 2), and Southwest Area (Phase 3, which includes the Entertainment and Sports Center). On a non-event day with the operation of Phases 1–3, one intersection is projected to be significantly impacted; assuming a sold-out, 15,000-seat event and concurrent operation of Phases 1–3, two intersections are projected to be significantly impacted. Each of the three significantly impacted intersections has a planned physical improvement<sup>20</sup> as part of the Warner Center Mitigation Program, which would

<sup>19</sup> LADOT requires analysis of the A.M. and P.M. peak hours, which generally occur between 7:00–10:00 A.M. and 3:00–6:00 P.M., respectively.

<sup>20</sup> The Warner Center Mitigation Program measures at the intersections include: Intersection No. 22, Shoup Avenue and Oxnard Street, add northbound right-turn lane (Warner Center Plan Mitigation Measure TR-40); Intersection No. 24, Topanga Canyon Boulevard and Oxnard Street, additional westbound (Footnote continued on next page)

reduce impacts to less-than-significant levels. In the event that the mitigation measures associated with each of these intersections are implemented by the City prior to operation of Phases 1–3, the three intersections would not be significantly impacted. In the event that the associated mitigation measures have not been implemented by the operation of Phases 1–3, then the significantly impacted intersections would remain significantly impacted until implementation of the Warner Center Mitigation Program.

### **c. Project Design Features**

The project design features that will be implemented as part of the Project include both physical improvements to the Project Site and operational measures, as described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR.

Physical improvements to the Project Site are described in Project Design Features K-1 through K-5 and K-8. Project Design Feature K-1 requires a new fourth lane along northbound Topanga Canyon Boulevard adjacent to the Project Site, between Oxnard Street and Erwin Street. This would continue the fourth lane added on Topanga Canyon Boulevard just north of the Project Site, adjacent to the Village at Westfield Topanga. The new lane would facilitate circulation into the Project Site, including via a speed ramp taking visitors directly into the subterranean parking below the Entertainment and Sports Center, while allowing non-Project traffic to continue using the existing three northbound lanes on Topanga Canyon Boulevard. Project Design Features K-2 through K-5 are additional street and traffic signal improvements, which would improve access and circulation around the Project Site. Project Design Feature K-8 includes installation of a dedicated eastbound right-turn lane at Owensmouth Avenue and Erwin Street.

An Event Management Plan (EMP) would be implemented for events at the Entertainment and Sports Center as part of Project Design Feature K-6, which is described in greater detail in Topical Response No. 2, Entertainment and Sports Center. The EMP is intended to be an evolving document subject to modification over time in coordination and consultation with LADOT and Caltrans, in order to respond to changes in traffic patterns and mobility/parking technologies that may alter the travel to and attendance of events at the Entertainment and Sports Center. The measures described in the EMP would be implemented in accordance with a tiered operational plan that is based on attendance levels.

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*left-turn lane & add northbound right-turn lane (Warner Center Plan Mitigation Measure TR-11); and Intersection No. 27, Canoga Avenue and Oxnard Street, additional northbound left-turn lane & add southbound, westbound, northbound right-turn lanes (Warner Center Plan Mitigation Measure TR-12).*

The EMP is proposed to include both physical design measures for the Project Site to optimize traffic flow, as well as on-site and off-site operational measures. The physical design includes vehicular access points on all four frontages, allowing multiple entry points into the Project Site to facilitate flow. A total of 13 lanes are provided into the Project Site, as well as 10 speed ramps to parking, to provide rapid access to the Site. Subterranean parking would be connected across the Project Site, and all Project parking is proposed to be operated by a single parking operator to optimize the utilization and efficiency of parking.

On-site operational measures of the EMP are proposed to include identification of a specific parking space location with the advance purchase of an event ticket; identification of preferred traffic routes to the assigned parking facility prior to the event; traffic announcements and updates made in the Entertainment and Sports Center and to guest cell phones at the end of the event; and coordination of traffic information and ridesharing services.

Off-site measures are proposed to include: identification of specific routing to distribute event traffic away from already congested locations and residential streets; the use/installation of changeable message signs at select freeway and arterial locations to communicate to visitors the preferred routing to the Project Site; coordinated traffic control adjacent to the Project Site; coordination with the LADOT Traffic Action Team, which oversees and/or implements special event traffic operations in the City; coordination with the citywide Traffic Management Center to facilitate the real-time monitoring of event traffic conditions along with real-time adjustments to traffic control equipment, including allowing adjustments to signal timing and synchronization; deployment of traffic control officers, by the Entertainment and Sports Center operator, to selected locations for the purposes of directing traffic; and facilitation of the utilization and integration of transit services during Entertainment and Sports Center events, including by coordinating with Metro to optimize transit service and frequency to the Entertainment and Sports Center during events.

Late-night measures for the purpose of reducing off-site noise are proposed to include: delaying access to the Warner Drive South & Oxnard Street driveway to exiting vehicles by approximately 15 minutes after the end of the event (or another period to be identified in consultation with LADOT) using internal traffic control (traffic control officers, staff, signage, and/or barriers); utilization of additional wayfinding signage and changeable message signs to direct exiting traffic to preferred routes; and utilization of traffic control officers to reconfigure driveway/intersection lanes to facilitate outbound event operations.

Project Design Feature K-7 is comprised of the preparation and implementation of a Transportation Demand Management (TDM) Program. The TDM program, which must be reviewed and approved by LADOT, will include a variety of measures to promote non-auto travel and reduce the use of single-occupancy vehicles during commute hours. Further,



the Project's location in Warner Center, adjacent to regional and sub-regional transit services, is anticipated to enhance the effectiveness of the TDM Program. This TDM program could include participation in the newly formed Warner Center Transportation Management Organization (TMO) launched on January 10, 2019, called Warner Connects. Warner Connects focuses on encouraging the use of sustainable or alternative transportation such as walking, biking, public transit and carpooling,<sup>21</sup> with the goal of reducing traffic within Warner Center.

Finally, LADOT has determined that the Warner Center mitigation measures adjacent to the Project Site shall be implemented as project design features as part of the Project's construction. These include construction of a dedicated eastbound right-turn lane at Owensmouth and Erwin Street (Project Design Feature K-8), a new traffic signal at Topanga Canyon Boulevard and Calvert Street/Promenade Boulevard (Project Design Feature K-2), and dedication of right-of-way around the Project Site frontages, which will be used as part of other Warner Center mitigation measure improvements as required by Section 7.7, Street Improvements and Dedications, of the Warner Center Plan. See also Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR for these project design features.

#### **d. Mitigation Measures**

As described in Section IV.K, Traffic Access, and Parking, of the Draft Supplemental EIR, the Warner Center Plan incorporates a transportation mitigation program (Warner Center Mitigation Program) that includes nearly 100 physical and operational improvements at arterial and intersection locations to mitigate the significant transportation impacts resulting from the buildout of the Warner Center Plan. Intersection improvements are included in the Warner Center Mitigation Program. Right-of-way dedications are also required in accordance with specified street standards. New development projects within the Warner Center are also assessed a Mobility Fee, which functions as an impact fee and is used to fund the Warner Center Mitigation Program. The fees collected are deposited into a Warner Center Mobility Trust Fund for the implementation of the Mitigation Program and other mobility measures and improvements identified by the Warner Center Plan.

Consistent with the requirements of Warner Center Plan Section 7.6.1, the Project will be required by LADOT to mitigate impacts by phase through: (1) the physical roadway and streetscape mitigation measure improvements as outlined in Appendix E, of the Warner Center Plan]; (2) payment of the Mobility Fee in-lieu of any physical improvements; or (3) the combination of both the mitigation measures outlined in Appendix E, of the

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<sup>21</sup> *Warner Connects, Warner Connects Launch a Success, <https://warnerconnects.org/warner-connects-launch-a-success/>, accessed January 17, 2019.*

Warner Center Plan, and the payment of the Mobility Fee. Mitigation Measure K-2 has been updated to reflect this language, as shown in Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR.

As previously stated, the Project's mitigation measures (and project design features) would be implemented by phase. As stated in DOT's Traffic Assessment Letter, included in Appendix M, of the Draft Supplemental EIR, the Applicant is required to pay the required Mobility Fee for each project phase, prior to issuance of any building permits for that phase. Additionally, the mitigation measures in the Warner Center Mitigation Program directly adjacent to the Project Site would be implemented by Project phase, as required by Project Design Feature K-2, Project Design Feature K-8, and Section 7.7, Street Improvements and Dedications, of the Warner Center Plan.

The Warner Center Plan also directs the establishment of an Warner Center Plan Implementation Board to implement the Warner Center Mitigation Program. Pursuant to Section 10.1 of the Warner Center Plan, the Warner Center Plan Implementation Board is responsible for the implementation of the Warner Center Plan's streetscape improvements, roadway improvements, transit improvements, and Transportation Demand Management mitigation measures, among other measures. On June 13, 2018, the Los Angeles City Council approved Ordinance 185618 establishing the Warner Center Plan Implementation Board. In November 2018, the Warner Center Plan Implementation Board was officially activated. Pursuant to this ordinance, the Warner Center Plan Implementation Board is required to meet at least once a quarter to receive reports and adopt an annual work program. To date, the Warner Center Plan Implementation Board has met monthly from November 2018 through March 2019, with agendized monthly meetings through June 2019 and quarterly meetings planned thereafter. The Warner Center Plan Implementation Board will work with the Department of Public Works, the Department of Transportation, the Department of City Planning, and other City departments as needed to ensure implementation of the Warner Center Mitigation Program.

## **e. Parking**

In accordance with SB 743, impacts associated with parking are not considered significant environmental impacts. However, an analysis of parking required under the Warner Center Plan and LAMC is provided in the Draft Supplemental EIR.

As described in Section II, Project Description, of the Draft Supplemental EIR, the Project proposes 5,610 parking spaces on-site. Based on the parking requirements for residential, hotel, retail, and office uses set forth in the Warner Center Plan and the LAMC, the Project would be required to provide a total of 2,790 parking spaces, which does not include the required parking for the Entertainment and Sports Center (3,000 parking

spaces). As shown in Table IV.K-16 of Section IV.K, Traffic, Access, and Parking, of the Draft Supplement EIR, the total off-street parking requirements for each use are:

- Residential—1,432 spaces
- Hotels—241 spaces
- Retail—488 spaces
- Office—629 spaces

As the Project would provide a total of 5,610 parking spaces, on-site parking would be able to satisfy the non-event parking requirement of 2,790 spaces.

The Entertainment and Sports Center would require 3,000 parking spaces for sold-out events under the LAMC (1 space per 5 seats). After subtracting the parking spaces required for the Project's other uses (2,790 parking spaces, described above), 2,820 parking spaces on the Project Site would be utilized to fulfill the majority of the required parking for the Entertainment and Sports Center; however, a deficit of 180 on-site parking spaces would remain. In order to make up the remainder of the required parking, and to provide for peak demand parking of a maximum of 2,380 parking spaces, a combination of on-site shared parking (shared with the office and retail uses only) and off-site parking located at adjacent office buildings is proposed, and would require approval through the Project's requested entitlements. The Project's proposed shared parking is consistent with the Warner Center Plan's purpose to "Provide a comprehensive parking strategy that limits the over-production of parking and encourages both existing and proposed parking to be shared amongst many developments."<sup>22</sup> The required parking for the residential and hotel uses would not be shared, in accordance with the Warner Center Plan.

The Project's EMP, discussed in Project Design Feature K-6, would require that sufficient parking be provided through a combination of on-site shared parking and available off-site parking to meet event demand. As further described in the EMP, the Applicant would be required to provide evidence to LADOT of agreements that identify and secure the location and quantity of available off-site parking prior to the issuance of a temporary or permanent certificate of occupancy for the Entertainment and Sports Center, and annually thereafter. For more information regarding the Entertainment and Sports Center's parking, see Topical Response No. 2, Entertainment and Sports Center.

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<sup>22</sup> Warner Center Plan, Section 2: Purpose, p. 4-6.

## f. Neighborhood Street Segments

This topical response addresses issues raised in the comments on the Draft Supplemental EIR related to the Project's impacts on neighborhood streets.

As detailed in the Traffic Study and described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the operation of the Northeast Area (anticipated Phase 1) and Northwest Area (anticipated Phase 2) are projected to generate a net reduction of daily trips on a typical weekday and Saturday, as compared to existing conditions. Therefore, the operation of the first two phases are not anticipated to result in impacts to neighborhood street segments. The Southeast Area, or Phase 3, would be the initial phase with potential neighborhood impacts.

As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, five neighborhoods were identified with potential impacts to neighborhood street segments. Those include the following areas bounded by the following, along with their neighborhood protection area as identified in the Warner Center 2035:

- Kittridge Street to the north, Topanga Canyon Boulevard to the east, Victory Boulevard to the south and Randi Avenue to the west (Warner Center 2035 Neighborhood Protection Area 4);
- Victory Boulevard to the north, Glade Avenue to the east, Erwin Street to the south, and Randi Avenue/Shoup Avenue to the west (Warner Center 2035 Neighborhood Protection Area 4);
- Erwin Street to the north, Glade Avenue to the east, Oxnard Street to the south and Nevada Avenue to the west (Warner Center 2035 Neighborhood Protection Area 4);
- Oxnard Street to the north, Farralone Avenue to the east, Burbank Boulevard to the south and Shoup Avenue to the west (Warner Center 2035 Neighborhood Protection Area 3); and
- Residential uses north and south of Oxnard Street between De Soto Avenue and Oso Avenue, residential uses north and south of Clark Street between Oso Avenue and Winnetka Avenue and residential uses east and west of Oso Avenue between Oxnard Street and Clark Street (Warner Center 2035 Neighborhood Protection Area 1).

A majority of the streets in the potentially affected areas identified above as potential neighborhood cut through routes, are designated as collector streets (not residential streets) in *Mobility Plan 2035, An Element of the General Plan*, Los Angeles Department of City Planning, January 2016). By definition of their function, collector streets are designed

to carry a moderate volume of traffic as they are intended to facilitate traffic movement between arterial streets (higher volume) and local streets (lower volume). Traffic utilizing a collector street is, therefore, not typically considered to be cut through traffic. Likewise, Project traffic utilizing collector streets is not anticipated to cause significant neighborhood street impacts. To provide a conservative analysis, however, the collector streets in the neighborhoods identified above, were included as potential cut-through routes, and are proposed for evaluation against the residential street criteria despite their collector street designation.

Warner Center Plan Section 8 establishes the Neighborhood Protection Program, which includes measures to make the primary arterial routes more attractive and discourage use of local routes by through traffic and to facilitate vehicular and pedestrian egress from adjacent local streets onto the primary arterial streets and highway system. The Mobility Fee collected from the Project pursuant to Mitigation Measure K-2 will finance the Warner Center Mitigation Program, which includes neighborhood protection components. The Warner Center Plan provides that as funds become available from payment of Mobility Fees, the Director of Planning shall have responsibility for implementation of an approved Neighborhood Protection Plan. The Warner Center Plan also provides for establishing a Neighborhood Protection Committee which may make recommendations to the Director and Council Offices concerning measures to implement the goals and objectives of the Neighborhood Protection Program. Pursuant to Warner Center Plan Mitigation Measure TR-101, the City will implement a Neighborhood Protection Program for the purpose of promptly assessing and mitigating “any unforeseeable neighborhood circulation impacts resulting from a potential increase in overflow or cut-through traffic along study area neighborhood streets caused by the WCRCCSP [Warner Center Plan] development or its mitigation measures.”

Mitigation Measure K-3 describes the neighborhood traffic management plan process for the Project, which would include the following steps: street segment counts before and after completion of a Project phase that could result in neighborhood intrusion impacts (anticipated with the completion of the Southwest Area, following completion of the Northeast and Northwest Areas) (the “Potential Impact Phase”) in an affected neighborhood(s); if neighborhood impact criteria are met, the preparation of a neighborhood traffic management study for the affected neighborhood(s); and the preparation and submittal of a neighborhood traffic management plan developed in cooperation with the neighborhood residents for approval by DOT and neighborhood residents. The neighborhood improvement plan requires approval by residents before implementation; without the required approval, the improvement plan will not be implemented and any potential neighborhood impacts would remain significant.

Additionally, as described above and in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the EMP included as Project Design Feature K-6 will be

implemented as part of regular operation of the Entertainment and Sports Center. The EMP is intended to be an evolving document that is subject to modification over time, in consultation with LADOT and Caltrans, and could include additional measures, if needed, to reduce potential impacts to neighborhood street segments.

In the event that significant impacts are identified based on trip counts conducted before and after the Potential Impact Phase, the Project would prepare a neighborhood traffic management plan developed in cooperation with neighborhood residents and LADOT. However, if this neighborhood traffic management plan is not approved by the affected neighborhood, then any identified significant Project-level neighborhood street segment impacts would remain. Such impacts would also be considered cumulatively significant.

For informational purposes and in response to public comments, additional analysis was conducted since publication of the Draft Supplemental EIR of the five neighborhoods identified above, as potentially impacted by cut-through traffic. Traffic counts were conducted on Thursday, October 4, 2018, and Saturday, October 6, 2018, at the 19 street segments shown in Figure 1, included in Appendix FSEIR-3, of this Final Supplemental EIR; these segments are comprised of both local and collector streets and provide some form of an alternative route to the arterial. The counts represent typical weekday and Saturday conditions on each segment. The counts were grown to the future condition (2035) using the same methodology as the Draft Supplemental EIR's Traffic Study, and Project traffic volumes through the neighborhood segments were estimated from the overall Project trip distribution. While the LADOT neighborhood segment criteria is applicable to local streets, as described above, it was conservatively applied to both the local and collector street segments identified. The results of this analysis indicate that the Project is anticipated to generate less than significant neighborhood intrusion impacts at Project buildout (and the intermediate phases) at each of the identified street segments, as shown in Appendix FSEIR-3, of this Final Supplemental EIR.

Nonetheless, Mitigation Measure K-3 will continue to be required of the Project, which requires that additional counts be conducted before and after completion of a Project phase that could result in neighborhood intrusion impacts, as well as preparation of a neighborhood traffic management plan if neighborhood impact criteria are met.

## **g. Construction Traffic Impact Analysis**

The Project is anticipated to be constructed in phases with each phase to be built over a period of approximately 22 to 33 months, with complete build-out anticipated in the Year 2033. Temporary construction impacts that may result from the construction activities of the Project, may include safety, operational, or capacity impacts.

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, construction activities are expected to be primarily contained within the Project Site boundaries. Construction fences may encroach into public rights-of-way (e.g., sidewalk and roadway) adjacent to the Project Site. Lane closures for on-site Project construction are not anticipated, however some temporary lane closures may be required for off-site street improvements or other infrastructure improvements. These closures would be temporary in nature (e.g., during daytime hours over the course of one or a few days) and would require review and approval from appropriate City agencies. Temporary traffic controls would also be provided to direct traffic around any closures as required in the Construction Management Plan, as set forth in Mitigation Measure K-1, discussed further below.

The Traffic Study's construction analysis was conservative. While the Project may be constructed in consecutive and non-overlapping phases, for the purpose of providing a conservative analysis of potential construction period impacts, the construction analysis assumes the maximum potential overlap of construction phases (the "Overlapping Construction Plan"), as detailed more fully in Appendix D and Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. The Overlapping Construction Plan assumes that Phase 1, Phase 2, and Phase 3 of the Project Site would be constructed with overlap, to provide a peak scenario of potential construction impacts. Additionally, the analysis assumed the combination of construction traffic from haul truck trips, vendor trips, and worker trips, and conservatively assumed all construction worker trips during the morning and afternoon peak periods, though workers are likely to arrive at the Project Site prior to the A.M. peak period, and leave the Site prior to the P.M. peak period. An interim year construction scenario ("Interim Year Construction") was also prepared for analysis. The Interim Year Construction assumes the full operation of the Project Phases 1–3, along with the simultaneous construction of Project Phase 4.

The Overlapping Construction Plan identifies the peak construction activity on the Project Site as occurring during the simultaneous building construction for Phases 1, 2, and 3. Additionally, operational trips from approximately 120,000 square feet of the existing shopping center use anticipated to remain in operation (AMC Theatres) until construction of Phase 4 is included in this construction analysis. This peak construction period would still result in fewer trips (1,188 morning and 1,396 afternoon trips) than the trips allocated for the Project Site (TAZ 9) under the Warner Center Plan EIR (2,256 morning and 3,841 afternoon trips). Therefore, the morning and afternoon peak hour transportation impacts of the Overlapping Construction Plan period are included in and consistent with the traffic impact analysis of the Warner Center Plan EIR. Nonetheless, until either the Project construction activity is completed or the Warner Center Mitigation Program is implemented, Project-level and cumulative construction traffic impacts would remain temporarily significant and unavoidable.

The Interim Year Construction assumes the full operation of the Project Phases 1 through 3 along with the simultaneous construction of Project Phase 4. Using the conservative assumptions described above, Project construction would result in 1,699 morning and 2,806 afternoon trips. This level of construction period trip generation would still be fewer than the trips allocated to the Project Site (TAZ 9) by the Warner Center EIR.

To mitigate the impacts described above, the Project will implement Mitigation Measure K-1, as required by Warner Center Plan Mitigation Measure TR-100, which requires the development of a Construction Management Plan prior to the start of construction for each phase of construction. This Construction Management Plan for each phase of construction will be subject to the City's review and approval.

The Construction Management Plan identifies specific actions to reduce the effects of the construction traffic impacts. The measures identified in Mitigation Measure K-1 have been further supplemented in the Final Supplemental EIR, as included in Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR, and as shown below:

**Mitigation Measure K-1:** Construction Management Plan—Prior to the start of construction for each Project phase, the Applicant shall prepare a Construction Management Plan and submit it to the City for review and approval. The Construction Management Plan shall include such measures as, but not be limited to the following:

- Minimum 72-hour advance notification to adjacent property owners and occupants, as well as, nearby schools, of upcoming construction activities affecting the public right of way (i.e. temporary lane closures and detours, short-term parking restrictions, etc.) including durations and daily hours of construction;
- Prohibition of construction worker parking on adjacent residential streets, and identification of construction employee parking locations and protocols;
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men)
- Prohibition of construction-related vehicle parking on surrounding public streets;
- Safety precautions for pedestrian and bicyclists through such measures as alternate routing and protection barriers as appropriate, including along all identified Los Angeles Unified School District (LAUSD) pedestrian routes to nearby schools;



- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, and so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to nearby schools;
- Coordination with public transit agencies to provide advanced notifications of any anticipated stop relocations and durations;
- Provision of advanced notification of any temporary on-street parking removals and duration of removals;
- Establish construction hours that are in compliance with Sections 41.40 and 62.61 of the Los Angeles Municipal Code (LAMC);
- Establish a construction phone number which shall be posted on the site, and appoint a construction liaison to respond to concerns or inquiries regarding Project construction;
- Maintain unimpeded emergency access to the Project site and nearby properties;
- Establish truck access and staging areas, and identify haul route approved with the Project;
- Provide construction site security.

The traffic component of the Construction Management Plan will be reviewed by the Citywide Temporary Traffic Control division of LADOT. As required by LADOT, the construction traffic component must meet the standards and guidelines of the *California Manual of Uniform Traffic Control Devices* (Caltrans/FHWA; 2014) and *Work Area Traffic Control Handbook* (American Public Works Association; 2016).

The Construction Management Plan is a regulatory requirement, as identified by Warner Center Mitigation Measure TR-100, which is subject to review and approval by LADOT as described above. As a Project mitigation measure, performance of the Construction Management Plan is further subject to review and monitoring as part of the Project's Mitigation Monitoring Program. The Mitigation Monitoring Plan included as Section IV, Mitigation Monitoring Plan, of this Final Supplemental EIR, specifies that a construction monitor will be established to ensure that all of the construction-related mitigation measures are implemented.

Additionally, as discussed above, the Project will be required by LADOT to mitigate intersection impacts through: (1) the physical roadway and streetscape mitigation measure improvements as outlined in the Warner Center Mitigation Program; (2) payment of the Mobility Fee to fund the Warner Center Mitigation Program; or (3) the combination of both

the Warner Center Mitigation Program outlined in Appendix E, of the Warner Center Plan, and the payment of the Mobility Fee.

## **4. The Village at Westfield Topanga**

The Village at Westfield Topanga (the “Village”) is an earlier project constructed by the Applicant in Warner Center, located directly adjacent to the Promenade to the north. The Village was approved by the City in 2012 for a Costco anchor retailer and a mix of commercial uses, to be built in two phases. Construction of the Costco, retail and restaurant components is included in the first phase, with the hotel and office components in a second future phase. To date, the first phase of the Village was completed and opened in September 2015. The discussion below is provided in response to comments on the Project’s Draft Supplemental EIR related to the Applicant’s implementation of the Village.

### **a. Buildout of the Village**

City approvals and EIRs generally describe a maximum program of square footage and uses which have been analyzed for their environmental impacts and are permitted to be constructed by an Applicant. Applicants cannot exceed that maximum envelope without undergoing subsequent environmental review and approvals by the City. However, applicants are generally permitted to construct a smaller square footage than what has been approved, provided that the environmental impacts remain the same or are lessened. A smaller project may result from a change in market conditions or other factors outside the applicants’ control.

The Village was approved with a phased buildout and a 15-year Development Agreement, which allows the Village to be built over an extended period of time in consideration for the Applicant implementing a number of community benefits. The Development Agreement included a detailed schedule of performance for construction of the first phase of the Village, including the community center, which was implemented by the Applicant. The remaining development is permitted to be built over the 15-year term of the Development Agreement at the discretion of the Applicant. Further, the Development Agreement specifically states that the “Property Owner cannot at this time predict when or at what rate the Property would be developed. These decisions depend upon numerous factors that are not all within the control of Property Owner, such as market orientation and demand, availability of financing, and competition.”<sup>23</sup>

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<sup>23</sup> *City of Los Angeles, Development Agreement by and among the City of Los Angeles and Westfield dated as of July 23, 2012.*

To date, the first phase of the Village has been constructed, which includes the Costco, retail, restaurant uses, and community center. The second phase consisting of a hotel and office have not yet been implemented. Therefore, the second phase of the Village is analyzed in the Project's Draft Supplemental EIR as Related Project No. 27, and includes the remaining office and hotel uses.

## **b. The Rose Goldwater Community Center**

Comments were raised regarding the community center which was required to be implemented as part of the first phase of the Village by the Development Agreement.

The 7,000 square foot Rose Goldwater Community Center became operational on October 23, 2014, as part of the first phase of construction for the Village Project. This is a first class facility that has an occupancy of 300 people; wi-fi; a private conference room with TV and seating for up to 18 persons; catering space and prep area; and a kitchenette with refrigerator and sink. The Community Center is maintained at all times in first class condition, as required by the Development Agreement.

The Rose Goldwater Community Center at Westfield Topanga is regularly used by community organizations, including more than 40 non-profits and governmental organizations over the past two years, and hosts regular meetings of the Warner Center Transportation Management Organization and the Warner Center Plan Implementation Board. The Community Center has included numerous events for seniors, including: educational seminars hosted by the Foundation for Senior Services; educational programs for seniors hosted by Oasis; retirement planning workshops; social security workshops; and celebrations for seniors including birthday parties and wedding anniversaries. The Applicant also funded the cost to build-out a permanent broadcast facility within the Community Center for the Los Angeles Radio Reading Service (LARRS), a nonprofit organization that provides information through its radio broadcasts to the visually-impaired, which includes senior citizens. LARRS broadcasts six days a week from the Community Center, and this space is provided rent-free.

The Community Center is operated on a non-profit basis, as the costs charged cover the cost of repair, clean-up, utilities, insurance and other ongoing maintenance requirements. Non-profit organizations seeking to utilize the Community Center also receive a 50-percent discount.

Additional information regarding the Community Center's use is also available for public review in the City's case files for the Village at Westfield Topanga.

### **c. Implementation of Transportation Improvements and Mitigation Measures**

Implementation of the Village's physical transportation improvement mitigation measures has required obtaining approval from Caltrans and multiple City departments, including but not limited to the Department of Transportation (multiple sections including Permit Plan Review, Valley Development Review Section, and the West Valley District Engineer), the Bureau of Engineering, the Department of Public Works, and Urban Forestry. This multi-departmental plan check review process has required extensive coordination and several iterations of construction plans. Additionally, it is difficult to anticipate all issues related to off-site physical improvements until the various responsible City departments and divisions make a final determination as to the off-site improvement plans. Factors which also impact timely implementation of mitigation measures include acquisition of right-of-way easements from private property owners, removal of street trees, and the coordination of street improvements by public entities in order to minimize disruption to the public. As a result of these and other factors, completion of some of the Village mitigation measures has been delayed.

Nonetheless, the Applicant has worked diligently to implement the Village's transportation mitigation measures. Of the 26 physical transportation mitigation measures assigned to the Village for the development of the first phase, 13 have been completed to date. The remaining are anticipated to be completed within the next year. Additional mitigation measures are assigned to Phase 2 of the Village, which includes the development of offices and a hotel. However, these mitigation measures are not required until such time as the Applicant proceeds with Phase 2 development.

Since approval of the Village, the City has adopted the Warner Center 2035 Specific Plan, a regulatory framework for development within the Warner Center, as discussed further in Topical Response No. 1, Warner Center 2035 Specific Plan. The Warner Center Plan alters the way that mitigation will be implemented in the future, including for the Project, with the goal of accelerating the coordination and construction of transportation improvements.

The Warner Center Plan includes a series of programmatic and physical transportation improvements to mitigate the significant transportation impacts resulting from the buildout of the Warner Center Plan area. It also assesses new projects a Mobility Fee to fund the mitigation program. To ensure that this mitigation program is constructed on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan, including these transportation mitigation measures. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board. The Warner Center Plan Implementation Board is required to

include representatives from the community, including the Woodland Hills–Warner Center Neighborhood Council, the Warner Center Association, the West Valley–Warner Center Chamber of Commerce, and the Woodland Hills Homeowners Organization. Additionally, the Warner Center Plan Implementation Board includes representatives from the Department of Public Works, Department of Transportation, Department of City Planning, and other City departments as needed. The first meeting of the Warner Center Plan Implementation Board was held in November 2018.

It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the Warner Center mitigation measures, including those mitigation measures associated with the Project, should be accelerated.

## **5. Public Services**

The Draft Supplemental EIR provided a thorough analysis of potential impacts associated with police and fire protection in Sections IV.J.1, Public Services—Police Protection and IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR.

As discussed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, the Warner Center Plan EIR analyzed full buildout under the Warner Center Plan and concluded that with mitigation measures, impacts would be less than significant to police protection services. The supplemental analysis provided in the Draft Supplemental EIR is specific to the Project Site and demonstrated that similar to the conclusion reached in the Warner Center Plan EIR, the Project would not generate any significant impacts related to police protection. Specifically, police protection services during construction and operation of the Project would be less than significant without project-level mitigation. Additionally, implementation of the Warner Center Plan Mitigation Measures PS-12 through PS-14, and PS-16, PS-17, and PS-19 would further reduce impacts to police protection services.

As discussed in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, the Warner Center Plan EIR concluded that potential construction impacts associated with fire protection and emergency medical services would be less than significant. The Warner Center Plan EIR concluded that with mitigation, operational impacts would also be less than significant. The supplemental analysis provided in the Draft Supplemental EIR is specific to the Project Site and demonstrated that similar to the conclusion reached in the Warner Center Plan EIR, the Project would not generate any significant impacts related to fire protection and emergency medical services. Implementation of the applicable Warner Center Plan mitigation measures would further reduce impacts to fire protection and emergency medical services.

This topical response addresses issues raised in the comments on the Draft Supplemental EIR related to police and fire protection.

### **a. Police Protection**

As detailed below, comments regarding the Draft Supplemental EIR suggest that development of the Project would result in impacts to police services that were not properly addressed or mitigated in the Draft Supplemental EIR. As discussed in more detail in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, the Project's impacts were thoroughly analyzed and determined to be less than significant. With the increase in the police service population from the Project, the officer-to-resident ratio for the Topanga Area would decrease from approximately 1.2 officers per 1,000 residents to approximately 1.1 officers per 1,000 residents with the Project. Therefore, the Project would not cause a significant change to the officer-per-resident ratio for the Topanga Area. With the Project's residential and visitor population, including from the Entertainment and Sports Center, the annual number of crimes reported in the Topanga Area would increase from 110 to 123 reported crimes per year; this likely overestimates the increase, and is therefore conservative, as it assumes daily sold-out events of 15,000 seats in the Entertainment and Sports Center. Furthermore, as discussed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, the Project would have private, on-site security throughout the Project Site, including at the Entertainment and Sports Center and Promenade Square.

Project Design Features J.1-1 through IV.J.1-9 detail the provisions for private, on-site security. Project Design Features J.1-1 through J.1-5 are specific to the Entertainment and Sports Center. As stated in Project Design Feature J.1-1, security personnel for the Entertainment and Sports Center would patrol the property during operating hours, as well as before and after events. They would also coordinate with the proper authorities regarding any unusual disturbances in the area, including loitering, trespassing, and/or criminal activity. In addition, as specifically set forth in Project Design Features J.1-2 and J.1-3, a security plan would be developed and implemented in consultation with the Los Angeles Police Department and Los Angeles Fire Department outlining the security services and features to be provided in conjunction with the Entertainment and Sports Center. The Security Plan would ensure appropriate public safety and security deployment based upon identified objective standards, including, but not limited to: anticipated crowd size, historical data associated with crowd or fan behavior, event type, etc. In addition, as part of the crowd control plans, pedestrian, vehicular, and bicycle patrols would be utilized during all hours of operation. Project Design Feature J.1-4 includes the implementation of an Emergency Procedures Plan, which would outline employee guidelines and procedures in the event of fire, medical emergency, civil disturbance, injuries to multiple individuals, evacuation, and other types of emergencies at the Entertainment and Sports Center. Furthermore, Project Design Feature J.1-5 would require the Applicant to provide a phone

number where the public would be able to report an emergency or a complaint about the method of operation of the Entertainment and Sports Center.

Project Design Features J.1-6 through IV.J.1-9 describe the security plan for the overall Project Site. This Project-wide security plan would include security personnel that would assist with patron access and monitoring entrances and exits; manage and monitor fire/life/safety systems; patrol the perimeter of the property; control and monitor activities in the parking facilities and in public spaces; and include the development of an Emergency Response Plan. Furthermore, an enhanced security program would be implemented for the overall Project Site, with security system features that include closed circuit television, and industry standard security lighting at recommended locations in consultation with LAPD, including parking structures, pathway options, and curbside queuing areas.

Finally, the Project would implement Warner Center Plan Mitigation Measures PS-16, PS-17, and PS-19, which would be applicable to the overall Project Site and would require the Project to include numerous operational design features. These operational design features would include incorporating design guidelines relative to security and semi-public and private spaces and providing the local Commanding Officer with access routes and other information that might facilitate police response, which would help to enhance safety within and immediately surrounding the Project Site.

Other commenters raised concerns regarding homelessness and security within the Project's open space areas, including Promenade Square. The Project-wide security plan discussed above in Project Design Features J.1-6 through IV.J.1-9 would include security measures for the Project's open space areas, as well as measures to address any individuals who attempt to stay overnight at Promenade Square. While the Warner Center Plan requires that Promenade Square be open to the public from 6:00 A.M. to 10:00 P.M. daily, security would be permitted to escort individuals out beyond those times, or within those times if they posed a security concern. Project Design Features J.1-6 and IV.J.1-7 have been updated to specifically address security for the Project's open space areas, as follows; see also Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR.

**Project Design Feature J.1-6:** In order to maintain high levels of safety for employees, patrons, residents and visitors during Project operation, on-site security consisting of personnel and equipment would be provided for the entire Project Site, including for the Project's open space areas, such as Promenade Square. On-site security presence would be implemented based on the anticipated day-to-day levels of activity and would be increased during peak shopping days. During each shift, security personnel would be assigned to foot patrol, bike patrol and golf cart/vehicle patrol, in order to cover the common areas

of the site. Duties of the security personnel would include, but not be limited to, the following:

- Assisting with patron access and monitoring entrances and exits,
- Managing and monitoring fire/life/safety systems,
- Patrolling the perimeter of the property,
- Controlling and monitoring activities in the parking facilities; and
- Controlling and monitoring activities in spaces open to the public.

**Project Design Feature J.1-7: Security Programs and Equipment:** An enhanced security program would be implemented for the entire Project Site, including for the Project's open space areas, such as Promenade Square. Security system features to be installed on-site as part of this enhanced security program include industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas. Closed-circuit television (CCTV) would be installed at locations consistent with industry standards. These locations would include all exit points, play areas, family rest areas, food courts, loading docks, and parking areas/structures. CCTV access would be available to the local police station via secure internet with future consideration of wireless secure transmission. Additionally, license plate recognition (LPR) cameras would be located strategically throughout the property.

In addition, as discussed further in Section IVJ.1, Public Services—Police Protection, of the Draft Supplemental EIR, in accordance with the police protection-related goals, objectives, and policies set forth in the City of Los Angeles General Plan Framework Element (Framework Element), the LAPD would also continue to monitor population growth and land development throughout the City for the purpose of evaluating existing and future police protection needs, as specified by Objective 9.13 and Policy 9.13.1, and provide adequate police services, facilities, equipment, and personnel are available to meet such needs, as required by Objective 9.14. However, the Project would implement various project design features and mitigation measures to reduce the Project's impacts on police protection. Furthermore, the Applicant would consult with LAPD regarding the incorporation of several project design features, including the development of a security plan, a First Responder Communications Plan, and an Emergency Procedures Plan, among others.

Notwithstanding, based on the *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, the need for or deficiency in adequate police



protection services in and of itself is not a CEQA impact.<sup>24</sup> Where a project causes a need for additional police protection services resulting in a need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in a Draft EIR. The ultimate determination of whether there is a significant impact to the environment, related to police protection services from a project is determined by whether construction of new or expanded police protection services is a reasonably foreseeable direct or indirect effect of the project.

Based on the analysis provided in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, with implementation of a comprehensive on-site private security plan for the Entertainment and Sports Center and overall Project Site through Project Design Features J.1-1 through J.1-9, and Warner Center Plan Mitigation Measures PS-16, PS-17, and PS-19, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site, nor is the need for additional police protection services an environmental impact that CEQA requires the Project to mitigate. Furthermore, the Project would not result in a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. As such, impacts on police protection services during Project operation would be less than significant.

## **b. Fire Protection**

As detailed below, comments regarding the Draft Supplemental EIR suggest that development of the Project would result in impacts to fire services that were not properly addressed or mitigated in the Draft Supplemental EIR. As discussed in more detail in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, the Project's impacts were determined to be less than significant.

With regard to fire flow, as discussed in the Utility Report, included in Appendix P, of the Draft Supplemental EIR, an Information of Fire Flow Availability Request was submitted

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<sup>24</sup> *The City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833 found that "[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city." Thus, the need for additional police protection services is not an environmental impact that CEQA requires the Project to mitigate.

to the Los Angeles Department of Water and Power (LADWP) to determine available fire hydrant flow from the existing public fire hydrants. Based on the completed information request, LAFD determined that eight hydrants flowing simultaneously for a combined flow of 16,000 gallons per minute (gpm) would be available. This is greater than the 12,000 gpm required at a minimum residual pressure of 20 psi. Therefore, the Project would comply with flow standards specified in Section 57.507.3.1 of the LAMC.

Other commenters raised concerns regarding an increase in fire hazards due to development of the Project, including an increase in wildfires and impact to already underserved fire facilities. The Project would implement various project design features and mitigation measures to reduce the Project's impacts on fire protection. In particular, Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, includes Project Design Features J.1-2, J.1-4, and J.1-9 which would reduce impacts for both police protection and fire protection. Specifically, Project Design Feature J.1-2, which applies to the Entertainment and Sports Center, requires preparation of a Security Plan that would be developed in consultation with LAPD and LAFD outlining the security services and features to be provided in conjunction with the proposed Entertainment and Sports Center. In addition, Project Design Features J.1-4 and J.1-9 require the development of an Emergency Procedures Plan for both the Entertainment and Sports Center and the Project's other buildings, respectively, that would outline employee guidelines and procedures in event of fire, medical emergency, civil disturbance, injuries to multiple individuals, evacuation, and other times of emergencies. The Emergency Procedures Plan would be subject to review by LAPD and LAFD. Additionally, the Project would be required to submit plans to LAFD, in consultation with LAFD, that incorporate fire prevention and suppression features appropriate to the design of the Project, as required by Warner Center Plan Mitigation Measures PS-1 through PS-10, among other mitigation measures. These mitigation measures would further reduce impacts to fire protection and emergency medical services.

The City is also required to ensure that adequate fire protection service levels are maintained. As discussed further in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, the Safety Element, and the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan, as listed in the regulatory framework above, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities (Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Policy 9-1.1 of the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan) and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). However, the Project would implement various project design features and mitigation measures to reduce the Project's impacts on fire protection. Furthermore, the Applicant would consult with LAFD regarding the incorporation of several project design features, including the

development of a security plan, a First Responder Communications Plan, and an Emergency Procedures Plan, among others.

Notwithstanding, based on the *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, the need for or deficiency in adequate fire protection and emergency medical services in and of itself is not a CEQA impact.<sup>25</sup> Specifically, *Hayward* found that “[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city.” The protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate. Where a project causes a need for additional fire protection services resulting in a need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in a Draft EIR. The ultimate determination of whether there is a significant impact to the environment related to fire protection services from a project is determined by whether construction of new or expanded fire protection and emergency medical facilities is a reasonably foreseeable direct or indirect effect of the project.

Based on the analysis provided in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, the Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service, nor is the need for additional fire protection services an environmental impact that CEQA requires the Project to mitigate. Operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection emergency services. Therefore, impacts to fire protection and emergency medical services during operation of the Project would be less than significant, and no mitigation measures are required.

## 6. Infrastructure

The Draft Supplemental EIR provided a thorough analysis of potential impacts associated with water, wastewater, and energy in Sections IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure; IV.M.2, Utilities and Service Systems—Wastewater; and IV.N, Appendix F—Energy Conservation, of the Draft Supplemental EIR.

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<sup>25</sup> *The City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833 found that “[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city.” Thus, the need for additional police protection services is not an environmental impact that CEQA requires the Project to mitigate.

Further, the Warner Center Plan EIR included an evaluation of potential impacts to water supply and infrastructure; wastewater generation, treatment, and conveyance; and impacts associated with electricity and natural gas usage resulting from construction and operation of the uses proposed within the Warner Center Plan area. The Warner Center Plan EIR concluded that with coordination with LADWP and compliance with applicable regulations, potential impacts to water supply and conveyance would be less than significant. In addition, with implementation of a mitigation measure, impacts to wastewater conveyance capacity and electricity and natural gas infrastructure would be less than significant. The supplemental analysis provided in the Draft Supplemental EIR is specific to the Project Site and demonstrated that similar to the conclusion reached in the Warner Center Plan EIR, the Project would not generate any significant impacts related to water supply or infrastructure, wastewater, and electricity and natural gas during construction or operation.

The topical responses below address issues raised in the comments on the Draft Supplemental EIR related to specific areas of infrastructure.

### **a. Water**

Issues raised in the comments regarding the Draft Supplemental EIR related to water include the Project's impacts on water supply and infrastructure, particularly during operation of the Project. As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft Supplemental EIR, a water supply assessment (WSA) was prepared for the Project and approved by LADWP, as provided in Appendix O, of the Draft Supplemental EIR. As shown therein, it is estimated that the Project would generate an average daily water demand of approximately 627,011 gallons per day (gpd) or approximately 702.39 acre-feet per year (AFY). The Project would implement Project Design Feature M.1-1, which includes implementation of additional water conservation measures beyond those required by the LAMC, as amended by Ordinance No. 184248. The design features that are more stringent than those required by the LAMC include high-efficiency toilets with flush volume of 1.04 gallons per flush, kitchen faucets with flow rate of 1.25 gallons per minute, showerheads with flow rate of 0.75 gallons per minute, reuse of pool backwash water for irrigation, drip/subsurface irrigation, and rainwater harvesting systems. With the removal of the existing uses and implementation of Project Design Feature M.1-1, the Project would result in a net average daily water demand of approximately 532,835 gpd, or approximately 597 AFY. The *Water Supply Assessment—Promenade 2035 Project* (Promenade 2035 WSA) concluded that the increase in water demand for the Project falls within the available and projected water supplies during an average year, single-dry year, and multiple-dry year through the year 2040, as well as the intervening years (i.e., 2033), as described in the 2015 Urban Water Management Plan (UWMP).

The 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City through the year 2040. LADWP, therefore, concluded that the increase in water demand for the Project falls within the available and projected water supplies during an average year, single-dry year, and multiple-dry year through the year 2040, as well as the intervening years (i.e., the Project buildout year 2033), as described in the 2015 UWMP. As outlined in the 2015 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2015 UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2015 UWMP also furthers the goals of the City's Executive Directive No. 5 and Sustainable City pLAn, addresses the current and future State Water Project supply shortages, and concludes that MWD's actions, in response to the threats to the State Water Project, will ensure continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, water conservation and recycling will play an increasing role in meeting future water demands in the City.

Based on the above, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Thus, 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. Therefore, the Draft Supplemental EIR found that the Project's operation-related impacts on water supply would be less than significant.

With regard to infrastructure, the Project proposes to connect to the existing mains within all of the surrounding streets: Topanga Canyon Boulevard, Erwin Street, Oxnard Street and Owensmouth Avenue with laterals that would be adequately sized to simultaneously accommodate fire demand and domestic demand. The Service Advisory Requests (SARs) approved by LADWP and provided in the Utility Report, included as Appendix P, of the Draft Supplemental EIR, were processed using the projected water demands and demonstrate that there is an existing static pressure of greater than 20 psi and therefore, the water infrastructure can meet the needs of the Project. Accordingly, the Project would not require or result in the construction of new off-site water facilities or expansion of existing off-site facilities. Therefore, the Project's operational impacts on water infrastructure would be less than significant.

The Project would also implement Warner Center Plan Mitigation Measures U-2 through U-11, which require the Applicant to obtain water supply and conveyance demand/pressure clearance from LADWP, to coordinate with LAFD and the Department of Building Safety in order to ensure that existing and/or planned fire hydrants are capable of meeting fire flow demand/pressure requirements, and to incorporate Phase I of the City of Los Angeles Emergency Water Conservation Plan, among others. These measures would

further reduce potential impacts to water supply and infrastructure due to development of the Project.

## **b. Wastewater**

Issues raised in the comments regarding the Draft Supplemental EIR related to wastewater include the Project's impacts on wastewater infrastructure capacity, particularly during operation of the Project. As discussed in Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft Supplemental EIR, there are two existing sanitary sewer connections extending to the Project Site from Erwin Street and Owensmouth Avenue. Connections from these streets lead to private sewer mains that traverse through the site. There is a 15-inch vitrified clay pipe (VCP) sewer line in Owensmouth Avenue flowing north and an 8-inch VCP sewer line in Erwin Street flowing west that ultimately leads to an 18-inch main in Topanga Canyon Boulevard that is flowing north. Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. A Sewer Capacity Availability Request, included in the Utility Report, provided in Appendix P, of the Draft Supplemental EIR, was obtained from LA Sanitation to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. The Bureau of Sanitation analyzed the Project demands in conjunction with existing conditions and forecasted growth, and approved the Project to discharge up to 526,950 gpd of waste water to the 15-inch VCP sewer line in Owensmouth Avenue and the 8-inch VCP sewer line in Erwin Street. Based on the current approximate flow levels and design capacities in the sewer system and the Project's estimated wastewater flow, the City determined that the existing capacity of the above sewer mains would be adequate to accommodate the additional wastewater infrastructure demand created by the Project. The Project would also comply with LAMC Section 64.14 to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LA Sanitation and California Plumbing Code standards. Therefore, the Project would not 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. Thus, impacts related to wastewater infrastructure capacity would be less than significant.

The Project would also implement Warner Center Plan Mitigation Measure U-1, which would require that the Applicant coordinate with the Department of Public Works, Bureau of Sanitation in order to ensure that existing and/or planned sewer conveyance and treatment facilities are capable of meeting wastewater flow capacity requirements. Implementation of this mitigation measure would further reduce potential impacts to infrastructure due to development of the Project.

### **c. Energy**

Issues raised in the comments regarding the Draft Supplemental EIR related to energy include the Project's impacts on electricity and natural gas supply and infrastructure, particularly during operation of the Project.

With regard to electricity, as discussed in Section IV.N, Appendix F—Energy Conservation, of the Draft Supplemental EIR, in addition to complying with CalGreen requirements, the Project Applicant would also implement Project Design Feature D-1 in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR, which states that the design of the new buildings shall incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program to be capable of meeting the standards of LEED Silver or equivalent. Energy-related measures include exceeding the California's Building Energy Efficiency Standards by 25 percent for energy efficiency, the use of Energy Star-labeled products and appliances, and use of light-emitting diode (LED) lighting where appropriate, to reduce electricity use. Furthermore, Project Design Feature D-3 would require the Project to install a minimum of 10 percent of total domestic hot water heaters as solar or non-fossil fuel burning units. Additionally, Project Design Features D-4 and D-5 would result in at least 40 percent of the total code-required parking spaces provided on the Project Site be capable of supporting electric vehicle supply equipment (EVSE) and at least 15 percent of the code-required parking spaces equipped with EV charging stations, respectively. It is anticipated that implementation of Project Design Features D-4 and D-5 would marginally increase usage of electricity; however, any additional electricity usage generated by use of EV charging stations and future conversion of EVSE to EV charging stations would be offset by transportation-fuel savings of gasoline and diesel from the electric vehicles using the EV charging equipment. Further, under Project Design Feature D-6, the Project would provide a minimum of 500 kilowatts of photovoltaic panels on the Project Site. Moreover, Project Design Feature M.1-1 in Section IV.M.1, Utilities and Service Systems---Water Supply and Infrastructure, of the Draft Supplemental EIR, requires that the Project would implement water conservation features, including high-efficiency toilets with flush volume of 1.04 gallons per flush, kitchen faucets with flow rate of 1.25 gallons per minute, showerheads with flow rate of 0.75 gallons per minute, reuse pool backwash water for irrigation, drip/subsurface irrigation, and rainwater harvesting systems, among others. Therefore, the Project would not cause wasteful, inefficient, and unnecessary consumption of electricity during operation as the project design features proposed for the Project would reduce the Project's electricity consumption.

Based on LADWP's 2016 Power Integrated Resource Plan, LADWP forecasts that its total energy sales in the 2033–2034 fiscal year (the Project's full buildout year) will be 28,804 gigawatt-hours (GWh) of electricity. As such, the Project-related net annual electricity consumption of 19,246 megawatt-hours (MWh)/year would represent

approximately 0.1 percent of LADWP's projected sales in 2033 (the Project's full buildout year). In addition, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area, as shown in Appendix P, of the Draft Supplemental EIR. Furthermore, the Project would implement any necessary connections and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project. Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Accordingly, operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

With regard to natural gas, the Project Applicant would implement Project Design Feature D-1 in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR, which requires that the design of the new buildings shall incorporate features of the LEED program to be capable of meeting the standards of LEED Silver or equivalent, including exceeding the California's Building Energy Efficiency Standards baseline standard requirements by 25 percent for energy efficiency. Specifically, natural gas would be reduced by implementing various energy efficiency improvements, consistent with LEED checklist requirements, such as installing high efficiency water heaters or tankless water heaters, installing enhanced insulation, and high-efficiency furnaces, among others. Furthermore, Project Design Feature D-2 would limit the installation of natural gas fireplaces to the villa and penthouse units and outdoor amenities. Additionally, Project Design Feature D-3 would require the Project to install a minimum of 10 percent of total domestic hot water heaters as solar or non-fossil fuel burning units. Therefore, the Project would not cause wasteful, inefficient, and unnecessary consumption of natural gas during operation as the project design features proposed for the Project would reduce the Project's natural gas consumption.

The Project's estimated net annual demand for natural gas is 34,433,600 cubic feet (cf)/year, or approximately 94,339 cf/day. Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.38 billion cf/day in 2033 (the Project's full buildout year). The Project would account for approximately 0.004 percent of the 2033 (the Project's full buildout year) forecasted consumption in SoCalGas' service area. In addition, SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area, as shown in Appendix P, of the Draft Supplemental EIR. The Project would implement any necessary connections and upgrades required by SoCalGas to ensure that SoCalGas would be able to adequately serve the Project. Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's net increase in demand for natural gas. As such, operation of the Project would not result in an increase in demand for natural gas that exceeds available



supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

## 7. Open Space

An analysis of the open space areas proposed on the Project Site was provided in Section IV.J.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR. In response to comments regarding the Draft Supplemental EIR, which include concerns regarding the sufficiency and visibility/accessibility of the proposed open space areas, as well as the security proposed for the open space areas, the discussion below provides additional information.

### a. Distinct Open Space Areas

The Project proposes approximately 10.6 acres of outdoor open space, of which approximately 5.6 acres are ground level and publicly accessible. These areas are proposed for active and passive recreational activities, and include approximately 3 miles of walking paths within the approximately 5.6 acres of ground level open space. In total, approximately 600 trees would be provided on-site by the Project, for an increase of 308 trees over existing conditions.

Promenade Square is the Project's largest open space area at nearly 1.5 acres, or 60,000 square feet in size; to provide a comparison, it is roughly the size of Pierce College's football field, as shown in Figure II-1 on page II-53. Given the large size of Promenade Square, it has been designed to include distinct areas that would function differently: the Central Lawn, the Deck, and the Central Plaza, as shown in Figure II-2 on page II-54. The Central Lawn is intended to be a flexible open grassy area that could be used for a variety of activities, like outdoor music and dance, kids play, pick-up soccer games, family picnics, and yoga and tai-chi classes. Keeping this area free of permanent objects would allow it to be a true multipurpose area, and the largest active recreation space at the Project. The Central Lawn would be bordered by the Deck, a raised walking path lined with a double row of trees. The Deck would have abundant shaded seating areas, where people could watch the activities on the Central Lawn, play chess, read a book, or stroll. Conceptual images of the intended look of the Deck are shown in Figure II-3 on page II-55. The Deck is intended to be a passive recreation area for smaller day-to-day gatherings, framing the Central Lawn. Finally, the Central Plaza would border Promenade Square's western side, at the same level as the Central Lawn, and also include trees. This area could be used for farmers markets, fairs, or as another passive recreation area. There will be a strong landscape connection between the Entertainment and Sports Center and Promenade Square, and a zero curb cut between these two areas would allow them to function together. A public restroom would also be available to visitors of



**Figure II-1**  
Promenade Square Comparisons





**Figure II-2**  
Areas of the Promenade Square





**Figure II-3**  
Conceptual Images of the Deck

Promenade Square, and the Project's other open space areas; the conceptual location of this public restroom is shown in Figure II-4 on page II-57.

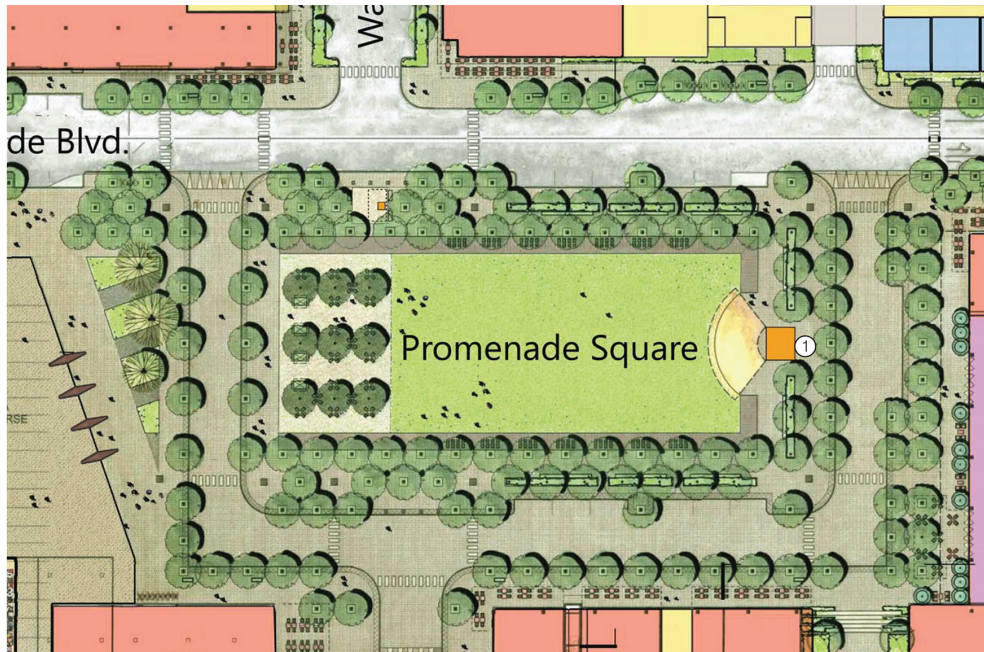
The Gardens are two smaller courtyard areas in the Northeast Area, which together total approximately 0.5 acre in size. They would be adjacent to the residential buildings in the Northeast Area, but open to the public and are proposed for small gatherings. These areas are proposed to have shade trees, small lawns, and soft decomposed granite with seating areas, and function as a mix of active and passive recreation with potential amenities like picnic tables and bocce ball courts.

Finally, the Project has several smaller pocket park areas throughout the Site. At the northern entrance to the Project Site at West Lane, both corner entrance locations would have green space areas totaling approximately 3,000 square feet. At the entry off Topanga Canyon Boulevard, both sides of Promenade Boulevard would have small landscaped areas together totaling approximately 12,000 square feet. An approximately 9,000-square-foot area would be located on the eastern side of the Entertainment Center, across from Promenade Square. Landscaped pathways dispersed throughout the Project Site, including pedestrian adapted pathways, would total approximately 84,000 square feet.

The Project further proposes approximately five acres of private landscaped roof deck open space for the Project's residential, office and hotel uses. Trees and landscaping are proposed on the edge of these decks to allow the greenery to be seen and experienced from the ground level. Amenity roof decks are proposed for the residential buildings, which will include pools, outdoor dining areas, landscaped park spaces, and shaded seating areas. The creative office spaces are proposed to have adjacent outdoor roof decks, allowing people to easily walk outside to eat lunch or bring meetings outdoors. Both hotels will also provide elevated outdoor spaces for guests and visitors that are proposed to include pools, seating areas, and other amenities. Private outdoor open space would total approximately 165,000 square feet for the residential buildings, 14,000 square feet of creative office outdoor open space, and 41,000 square feet of hotel outdoor open space.

The Project would also include landscaped and tree-lined parkways bordering the entire perimeter of the Project Site, consistent with the Warner Center Plan. Along Topanga Canyon Boulevard in the Northwest Area, an 8-foot parkway would be provided next to the public street, followed by an adjacent 14-foot shared use trail, and then a 16-foot landscaped setback between the trail and the Project's internal road/valet area. Along Erwin Street, an 8-foot sidewalk would be provided, and supplemented with a 12-foot setback for landscape and retail areas to support the active street frontages. Owensmouth Avenue is also designed as an active street frontage, and will have an 8-foot parkway, followed with an adjacent 8-foot sidewalk plus additional 12-foot setbacks. Oxnard Street will have an 8-foot parkway with an adjacent 8-foot sidewalk, and a 12-foot required





① Public Restroom at Promenade Square



NOTE: Conceptual and Illustrative Only

**Figure II-4**  
Conceptual Location of Promenade Square Public Restroom

setback. Walking paths through the site include large canopy trees that will scale with the buildings and allow views beneath to the retail frontage, as well as shaded seating.

The Project's proposed 466,000 square feet of open space would exceed both the 154,325 square feet of residential open space requirements of the LAMC and the 107,941 square feet of publicly accessible open space requirements in the Warner Center Plan.

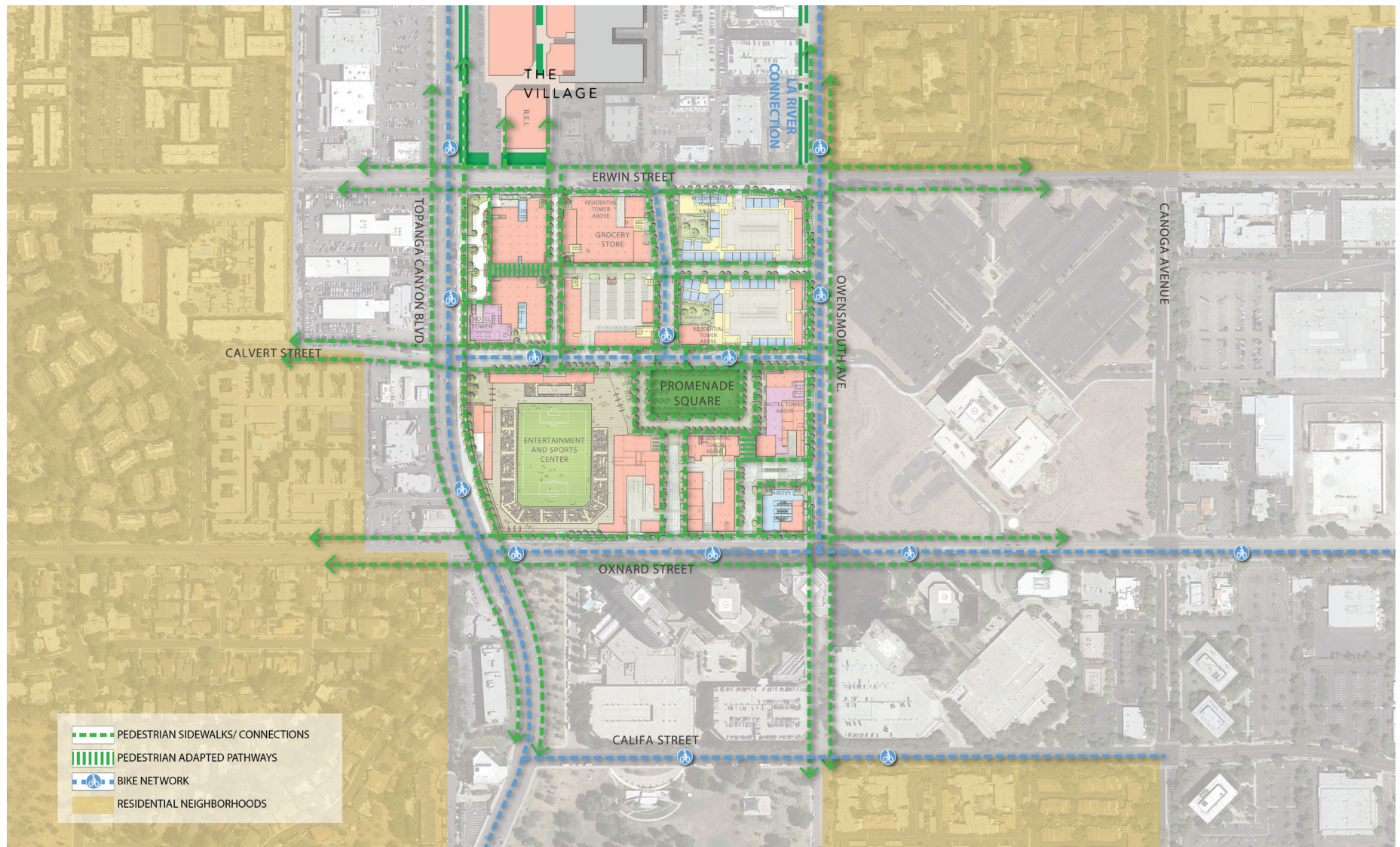
Additionally, all of these open space areas would be privately maintained by the Project Applicant. In compliance with the Warner Center Plan, the Applicant would be required to record a covenant prior to the issuance of building permits to ensure that Promenade Square would be maintained in good condition and made available and accessible to the public.

## **b. Accessibility and Visibility of Promenade Square**

Promenade Square is required by the Warner Center Plan to be open to the public, and will be easily accessible to people who walk, bike or take transit to the Project Site, in addition to those who choose to park on-site. All pathways would be ADA accessible. The Project proposes a series of integrated walkways providing both external and internal connections, to encourage and promote walkability to the Project Site, as shown in Figure II-5 on page II-59. The Project would also be accessible by bicycle, as shown in Figure II-5, and would provide bicycle parking spaces and facilities throughout the Project Site in accordance with City requirements, which currently require 361 short-term and 1,726 long-term bicycle parking spaces. In addition, the Project would provide showers and lockers in compliance with LAMC Section 12.21.A.16, which requires shower and personal lockers for long-term bicycle parking spaces. Finally, the Project is located in an area well-served by public transit provided by Metro, LADOT, Santa Clarita Transit, and the Antelope Valley Transit Authority. The Project is located next to the Warner Center Transit Hub, which includes a stop by Metro's new Warner Center circulator providing a connection to the Metro Orange Line.

Due to the size of Promenade Square, at nearly 1.5 acres, and the wide streets traversing the Project Site connecting the public streets to Promenade Square, Promenade Square will be visible from the Project's perimeter. Promenade Boulevard, the east-west street through the Project Site, is designed as a New Street under the Warner Center Plan. Buildings would be separated by approximately 80 feet across Promenade Boulevard, which is eight feet wider than the prescribed minimum right-of-way under the Warner Center Plan. This wide street and large building separation will allow views into the Site of Promenade Square from both Topanga Canyon Boulevard and Owensmouth Avenue. Warner Drive South is designed with buildings separated by approximately 90 feet with wide landscaped parkways to enhance visibility from Oxnard Street. An exhibit illustrating





**Figure II-5**

Walking Connections to the Project Site and Promenade Square



the wide view corridors of Promenade Square is provided in Figure II-6 on page II-61. Additionally, Promenade Square will be a prominent visual feature of the New Streets traversing the Project Site, which streets will be open to the public.

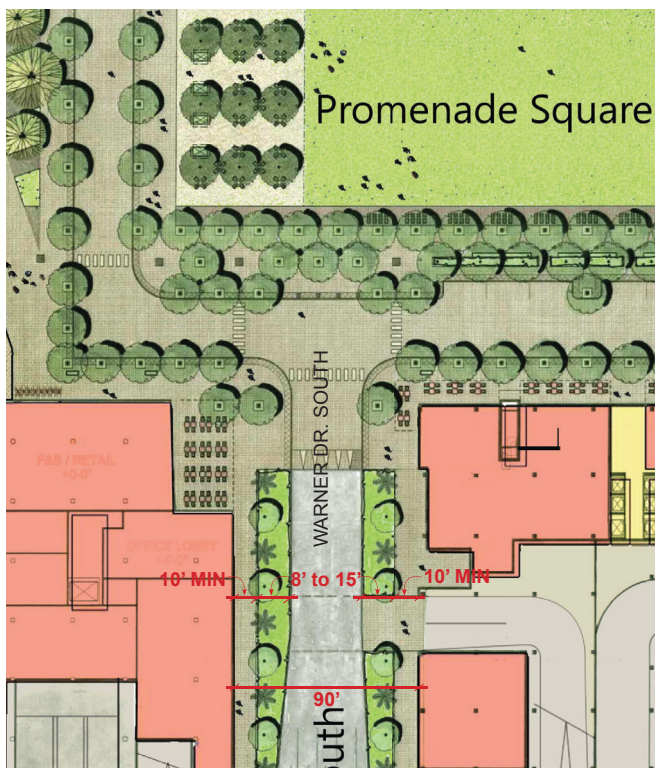
However, in response to comments expressing concern that there would be a lack of visibility of Promenade Square, and to provide an even wider view corridor from Topanga Canyon Boulevard, the Applicant has updated its site plan to provide a 20-foot sidewalk along Promenade Boulevard on the north side of the Entertainment and Sports Center. This would allow a second row of trees at this location, and increase the building separation to a variable dimension between 85 to 100 feet at this location, further expanding views of Promenade Square from Topanga Canyon Boulevard. This updated site plan is provided in Figure II-7 on page II-62; see also Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR.

### **c. Security for Open Space Areas**

Some commenters raised concerns regarding homelessness and security within the Project's open space areas, including Promenade Square. The Project would include an enhanced Security Plan described in Project Design Features J.1-6 through IV.J.1-9, that includes patrols on foot, bike, and vehicles; security lighting; closed-circuit television, which access would be available to local police through secure internet; and license plate recognition cameras strategically located throughout the Project Site. The Applicant would also be required to consult with the LAPD to develop additional crime prevention features to maintain a safe and secure environment. While these project design features are for the entire Project Site, including the open space areas, Project Design Features J.1-6 and IV.J.1-7 have been updated to specifically address security for the Project's open space areas, as follows; see also Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR:

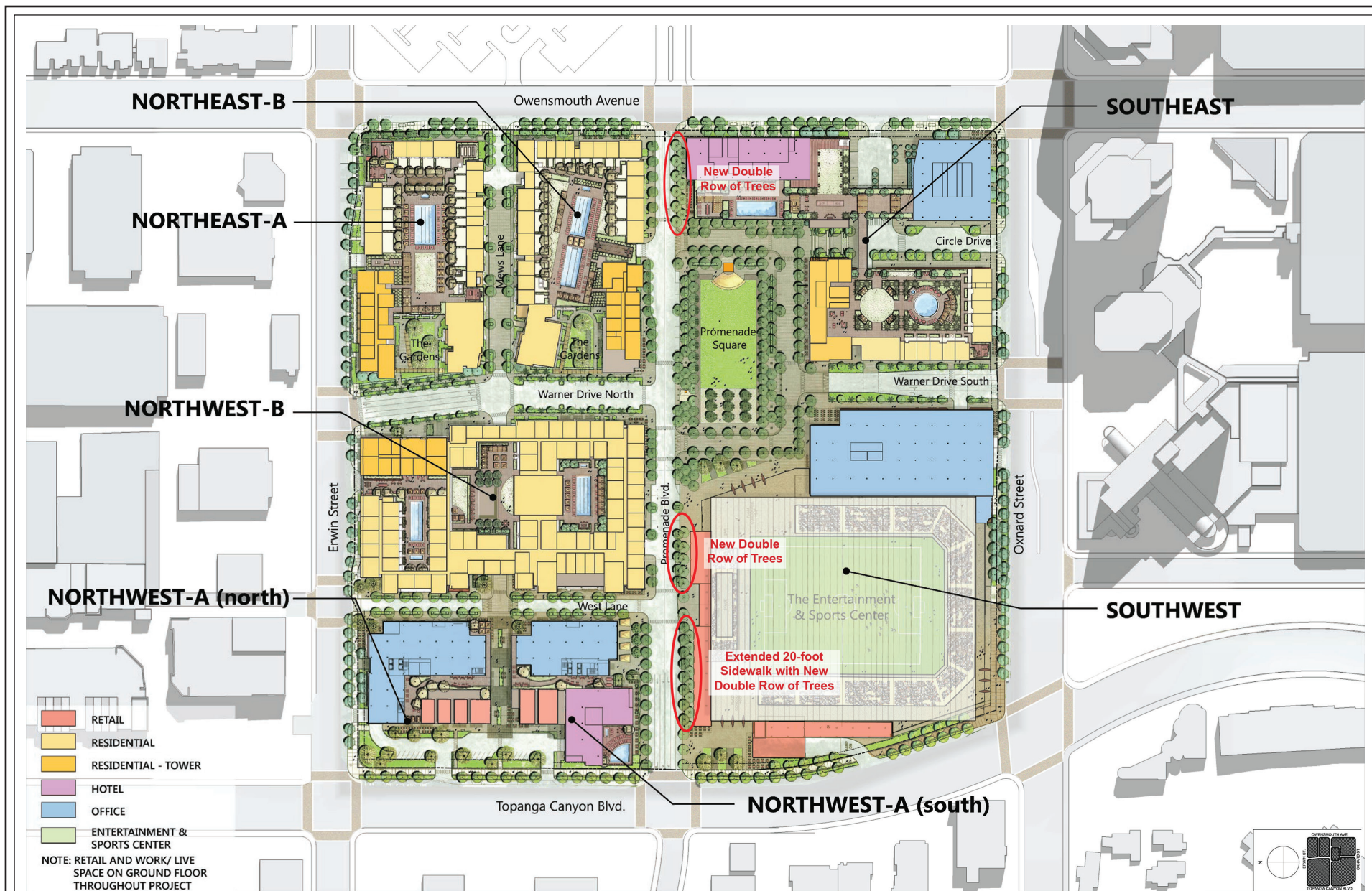
**Project Design Feature J.1-6:** In order to maintain high levels of safety for employees, patrons, residents and visitors during Project operation, on-site security consisting of personnel and equipment would be provided for the entire Project Site, including for the Project's open space areas such as Promenade Square. On-site security presence would be implemented based on the anticipated day-to-day levels of activity and would be increased during peak shopping days. During each shift, security personnel would be assigned to foot patrol, bike patrol and golf cart/vehicle patrol, in order to cover the common areas of the site. Duties of the security personnel would include, but not be limited to, the following:

- Assisting with patron access and monitoring entrances and exits;



**Figure II-6**  
View Corridors of Promenade Square





**Figure II-7**  
Updated Conceptual Site Plan

- Managing and monitoring fire/life/safety systems;
- Patrolling the perimeter of the property;
- Controlling and monitoring activities in the parking facilities; and
- Controlling and monitoring activities in spaces open to the public.

**Project Design Feature J.1-7: Security Programs and Equipment:** An enhanced security program would be implemented for the entire Project Site, including for the Project's open space areas such as Promenade Square. Security system features to be installed on-site as part of this enhanced security program include industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas. Closed-circuit television (CCTV) would be installed at locations consistent with industry standards. These locations would include all exit points, play areas, family rest areas, food courts, loading docks, and parking areas/structures. CCTV access would be available to the local police station via secure internet with future consideration of wireless secure transmission. Additionally, license plate recognition (LPR) cameras would be located strategically throughout the property.

These security measures would also address any individuals who attempt to stay overnight at Promenade Square. While the Warner Center Plan requires that Promenade Square be open to the public from 6:00 A.M. to 10:00 P.M. daily, security would be permitted to escort individuals out beyond those times, or within those times if they pose a security concern.

Additionally, the Project would implement Warner Center Plan Mitigation Measures PS-16, PS-17, and PS-19, which would be applicable to the overall Project Site and would require the Project to include numerous operational design features. These operational design features would include incorporating design guidelines relative to security and semi-public and private spaces and providing the local LAPD Commanding Officer with access routes and other information that might facilitate police response, which would help to enhance safety within the Project Site, as well as for the adjacent residential areas to the Project Site.

## II. Responses to Comments

### C. Matrix of Comments Received on the Draft Supplemental EIR

Table II-1  
Matrix of Comments Received on the Draft Supplemental EIR

| Letter No.                | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|---------------------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| <b>STATE AND REGIONAL</b> |  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              |               |
| 1                         | Scott Morgan<br>Director, State Clearinghouse<br>State Clearinghouse & Planning Unit<br>Governor's Office of Planning and Research<br>State of California<br>1400 Tenth St.<br>Sacramento, CA 95814-5502 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
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| 2          | Scott Morgan<br>Director, State Clearinghouse<br>State Clearinghouse & Planning Unit<br>Governor's Office of Planning and Research<br>State of California<br>1400 Tenth St.<br>Sacramento, CA 95814-5502 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 3          | Lijin Sun<br>Program Supervisor<br>CEQA Inter-Governmental Review<br>Planning, Rule Develop. & Area Sources<br>SCAQMD<br>21865 Copley Dr.<br>Diamond Bar, CA 91765-4178                                  |                   |                     |                       |   | X           |                    |                          | X                               |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              |               |

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| 4          | Andrew Pennington<br>Director of Land Use & Planning<br>Office of Councilmember Bob Blumenfield<br>Los Angeles City Council, Third District<br>19040 Vanowen St.<br>Reseda, CA 91335-5172<br><br>Honorable Bob Blumenfield<br>Council District 3<br>Los Angeles City Hall<br>200 N. Spring St., Rm. 415<br>Los Angeles, CA 90012-1793 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 5          | Tom Bartlett<br>City Planner<br>City of Calabasas<br>100 Civic Center Way<br>Calabasas, CA 91302-4112   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 6          | Ali Poosti<br>Division Manager<br>Wastewater Engineering Services Div.<br>LA Sanitation   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
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| 7             | Ali Poosti<br>Division Manager<br>Wastewater Engineering Services Div.<br>LA Sanitation  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| ORGANIZATIONS |  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              |               |
| 8             | Matt Dixon<br>Abundant Housing LA<br>620 W. Wilson Ave., Unit H<br>Glendale, CA 91203-2477<br><br>Mark Vallianatos<br>Abundant Housing LA<br>3591 Canada St.<br>Los Angeles, CA 90065-2812<br><br>Brent Gaisford<br>Abundant Housing LA<br>3236 Hutchison Ave.<br>Los Angeles, CA 90034-3211<br><br>Leonora Yetter<br>Abundant Housing LA<br>1013 16th St., Unit 102 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |



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|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
|            | <p>Santa Monica, CA 90403-4331</p> <p>Mark Edwards<br/>Abundant Housing LA<br/>1174 N. Curson Ave., Apt. 8<br/>West Hollywood, CA 90046-5435</p> <p>Gabe Rose<br/>Abundant Housing LA<br/>abundanthousingla@gmail.com</p> <p>Chelsea Byers<br/>Abundant Housing LA<br/>abundanthousingla@gmail.com</p> |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              |               |
| 9          | <p>David Allison, President<br/>Allison Asset Management Company, Inc.<br/>2424 S.E. Bristol St., Ste. 300<br/>Newport Beach, CA 92660-0764</p>  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | <b>X</b>      |

**Table II-1 (Continued)**  
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|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 10         | Hilary Norton<br>BizFed Chair<br><br>David Fleming<br>BizFed Founding Chair<br><br>Tracy Hernandez<br>BizFed Founding CEO<br><br>Los Angeles Business Federation<br>6055 E. Washington Blvd., Ste. 260<br>Commerce, CA 90040-2488                                    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 11         | Jerard Wright<br>Policy Manager<br>BizFed—Los Angeles County Business Federation<br>6055 E. Washington Blvd., #260<br>Commerce, CA 90040-2488<br><br>Hilary Norton<br>BizFed Chair<br>Fixing Angelenos Stuck in Traffic (FAST)<br>BizFed—Los Angeles County Business |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

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|            | <p>Federation<br/>6055 E. Washington Blvd., #260<br/>Commerce, CA 90040-2488</p> <p>David Fleming<br/>BizFed Founding Chair<br/>BizFed—Los Angeles County Business Federation<br/>6055 E. Washington Blvd., #260<br/>Commerce, CA 90040-2488</p> <p>Tracy Hernandez<br/>BizFed Founding CEO<br/>Impower, Inc.<br/>BizFed—Los Angeles County Business Federation<br/>6055 E. Washington Blvd., #260<br/>Commerce, CA 90040-2488</p> |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              |               |

**Table II-1 (Continued)**  
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| 12         | Rebecca L. Morales<br>rlm@m-consultants.net<br><br>Jeff Modrzejewski<br>CREED LA<br>501 Shatto Pl., Ste. 200<br>Los Angeles, CA 90020-1748   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 13         | Brandy Salas, Admin Specialist<br>Gabrieleño Band of Mission Indians—<br>Kizh Nation<br><br>Andrew Salas, Chairperson<br>Gabrieleño Band of Mission Indians—<br>Kizh Nation<br>P.O. Box 393<br>Covina, CA 91723-0393 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              | X                         |                                 |            |             |                                |                   |              |               |
| 14         | Administrative Specialist<br>Gabrieleño Band of Mission Indians—<br>Kizh Nation<br>P.O. Box 393<br>Covina, CA 91723-0393   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              | X                         |                                 |            |             |                                |                   |              |               |

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| 15         | Board of Directors<br>Golden State Environmental Justice Alliance<br>P.O. Box 79222<br>Corona, CA 92877-0174                                    |                   | X                   | X                     |   | X           |                    |                          |                                 |                             | X        | X     | X                                   |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 16         | Gerald A. Silver<br>President<br>Homeowners of Encino<br>P.O. Box 260064<br>Encino, CA 91426-0205   |                   | X                   |                       | X   | X           |                    |                          |                                 |                             | X        | X     | X                                   | X                 | X               |         |                      |           | X                            |                           | X                               | X          | X           |                                |                   | X            | X             |
| 17         | Kathryn S. Schloessman, President<br>Los Angeles Sports & Entertainment Commission<br>633 W. Fifth St., Ste. 1800<br>Los Angeles, CA 90071-2087 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

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|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 18         | Auza Rosenberg<br>Manager<br>Board and Office Administration<br><br>Ernest Wooden Jr.<br>President and CEO Los Angeles<br><br>Tourism & Convention Board<br>633 W. Fifth St, Ste. 1800<br>Los Angeles, CA 90071-2087 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 19         | Rebecca L. Morales<br>r1m@m-consultants.net<br><br>Ron Miller<br>Executive Secretary<br>Los Angeles/Orange County Building and<br>Construction Trades Council<br>1626 Beverly Blvd.<br>Los Angeles, CA 90026-5784    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

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| 20         | Carolyn Uhri, President<br>San Fernando Valley Arts & Cultural Center<br>18312 Oxnard St.<br>Tarzana, CA 91356-1502   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 21         | Rebecca L. Morales<br>r1m@m-consultants.net<br><br>Mike Layton<br>Business Manager<br>Southern California Pipe Trades District Council 16<br>501 Shatto Pl., Ste. 400<br>Los Angeles, CA 90020-1748 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 22         | Angela Taslakian<br><br>Kenn Phillips<br>President & CEO<br><br>The Valley Economic Alliance<br>5121 Van Nuys Blvd., Ste. 200<br>Sherman Oaks, CA 91403-1497  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

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| 23         | Johntommy Rosas<br>Tongva Ancestral Territorial Tribal Nation<br>tattnlaw@gmail.com   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              | X                         |                                 |            |             |                                |                   |              |               |
| 24         | Roger Pugliese<br>Topanga Association for a Scenic Community<br>P.O. Box 352<br>Topanga, CA 90290-0352<br><br>Stacy Sledge<br>Topanga Town Council<br>P.O. Box 1085<br>Topanga, CA 90290-1085<br><br>Ron Fomalont<br>Topanga Chamber of Commerce<br>101 S. Topanga Canyon Blvd., #185<br>Topanga, CA 90290-2005<br><br>Carrie Carrier<br>Topanga Creek Watershed Committee<br>21936 Canon Dr.<br>Topanga, CA 90290-4335 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   | X            |               |



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| 25         | Roger Pugliese<br>Topanga Association for a Scenic Community<br>P.O. Box 352<br>Topanga, CA 90290-0352   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 26         | Marian E. Jocz<br>Executive Director<br>United Chambers of Commerce of the San Fernando Valley<br>5121 Van Nuys Blvd., #203<br>Sherman Oaks, CA 91403-6122 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 27         | Casey Maddren<br>President<br>United Neighborhoods for Los Angeles<br>2141 Cahuenga Blvd., Apt. 17<br>Los Angeles, CA 90068                                |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 28         | Nora Ross<br>Executive Director<br>Valley Cultural Center<br>21550 Oxnard St., Ste. 470<br>Woodland Hills, CA 91367-7116                                   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

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|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 29         | Lisa Gritzner<br>VICA Chair<br><br>Stuart Waldman<br>VICA President<br><br>Valley Industry & Commerce Association<br>16600 Sherman Way, Ste. 170<br>Van Nuys, CA 91406-3861 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 30         | Diana Williams<br>CEO<br>West Valley–Warner Center Chamber of Commerce<br>diana@woodlandhillscs.net   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 31         | John M. Walker<br>President<br>Woodland Hills Homeowners Organization, Inc.<br>P.O. Box 6368<br>Woodland Hills, CA 91365-6368   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

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|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 32         | John M. Walker<br>President<br>Woodland Hills Homeowners<br>Organization, Inc.<br>P.O. Box 6368<br>Woodland Hills, CA 91365-6368                         |                   |                     |                       | X   |             | X                  |                          |                                 | X                           |          | X     | X                                   | X                 | X               | X       | X                    |           | X                            |                           |                                 |            |             |                                |                   | X            | X             |
| 33         | Joyce Fletcher<br>President<br>Woodland Hills–Warner Center<br>Neighborhood Council<br>20929 Ventura Blvd., Ste. 47-535<br>Woodland Hills, CA 91364-2334 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 34         | Joyce Fletcher<br>President<br>Woodland Hills–Warner Center<br>Neighborhood Council<br>20929 Ventura Blvd., Ste. 47-535<br>Woodland Hills, CA 91364-2334 |                   | X                   |                       | X   |             | X                  |                          |                                 | X                           |          | X     | X                                   | X                 | X               | X       | X                    | X         | X                            |                           |                                 |            |             |                                |                   | X            | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

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|--------------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| <b>INDIVIDUALS</b> |  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              |               |
| 35                 | Damian Acevedo<br>22900 Califa St.<br>Woodland Hills, CA 91367-4211                                      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     | X                 |                 | X       |                      |           | X                            |                           | X                               |            |             |                                |                   |              | X             |
| 36                 | Eliza Ahn<br>5737 Laityan Dr.<br>Woodland Hills, CA 91367  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 37                 | Nancy Allison<br>5727 Topanga Canyon Blvd., Apt. 5<br>Woodland Hills, CA 91367-4847                      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 38                 | Franck Amiach<br>Fountain Park Cooperative<br>22050 Calvert St., Unit 7<br>Woodland Hills, CA 91367-3501 |                   |                     |                       |   |             |                    |                          |                                 |                             | X        |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 39                 | Carol Anthony<br>livingair2005@aol.com   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     | X                 | X               |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 40                 | Marc Arjang<br>Mina Kasra<br>22049 Oxnard St.<br>Woodland Hills, CA 91367-3546                           |                   |                     |                       |   | X           |                    |                          |                                 |                             |          | X     |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

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|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 41         | Jack Aroyan<br>20410 Clark St.<br>Woodland Hills, CA 91367-6819             |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 42         | Jack Aroyan<br>20410 Clark St.<br>Woodland Hills, CA 91367-6819             |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 43         | Nicole Arslanian<br>18980 Ventura Blvd., Ste. 300<br>Tarzana, CA 91356-3297 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 44         | Sabine Arslanian<br>18980 Ventura Blvd., Ste. 300<br>Tarzana, CA 91356-3297 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 45         | Serge Arslanian<br>18980 Ventura Blvd., Ste. 300<br>Tarzana, CA 91356-3297  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 46         | Taline Arslanian<br>18980 Ventura Blvd., Ste. 300<br>Tarzana, CA 91356-3297 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
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| 47         | Penny Bahn<br>23045 Collins St.<br>Woodland Hills, CA 91367-4224            |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     | X                 | X               |         |                      |           | X                            |                           | X                               |            |             |                                |                   |              | X             |
| 48         | Dennis & Yuko Barron<br>6021 N. Pointe Pl.<br>Woodland Hills, CA 91367-5500 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 49         | Barbara Baum<br>23015 Dolarosa St.<br>Woodland Hills, CA 91367-6106         |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     | X                 |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 50         | Kelly and Ted Beder<br>kbeder@att.net                                       |                   |                     |                       |   |             |                    |                          |                                 |                             |          | X     |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              |               |
| 51         | Jed Behar<br>7031 Keokuk Ave.<br>Winnetka, CA 91306-3546                    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 52         | Fran Bernstein<br>22119 Oxnard St.<br>Woodland Hills, CA 91367-3547         |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 53         | Francie Bemstein<br>24120 Park Riviera<br>Calabasas, CA 91302-2533          |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
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|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 54         | Robert Bernstein<br>7551 Atherton Ln.<br>West Hills, CA 91304-5214       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 55         | Tony Blake<br>4819 Poe Ave.<br>Woodland Hills, CA 91364-4621             |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 56         | Judith Bluestone<br>22241 1/2 Erwin St.<br>Woodland Hills, CA 91367-0948 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 57         | Jeff Bornstein<br>7507 Winnetka Ave.<br>Canoga Park, CA 91306-2929       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       | X                                   | X                 | X               |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 58         | Ann C. Bose<br>22115 Avenue Morelos<br>Woodland Hills, CA 91364-5004     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 59         | Angela Bravoderueda<br>22723 Bassett St.<br>West Hills, CA 91307         |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

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| 60         | Boni Bruno<br>22314 Haynes St.<br>Woodland Hills, CA 91303-2424  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 61         | Eugene Burke<br>P.O. Box 95<br>Woodland Hills, CA 91365-0095   |                   |                     |                       |   | X           |                    |                          | X                               |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 62         | Garrison Burrell<br>garrisonburrell7@gmail.com   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 63         | James Caldwell<br>jascaldwell7@gmail.com   |                   |                     |                       | X   |             |                    |                          |                                 |                             |          | X     |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 64         | Gail C. Cane<br>Rodeo Realty—Woodland Hills Office<br>21031 Ventura Blvd., Ste. 100<br>Woodland Hills, CA 91364-2208 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 65         | Mitch Carter<br>24650 Gilmore St.<br>West Hills, CA 91307-2723   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 66         | Helene Chemel<br>23840 Calvert St.<br>Woodland Hills, CA 91367-1213  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |



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|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 67         | Joseph Choe<br>6300 Variel Ave., Apt. 240<br>Woodland Hills, CA 91367-7761      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 68         | Nadia S. Choe<br>6300 Variel Ave., Apt. 240<br>Woodland Hills, CA 91367-7761    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 69         | Ronald B. Clary<br>7222 Owensmouth Ave., Ste. 102<br>Canoga Park, CA 91303-1580 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 70         | Teresa Comito<br>22030 Calvert St., Apt. 1<br>Woodland Hills, CA 91367-3558     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 71         | William Conroy<br>17434 Stare St.<br>Northridge, CA 91325-1534                  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 72         | Patricia Davis<br>5314 Baza Ave.<br>Woodland Hills, CA 91364-1805               |                   |                     |                       |   | X           |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |

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|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 73         | Kelly Del Valle<br>23218 Hatteras St.<br>Woodland Hills, CA 91367-3118           |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 74         | Lisa DeTournay<br>21650 Burbank Blvd., Unit 210<br>Woodland Hills, CA 91367-6472 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 75         | Alma Diaz<br>20727 Vanowen St., Apt. A-10<br>Winnetka, CA 91306-3726             |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 76         | Karen DiBiase<br>20525 Aetna St.<br>Woodland Hills, CA 91367-5412                |                   | X                   |                       |   | X           | X                  |                          |                                 | X                           | X        | X     |                                     | X                 | X               | X       | X                    |           | X                            |                           |                                 | X          |             |                                |                   | X            | X             |
| 77         | Steven Dick<br>steven3745@aol.com  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 78         | Michel Doots<br>22057 Oxnard St.<br>Woodland Hills, CA 91367-3546                |                   | X                   |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 79         | Catherine Dunaj<br>22925 Sylvan St.<br>Woodland Hills, CA 91367-1627             |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

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|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 80         | Paul Edelman<br>5065 Catalon Ave.<br>Woodland Hills, CA 91364-3313                |                   |                     |                       |   | X           |                    |                          |                                 | X                           |          |       |                                     |                   |                 |         | X                    |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 81         | Amir Erez<br>53 Bell Canyon Rd.<br>Bell Canyon, CA 91307-1103                     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 82         | Sylvestine Etienne<br>6300 Variel Ave., Apt. 258<br>Woodland Hills, CA 91367-7770 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 83         | Donald Evans<br>22345 Baltar St.<br>Canoga Park, CA 91304-3842                    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 84         | Margarita Fedorova<br>ritaFed@gmail.com   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 85         | Angela Ferdig<br>photos@angelaferdig.com  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 86         | Howard M. Fields<br>21900 Marylee St., Unit 287<br>Woodland Hills, CA 91367-4826  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      | X         |                              |                           |                                 |            |             |                                |                   |              | X             |

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| 87         | Shawn Finnegan<br>5202 Mecca Ave.<br>Tarzana, CA 91356                        |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 88         | Frances Fitzpatrick<br>7936 Valley Flores Dr.<br>West Hills, CA 91304-6118    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 89         | Armando Flores<br>armando.i.flores7@gmail.com                                 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 90         | Austin Fowler<br>19010 Archwood St., Unit 5<br>Reseda, CA 91335-5118          |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 91         | Phillip Fox<br>P.O. Box 802<br>Woodland Hills, CA 91365-0802                  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 92         | Devorh Frischer<br>5302 Comercio Ln., Apt. 1<br>Woodland Hills, CA 91364-2049 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 93         | Barry Garfield<br>7731 Atron Ave.<br>West Hills, CA 91304-5370                |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 94         | Kimaree and Yehuda Gilad<br>23300 Erwin St.<br>Woodland Hills, CA 91367-1412     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 95         | Cheryl Ginolfi<br>23101 Victory Blvd.<br>West Hills, CA 91307-3516               |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 96         | Gary Gluck<br>22307 Mobile St.<br>Woodland Hills, CA 91303-2427                  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 97         | Anita Gogoshian<br>7247 Ponce Ave.<br>West Hills, CA 91307-1602                  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 98         | Luis R. Gomez<br>5520 Owensmouth Ave., Apt. 318<br>Woodland Hills, CA 91367-7021 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 99         | Edwin J. Gooze<br>6250 Canoga Ave., Apt. 410<br>Woodland Hills, CA 91367-2498    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter   | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 100        | Ellen Gordon<br>5346 Hinton Ave.<br>Woodland Hills, CA 91367-6026                   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 101        | James Grant<br>jamiergrant@gmail.com  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                | X                 |              |               |
| 102        | Shirley Greene<br>4569 Natoma Ave.<br>Woodland Hills, CA 91364                      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 103        | Tiffany Gwyther<br>22414 Miranda St.<br>Woodland Hills, CA 91367-4453               |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 104        | Younma Haddad<br>6041 Fountain Park Ln., Apt. 5<br>Woodland Hills, CA 91367-3526    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 105        | Michel and Gunilla Hamaoui<br>4731 Abbeyville Ave.<br>Woodland Hills, CA 91364-3702 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 106        | Bonnie Harris<br>sundaysmom@gmail.com   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 107        | Rena Harris<br>5121 Penfield Ave.<br>Woodland Hills, CA 91364-3533     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 108        | Kurt Harrison<br>5028 Clavel Ct.<br>Woodland Hills, CA 91364-3016      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 109        | Alyse Hart<br>20516 Aetna St.<br>Woodland Hills, CA 91367-5411         |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              | X                         |                                 |            | X           |                                |                   |              | X             |
| 110        | Felice Hartenstein<br>felice.hartenstein@gmail.com                     |                   |                     |                       |   | X           |                    |                          |                                 |                             |          | X     |                                     | X                 |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 111        | Alma Haykian<br>20569 Haynes St.<br>Canoga Park, CA 91306-4103         |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 112        | Gavin Heller<br>22140 Victory Blvd.<br>Woodland Hills, CA 91367-1947   |                   |                     |                       |   | X           |                    |                          |                                 |                             |          | X     | X                                   |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 113        | Betty L. Hennigan<br>22113 Oxnard St.<br>Woodland Hills, CA 91367-3547 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter   | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 114        | Betty L. Hennigan<br>22113 Oxnard St.<br>Woodland Hills, CA 91367-3547                              |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 115        | Betty L. Hennigan<br>22113 Oxnard St.<br>Woodland Hills, CA 91367-3547                              |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 116        | Jason Hines<br>6100 Le Sage Ave.<br>Woodland Hills, CA 91367-1322                                   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 117        | Jim Hoffman<br>22163 Marylee St.<br>Woodland Hills, CA 91367-4518                                   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 118        | Hope Holm<br>hopedale1@yahoo.com  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           | X                               |            |             |                                |                   |              |               |
| 119        | Steve H. Hornstein<br>Law Offices<br>20335 Ventura Blvd., Ste. 203<br>Woodland Hills, CA 91364-2456 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |



**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter   | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 120        | Laurel Hubbard<br>8901 Eton Ave., Spc. 83<br>Canoga Park, CA 91304-6511         |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 121        | Janel L. Huff<br>20934 Bandera St.<br>Woodland Hills, CA 91364-4503             |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       | X                                   | X                 | X               |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 122        | Eva Huffman<br>23109 Canzonet St.<br>Woodland Hills, CA 91367-6104              |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           | X                               |            | X           |                                |                   |              | X             |
| 123        | Frederick Johnson<br>6020 Nevada Ave., Apt. 4<br>Woodland Hills, CA 91367-3504  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 124        | Linda Johnson<br>21550 Burbank Blvd., Apt. 206<br>Woodland Hills, CA 91367-7067 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 125        | Jacqueline Jones<br>5800 Oso Ave.<br>Woodland Hills, CA 91367-5424              |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter   | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 126        | Jordan Kajan<br>3817 Coldstream Ter.<br>Tarzana, CA 91356-5401          |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 127        | Karo Karapetyan<br>23206 Aetna St.<br>Woodland Hills, CA 91367-3101     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 128        | Ilene Karpman<br>20316 Aetna St.<br>Woodland Hills, CA 91367-5407       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 129        | Sheppard Kaufman<br>22154 Alizondo Dr.<br>Woodland Hills, CA 91364-6101 |                   | X                   |                       | X   | X           | X                  |                          |                                 |                             | X        | X     | X                                   | X                 | X               | X       |                      | X         | X                            |                           |                                 |            |             | X                              |                   | X            | X             |
| 130        | Diana Kelley<br>22055 Oxnard St.<br>Woodland Hills, CA 91367-3546       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 131        | Maureen D. Kessie<br>21790 Ybarra Rd.<br>Woodland Hills, CA 91364-4327  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           | X                               |            |             |                                |                   |              | X             |
| 132        | Alan Keyfman<br>mask0425@sbcglobal.net                                  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              |               |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 133        | Victoria Killian<br>22120 Cantara St.<br>Canoga Park, CA 91304-3826                |                   |                     |                       |   | X           |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 134        | James W. Kinsey III<br>21550 Oxnard St., Ste. 470<br>Woodland Hills, CA 91367-7116 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 135        | Andrea Koepke<br>19716 Horseshoe Dr.<br>Topanga, CA 90290-3235                     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 136        | Brandon Kuipers<br>21115 Dumetz Rd.<br>Woodland Hills, CA 91364-4533               |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     | X                 | X               |         |                      |           |                              |                           |                                 |            |             | X                              |                   |              | X             |
| 137        | Praveen Kumar<br>5535 Canoga Ave., Unit 120<br>Woodland Hills, CA 91367-6690       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 138        | Suzie Labowe<br>4432 Conchita Way<br>Tarzana, CA 91356-4902                        |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 139        | Maria Sandoval<br>ma_sandoval17@yahoo.com<br><br>Avi Lerner<br>TA Warner Investors, LLC  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 140        | Wendy A. de Vries, Legal Assistant<br>Lerner & Weiss, APC<br>21600 Oxnard St., Ste. 1130<br>Woodland Hills, CA 91367-7838<br><br>Leonard D. Lerner<br>& Weiss, APC<br>21600 Oxnard St., Ste. 1130<br>Woodland Hills, CA 91367-7838 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 141        | Byron Levy<br>P.O. Box 371683<br>Reseda, CA 91337-1683   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 142        | Melissa Lintinger<br>4788 Burgundy Rd.<br>Woodland Hills, CA 91364-4760  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 143        | Dave Lowery<br>23131 Collins St.<br>Woodland Hills, CA 91367-4226                        |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 144        | Karen Y. Lu<br>P.O. Box 631<br>Canoga Park, CA 91305-0631                                |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 145        | Gregory Maier<br>5727 Canoga Ave., Apt. 180<br>Woodland Hills, CA 91367-6501             |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 146        | Varant Majarian<br>P.O. Box 17214<br>Encino, CA 91416-7214                               |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 147        | Ronald and Dolores Marantz<br>22647 Ventura Blvd., #216<br>Woodland Hills, CA 91364-1416 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 148        | Gina Masequesmay<br>22117 Oxnard St.<br>Woodland Hills, CA 91367-3547                    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 149        | Jacqui Matsumoto<br>4851 Hazeltine Ave., Unit 102<br>Sherman Oaks, CA 91423-2339                       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 150        | Susan McCall<br>22431 Gilmore St.<br>West Hills, CA 91307-3707   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 151        | Sean McCarthy<br>5151 Balboa Blvd., Unit 204<br>Encino, CA 91316-3467                                  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 152        | Kelly McClellan<br>Michael McClellan<br>Rory McClellan<br>Connor McClellan<br>mcclellans@sbcglobal.net |                   |                     |                       |   | X           |                    |                          |                                 |                             |          |       |                                     | X                 | X               |         |                      |           | X                            |                           | X                               |            |             |                                |                   |              | X             |
| 153        | Ryan McGinn<br>7106 McLaren Ave.<br>West Hills, CA 91307-2219  |                   |                     |                       |   |             |                    |                          |                                 |                             |          | X     |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   | X            | X             |
| 154        | Gerda McKeethan<br>pgmac@att.net   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 155        | Paul McKeehan<br>pgmac@att.net                                     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 156        | Mike Merina<br>mike.merina@yahoo.com                               |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 157        | Marlene D. Moore<br>6219 Balcom Ave.<br>Encino, CA 91316-7209      |                   | X                   |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 158        | Tom Morehouse<br>23533 Oxnard St.<br>Woodland Hills, CA 91367-3039 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 159        | Marylou Morelock<br>1187 Aztec<br>Topanga, CA 90290-4407           |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 160        | Pati Moser<br>23547 Burbank Blvd.<br>Woodland Hills, CA 91367-3009 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     | X                 |                 |         |                      |           | X                            |                           | X                               |            |             |                                |                   |              | X             |
| 161        | Gilian Neiditch<br>1118 Mohawk<br>Topanga, CA 90290-4445           |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter   | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 162        | Jo Ann Nickerson<br>outlook_6168B12DBFC28B01@outlook.com                      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 163        | Shannon Padgett<br>20921 Community St., Apt. 22<br>Canoga Park, CA 91304-2767 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 164        | Lorna Paisley<br>6952 Balboa Blvd.<br>Lake Balboa, CA 91406-4557              |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 165        | Lorna Paisley<br>6952 Balboa Blvd.<br>Lake Balboa, CA 91406-4557              |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 166        | Frank Pajonk<br>22950 Mariano St.<br>Woodland Hills, CA 91367-6132            |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 167        | Tony Palermo<br>21428 Mulholland Dr.<br>Woodland Hills, CA 91364-5343         |                   |                     |                       |   |             |                    |                          |                                 | X                           |          |       |                                     |                   |                 |         |                      | X         |                              |                           |                                 |            |             |                                |                   |              | X             |



**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 168        | Leegie Parker<br>5131 Geyser Ave.<br>Tarzana, CA 91356                           |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 169        | Ghanouni Parvin<br>21500 Califa St., #121<br>Woodland Hills, CA 91367-4955       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 170        | Kristina Payton<br>kristinapayton@gmail.com                                      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 171        | Terry Ann Perry<br>23648 Balmoral Ln.<br>West Hills, CA 91307-1307               |                   |                     |                       |   |             |                    |                          | X                               |                             |          |       |                                     |                   |                 | X       |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 172        | Vlad Pesin<br>5500 Owensmouth Ave.<br>Woodland Hills, CA 91367-7004              |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 173        | Christine Peterson<br>5900 Jumilla Ave.<br>Woodland Hills, CA 91367-5606         |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 174        | Gwyn Petrick<br>6355 Topanga Canyon Blvd., #428<br>Woodland Hills, CA 91367-2140 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 175        | David Price<br>Ellen Brown<br>21007 Topochico Dr.<br>Woodland Hills, CA 91364-6030 |                   |                     |                       |   | X           |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 176        | Curtis B. Quillin<br>21030 Kenwyn Ct.<br>Topanga, CA 90290-4436                    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 177        | Mark R. Rachman<br>22104 Victory Blvd., #B209<br>Woodland Hills, CA 91364          |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 178        | Ralph and Susan<br>sp54@socal.rr.com   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 179        | Sinesh Ramamurti<br>4949 Hood Dr.<br>Woodland Hills, CA 91364-4711                 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 180        | Bonnie Ramos<br>20767 Ingomar St.<br>Winnetka, CA 91306-2020                       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter   | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 181        | Sandra Ramsey<br>22726 Collins St.<br>Woodland Hills, CA 91367-4434                   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 182        | Nancy Reims<br>ncyrei2@icloud.com   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 183        | Juergen S. Rinnert<br>6220 Owensmouth Ave., Apt. 271<br>Woodland Hills, CA 91367-2255 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              |               |
| 184        | Michael and Maria L. Rissi<br>mike.a.rissi@gmail.com                                  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 185        | Bruce Roberts<br>18034 Ventura Blvd., #318<br>Encino, CA 91316-3516                   |                   |                     |                       |   |             |                    |                          |                                 |                             | X        |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                | X                 | X            |               |
| 186        | Burton and Marsha Roseman<br>13432 Tiara St.<br>Van Nuys, CA 91401-4047               |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 187        | Judith Rosenblatt<br>judimr@sbcglobal.net   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              |               |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

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|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 188        | Christine L. Rowe<br>6732 Faust Ave.<br>West Hills, CA 91307-3627                  |                   |                     |                       |   | X           |                    |                          | X                               | X                           |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 189        | Shain Sabeti<br>6431 Valley Circle Ter.<br>Canoga Park, CA 91307-2747              |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 190        | Adam Salcido<br>P.O. Box 79222<br>Corona, CA 92877                                 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 191        | Jason Schlieske<br>6041 Fountain Park Ln., Apt. 5<br>Woodland Hills, CA 91367-3526 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 192        | Kim Seiniger<br>19807 Gilmore St.<br>Woodland Hills, CA 91367-2811                 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 193        | Carmella Sheeler<br>22332 Dolorosa St.<br>Woodland Hills, CA 91367-4438            |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 | X       |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter   | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 194        | Judy and Bert Sherman<br>22071 Oxnard St.<br>Woodland Hills, CA 91367-3546    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 195        | Remus Sicolvan<br>20761 Archwood St.<br>Winnetka, CA 91306-4010               |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 196        | Michael Siegfried<br>21900 Marylee St., #260<br>Woodland Hills, CA 91367-4803 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 197        | Antranik Sinanian<br>4236 Tarzana Estates Dr.<br>Tarzana, CA 91356-5447       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 198        | Katherine Sison<br>23962 Eagle Mountain St.<br>West Hills, CA 91304-2100      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 199        | David Slonaker<br>24529 Calvert St.<br>Woodland Hills, CA 91367-1015          |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

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|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 200        | Patti Smith<br>6219 Balcom Ave.<br>Encino, CA 91316-7209   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 201        | Travis Smith<br>CEO<br>Reflex Sales Group<br>6219 Balcom Ave., Ste. 101<br>Encino, CA 91316-7209 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 202        | Jan Sobel<br>5177 Alhama Dr.<br>Woodland Hills, CA 91364-3238                                    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 203        | Brenda Sosoban<br>6421 Neddy Ave.<br>West Hills, CA 91307-2831                                   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 204        | John Spaulding<br>jrspaulding@yahoo.com  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 205        | Andrea Spencer<br>6670 Glade Ave., Apt. 334<br>Woodland Hills, CA 91303-2500                     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
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|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 206        | Alok Srivastava<br>5192 Knollwood Way<br>Woodland Hills, CA 91364-1356                                       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 207        | Patrick J. Statham<br>stuntsonly@gmail.com   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 208        | Kriss Stauber<br>20559 Aetna St.<br>Woodland Hills, CA 91367-5412  |                   |                     |                       |   | X           |                    |                          |                                 |                             |          | X     |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 209        | Susan Stearns<br>Berkshire Hathaway California Properties<br>23925 Park Sorrento<br>Calabasas, CA 91302-4010 |                   |                     |                       |   |             |                    |                          |                                 |                             | X        | X     |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 210        | Mickie Stern<br>4637 Park Mirasol<br>Calabasas, CA 91302-1732  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 211        | Stefan Storace<br>stefanstorace@yahoo.com  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              | X                         |                                 |            |             | X                              |                   |              | X             |
| 212        | Patricia Streeter<br>18331 Tarzana Dr.<br>Tarzana, CA 91356-4215   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
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| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 213        | Diane Sukiennik<br>23371 Mulholland Dr., #124<br>Woodland Hills, CA 91364              |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 214        | John L. Sundahl<br>22843 Erwin St.<br>Woodland Hills, CA 91367-3214                    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 215        | John L. Sundahl<br>22843 Erwin St.<br>Woodland Hills, CA 91367-3214                    |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 216        | Maureen Tamuri<br>Glenn Michitsch<br>22112 Califa St.<br>Woodland Hills, CA 91367-4502 |                   |                     |                       | X   |             |                    |                          |                                 |                             |          | X     |                                     | X                 |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 217        | Joy Tangarone<br>4201 Esteban Rd.<br>Woodland Hills, CA 91364-6011                     |                   |                     |                       |   |             |                    |                          |                                 |                             |          | X     |                                     | X                 |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 218        | Vivian Teasdale<br>7014 Middlesbury Ridge Cir.<br>West Hills, CA 91307-1813            |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |



**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter   | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 219        | Jane Terjung<br>1639 Oak Dr.<br>Topanga, CA 90290-4023                              |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 220        | Gina K. Thornburg<br>5146 Comercio Ave.<br>Woodland Hills, CA 91364-3245            |                   |                     |                       |   | X           | X                  |                          |                                 | X                           |          |       | X                                   |                   |                 |         | X                    |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 221        | T. Jennifer Tran<br>5500 Owensmouth Ave., Unit 233<br>Woodland Hills, CA 91367-7007 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 222        | Laura Trickey<br>21021 Erwin St., #315<br>Woodland Hills, CA 91367-3839             |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 223        | Zennon Ulyate-Crow<br>P.O. Box 680<br>Topanga, CA 90290-0680                        |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 224        | Cindy and Maurice Verloop<br>4215 Saltillo St.<br>Woodland Hills, CA 91364-5927     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
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|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 225        | John A. Vickers<br>23757 Burton St.<br>West Hills, CA 91304-5703           |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 226        | Purnanda Wagle<br>22330 Victory Blvd.<br>Woodland Hills, CA 91367-1842     |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 227        | Pat & Don Walker<br>walkerdp01@hotmail.com                                 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         | X                    |           | X                            |                           |                                 |            |             |                                |                   |              |               |
| 228        | Diana Williams<br>5302 Don Pio Dr.<br>Woodland Hills, CA 91364-1735        |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 229        | Buzz Wilms<br>2740 Marquette Dr.<br>Topanga, CA 90290-4016                 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 230        | Rohan Wiratunga<br>19850 Buttonwillow Dr.<br>Winnetka, CA 91306-2671       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 231        | Randy Witt<br>5121 Van Nuys Blvd., Ste. 222<br>Sherman Oaks, CA 91403-6123 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter   | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
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| 232        | Douglas J. Wolf<br>23651 Gerrad Way<br>West Hills, CA 91307-1319  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 233        | Patrick Yaghoobi<br>Managing Partner<br>Amplify Development Co.<br>19730 Ventura Blvd., Ste. 5<br>Woodland Hills, CA 91364-2690 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 234        | Cynthia Yokoyama<br>cegyokoyama@yahoo.com   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 235        | Bryan Young<br>20734 Clark St.<br>Woodland Hills, CA 91367-6825   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 236        | Rick Young<br>23106 Park Contessa<br>Calabasas, CA 91302-1709   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 237        | Bob and Joyce Yovannone<br>22276 Buena Ventura St.<br>Woodland Hills, CA 91364-5006   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           | X                               |            |             | X                              |                   |              | X             |

**Table II-1 (Continued)**  
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|---------------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| <b>LATE LETTERS</b> |  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              |               |
| 238                 | <p>Sarah Stockham<br/> Assistant Construction Coordinator<br/> California Home Builders<br/> 21510 Roscoe Blvd.<br/> Canoga Park, CA 91304-4144</p> <p>Matt Modrzejewski<br/> Vice President<br/> Land Development<br/> California Home Builders<br/> 21510 Roscoe Blvd.<br/> Canoga Park, CA 91304-4144</p> |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | <b>X</b>      |

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| 239        | Roger Pugliese<br>Chairperson<br>Topanga Association for a Scenic Community<br>P.O. Box 352<br>Topanga, CA 90290-0352<br><br>Carolyn Day<br>Topanga Association for a Scenic Community<br>P.O. Box 352<br>Topanga, CA 90290-0352 |                   |                     |                       |   | X           |                    |                          |                                 |                             |          | X     |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 240        | Stacy Sledge<br>President<br>Topanga Town Council<br>P.O. Box 1085<br>Topanga, CA 90290-1085   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 241        | Sandra Berube<br>4409 Vanalden Ave.<br>Tarzana, CA 91356-5521  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |

**Table II-1 (Continued)**  
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|------------|---|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 242        | Debra S. Grether<br>dshiergrether@gmail.com                             |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 243        | Paula Hayes<br>6532 Penfield Ave.<br>Woodland Hills, CA 91367-2733      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           | X                               |            |             |                                |                   |              | X             |
| 244        | Corinne Ho<br>corinnemho@gmail.com                                      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     | X                 |                 | X       |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 245        | Charlene Hopey<br>1226 Old Topanga Canyon Rd.<br>Topanga, CA 90290-3826 |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 246        | Nicole Jacks<br>19700 Arundel Pl.<br>Woodland Hills, CA 91364-3603      |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 247        | Donald Kreuzberger<br>kreuzon@sbcglobal.net                             |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 248        | Paul Lawler<br>19811 Henshaw St.<br>Woodland Hills, CA 91364-2604       |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           |                              |                           |                                 |            |             |                                |                   |              | X             |
| 249        | Carol Riel<br>calyteri@gmail.com  |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   | X               |         |                      |           |                              |                           |                                 |            |             |                                |                   |              |               |

**Table II-1 (Continued)**  
**Matrix of Comments Received on the Draft Supplemental EIR**

| Letter No. | Commenter  | Executive Summary | Project Description | Environmental Setting | Aesthetics, Views, Light/Glare, and Shading | Air Quality | Cultural Resources | Greenhouse Gas Emissions | Hazards and Hazardous Materials | Hydrology and Water Quality | Land Use | Noise | Population, Housing, and Employment | Police Protection | Fire Protection | Schools | Parks and Recreation | Libraries | Traffic, Access, and Parking | Tribal Cultural Resources | Water Supply and Infrastructure | Wastewater | Solid Waste | Appendix F—Energy Conservation | Cumulative Impact | Alternatives | General/Other |
|------------|--|-------------------|---------------------|-----------------------|---|-------------|--------------------|--------------------------|---------------------------------|-----------------------------|----------|-------|-------------------------------------|-------------------|-----------------|---------|----------------------|-----------|------------------------------|---------------------------|---------------------------------|------------|-------------|--------------------------------|-------------------|--------------|---------------|
| 250        | Terri Starrett<br>tstarr06@sbcglobal.net   |                   |                     |                       |   |             |                    |                          |                                 |                             |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |
| 251        | Susan Stearns<br>Berkshire Hathaway California Properties<br>23925 Park Sorrento<br>Calabasas, CA 91302-4010 |                   |                     |                       |   | X           |                    |                          |                                 | X                           |          |       |                                     |                   |                 |         |                      |           | X                            |                           |                                 |            |             |                                |                   |              | X             |

## **II. Responses to Comments**

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### **D. Comment Letters**

#### **Comment Letter No. 1**

Scott Morgan  
Director  
State Clearinghouse  
Office of Planning & Research  
1400 Tenth St.  
Sacramento, CA 95814-5502

#### **Comment No. 1-1**

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. The review period closed on July 26, 2018, and no state agencies submitted comments by that date. 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 call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

#### **Response to Comment No. 1-1**

This comment acknowledges receipt of the Draft Supplemental 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. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 1-2**

Attachment: Document Details Report—State Clearinghouse Data Base (2 pages)



**Response to Comment No. 1-2**

This letter includes a Document Details Report of Promenade 2035 Project, which correctly summarizes general Project information as provided by the lead agency in the Notice of Completion for the Draft Supplemental EIR and lists the state agencies that have reviewed the Draft Supplemental EIR. The Document Details Report is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

## **Comment Letter No. 2**

Scott Morgan  
Director  
State Clearinghouse  
Office of Planning & Research  
1400 Tenth St.  
Sacramento, CA 95814-5502

### **Comment No. 2-1**

Pursuant to the attached letter, the Lead Agency has extended the review period for the above referenced project to July 26, 2018 to accommodate the review process. All other project information remains the same.

Attachment: Notice of Completion & Environmental Document Transmittal (3 pages)

### **Response to Comment No. 2-1**

This comment acknowledges receipt of the Draft Supplemental EIR Notice of Extension by the State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

**Comment Letter No. 3**

Lijin Sun  
Program Supervisor  
CEQA Inter-Governmental Review  
Planning, Rule Develop. & Area Sources  
SCAQMD  
21865 Copley Dr.  
Diamond Bar, CA 91765-4178

**Comment No. 3-1**

Attached are SCAQMD staff comments on the Draft Supplemental Environmental Impact Report for Promenade 2035 (ENV-2016-3909-EIR) (SCAQMD Control Number: LAC180426-05). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. SCAQMD staff comments are meant as guidance for the Lead Agency and should be reviewed for incorporation into the Final Supplemental EIR. Please contact me if you have any questions regarding these comments.

**Response to Comment No. 3-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 3-2**

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

**SCAQMD Staffs Summary of Project Description**

The Lead Agency proposes to demolish 641,164 square feet of existing buildings, and build 1,432 residential units, 244,000 square feet of retail and restaurant uses, 629,000 square feet of office uses, hotels with 572 rooms, and a 320,050-square-foot entertainment and sports center with 15,000 seats, resulting in a net new 2,629,866 square feet on 34 acres (Proposed Project). Construction is expected to take place in multiple phases over a period of 15 years<sup>1</sup>.

<sup>1</sup> Draft SEIR. Page I-18.

**Response to Comment No. 3-2**

This introductory comment describing the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 3-3****SCAQMD Staff's Comments***Tier 4 Construction Equipment*

In the Air Quality Analysis, the Lead Agency found that the Proposed Project's construction activities would result in significant and unavoidable air quality impacts after incorporating mitigation measures. The Lead Agency requires, among others, that "post-January 2015, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. [...] Any emissions control device used by the contractor shall achieved emission 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>2</sup>."

<sup>2</sup> Draft SEIR. Page I-50.

Based on a review of the CalEEMod output files in Appendix D to the Draft SEIR, SCAQMD staff found that "Tier 4 Final" was used in the air quality modeling for the Proposed Project. While it does not materially change the Lead Agency's conclusion about the Proposed Project's construction impacts from NO<sub>x</sub> emissions, to be consistent with the modeling assumption, it is recommended that the Lead Agency is committed to requiring Tier 4 emission standards only, not based on availability. Otherwise, a more conservative modeling methodology will be to use Tier 3 in CalEEMod to quantify the Proposed Project's construction emissions after mitigation.

Additionally, SCAQMD staff recommends that the Lead Agency provide additional information on how the "availability" will be defined and determined in the Final SEIR. The recommended information establishes a clear set of standards and criteria for assessing the feasibility of Tier 4 construction equipment, provides public transparency in the Lead Agency's decision-making regarding Tier 4 construction equipment, demonstrates a commitment by the Lead Agency to using Tier 4 construction equipment, ensures implementation of Tier 4 construction equipment during project implementation, strengthens the Proposed Project's mitigation monitoring and reporting program, and facilitates the purpose and goal of CEQA on public disclosure.

Technology is transforming the environmental sector and land use planning at a rapid pace. Since the Proposed Project will be implemented over a period of 15 years, and to ensure that the lowest emission technologies will be used throughout the Project implementation, SCAQMD staff recommends that the Lead Agency revise the mitigation measure as follows to allow engines that are better rated than Tier 4 can be used.

“Post-January 2015, all off-road diesel-powered construction equipment greater than 50 hp shall meet or exceed the Tier 4 emission standards or better, ~~where available~~. [...] Any emissions control device used by the contractor shall achieved emission 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>3</sup>.”

<sup>3</sup> Draft SEIR. Page I-50.

### **Response to Comment No. 3-3**

Tier 4 off-road requirements under Warner Center Mitigation Measure B-2 provided in the Draft Supplemental EIR were consistent with requirements from the Warner Center Plan EIR to reduce construction air quality impacts. However, in response to this comment, Mitigation Measure Warner Center Mitigation Measure B-2 has been updated consistent with SCAQMD’s recommendation. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR. This comment does not change any significance conclusions provided in the Draft Supplemental EIR.

### **Comment No. 3-4**

#### *Overlapping Construction and Operational Activities*

In the Air Quality Section, the Lead Agency analyzed air quality impacts from overlapping construction and operational activities by combining construction and operational emissions from the Proposed Project. Based on a review of Table IV.B-9 in the Draft SEIR<sup>4</sup>, SCAQMD staff found that the Lead Agency compared the combined emissions to SCAQMD’s regional CEQA air quality significance thresholds for construction. However, according to the SCAQMD’s recommended methodology for determining the significance level for air quality impacts from overlapping construction and operational activities, the combined emissions should be compared to SCAQMD’s air quality CEQA operational thresholds of significance. While revisions to Table IV.B-9 based on this comment are not expected to materially change the significance determination for the combined construction and operational air quality impacts, SCAQMD staff recommends that the Lead Agency use “SCAQMD Operation Thresholds” instead of “SCAQMD Construction Thresholds” in Table IV.B-9 in the Final SEIR.

<sup>4</sup> Draft SEIR. Page IV.B-49.

### **Response to Comment No. 3-4**

In response to this comment, Table IV.B-9 of the Draft Supplemental EIR has been updated to compare overlapping construction and operational regional emissions to the SCAQMD's air quality CEQA operational thresholds of significance. The City concurs with SCAQMD that this comment does not materially change the significance determination for the combined construction and operational air quality impacts. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR.

### **Comment No. 3-5**

#### *SCAQMD Rule 1403—Asbestos Emissions from Demolition/Renovation Activities*

Since the Proposed Project would include demolition of 641,164 square feet of existing buildings, asbestos may be encountered during demolition. As such, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403<sup>5</sup> in the Air Quality Section of the Final SEIR.

<sup>5</sup> South Coast Air Quality Management District. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

### **Response to Comment No. 3-5**

The Draft Supplemental EIR included a discussion on SCAQMD Rule 1403, as requested by the commenter. Specifically, as discussed on page IV.E-29 in Section IV.E, Hazards and Hazardous Materials, of the Draft Supplemental EIR, in accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition. In the event that asbestos-containing materials are found within areas proposed for demolition, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers in the environment.

### **Comment No. 3-6**

#### **Closing**

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the

Final SEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions regarding the enclosed comments.

### **Response to Comment No. 3-6**

In accordance with CEQA, written responses to the above comments from the SCAQMD have been provided and will be sent to the SCAQMD.

**Comment Letter No. 4**

Andrew Pennington  
Director of Land Use & Planning  
Office of Councilmember Bob Blumenfield  
Los Angeles City Council, Third District  
19040 Vanowen St.  
Reseda, CA 91335-5172

Honorable Bob Blumenfield  
Council District 3  
Los Angeles City Hall  
200 N. Spring St., Rm. 415  
Los Angeles, CA 90012-1793

**Comment No. 4-1**

Please find attached a letter from Councilmember Blumenfield. It regards an extension of the comment period for the Promenade 2035 project.

I am writing today to request that the Department of City Planning (Department) extend the comment period for the Promenade 2035 draft environmental impact report (DEIR), ENV-2016-3909-EIR. Over the last few weeks my office and your staff have received numerous requests from community members to extend the comment period. This includes stakeholders groups such as the Woodland Hills–Warner Center Neighborhood Council and the Woodland Hills Homeowners Organization who have asked for an additional 90 days.

A project of this scale, with multiple phases and a previously unstudied sports and entertainment center, demands ample time for the community to review and comment. I respect the voices asking for more time, and request an extension for 45 days bringing the total time for review to 90 days. I realize this is beyond what is typically given or required by state law, but the circumstances require us to hold firm in advocating for this to be granted.

This is still short of what some in the community are advocating for, however after speaking with your staff and having my own staff do research on the issue I realize this is the maximum we could reasonably ask for and far more time than would normally be granted. However, it is on par with all other large scale projects the City has reviewed including the master plan for NBCUniversal Studios expansion and the NoHo West project and by no less important or impactful.



Thank you for your time in reviewing this matter, and if you have any questions please do not hesitate to contact my Director of Planning and Land Use, Andrew Pennington, at [andrew.pennington@lacity.org](mailto:andrew.pennington@lacity.org) or 818-774-4330.

#### **Response to Comment No. 4-1**

CEQA requires that a Draft Supplemental EIR be circulated for a 45-day comment period. In response to requests for extension of the Draft Supplemental EIR comment period for the Project, the Department of City Planning extended the comment period by 45 days, until 4:00 P.M. on Thursday July 26, 2018, for a total comment period of 92 days, as shown in Appendix FSEIR-4.

**Comment Letter No. 5**

Tom Bartlett  
City Planner  
City of Calabasas  
100 Civic Center Way  
Calabasas, CA 91302-4112

**Comment No. 5-1**

Please accept the attached comment letter regarding the Draft EIR for the proposed Promenade 2035 project.

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Promenade 2015 [sic] project. As an adjoining jurisdiction, the City of Calabasas is keenly interested in this project, particularly because of its massive scale and the corresponding regional impacts.

Of particular interest and concern are the significant impacts to traffic.

With regard to traffic impacts, the DEIR is deficient on a number of points (listed below), each of which is discussed in greater detail afterward.

- 1) The DEIR inappropriately applies SB 743 as a basis for determining that traffic and parking impacts are insignificant.
- 2) The DEIR fails to define an appropriately inclusive geographic area, such that all of the reasonably affected freeway on-ramps, off-ramps, and nearby street intersections are included and analyzed for potential traffic impacts.
- 3) The DEIR fails to adequately account for the truck traffic volumes (and the corresponding traffic and noise impacts) associated with the approximately 1,700,000 cubic yards of excavation for the proposed subterranean parking structures.
- 4) Off-street parking for the proposed 15,000-seat sports and entertainment venue is deficient, and the DEIR fails to adequately address the deficiency.

**Response to Comment No. 5-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to

any action on the Project. Each of the points within this comment are responded to in detail below.

### **Comment No. 5-2**

#### **Inappropriate Application of SB 743**

In several places the DEIR cites SB 743 as a basis for exemption from environmental impact review; thus, the DEIR presents to readers and reviewing agencies the impact analyses regarding aesthetics, noise, traffic, and parking, as being “for informational purposes only”. Understandably, SB 743 and the corresponding CEQA review exemption might reasonably apply to mixed-use projects composed of residential and commercial land uses and located within one-half mile of a major transit hub; however, the subject project is a mixed-use project composed in part of residential and commercial land uses, as well as a proposed 15,000-seat entertainment and sports venue (an arena or stadium) and two large hotel uses (totaling approximately 572 rooms). The proposed stadium use is an altogether different land use—one which most assuredly draws its patrons (athletes, performers, and attendees) from the entire Southern California region. The proposed stadium does not merely support and complement the proposed residences and businesses in such a manner that vehicle trips to and from the project site would be reduced, and the mass transit facilities in the area do not efficiently transport event attendees and participants to the venue from surrounding counties. This is similarly the case with the proposed hotel uses. Thus, the SB 743 CEQA exemption has been erroneously applied to the proposed project, and the EIR should be revised accordingly.

### **Response to Comment No. 5-2**

Contrary to this comment, SB 743 applies to the Project. As discussed in detail in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, Public Resources Code Section 21099 provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Public Resources Code Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75

percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The Project is a multiple phase, mixed-use residential development which is entirely within 0.5 mile of a major transit stop (i.e., the adjacent Warner Center Transit Hub along Owensmouth Avenue), which is defined as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods,” and meets Public Resources Code Section 21099’s definition of an infill site as a lot located within an urban area that has been previously developed. Therefore, the Project is located in a transit priority area pursuant to SB 743, and all the uses within that Project are covered by SB 743. As such, pursuant to SB 743, the Project’s aesthetic and parking impacts shall not be considered a significant impact on the environment. Nonetheless, the Draft Supplemental EIR fully analyzes both environmental areas. Additionally, contrary to the comment above, the Draft Supplemental EIR does not state that the Project’s noise and traffic impacts are covered by SB 743, and both are fully analyzed in the Draft Supplemental EIR.

As a note, noise and traffic impacts were not provided “for informational purposes only” under SB 743. With regard to noise, only the Project impacts to future on-site Project receptors was provided for informational purposes as CEQA does not generally require the analysis of Project impacts to future on-site Project receptors. With regard to traffic, the analysis of Project Phases 1–3 interim condition was analyzed for informational purposes and to identify a consistency with the Warner Center Plan.

### **Comment No. 5-3**

#### **Inadequate Geographic Scope of Affected Highway Ramps and Intersections**

The list of intersections and freeway ramps for traffic impact review and analysis is too narrow and fails to include the Highway 101 on-ramps and off-ramps (and the associated adjacent street intersections) at Fallbrook Avenue and at Mulholland/Valley Circle.

### **Response to Comment No. 5-3**

This comment suggests that the geographic scope of affected highway ramps and intersections is inadequate for traffic impact review and analysis; the specific locations identified, the US-101 on and off ramps at Fallbrook Avenue and Mullholland Drive/Valley Circle Boulevard, are Caltrans facilities. As described in Topical Response No. 3, Traffic and Parking, above, and Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Traffic Study analyzed a Study Area which included 49 intersections with the greatest potential to experience significant traffic impacts due to the Project. This

Study Area was developed in consultation with both LADOT and Caltrans, and tiers off of the Warner Center Plan EIR, which analyzed 152 intersections. Intersections at the periphery of the Project's Study Area were determined to have less than significant impacts as a result of the addition of Project traffic, with implementation of the Warner Center Mitigation Program and Project specific project design features. Therefore, the intersections beyond the Study Area would not experience significant impacts, given that Project traffic dissipates farther from the Project Site. The Mulholland Drive/Valley Circle and Fallbrook Avenue US-101 ramp interchanges are located outside of the Project's Study Area; i.e., at a greater distance from the Project Site than the intersections analyzed in the Traffic Study, and therefore would not be significantly impacted.

The Project will also implement an Event Management Plan (EMP) before and after events at the Entertainment and Sports Center. Off-site operational measures will include a combination of traffic management/guidance and as well as the deployment of traffic control officers to selected intersections/routes. Traffic on both the freeways and arterials can be guided to utilize specified ramps/routes through use of changeable message signs; additionally, traffic control officers can be deployed at key intersections to direct traffic. The EMP is an evolving document that can be modified in coordination with LADOT to incorporate additional off-site operational measures. The Mulholland Drive/Valley Circle US-101 ramp interchange is approximately two miles from Topanga Canyon Boulevard and is not anticipated to be an attractive route to the Project Site due to the extended travel on surface routes; however the EMP can incorporate measures for this interchange in the future if deemed appropriate by LADOT.

#### **Comment No. 5-4**

The DEIR states that nearly all of the affected freeway segments already operate at levels-of-service (LOS) E or F under existing conditions and that the addition of the project related traffic will result in LOS of E or F for nine of eleven mainline segments. Likewise, freeway off-ramp queuing is stated to be affected by the project with the ramps at Canoga Avenue, De Soto Avenue and at Topanga Canyon Boulevard all being incapable of accommodating the traffic volumes under one or more scenarios.

#### **Response to Comment No. 5-4**

This comment correctly restates the freeway segment findings of the existing conditions analysis, where seven of the eleven mainline segments operate at LOS E or F. Similarly, nine of the eleven segments are anticipated to operate at LOS E or F with the addition of Project traffic to the existing conditions. For clarification, the freeway mainline portion of the comment references an existing with Project operating condition whereas the freeway off-ramp queuing portion of the comment references a future with Project operating condition. The reported queue lengths in the *Caltrans Analysis for Promenade 2035*

(Caltrans Analysis) provided in Appendix M, of the Draft Supplemental EIR, represent the 85th percentile results, where the queue length (or shorter) is projected to occur 85 percent of the time. Two of the five off-ramps (Topanga Canyon Boulevard and De Soto Avenue) are anticipated to operate in excess of ramp storage capacity under the Future without Project Conditions, and would continue to do so, along with the Canoga Avenue ramp, with the addition of Project traffic. As identified in Section IV. K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Applicant would coordinate with Caltrans to “contribute a proportionate share towards improvements that Caltrans identifies for the freeway mainline and off-ramps identified above to mitigate cumulative impacts to the state transportation network.”

To identify the Project’s contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project’s proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project’s impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project’s financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project’s percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an ESC event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

**Comment No. 5-5**

However, the traffic analysis fails to examine the logical outcome to such conditions, which is that eastbound travelers on Highway 101 who endeavor to arrive at the project location (especially for a planned concert or athletic event) will attempt to by-pass the clogged freeway segments and off-ramps by exiting at Fallbrook or at Mulholland/Valley Circle. These off-ramps should have been analyzed in the traffic study and the traffic impacts reported in the EIR along with appropriate mitigation measures.

**Response to Comment No. 5-5**

See Response to Comment No. 5-3, above.

**Comment No. 5-6****Truck Traffic Volumes Associated With 1,774,000 c.y. of Excavation**

To accomplish the proposed 2-level and 5-level subterranean parking structures, a total of approximately 1,774,000 cubic yards of material will be exported or imported. Assuming full-size trucks for the hauling of this material (with 24 c.y. capacity), and recognizing that each haul truck will require two trips, then approximately 147,833 truck trips will be required just for the parking garage excavation component of this project. The designated haul route is via Topanga Canyon Boulevard to Highway 101. The truck trips associated with the project construction will substantially affect area traffic and have not been fully factored into the traffic impact analysis.

**Response to Comment No. 5-6**

As discussed in Section II, Project Description, of the Draft Supplemental EIR, it is estimated that approximately 1,430,000 cubic yards of export and 344,000 cubic yards of import may be hauled from the Project Site over the Project's entire buildout. However, buildout is proposed in phases, and would not all occur at the same time. Further, less export may be needed if multiple phases are constructed at the same time and the soil can be kept on site.

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the preliminary construction schedule identified the maximum potential overlap of construction phases (the "Overlapping Construction Plan"<sup>26</sup>), including the maximum

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<sup>26</sup> *The Overlapping Construction Plan assumes that the Northeast, Northwest, and Southwest areas of the Project Site would be constructed as close in time as feasible, to provide a peak scenario of potential construction impacts.*

overlap of construction activities (including haul truck trips, vendor trips, or worker trips where applicable) and these conservative trip estimates were evaluated in the Traffic Impact Analysis. Worker trips to and from the Project Site are anticipated to occur outside of the peak hours (i.e., arrive at the site prior to 7:00 A.M. and depart before 4:00 P.M. or after 6:00 P.M.). However, even if all construction worker trips were conservatively assumed to occur during the morning and afternoon peak periods, there would still be fewer construction worker trips (1,188 morning and 1,396 afternoon trips) than the trips allocated for the Project Site (TAZ 9) under the Warner Center Plan (2,256 morning trips and 3,841 afternoon trips). Therefore, the morning and afternoon peak-hour transportation impacts of the Overlapping Construction Plan period were fully analyzed in the Draft Supplemental EIR, and are included in, and consistent with, the traffic impact analysis of the Warner Center Plan EIR.

To the extent that Project construction begins prior to the implementation of the Warner Center Mitigation Program, peak-hour construction transportation impacts may occur during the Overlapping Construction Plan period. The Construction Management Plan, described under Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1, is anticipated to limit almost all haul truck activity to outside of the morning and afternoon peak hours and will identify specific actions to reduce the effects of the construction impacts where feasible. Additionally, as set forth under Mitigation Measure K-1, the Project would prepare a detailed Construction Management Plan. As part of the Construction Management Plan, construction-related deliveries, haul trips, and construction worker trips would be scheduled to occur outside of typical commuter peak hours to the extent feasible. However, until either the construction activity is completed or the Warner Center Mitigation Program is implemented, which would reduce impacts, Project-level and cumulative construction traffic impacts are considered temporary in nature but significant and unavoidable. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 5-7**

With this in mind, the review of project alternatives should be revised to better illustrate relative reductions in traffic impacts (including construction related traffic) for the project alternatives when compared to the traffic impacts associated with the proposed project. For example, as presently written and constructed, the DEIR concludes that the potential construction traffic impacts associated with project alternative number 4 (construct a smaller sports and entertainment venue) are the same as for the project itself because both the project and alternative number 4 would result in “significant and unavoidable” traffic impacts. The DEIR fails to present to decision makers and the public the basic fact that Alternative Number 4 will result in substantially fewer truck trips and less traffic than would occur with the proposed project.



**Response to Comment No. 5-7**

Section V, Alternatives, of the Draft Supplemental EIR, includes an analysis of five alternatives that were selected based in part on their ability to reduce the significant impacts of the Project. As set forth in Section V, Alternatives, of the Draft Supplemental EIR, four of the five alternatives would generate less operational traffic than the Project. With regard to construction traffic, as explained in Section V, Alternatives, of the Draft Supplemental EIR, while the amount of overall building construction and excavation would decrease under Alternative 4, and thus the overall construction duration of Alternative 4, maximum daily haul trips and worker trips during demolition and construction would remain similar to the Project. As such, construction traffic impacts were appropriately concluded to be similar to those of the Project.

**Comment No. 5-8****Inadequate Off-Street Parking**

Off-street parking for the proposed 15,000-seat sports and entertainment venue is identified in the DEIR as being deficient by 180 spaces, notwithstanding the application of a highly questionable off-street parking standard of one space per five seats. Statements are then made about reliance on the off-street parking facilities for nearby commercial, office and residential uses as being sufficient to off-set the deficiency (e.g., shared parking). Although deficient off-street parking will not affect the City of Calabasas, this does appear to be a substantial shortcoming of the project, and nearby property owners will likely be negatively affected.

**Response to Comment No. 5-8**

As discussed above, in accordance with SB 743, impacts associated with parking are not considered significant impacts. However, an analysis of parking is provided in the Draft Supplemental EIR. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project's provision of 5,610 parking spaces would satisfy the non-event parking requirements of 2,790 parking spaces. The Entertainment and Sports Center would require 3,000 parking spaces for sold-out events under the LAMC (1 space per 5 seats). Therefore, the remaining 2,820 parking spaces provided on the Project Site would be utilized to fulfill the required parking spaces for the Entertainment and Sports Center. In order to make up the remainder of the LAMC required parking (i.e., 180 parking spaces) and to provide a peak demand parking of a maximum of 2,380 parking spaces, a combination of on-site shared parking (shared with the office and retail uses only) and off-site parking located at adjacent office buildings is proposed, and would require approval through the Project's requested entitlements.

Shared parking takes into account the peak parking demand patterns of the land uses on a project site. Each land use has a distinct demand pattern and the concept of shared parking maximizes the relationships of these demand patterns. A shared parking analysis was conducted for the Project to determine the peak parking demand, taking into consideration the different parking patterns associated with the Project's various land uses. As office and retail parking spaces are most heavily utilized during the daytime, and office parking spaces are largely vacant on weekends, shared parking would permit the Entertainment and Sports Center visitors to use those available spaces, and avoid overparking the Project Site (which would have greater construction impacts). Similarly, the Project proposes using off-site office parking spaces which are available on weeknights and weekends.

As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplement EIR, and set forth under Project Design Feature K-6, the Project would include the development of an EMP. The EMP would address the on-site shared use and off-site parking required for the Entertainment and Sports Center, depending on the time of year, day/time of the event, and the number of event attendees. Relative to parking, the EMP would identify the number of on-site shared use parking spaces available for the Entertainment and Sports Center and identify the number of off-site parking spaces that would be required to meet demand, depending on the time of year and number of event attendees. The EMP would require that sufficient parking be provided through a combination of on-site shared parking and available off-site parking to meet event demand. The Applicant would be required to provide evidence to LADOT of agreements that identify and secure the location and quantity of available off-site parking prior to the issuance of a temporary or permanent certificate of occupancy for the Entertainment and Sports Center, and annually thereafter.

#### **Comment No. 5-9**

Also, in the same manner as discussed above for construction traffic impacts the review of project alternatives falls short in its portrayal of the relative differences in parking impacts, and should be amended accordingly.

#### **Response to Comment No. 5-9**

As discussed above in Response to Comment No. 5-2, the Project is a mixed-use residential project located within a transit priority area. As such, in accordance with SB 743, parking impacts associated with the Project are less than significant. Nonetheless, the Draft Supplemental EIR demonstrates that adequate parking will be provided for the proposed uses. As significant parking impacts would not result from the Project, the selection of alternatives was not focused on alternatives that reduce the demand parking. However, parking impacts were identified for each of the Project Alternatives. The

alternatives each analyzed different parking requirements. With regard to Alternative 2 and 4, the alternatives would not require use of off-site parking or implementation of an EMP. Parking requirements under Alternative 3 would require off-site parking to accommodate the Entertainment and Sports Center and would be similar to the Project. Under Alternative 5, off-site parking would not be necessary during the off-peak month (November) on the weekdays under Option 1 and during either the peak month (December) or off-peak month (November) on the weekdays or weekends under Option 2.

**Comment No. 5-10**

Again, we appreciate the opportunity to comment on the DEIR. Please advise of the availability of a revised DEIR at the earliest opportunity, as well as of all public hearing dates relating to either the DEIR or the project.

**Response to Comment No. 5-10**

The City of Calabasas will be on the Project's mailing list for future environmental and hearing notices related to the Project. A revised Draft EIR will not be prepared as the Draft Supplemental EIR is comprehensive and none of the circumstances requiring recirculation of a draft EIR set forth in CEQA Guidelines Section 15088.5 have been met. Specifically, based on the comments and responses within this Final Supplemental EIR, no new significant impacts or substantial increases in already identified significant impacts have been identified. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 6**

Ali Poosti  
Division Manager  
Wastewater Engineering Services Division  
LA Sanitation

**Comment No. 6-1**

This is in response to your April 27, 2018 Notice of Completion and Availability of Draft Supplemental Environmental Impact Report for the proposed residential, retail, restaurant, office space, hotel and entertainment center located at 6100 N Topanga Canyon Boulevard; 21800 and 21900 W Erwin Street; 21801, 21821, 21901, and 29131 W Oxnard Street; and 6101 N Owensmouth Avenue, Woodland Hills, CA 91367. LA Sanitation, Wastewater Engineering Services Division (WESD), has received and logged the notification. A previous response was submitted by WESD to your offices on November 30, 2016. No changes have taken place regarding the wastewater generation, and as such the previous response is still valid. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at [chris.demonbrun@lacity.org](mailto:chris.demonbrun@lacity.org)

**Response to Comment No. 6-1**

This comment acknowledges that no additional hydraulic analysis is necessary for the Project at this time and that the previous information provided by WESD, and incorporated into the Draft Supplemental EIR, remains valid. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 7**

Ali Poosti  
Division Manager  
Wastewater Engineering Services Division  
LA Sanitation

**Comment No. 7-1**

This is in response to your June 5, 2018 Notice of Extension of Draft Supplemental Environmental Impact Report for the proposed residential, retail, restaurant, office space, hotel and entertainment center located at 6100 N Topanga Canyon Boulevard; 21800 and 21900 W Erwin Street; 21801, 21821, 21901, and 29131 W Oxnard Street; and 6101 N Owensmouth Avenue, Woodland Hills, CA 91367. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, there were no changes to the project and the previous response is valid. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at [chris.demonbrun@lacity.org](mailto:chris.demonbrun@lacity.org)

**Response to Comment No. 7-1**

This comment acknowledges receipt of the Notice of Extension of the Draft Supplemental EIR comment period. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 8**

Matt Dixon  
Abundant Housing LA  
620 W. Wilson Ave., Unit H  
Glendale, CA 91203-2477

Mark Vallianatos  
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**Comment No. 8-1**

Attached, please find our letter of support for the Westfield Promenade 2035 project, including comment on the SDEIR.

We are writing to you to in support of the proposed Westfield Promenade 2035 project, case number ENV-2016-3909-EIR. Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Report (SDEIR).

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing. By creating new housing in a desirable neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project will convert an auto-oriented mall into a walkable, transit-served, mixed-use neighborhood. By creating about 1,400 residential units, approximately 600,000 SF of office space, retail, and open space in a mixed-use setting, the project will help fulfill the goals of the Warner Center 2035 Specific Plan and create a vibrant downtown for the West Valley.

This project is in a great location for housing and mixed-use development. It is directly served by the Metro Orange Line, providing good transit access to Universal City, Hollywood, Koreatown, and downtown LA via the Red Line. The project is also served by many Metro Bus routes, including Routes 161, 164, 165, 169, 245/244, and 750, and will benefit from future transit improvements funded under Measure M, such as the Sepulveda Pass corridor, which will provide a connection to the Westside. In addition to employment opportunities developed as part of the project, it will be within walking and cycling distance of many jobs in Warner Center, and close to educational opportunities at Pierce College.

The project will also create walkable & bikeable retail, such as shops and restaurants, for both residents of the project, and current and future residents and workers of the Warner Center area. The success of dense, mixed-use projects across the country shows that there is enormous unmet demand for this type of neighborhood. As part of the Warner Center 2035 Specific Plan, this project will help create a mixed-use neighborhood that people in the West Valley can live in, visit, and enjoy without having to travel all the way to the Westside or downtown LA.

As a result of the features described above, specific to the SDEIR, we believe that the project will have many positive impacts on the environment. For example, by creating a dense mixed-use neighborhood with good transit access and many amenities such as employment and retail in walking distance, it will have a positive impact on air quality and greenhouse gas (GHG) emissions. The people who will live and work in the project do not disappear if the project is not built; instead, they may move to more distant suburbs such as Santa Clarita and the Antelope Valley, or to other states like Arizona and Texas. Thus,

compared to a realistic baseline where people live in suburban Texas instead, it is likely that this project will have a positive impact on GHG emissions.

The Westfield Promenade 2035 project is a good project for Los Angeles and for the region. We are pleased to support it, and urge the city to approve it.

**Response to Comment No. 8-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 9**

David Allison  
President  
Allison Asset Management Company, Inc.  
2424 S.E. Bristol St., Ste. 300  
Newport Beach, CA 92660-0764

**Comment No. 9-1**

Please see the attached letter of support for the Westfield Promenade 2035 Plan.

As a member of the Warner Center Association, an organization comprised of property owners and businesses with the mission to create and enhance opportunities for the benefit of Warner Center, I am writing to express our support for Westfield's Promenade 2035 Plan. Allison has developed and owned commercial property in Warner Center since its inception and we take a long view on trends affecting the area.

Warner Center has long embraced the idea of "local living," envisioning a community where one can live, work and play. This is at the core of the Warner Center 2035 Plan, which takes a thoughtful approach to planned growth that balances the need for housing, jobs and services for the broader community.

The Westfield Promenade 2035 Plan complies with the Warner Center 2035 Plan and will revitalize the area by creating an exciting mixed-use development within the Downtown District. The Plan will include residences, offices, hotels, retail, public open green spaces, new streets and pedestrian paths, more dining and leisure options as well as an entertainment/sports venue.

The Draft Supplemental Environmental Impact Report analyzing the potential impacts of The Westfield Promenade 2035 Plan is based on well researched facts and its conclusions are sound and defensible. I support the Draft Supplemental Environmental Impact Report as drafted and believe the Westfield Promenade 2035 Plan will greatly enhance the area and further Warner Center's goal for "local living."

**Response to Comment No. 9-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 10**

Hilary Horton  
BizFed Chair  
Los Angeles Business Federation  
6055 E. Washington Blvd., Ste. 260  
Commerce, CA 90040-2488

David Fleming  
BizFed Founding Chair  
Los Angeles Business Federation  
6055 E. Washington Blvd., Ste. 260  
Commerce, CA 90040-2488

Tracy Hernandez  
BizFed Founding CEO  
Impower, Inc.  
Los Angeles Business Federation  
6055 E. Washington Blvd., Ste. 260  
Commerce, CA 90040-2488

**Comment No. 10-1**

On behalf of BizFed, a grassroots alliance of more than 170 business organizations that represent 390,000 employers with over 3.5 million employees in LA County we are celebrating our tenth anniversary with a mission to lift one million people out of poverty in the next decade. We believe that job creation and housing production are important to achieving that goal and we are writing to express our support for the Warner Center 2035 Plan.

We have long advocated for policies that strengthen our regional economy and the Promenade project certainly supports our mission. Westfield is making a Significant, long-term investment in the San Fernando Valley that will generate thousands of jobs during and after construction, in addition to providing much needed residences to help the region's severe housing shortage.

The project's design bringing housing and jobs together is smart and forward-thinking and will have a positive long-term benefit in terms of mobility and air quality. We also are pleased that Westfield has committed to employing green building and sustainable practices.

Importantly, the Promenade will generate new annual revenues to the city and strengthen the local economy. We need more projects like this to ensure sustainable economic growth and job creation.

If you have any questions please contact Jerard Wright, our policy manager on this issue, at [jerard.wright@bizfed.org](mailto:jerard.wright@bizfed.org).

**Response to Comment No. 10-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 11**

Jerard Wright  
Policy Manager  
BizFed—Los Angeles County Business Federation  
6055 E. Washington Blvd., #260  
Commerce, CA 90040-2488

Hilary Norton  
BizFed Chair  
Fixing Angelenos Stuck in Traffic (FAST)  
BizFed—Los Angeles County Business Federation  
6055 E. Washington Blvd., #260  
Commerce, CA 90040-2488

David Fleming  
BizFed Founding Chair  
BizFed—Los Angeles County Business Federation  
6055 E. Washington Blvd., #260  
Commerce, CA 90040-2488

Tracy Hernandez  
BizFed Founding CEO  
Impower, Inc.  
BizFed—Los Angeles County Business Federation  
6055 E. Washington Blvd., #260  
Commerce, CA 90040-2488

**Comment No. 11-1**

See attached BizFed letter of support for DEIR of Westfield Promenade 2035 project

On behalf of BizFed, a grassroots alliance of more than 170 business organizations that represent 390,000 employers with over 3.5 million employees in LA County we are celebrating our tenth anniversary with a mission to lift one million people out of poverty in the next decade. We believe that job creation and housing production are important to achieving that goal and are writing to express our support for the Westfield's Promenade 2035 project.

We have long advocated for policies that strengthen our regional economy and the Promenade project certainly supports our mission. Westfield is making a Significant, [sic]

long-term investment in the San Fernando Valley that will generate thousands of jobs during and after construction, in addition to providing much needed residences to help the region's severe housing shortage. Importantly, the Promenade will generate new annual revenues to the city and strengthen the local economy.

The project's design bringing housing and jobs together is smart and forward-thinking and will have a positive long-term benefit in terms of mobility and air quality. We also are pleased that Westfield has committed to employing green building and sustainable practices. We need more projects like this to ensure sustainable economic growth and job creation.

If you have any questions please contact Jerard Wright, our policy manager on this issue, at [jerard.wright@bizfed.org](mailto:jerard.wright@bizfed.org).

#### **Response to Comment No. 11-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 12**

Rebecca L. Morales  
rlm@m-consultants.net

Jeff Modrzejewski  
CREED LA  
501 Shatto Pl., Ste. 200  
Los Angeles, CA 90020-1748

**Comment No. 12-1**

I mistakenly attached the Pipe Trades letter twice. Thank you for calling my attention to it. Attached is the correct CREED LA letter.

**Response to Comment No. 12-1**

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 12-2**

On behalf of CREED LA in support of the Westfields Promenade 2035 project. [sic] CREED LA is an unincorporated association of individuals and labor organizations established to advocate for development projects that provide economic and employment benefits to the local communities where they are located, and that further the kind of environmentally responsible and sustainable construction practices that will protect the health and well-being of local residents and ensure continued opportunities for growth and development in the City of Los Angeles.

In this case, the Applicant has made commitments that will ensure the hiring of local contractors and the employment of local workers, will maintain area wage and benefit standards, and will support local workforce training and development. In order to promote and maximize the employment of City of Los Angeles residents on the Project, the Applicant has specifically agreed to percentage goals for local resident hiring on the Project. The Applicant has also agreed to work with the City of Los Angeles Economic and Workforce Development Department when requesting referrals for employees to perform work on the Project.

Westfields [sic] Promenade 2035 project will help to revitalize the Warner Center by transforming the 34-acre [sic] promenade site into a new lifestyle center with 150,000

square feet of creative office space, 470,000 square feet of Class A office, and 60,000 square feet of work/live space. The project will create more than 12,500 good-paying full time and part time jobs during construction and generate nearly \$2 billion in economic output. After completion, the project will create more than 7,900 total good-paying full-and part-time jobs and generate nearly \$12 million in net new annual revenues to the City's General Fund.

The commitments made by this Applicant will ensure that Project construction will provide maximum economic and employment benefits to local communities and workers. We also believe that the overall Project design is consistent with the kind of safe and sustainable development supported by CREED LA. For these reasons, we respectfully request your approval of the Project.

**Response to Comment No. 12-2**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 13**

Brandy Salas  
Admin Specialist  
Gabrieleño Band of Mission Indians—Kizh Nation  
P.O. Box 393  
Covina, CA 91723-0393

Andrew Salas  
Chairperson  
Gabrieleño Band of Mission Indians—Kizh Nation  
P.O. Box 393  
Covina, CA 91723-0393

**Comment No. 13-1**

Please see attachment

Please find this letter as a written request for consultation regarding the above-mentioned project pursuant to Public Resources Code § 21080.3.1, subd. (d). Your project lies within our ancestral tribal territory, meaning belonging to or inherited from, which is a higher degree of kinship than traditional or cultural affiliation. Your project is located within a sensitive area and may cause a substantial adverse change in the significance of our tribal cultural resources. Most often, a records search for our tribal cultural resources will result in a “no records found” for the project area. The Native American Heritage Commission (NAHC), ethnographers, historians, and professional archaeologists can only provide limited information that has been previously documented about California Native Tribes. This is the reason the NAHC will always refer the lead agency to the respective Native American Tribe of the area because the NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & tribal historians are the experts for our Tribe and are able to provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area. Therefore, to avoid adverse effects to our tribal cultural resources, we would like to consult with you and your staff to provide you with a more complete understanding of the prehistoric use(s) of the project area and the potential risks for causing a substantial adverse change to the significance of our tribal cultural resources.

Consultation appointments are available on Wednesdays and Thursdays at our offices at 910 N. Citrus Ave. Covina, CA 91722 or over the phone. Please call toll free 1-844-390-0787 or email [gabrielenoindians@yahoo.com](mailto:gabrielenoindians@yahoo.com) to schedule an appointment.



\*\* Prior to the first consultation with our Tribe, we ask all those individuals participating in the consultation to view a video produced and provided by CalEPA and the NAHC for sensitivity and understanding of AB52. You can view their videos at: <http://calepa.ca.gov/Tribal/Training/> or <http://nahc.ca.gov/2015/12/ab-52-tribal-training/>

### **Response to Comment No. 13-1**

As discussed in Section IV.L, Tribal Cultural Resources, of the Draft Supplemental EIR, the Gabrieleño Band of Mission Indians—Kizh Nation, was the only tribal representative that responded during the 30-day project notification conducted by the City of Los Angeles Department of City Planning. Following the request for consultation, the City spoke with tribal representative Andrew Salas regarding the Project on January 24, 2017. At that time, Mr. Salas indicated the tribal importance of Topanga Canyon Boulevard as a traditional trading route. In a response to ongoing consultation, dated May 4, 2017, Mr. Salas provided a follow-up email, which included a number of online references in evidence of the Native American traditional use of areas in the project vicinity. Additional follow up emails were exchanged with Mr. Salas on January 31, 2018, as part of ongoing consultation with the City. As discussed in a letter sent to the Gabrieleño Band of Mission Indians-Kizh Nation on March 28, 2018, provided in Appendix N, of the Draft Supplemental EIR, the City and the Gabrieleño Band of Mission Indians-Kizh Nation were in mutual agreement that any potential impacts to Tribal Cultural Resources would be less-than-significant with the inclusion of Mitigation Measure L-1. A copy of the mitigation measure was provided to the Gabrieleño Band of Mission Indians-Kizh Nation via e-mail on March 9, 2018. On March 19, 2018, the City subsequently e-mailed the Gabrieleño Band of Mission Indians—Kizh Nation requesting any additional comments regarding the proposed mitigation measure be provided to the City by end of day on March 23, 2018. No additional comments were received. Therefore, the City of Los Angeles issued its close of consultation letter to the Gabrieleño Band of Mission Indians—Kizh Nation, on March 28, 2018, as shown in Appendix N, of the Draft Supplemental EIR. Subsequent to the publication of the Draft Supplemental EIR, the City updated its tribal cultural resources mitigation measure. As such, Mitigation Measure L-1 has been updated to reflect this updated mitigation measure. See Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR.

**Comment Letter No. 14**

Administrative Specialist  
Gabrieleño Band of Mission Indians—Kizh Nation  
P.O. Box 393  
Covina, CA 91723-0393

**Comment No. 14-1**

Archeologist no longer have authority over our cultural resources . [sic] According i [sic] to the law archeological resources and cultural (TCR) are now considered separate entities [sic] Archeologist should not be handeling [sic] or making any recommendation of our cultural resources which includes human remains. This is in violation of our birth rights. Also our monitoring services are to protect our resources and the developer therefore we also get paid just like everyone else . [sic] This mitigation is unlawful !! [sic]

**Response to Comment No. 14-1**

Mitigation Measure L-1 requires monitoring during construction activities. As part of this measure, the monitor must be determined by the City's Office of Historic Resources to be qualified to identify subsurface tribal cultural resources. Mitigation Measure L-1 also requires that prior to the commencement of any ground disturbance activities, the Applicant, or its successor, shall notify any California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project that ground disturbance activities are about to commence and invite the tribes to observe the ground disturbance activities, if the tribes wish to monitor. Finally, upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, is required to immediately stop all ground disturbance activities and contact all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; and contact the Department of City Planning, Office of Historic Resources. Subsequent to the publication of the Draft Supplemental EIR, the City updated its tribal cultural resources mitigation measure. As such, Mitigation Measure L-1 has been updated to reflect this updated mitigation measure. See Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR.

**Comment No. 14-2****§10.14 Lineal descent and cultural affiliation.**

(a) *General.* This section identifies procedures for determining lineal descent and cultural affiliation between present-day individuals and Indian tribes or Native Hawaiian organizations and human remains, funerary objects, sacred objects, or objects of cultural

patrimony in museum or Federal agency collections or excavated intentionally or discovered inadvertently from Federal lands. They may also be used by Indian tribes and Native Hawaiian organizations with respect to tribal lands.

(b) *Criteria for determining lineal descent.* A lineal descendant is an individual tracing his or her ancestry directly and without interruption by means of the traditional kinship system of the appropriate Indian tribe or Native Hawaiian organization or by the common law system of descent to a known Native American individual whose remains, funerary objects, or sacred objects are being requested under these regulations. This standard requires that the earlier person be identified as an individual whose descendants can be traced.

(c) *Criteria for determining cultural affiliation.* Cultural affiliation means a relationship of shared group identity that may be reasonably traced historically or prehistorically between a present-day Indian tribe or Native Hawaiian organization and an identifiable earlier group. All of the following requirements must be met to determine cultural affiliation between a present-day Indian tribe or Native Hawaiian organization and the human remains, funerary objects, sacred objects, or objects of cultural patrimony of an earlier group:

(1) Existence of an identifiable present-day Indian tribe or Native Hawaiian organization with standing under these regulations and the Act; and

(2) Evidence of the existence of an identifiable earlier group. Support for this requirement may include, but is not necessarily limited to evidence sufficient to:

(i) Establish the identity and cultural characteristics of the earlier group,

(ii) Document distinct patterns of material culture manufacture and distribution methods for the earlier group, or

(iii) Establish the existence of the earlier group as a biologically distinct population; and

(3) Evidence of the existence of a shared group identity that can be reasonably traced between the present-day Indian tribe or Native Hawaiian organization and the earlier group. Evidence to support this requirement must establish that a present-day Indian tribe or Native Hawaiian organization has been identified from prehistoric or historic times to the present as descending from the earlier group.

(d) A finding of cultural affiliation should be based upon an overall evaluation of the totality of the circumstances and evidence pertaining to the connection between the claimant and

the material being claimed and should not be precluded solely because of some gaps in the record.

(e) *Evidence*. Evidence of a kin or cultural affiliation between a present-day individual, Indian tribe, or Native Hawaiian organization and human remains, funerary objects, sacred objects, or objects of cultural patrimony must be established by using the following types of evidence: Geographical, kinship, biological, archeological, anthropological, linguistic, folklore, oral tradition, historical, or other relevant information or expert opinion.

(f) *Standard of proof*. Lineal descent of a present-day individual from an earlier individual and cultural affiliation of a present-day Indian tribe or Native Hawaiian organization to human remains, funerary objects, sacred objects, or objects of cultural patrimony must be established by a preponderance of the evidence. Claimants do not have to establish cultural affiliation with scientific certainty.

Native American monitoring guide lines

(Monitors to be hired)

<https://files.acrobat.com/a/preview/1294fc43-b98a-4deb-afd9-50b763bc075d>

### **Response to Comment No. 14-2**

This comment cites regulations regarding lineal descent and cultural affiliation. This comment does not change any of the analysis or conclusions with regard to tribal cultural resources. As discussed in Section IV.L, Tribal Cultural Resources, of the Draft Supplemental EIR, with implementation of Mitigation Measure L-1, potential impacts associated with tribal cultural resources would be less than significant.

**Comment Letter No. 15**

Board of Directors  
Golden State Environmental Justice Alliance  
P.O. Box 79222  
Corona, CA 92877-0174

**Comment No. 15-1**

Please find attached comments for the record on behalf of Golden State Environmental Justice Alliance regarding the proposed Promenade 2035 EIR.

Thank you for the opportunity to comment on the Supplemental Environmental Impact Report (EIR) for the proposed Promenade 2035 project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

**Response to Comment No. 15-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Golden State Environmental Alliance was added to the "Interested Parties" list for the Promenade 2035 Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 15-2****1.0 Summary**

As we understand it, the project proposes the redevelopment of the existing Westfield Promenade Shopping Center located within the Warner Center 2035 Specific Plan (Warner Center Plan) area with a new mixed-use development consisting of residential, retail/restaurant, office, hotel and entertainment uses. Upon completion the Project, the Project Site would include a total of 3,271,050 square feet of floor area. The Project would specifically include up to 1,432 multi-family residential units (which include work-live units), approximately 244,000 square feet of retail/restaurant uses, approximately 629,000 square feet of office space, up to 572 hotel rooms, and an Entertainment and Sports Center approximately 320,050 square-feet and 15,000 seats in size. The proposed uses would be provided in several buildings throughout the Project Site that would range in height from

one story and three to four stories at the corner of Topanga Canyon Boulevard and Erwin Street, to 28 stories at the opposite corner of Owensmouth Avenue and Oxnard Street.

### **Response to Comment No. 15-2**

This comment accurately summarizes the project description. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 15-3**

The proposed uses would be supported by 5,610 on-site parking spaces at buildout. Parking would be distributed in both subterranean parking areas and above-grade parking. The EIR states “a limited number of surface parking spaces would be provided along Topanga Canyon Boulevard specifically for valet use”, [sic] but does not detail the exact number of surface parking spaces proposed, the square footage of the surface lot, or a method describing how the stalls will be restricted to valet use only.

### **Response to Comment No. 15-3**

The Draft Supplemental EIR states in Section IV.A, Aesthetic, Views, Light/Glare, and Shading, that the small valet area, which would be located in Northwest-A, would include 13 parking spaces. These parking spaces were accurately accounted for in the Draft Supplemental EIR analysis. This valet area would be used for the hotel proposed in Northwest-A and would include measures typically used to restrict valet use, including signage, attendants, and ropes to block off the valet parking, among others.

### **Comment No. 15-4**

## **2.0 Project Description**

The Project Description states that the project is located on a 34 acre site. The Land Use analysis indicates that the project will dedicate 0.97 acres of land, resulting in a 33.03 acre net site. The Project Description and EIR do not discuss this dedication except when it is buried in the compatibility charts of the Land Use analysis. The Project Description and EIR do not accurately describe the project site and must be revised to include this information.

### **Response to Comment No. 15-4**

As accurately stated in the EIR, the Project Site in the existing condition is approximately 34 acres. After dedications along adjacent streets to meet City requirements on street and sidewalk width, including requirements of the Warner Center Plan, the Project

Site is expected to be approximately 33 acres. The Draft Supplemental EIR uses the site acreage after dedication where appropriate in the environmental analysis. Therefore the conclusions of the EIR remain accurate.

#### **Comment No. 15-5**

The EIR utilizes the Warner Center Plan EIR as a reference throughout the EIR. CEQA § 15150 (f) states that incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand. The Warner Center Plan EIR utilized for analysis throughout the EIR contributes directly to the analysis of the problem at hand. Not including the Warner Center Plan EIR as an attachment for public review is in violation of CEQA § 15150 (t).

#### **Response to Comment No. 15-5**

This comment claims that the Warner Center Plan EIR needed to be included as an attachment for public review. The weblink to the Warner Center Plan EIR was included numerous times throughout the Draft Supplemental EIR. In addition, the Warner Center Plan EIR is also available for in-person review at the Department of City Planning. Furthermore, the Warner Center Plan EIR was provided as part of a reference library CD which is available for use at the Department of City Planning office.

#### **Comment No. 15-6**

##### **4.B Air Quality**

Appendix D of the Air Quality Analysis (AQA) indicates that the CalEEMod analysis did not include the surface parking lot along Topanga Canyon Blvd. Surface parking is defined as a separate land use in the CalEEMod User Guide<sup>1</sup> and must be entered into the analysis separately.

<sup>1</sup> [http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/01\\_user-39-s-guide2016-3-1.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/01_user-39-s-guide2016-3-1.pdf?sfvrsn=2)

#### **Response to Comment No. 15-6**

As discussed in Response to Comment No. 15-3, above, the 13 parking spaces located in Northwest-A along with all proposed parking spaces were accurately accounted for in the Draft Supplemental EIR analysis. Specifically, the 13 parking spaces were included in the total unenclosed/enclosed parking with elevator land uses in the CalEEMod analysis performed for the Project, provided in Appendix D, of the Draft Supplemental EIR. When modeling project emissions with CalEEMod, it is more conservative for these parking

spaces to be accounted for under the unenclosed/enclosed parking with elevator land uses, as these land uses account for lighting necessary in these parking structures, as well as additional electricity associated with ventilation and elevators included in these parking structures. The surface parking land use only accounts for lighting necessary for the surface parking area. In fact, Table 2 of Appendix E6, Assessment of Energy Emissions Associated with Parking Lots and Structures, of the User's Guide for CalEEMod Version 2016.3.2 shows that open parking spaces result in 0.88 kWh/sf in comparison to 6.55 kwh/sf for enclosed parking with elevator. Thus, the analysis of the air quality and greenhouse gas emissions associated with the parking land uses provided in the Draft Supplemental EIR is conservative.

### **Comment No. 15-7**

Further, the EIR does not explain the CalEEMod output sheets utilization of movie theater land use when modeling the entertainment and sports center. The movie theater land use is extremely specific as defined by the CalEEMod User Guide, stating that movie theaters "consist of audience seating, single or multiple screens and auditoriums, a lobby and a refreshment stand." CalEEMod includes an arena land use for modeling, defined as "large indoor structures in which spectator events are held. These events vary from professional ice hockey and basketball to non-sporting events such as concerts, shows, or religious services," which is an appropriate classification of the proposed entertainment and sports center.

### **Response to Comment No. 15-7**

The Draft Supplemental EIR analyzed the Entertainment and Sports Center by using the "movie theater" land use in CalEEMod. Refer to Appendix D-3, Air Quality Worksheet and Modeling Output Files, of the Draft Supplemental EIR. This approach was applied because a movie theatre represented the closest land use that included the size metric in terms of seats, whereas, the "arena" category included a size metric in terms of acres and square feet. This is important since daily trip rates are calculated based on trips per seat. Refer to Table IV.K-6 on page IV.K-49 of Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR.

In addition, the analysis of the Entertainment and Sports Center was not dependent solely on the land use selected for CalEEMod. As shown in Table IV.B-7, Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout (2033), of the Draft Supplemental EIR, pollutant emissions are categorized into area, energy, mobile, and stationary (emergency generators).

Area source emissions within CalEEMod for commercial uses consist of consumer products, architectural coatings and landscape equipment. These emission are calculated



in terms of pounds per square feet and independent of specified land use. Since the project specific square footage for the Entertainment and Sports Center (320,050 square feet) was used in the CalEEMod modeling (see referenced CalEEMod output file), no change in emissions would occur by selecting the “arena” versus “movie theatre” category. Regarding energy usage emissions, Table 8.1, Energy Use by Climate Zone and Land Use Type, of the User’s Guide for CalEEMod Version 2016.3.2 shows that energy usage rates are equivalent for both the movie theatre and indoor arena categories. Therefore, no change in emissions would occur by selecting arena versus movie theatre. Mobile source emissions were based on the Project trip-generation estimates provided by Gibson Transportation, Inc.<sup>27</sup> and are independent of trip-generation rates provided within CalEEMod for specific land uses. Stationary source (emergency generators) emissions were project specific and independent of selected land use. Thus, the change in selected land use would not materially change the analysis because emissions associated with area, energy, mobile (vehicles), and stationary sources are not dependent on the CalEEMod land use, and these sources comprise the majority of emissions from this use.

Even though the Draft Supplemental EIR analysis of the Entertainment and Sports Center was reasonable, in response to this comment and for disclosure purposes, the buildout CalEEMod modeling run has been updated to reflect an “indoor arena” category instead of movie theater. In addition in Response to Comment No. 15-8, below, the updated CalEEMod modeling run also reflects changes related to mid-rise versus high-rise residential and grocery store versus retail. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR. As shown therein, VOC emissions would decrease by 0.15 percent (0.12 pound per day); NO<sub>x</sub> emissions would increase by 0.12 percent (0.09 pound per day); CO emissions would decrease by 0.50 percent (1.13 pounds); SO<sub>x</sub> emissions would increase by 0.5 percent (less than 0.01 pound per day); PM<sub>10</sub> emissions would increase by 0.78 percent (0.21 pound per day); and PM<sub>2.5</sub> emissions would increase by 0.64 percent (0.06 pound per day). These minor changes would not materially change any significance conclusions provided in the Draft Supplemental EIR.

### **Comment No. 15-8**

Further, the output sheets indicate that all residential units were modeled as mid-rise apartments, which are defined as “rental buildings that have between 3 and 10 levels” even though the EIR describes that the residential buildings will be up to 28 stories tall. The project description also states that a grocery store with at least 7,500 square feet of floor area will be part of the project, and the AQA does not reflect this by utilizing the supermarket land use. The EIR and Appendix D must be revised to properly categorize

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<sup>27</sup> Gibson Transportation Consulting, Inc., *Traffic Impact Study for Promenade 2035*, March 2018.

each use within the proposed project to adequately and accurately estimate the potentially significant air quality impacts.

### **Response to Comment No. 15-8**

The Draft Supplemental EIR analyzed the residential buildings as mid-rise residential buildings. Refer to Appendix D-3, Air Quality Worksheet and Modeling Output Files, of the Draft Supplemental EIR. This approach was applied because, as discussed in Section II, Project Description, of the Draft Supplemental EIR, residential buildings would range in height between seven stories to 28 stories, which includes both mid- and high-rise residential buildings.

This approach is reasonable because, similar to Response to Comment No. 15-7, above, the selection of mid-rise versus high-rise residential land use within CalEEMod does not affect the emissions estimates associated with area, energy, mobile, and stationary sources. Specifically, area source and energy emissions within CalEEMod for both mid-rise and high-rise residential are equivalent and are calculated in terms of pounds per dwelling. Refer to Table 8.1, Energy Use by Climate Zone and Land Use Type, of the User's Guide for CalEEMod Version 2016.3.2 which shows that energy usage rates are equivalent for both mid-rise and high-rise residential. Mobile source emissions were based on the Project trip-generation estimates provided by Gibson Transportation, Inc. for each land use.<sup>28</sup>

While Section II, Project Description, of the Draft Supplemental EIR, does describe the construction of a 7,500 square foot grocery store on the northern end of the residential building of Northwest Area-B, this land use was accounted for and assigned as a retail use for determining trip generation, as discussed on page IV.K-23 and shown in Table IV.K-3 of the Draft Supplemental EIR. As described in Appendix M, of the Draft Supplemental EIR, the use of retail trip generation factors for this land use is consistent with the methodology contained in the Warner Center Plan EIR. The Warner Center Plan EIR Model did not generate trips based on land use, instead it utilized socio-economic data to develop trip estimates of proposed development. For comparison purposes against the Warner Center Plan Model trips, two types of retail use were identified relative to trip generation rates: regional shopping center and typical retail (i.e. neighborhood serving). The grocery store use is understood to function in a neighborhood serving manner rather than a regional serving manner. For the purposes of the Project analysis, a grocery store use is assumed to be similar in function to a typical retail use (non-regional type). As such, the trip generation estimate was developed based on the typical retail use rate consistent with the proposed function of the Project's retail uses. Thus, the change in selected land uses

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<sup>28</sup> Gibson Transportation Consulting, Inc., *Traffic Impact Study for Promenade 2035*, March 2018.

would not materially change mobile source emissions. As discussed above, area source emissions within CalEEMod for commercial uses are calculated in terms of pounds per square feet and independent of specified land use. Since the grocery store was included in the total retail square footage, no change in area source emissions would occur by selecting grocery store versus retail. Regarding energy usage emissions, Table 8.1, Energy Use by Climate Zone and Land Use Type, of the User's Guide for CalEEMod Version 2016.3.2 shows that energy usage rates slightly increase for a grocery store versus retail. As a result, energy source emissions would slightly increase by less than 1 percent as a result of a change of land use. As discussed above, stationary source (emergency generators) emissions were project specific and independent of selected land use.

Even though the Draft Supplemental EIR analysis of the residential and retail use were reasonable, in response to this comment and for disclosure purposes, the buildout CalEEMod modeling has also been run to reflect high-rise residential and 7,500 square feet of grocery store versus retail. As discussed above in Response to Comment No. 15-7, the updated CalEEMod modeling run also reflects changes related to input as an arena category instead of movie theater. Refer to Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR. As shown therein, VOC emissions would decrease by 0.15 percent (0.12 pound per day); NO<sub>x</sub> emissions would increase by 0.12 percent (0.09 pound per day); CO emissions would decrease by 0.50 percent (1.13 pound); SO<sub>x</sub> emissions would increase by 0.5 percent (less than 0.01 pound per day); PM<sub>10</sub> emissions would increase by 0.78 percent (0.21 pound per day); and PM<sub>2.5</sub> emissions would increase by 0.64 percent (0.06 pound per day). These minor changes would not materially change any significance conclusions provided in the Draft Supplemental EIR.

### **Comment No. 15-9**

Section 41.40 of the LAMC prohibits construction activity (including demolition) between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. All such activities are also prohibited on Sundays. Thus, the legal hours of construction in the City of Los Angeles are 7:00 A.M.–9:00 P.M., Monday–Friday and 8:00 A.M.–6:00 P.M. on Saturday. The EIR does not provide a “worst-case scenario” analysis of construction equipment emitting pollutants for the legal 14 hours per weekday plus 8 hours on Saturday. It is legal for construction to occur for much longer hours and an additional day (6 days per week including Saturday for every type of construction) than modeled in the Air Quality Analysis. The Air Quality modeling must be revised to account for these legally possible longer construction days and increased number of construction days.

**Response to Comment No. 15-9**

SCAQMD's *Air Quality Handbook* (Handbook) provides guidance regarding recommended procedures for calculating emissions that may be generated during project construction. Page 9-1 of the Handbook recommends to "Estimate daily emissions for each source category" and does not specifically recommend a "worst-case scenario" be evaluated. Peak daily operating hours for construction equipment were developed to represent expected worst-case daily construction emissions for comparison to SCAQMD daily construction emissions thresholds based on the maximum level of daily construction emissions reasonably anticipated for the site. Refer to Page IV.B-38 of the Draft Supplemental EIR. The analysis is based on the peak day and is not specific to weekday or weekend and Saturday would be accounted for in the evaluation of peak-daily impacts.

As shown in Appendix D, of the Draft Supplemental EIR, air quality modeling assumed that all pieces of equipment for any given construction phase would be operating for 8 hours per day. This peak daily usage assumption is consistent with data provided in construction site surveys conducted by SCAQMD (SCAQMD, Sample Construction Scenarios for Projects Less than Five Acres in Size, February 2005). Although the LAMC specifies the time periods when these pieces of equipment can operate, this does not mean that the same piece of equipment would operate during that entire time period. As an example, a concrete pour day may require use of welders early in the morning to place rebar; followed by use of concrete pumps to place the concrete; and then followed by use of compactors later in the process. The duration of the entire concrete pour day may require 14 hours, but different pieces of equipment would be used for shorter durations to perform specific tasks. In addition, there are some hours of construction allowed during the times specified within the LAMC that would not result in substantial use of heavy-duty construction equipment. Examples include surveying the construction efforts, breaks (e.g., lunch), clean-up, etc.

Eight hours of operation of each individual piece of equipment on a peak day is considered the upper-end of what is anticipated for the Project construction. Thus, the Draft Supplemental EIR's analysis of expected daily construction emissions is reasonable and consistent with SCAQMD guidance recommending an "estimate of daily emissions"; an analysis of a hypothetical longer daily construction period is not required. Moreover, the Draft Supplemental EIR's daily construction assumptions are also consistent with construction assumptions used in analyzing construction air quality impacts within the Warner Center Plan EIR. Refer to page 18 of Appendix C, Air Quality Modeling, of the Warner Center Plan EIR.

**Comment No. 15-10**

Further, Appendix D states “construction hours could extend beyond these hours if required and specifically permitted by the City,” indicating that construction hours are planned to be longer than the legal 14 hours per day. Additional information must be included that analyzes the proposed overnight/early morning construction schedule and this portion of the schedule must be included in the EIR instead of buried in Appendix D.

**Response to Comment No. 15-10**

At this time, outdoor construction activities beyond the hours specified by the LAMC are not proposed. Should such activities be proposed, approval from the Board of Police Commissioners would be required.

**Comment No. 15-11***Cumulative Impacts*

The EIR analyzes the proposed project’s local and regional cumulative impacts in the context of the Warner Center Plan. The EIR does not consider the amount of pollutants emitted by all projects listed in the cumulative projects list for cumulative analysis and then compare the cumulative effect of those total emissions on the air quality standards. The EIR also does not confirm whether each of the cumulative projects will emit air pollutants below SCAQMD thresholds. Given the City’s authority to approve any project notwithstanding its significant air quality impacts, the public and decision makers cannot determine from the proposed project EIR whether any of the listed cumulative projects are expected to emit air pollutants at or below levels that will have significant impacts. The EIR’s cumulative impact analysis is insufficient and must be substantially revised to analyze all listed projects in a cumulative setting in a recirculated EIR.

**Response to Comment No. 15-11**

The definition of a cumulative impact is included on pages 3-5 of Section III, Environmental Setting, of the Draft Supplemental EIR. The Draft Supplemental EIR appropriately uses specific analyses for each cumulative analysis impact category. The SCAQMD guidance regarding air quality cumulative impact methodology is explained below and does not require an analysis comparing the Project’s emissions in combination with other Project emissions against the significance thresholds.<sup>29</sup>

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<sup>29</sup> Email Correspondence with Jillian Wong, SCAQMD, dated August 8, 2016.

The SCAQMD shares responsibility with CARB for ensuring that all federal and state ambient air quality standards are achieved and maintained throughout all of Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. SCAQMD has developed methodologies and thresholds of significance that are widely used by lead agencies throughout the air basin. As set forth in the *LA CEQA Thresholds Guide*, the City adopted the SCAQMD thresholds to assess the significance of a project's project-specific and cumulative air quality impacts. SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution prepared in August 2003 specifically states:

*The AQMD, as Lead Agency, complies with all cumulative impact analysis requirements when preparing CEQA documents. As a Commenting Agency, the AQMD recommends that other public agencies perform cumulative impact analyses relative to air quality in the same manner as does AQMD.... As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR.... Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.*<sup>30</sup>

The cumulative analysis of air quality impacts within the Draft Supplemental EIR appropriately follows SCAQMD's specified methodology. Specifically, as discussed on page IV.B-59 of the Draft Supplemental EIR, individual projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.

Section 9.5, Cumulative Impact Evaluation, of SCAQMD's *CEQA Air Quality Handbook* also provides guidance regarding evaluation of cumulative impacts. On Page 9-12 of the *CEQA Air Quality Handbook (1993)*, a project could evaluate cumulative impacts by determining whether the project reduces the rate of growth in vehicle miles traveled (VMT). This analysis was conducted in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR on page IV.D-69. As discussed therein, the Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options. As shown in Table IV.D-9 on page IV.D-70 of the Draft

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<sup>30</sup> *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, South Coast Air Quality Management District, August 2003.*

Supplemental EIR, the 5.15 Total Project VMT per capita, as generated by CalEEMod, is well below SCAG's 20.5 daily Total VMT per capita for the 2040 Plan Year and Los Angeles County's 18.4 daily Total VMT per capita for the 2040 Plan Year. In addition, the Project results in a VMT reduction of approximately 67 percent in comparison to a standard project as estimated by CalEEMod and would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS. This analysis would support a conclusion of less than significant cumulative operational air quality impacts. Nevertheless, the Draft Supplemental EIR conservatively followed guidance from SCAQMD's White Paper. As such, since operational emissions from the Project would exceed SCAQMD's regional VOC and NO<sub>x</sub> significance thresholds at Project buildout, the emissions of non-attainment pollutants and precursors generated by Project operation were concluded in the Draft Supplemental EIR to be cumulatively considerable, i.e., significant and unavoidable.

#### **Comment No. 15-12**

##### **4.G Land Use**

In the Land Use section, the proposed project is described as “a total of 3,271,050 square feet, over a net site area of 1,439,222 square feet after dedications.” A net site area of 1,439,222 square feet is a 33.03 acre site. The project description details the project area as a “34 acre site.” The dedications described in the Land Use section are not described, detailed, or discussed anywhere else throughout the EIR. No details are given to support nearly 1 full acre in dedications that is not consistent with the project site area described in the project description.

#### **Response to Comment No. 15-12**

See Response to Comment No. 15-4, above.

#### **Comment No. 15-13**

Further, the FAR calculation for the project's 34 acre site provides different residential and non-residential square footage requirements per the Warner Center Plan Appendix B. 34 acres is a site area of 1,481,040 square feet. 3,271,050 square feet of proposed floor area divided by a 1,481,040 square feet project site equals a FAR of 2.20. The 2.20 FAR range in the Downtown District of the Warner Center Plan permits a maximum 40% of the floor area to be residential development and a minimum 60% of the floor area to be non-residential development. The project proposes 1,545,000 square feet of residential floor area out of a total 3,271,050 square feet of proposed floor area, resulting in 47.2% residential floor area, exceeding the Warner Center Plan's 40% maximum. The EIR is misleading to the public and decision makers and must be revised to include meaningful support for the claims regarding the proposed FAR.

**Response to Comment No. 15-13**

As stated in Section IV.G, Land Use, of the Draft Supplemental EIR, the Project Site area after dedications is 1,439,222 square feet. The total Project size is proposed to be 3,271,050 square feet, therefore the Project's FAR is approximately 2.3. Per Section 6.1.2.3.3 of the Warner Center Plan, a project FAR of between 2.25 and 2.5 is required to have a minimum non-residential component of 52 percent of a project's total uses, and a maximum residential component of 48 percent. The Project's proposed 1,545,000 square feet of residential uses is approximately 48 percent of the total 3,271,050 square feet, in compliance with the Warner Center Plan. Likewise, the Project's proposed 1,716,000 square feet of non-residential uses is approximately 52 percent of the total 3,271,050 square feet, also consistent with the Warner Center Plan.

**Comment No. 15-14****4.H Noise**

The EIR does not analyze noise during peak A.M. or P.M. hours, only during "peak overlapping construction" phases. Further, Appendix I does not present any information indicating that ambient noise levels were studied during peak A.M. or P.M. hours, only during daytime (10 A.M.–2 P.M.) and nighttime (10 P.M.–1 A.M.), which are not during peak morning (7 A.M.–9 A.M.) or evening (5 P.M.–7 P.M.) hours. The EIR is misleading to the public and decision makers by not presenting a worst-case scenario noise analysis during peak hours of peak construction overlap and must be revised to include this analysis.

**Response to Comment No. 15-14**

As described in Section IV.H, Noise, of the Draft Supplemental EIR, the daytime ambient noise levels were taken between 10:00 A.M. and 2:00 P.M., and the nighttime ambient noise levels were taken between 10:00 P.M. and 1:00 A.M. Generally, the ambient noise levels during the peak A.M. or peak P.M. hours would be higher than during the mid-day (i.e., between 10 A.M. and 2:00 P.M.), due to the peak hours' higher traffic volumes. As discussed in the Draft Supplemental EIR, the Project noise significance thresholds are based on the increase above measured baseline ambient noise levels. Therefore, using ambient noise levels that are, generally, lower than noise levels during the peak A.M. or peak P.M. hours would be more conservative, resulting in a greater increase due to Project impacts, as compared to using a baseline with higher ambient noise level during the peak hours. Furthermore, the noise analysis provided in the Draft Supplemental EIR represents a worst-case scenario with regard to construction equipment assumptions. Therefore, no further analysis is needed.



**Comment No. 15-15***Operational Impacts—Entertainment and Sports Center*

The EIR states that the noise analysis is based on “a concert event with an *open-roof* to represent the most conservative analysis.” However, Appendix I indicates that an event with a *partial roof* was modeled for analysis. The EIR misrepresents the noise analysis provided in Appendix I. The EIR and Appendix I must be revised to accurately represent a worst-case scenario event with an open roof.

**Response to Comment No. 15-15**

As noted above in Topical Response No. 2, Entertainment and Sports Center, the “no roof” or “open roof” option described in the Draft Supplemental EIR is more accurately described as a “partial roof”, as it includes an overhang extending over the seating areas of the Entertainment and Sports Center to provide shade, which would have additional benefits of providing some lighting and noise shielding. The partial roof would extend approximately 86 feet interior to the Entertainment and Sports Center from the exterior wall, as shown in Figure II-1. The “partial roof” was analyzed throughout the Draft Supplemental EIR, including in Section IV.H, Noise, of the Draft Supplemental EIR (see page IV.H-52) and in Appendix I (see page 180 of 362), of the Draft Supplemental EIR. Therefore, the requested revision to the analysis is not needed, as the noise analysis analyzed the worst-case scenario with the partial roof option. The Final Supplemental EIR more accurately uses the term “partial roof” for this option.

**Comment No. 15-16***Parking Facilities*

The EIR analyzes noise impacts related to all parking garages within the project. However, the surface parking lot near Topanga Canyon Boulevard is not represented for analysis. The EIR must be revised to include analysis of the surface parking lot’s potential noise impacts.

**Response to Comment No. 15-16**

As described in Section IV.H, Noise, of the Draft Supplemental EIR (see page IV.H-54), the noise analysis for the parking facilities includes a valet parking area in Northwest-A, which is the surface parking lot along Topanga Canyon Boulevard. As presented in Table IV.H-24 of the Draft Supplemental EIR, the estimated noise levels from the Project parking facilities, which included all of the Project’s parking garages and the surface parking area near Topanga Canyon Boulevard, would be below the Project significance threshold. Thus, noise impacts associated with the Project parking operations

have accounted for the surface parking near the Topanga Canyon Boulevard. Therefore, the requested additional noise analysis for the surface parking lot near Topanga Boulevard is not warranted.

### **Comment No. 15-17**

#### **4.I Population and Housing**

##### *Direct Population Impacts*

The EIR utilizes a “household size factor of 2.73 persons per household for multi-family housing units and a 95 percent occupancy rate”, [sic] resulting in a population of “3,714 persons at full buildout”. [sic] The EIR is misleading because a 95 percent occupancy rate does not present the “worst-case scenario” required to be presented and analyzed by CEQA. At full buildout, the 1,432 units will generate 3,910 new residents. The EIR must be revised to include the accurate number of residents resulting from project operation.

### **Response to Comment No. 15-17**

The commenter correctly states that the household size factor of 2.73 persons per household was used with a 95 percent occupancy rate and would result in a population of 3,714 persons at full buildout. The five percent vacancy assumption is based on industry standards. Subsequent to the release of the Draft Supplemental EIR, the City updated their population factor to 2.43 persons per unit.<sup>31</sup> The household size of 2.73 persons per household, which is based on the 2010–2014 American Community Survey 5-year estimates for the City of Los Angeles, is a conservative number compared to the City’s current population factor of 2.43 persons per household. Assuming a 2.43 persons per household and an occupancy rate of 100 percent, the Project’s resulting population would be 3,480 persons per household, which is less than the 3,714 persons per household at full buildout analyzed in the Draft Supplemental EIR. Thus, the assumptions used in the Draft Supplemental EIR are conservative.

### **Comment No. 15-18**

Further, the EIR does not provide information to support the claim that the project is “consistent with contemplated growth under the Warner Center Plan as described in the Warner Center Plan EIR.” The Warner Center Plan EIR accounts for 20,000 new dwelling units in the plan area, but the EIR does not demonstrate that all of the units within the

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<sup>31</sup> Based on a 2.43 persons per household rate for multi-family units based on the 2016 American Community Survey 5-Year Average Estimates (2012–2016) per correspondence with Jack Tsao, Research Analyst II, Los Angeles Department of City Planning, March 22, 2018.

proposed project are within the 20,000 unit limit. The EIR must be revised to include a list of all previously approved dwelling units within the Warner Center Plan area to support the claim that all units within the proposed project are consistent with the Plan EIR.

### **Response to Comment No. 15-18**

As discussed in Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, the Warner Center Plan EIR determined that there were approximately 6,200 housing units within the Warner Center Plan area in 2008. At buildout, the Warner Center Plan could result in an addition of approximately 19,848 housing units, as discussed further in Warner Center Plan EIR. The Project would add up to 1,432 units of housing. In addition, all of the related projects, including several that are outside of the Warner Center Plan, would generate up to 8,600 housing units in addition to the Project's expected growth. As such, the Project and related projects would be consistent with contemplated housing growth in the Warner Center Plan area as described in the Warner Center Plan EIR.

### **Comment No. 15-19**

#### *Direct Employment Impacts*

The EIR's employment analysis does not include employees resulting from the proposed live-work units. The EIR must be revised to include these employees in order to present a "worst-case scenario" analysis of employment impacts. Additionally, the EIR estimates 125 employees will be generated by the entertainment and sports center. Appendix K details this estimate was generated by averaging the number of employees at three unnamed event centers in San Jose, Portland, and Sacramento. This estimate of employees at the proposed 15,000 seat event and sports center is unduly low. The greater Southern California area is home to dozens of stadium arenas that host sporting events and none of these were included in the survey.

### **Response to Comment No. 15-19**

The employment impacts of live/work units are unlike other land uses such as office, retail, or industrial for which a level of employment can reasonably be assumed using industry standard metrics (e.g., a typical number of jobs per square foot of built space). Residents may or may not work from their place of residence, and those that do so may be employees of other office locations but work at home, and therefore counting them as employees would be double-counting. As such, tenants of live/work units were treated as residents. The economic impact of spending by these tenants was assumed to be the same as other residents not living in live/work spaces. Were these tenants also to be treated separately as employees, their economic impact would be over counted.

The ongoing employment impacts of the Entertainment and Sports Center is highly-dependent on the intensity of use which can vary widely from venue to venue, and does not correlate well with traditional land use metrics. To estimate the number of direct annual jobs (not solely event-day jobs) at the Entertainment and Sports Center, HR&A Advisors, Inc. (HR&A) conducted a benchmarking analysis of similarly-sized multi-purpose venues on the West Coast which host professional teams and for which economic impact studies have been completed within the past decade, as provided in Appendix K, of the Draft Supplemental EIR. As is typical with sports and entertainment venues, year-round jobs largely relate to field and facility maintenance, as well as other team and venue operational staff, notably including those responsible for administration, ticket sales, community outreach, entertainment programming, and contracted food and retail vendors.

The three venues below met HR&A's criteria, and each venue is identified in this figure in response to the commenter's request. Critically, the economic impact study for each venue identified the number of annual direct jobs that would be located on site. The results of the analysis, shown in Appendix K, are summarized in Figure 1<sup>32</sup> below:

**Figure 1: Venue Seating and Employment Benchmark Analysis**

| City  | Study Date | Analysis Completed By | Stadium Seating | Direct Jobs at Stadium | Seats Per Employee |
|---|------------|-----------------------|-----------------|------------------------|--------------------|
| <b>Avaya Stadium<br/>San Jose Earthquakes<sup>1</sup></b>   | 2008       | Sports Economics      | 18,500          | 142.9                  | 129.5              |
| <b>Providence Stadium<br/>Portland Timbers<sup>2</sup></b>  | 2008       | ERA                   | 19,200          | 201.0                  | 95.5               |
| <b>Papa Murphy's Park<br/>Sacramento Republic FC<sup>3</sup></b>                                  | 2015       | Capital PFG           | 20,000          | 150.0                  | 133.3              |
| <b>Average</b>  |            |                       |                 |                        | <b>119.5</b>       |
| <b>Estimated Direct Employment at Westfield<br/>Entertainment &amp; Sports Center<sup>4</sup></b> |            |                       | <b>15,000</b>   | <b>125.6</b>           |                    |

<sup>1</sup> Per a 2008 economic impact study completed by Sports Economics, 1/3 of the Stadium's \$15 million annual operating budget is spent on jobs. HR&A conservatively estimated that the average wage for a job would be \$35,000.

<sup>2</sup> Per a 2008 economic impact study conducted by ERA, there would be 201 direct jobs associated with the operations of the Portland Soccer Stadium.

<sup>3</sup> Per a 2015 economic impact study conducted by Capital PFG, the Sacramento stadium is likely to generate up to 150 full time stadium employees. HR&A used an average of the proposed seating range (18,000 to 22,000 seats).

<sup>4</sup> Assumes 119.5 seats per employee for the proposed 15,000-seat stadium.

<sup>32</sup> Figure 1 in Appendix K has been revised to clarify which stadium is referenced in each City and footnote 4 has been added to clarify the employment assumptions used for the Entertainment and Sports Center. The numbers used in this table have not changed. These clarifications have been captured in Updated Appendix K in Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR.

Through the benchmarking analysis, HR&A identified or calculated the number of direct jobs estimated at each venue once it would be fully operational on a per-seat basis, assuming that the scale of employment is a function of the size of the stadium. This ratio ranged from 95.5 (Portland) to 133.3 (Sacramento), with an average of 119.5 seats per employee. HR&A then divided this value into 15,000 seats to arrive at an estimate of 125.6 total jobs at the Entertainment and Sports Center.

In response to the above comment, HR&A conducted additional research to evaluate indicators of employment at local venues. The proposed Entertainment and Sports Center is unique in the Southern California market in that most new stadiums in and around Los Angeles are substantially bigger than the proposed Entertainment and Sports Center. In terms of size, few comparable venues exist in Southern California, and most are significantly older than 10 years old. However, two local venues with publicly accessible employee information were identified and used for this supplemental analysis: the Banc of California stadium, home of the Los Angeles Football Club ("LAFC"), and the StubHub Center, home of the Los Angeles Galaxy ("LAG"), both Major League Soccer teams.

HR&A's analysis of these venues confirms the original estimate of employees for the Entertainment and Sports Center included in Appendix K, of the Draft Supplemental EIR. According to publicly available staffing lists, the Banc of California stadium (LAFC) employs approximately 137 on-site direct employees while the StubHub Center (LAG) employs approximately 142 on-site employees.<sup>33</sup>

With 22,000 seats and 137 full-time, on-site employees at the Banc of California Stadium and 27,000 seats and 142 full-time, on-site employees at the StubHub Center, the seats per job ratios are equal to approximately 161 and 190, respectively. When averaged with the other three venues identified in Figure 1, the average seats per job ratio goes up to 142. Using this average, the anticipated direct employment for the Entertainment and Sports Center would be reduced to 106 from 125.6. This analysis confirms that HR&A's original estimate for direct employment associated with the Entertainment and Sports Center, as reported in Appendix K, of the Draft Supplemental EIR, is not low as suggested by the commenter, and indicates that HR&A's estimate may be a conservative (high) projection. Additionally, a Revised Appendix K has been included in the Final Supplemental EIR which includes revisions in Figure 1 to clarify the information provided.

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<sup>33</sup> *Employment counts from LAFC.com and LAGalaxy.com are current as of December 2018.*

**Comment No. 15-20**

For example, the Honda Center Enhancement Project IS (Anaheim, 2012<sup>2</sup>) estimates approximately 950 staff during basketball and hockey games, up to 1,000 staff during concerts and other events, and 200+ team members/production employees during events. This results in 1 employee for every 20 seats during sporting events, while the project EIR concludes that 1 employee will be generated for five times that number of seats.

City of Anaheim

**TABLE 1**  
**HONDA CENTER EVENTS AND EVENT POPULATION**

| <i>Event Type</i>                       | <i>Seating Capacity</i>                     | <i>Staff/ Employees</i> | <i>Team Members/<br/>Production<sup>1</sup></i> |
|---|---|-------------------------|---|
| Basketball Games <sup>2</sup>           | 18,336                                      | 950                     | 200+ <sup>3</sup>                               |
| Hockey Games <sup>4</sup>               | 17,174                                      | 950                     | 200   |
| Concerts and Other Events               | 18,325 – End Stage<br>18,900 – Center Stage | 1,000 (max)             | 200   |
| Maximum Number of Events (last 5 years) | 162   |                         |   |
| Nonevent Days                           | 203   |                         |   |

Source: Starkey 2011.

<sup>1</sup> Team members and production staff include players, coaches, trainers, media, road crew, and others not included as spectators.

<sup>2</sup> Basketball games include Lakers Preseason, the John Wooden Classic, the Big West Tournament, the National Collegiate Athletic Association (NCAA) Tournament, and University of California, Los Angeles (UCLA), games.

<sup>3</sup> For the purpose of this air quality and GHG technical report, up to 250 team members are assumed for a basketball game for a conservative modeling scenario.

<sup>4</sup> The National Hockey League (NHL) has 41 home games during the regular season. During the Stanley Cup Playoffs and Stanley Cup, up to 20 additional games could occur.

- <sup>2</sup> Honda Center Enhancement Project Initial Study p. 10 (2012) <https://www.anaheim.net/DocumentCenter/View/3048/Notice-of-Preparation-and-Initial-Study->

The EIR and Appendix K must be revised to include more detailed information regarding the applicability of the stadiums surveyed to the proposed event and sports center. The EIR must be revised to include stadiums surveyed in the Southern California area to reflect market conditions, demand, security measures, and other factors impacting the region that result in a need for increased number of employees.

**Response to Comment No. 15-20**

The information provided in the comment above does not provide a like, or “apples-to-apples”, comparison to the HR&A annual direct employee estimates provided in the Draft Supplemental EIR. The information above provides event-specific employment information. In contrast, HR&A evaluated the number of employees anticipated to be

located on-site averaged over an annual period. Additionally, the Honda Center Enhancement Project Initial Study identified by the commenter included maximum event-specific employment only: “Maximum capacities for hockey, basketball, and other events (e.g., concerts, circus, etc.)...” HR&A’s analysis was based on an analysis of comparably-sized west coast sports stadiums for which economic impact analyses were available at the time of the original study; see Response to Comment No. 15-19, above, for the analysis methodology. The Honda Center was not included in the venue seating and employment benchmarking analysis because there was not an economic impact study available at the time of the report which evaluated annual direct employment located on site.

However, under certain reasonable assumptions, the Honda Center example cited supports HR&A’s venue seating benchmarking analysis. Based on a June 2018 press release by the Honda Center, more than 39 million guests have attended over 4,000 events in 25 years of stadium operations. Under assumptions listed in Figure 2, employment at Honda Center events can be translated to approximately 139 annual full-time equivalent jobs at the Honda Center, or 130 seats per job based on the Honda Center’s 18,000 seats. This further reflects the reasonableness of HR&A’s assumption of an annual employment of 125.6 direct jobs at the Entertainment and Sports Center based on 119.5 seats per employee.

**Figure 2: Honda Center Comparison to Venue Seating and Employment Benchmarking Analysis**

| <b>Honda Center Benchmarking Analysis (for comparison)</b>      |              |
|---|--------------|
| <u>Assumptions</u>  |              |
| Event Shift as Percentage of Full Day (assumption) <sup>1</sup> | 50%          |
| % of Employees as Compared to Maximum <sup>2</sup>              | 52%          |
| <u>Honda Center Characteristics</u>                             |              |
| Stadium Capacity  | 18,000       |
| Maximum Number of Annual Event Days                             | 162          |
| Maximum Number of Employees per Event                           | 1,200        |
| Assumed Total Annual Event Days Worked <sup>3</sup>             | 50,544       |
| <b>Full-Time Equivalents</b>                                    | <b>138.5</b> |
| <b>Seats per Employee</b>                                       | <b>130.0</b> |

<sup>1</sup> Assumes four-hour shifts per employee.

<sup>2</sup> Based on typical spectator attendance as share of maximum spectator capacity. According to a June 2018 press release by the Honda Center, more than 39 million guests have attended over 4,000 events in the 25 years of stadium operations, or an average of 9,750 attendees per event (approximately 52% of capacity) <http://www.hondacenter.com/arena-info/press-releases/honda-center-celebrates-25th-anniversary/>

<sup>3</sup> Assumes 8-hour days.

**Comment No. 15-21***Cumulative Impacts*

The EIR incorrectly states that there are “eight related projects” within the Warner Center Plan area. Section III, Environmental Setting, identifies 16 related projects that are within the Warner Center Plan; 14 of the projects include dwelling units. The total number of units listed in these 14 projects plus the proposed project totals 9,675 units (includes 330 assisted living units). The EIR is inadequate as an informational document and must be revised to be internally consistent and accurately disclose the number of cumulative units presented.

**Response to Comment No. 15-21**

Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, incorrectly stated that there are eight related projects within the Warner Center area. This error has been corrected in Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR to 16 related projects as provided in Section III, Environmental Setting, of the Draft Supplemental EIR. Note that the cumulative analysis and basis for the Project’s cumulative impact conclusion is based on development of the Project in conjunction with all 29 related projects, which analyzed a total of 10,032 dwelling units. The related projects were prepared based on information obtained from LADOT and the Department of City Planning. As a note, while Section III, Environmental Setting, of the Draft Supplemental EIR, included 1,029 dwelling units in Table III-1 for Related Project No. 29, a typo in Table IV.I-6 of Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, was found which stated that Related Project No. 29 included 1,000 dwelling units. The additional 29 dwelling units would increase the total number of dwelling units analyzed for the Project and related projects from 10,032 dwelling units to 10,061 dwelling units and would also increase the population analyzed for the Project and related projects from 26,017 to 26,092. None of the percentages in Table IV.I-7 increase except for the cumulative share of the housing growth in the City of Los Angeles from 2016 to 2033, which increase by 0.01 percent. Corrections have been made in Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR. As discussed in Response to Comment No. 15-18, above, the statement that the Project and related projects cumulative impacts on housing would be well within the contemplated dwelling unit growth proposed in the Warner Center Plan remains accurate with this correction.

**Comment No. 15-22**

Further, the EIR concludes the proposed project plus the cumulative projects are “well within the contemplated dwelling unit and floor area growth proposed in the Warner Center Plan.” However, the EIR does not include information regarding the dates of approval of



the related projects. The Warner Center Plan was approved in 2013. Based on the information given regarding the cumulative projects, it is not possible to ensure that this list is exhaustive of all projects approved within the Plan area. The EIR must be revised to present the dates of approval of each cumulative project to ensure the list of cumulative projects includes every project approved since approval of the Warner Center Plan.

### **Response to Comment No. 15-22**

The list of related projects includes all projects that have a current application filed with the Department of City Planning or LADOT and was last updated in February 2017. The date of approval for each related project is not necessary for the cumulative analyses as the analyses conservatively assumes buildout of each project, regardless of whether each project is ultimately approved or constructed.

### **Comment No. 15-23**

#### **4.K Traffic, Access, and Parking**

##### *Mitigation Measures*

Mitigation Measure K-1 requires “advance notification to be sent to adjacent property owners and occupants, as well as, nearby schools, of upcoming construction activities, including durations and daily hours of construction.” This is unenforceable as there is no enforcement entity, field verification, or lead agency oversight component. Further, it does not specify how far in advance the notice must be sent. The mitigation measure must also be revised to include a contact name and phone number for a lead agency enforcement entity to report violations or work conducted outside of the legal hours of construction in order to comply with CEQA § 15126.4 (a)(2).

### **Response to Comment No. 15-23**

The commenter incorrectly states that Mitigation Measure K-1 is not enforceable as the Mitigation and Monitoring Program (MMP) included in this Final Supplemental EIR identifies the enforcement entity, the field verification, as well as the lead agency oversight. As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, Mitigation Measure K-1 is the preparation of a Construction Management Plan for review and approval by the City of Los Angeles. This measure has been included as part of the Mitigation Monitoring Plan (MMP) included as Section IV, Mitigation Monitoring Plan, of this Final Supplemental EIR. As discussed in the MMP, a construction monitor will be established to ensure that all of the construction-related mitigation measures are implemented. In response to this comment, Mitigation Measure K-1 has been revised in Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR, to include a minimum 72-hour notice for construction activities

affecting the public right of way (i.e., temporary lane closures and detours, short-term parking restrictions, etc.), as well as a requirement to post the contact name and phone number during construction activities of a construction liaison to respond to concerns or inquiries regarding Project construction.

#### **Comment No. 15-24**

##### **Conclusion**

For the foregoing reasons, GSEJA believes the EIR is flawed and an amended EIR must be prepared for the proposed project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

#### **Response to Comment No. 15-24**

As demonstrated in the responses to comments above, the Draft Supplemental EIR is comprehensive and complies with CEQA requirements. The corrections and additions identified above do not change any of the significance conclusions of the Draft Supplemental EIR, therefore recirculation is not necessary. The commenter is also on the Project's mailing list and will receive future environmental and public hearing notices related to the Project. This closing comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 16**

Gerald A. Silver  
President  
Homeowners of Encino  
P.O. Box 260064  
Encino, CA 91426-0205

**Comment No. 16-1**

LOS ANGELES DEPARTMENT OF CITY PLANNING  
RESPONSE TO  
PROMENADE 2035 PROJECT  
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DSEIR)  
CASE NO. ENV-2016-3909-EIR  
July 26, 2018  
COMMENTS ON THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT  
(DSEIR)  
(CEQA, Sec. 21000 et. seq. and GUIDELINES SEC. 15087)

RESPONSE to the Draft Supplemental Environmental Impact Report (DSEIR) for a project known as: Westfield Promenade

The project will be located at: 6100 N TOPANGA CANYON BLVD

The project applicant is: Westfield Promenade LLC and Promenade Buyer LLC

The proposed project affects transportation, earth, air, water, plant life, population, energy, utilities, land use, and other environmental elements in Encino, (and San Fernando Valley) 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. HOMEOWNERS OF ENCINO, INC.**

This Response is filed by the Homeowners of Encino, a Californian non-profit corporation duly organized and existing under the laws of the State of California. Homeowners of Encino is a public benefit association organized for the purpose of promoting social welfare. This corporation 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 will be heavily impacted by it.

**Response to Comment No. 16-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the proposed Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 16-2****II. DESCRIPTION OF PROJECT**

Westfield Promenade LLC and Promenade Buyer LLC, both Westfield entities and together constituting the Applicant, propose the redevelopment of the 34-acre existing Westfield Promenade Shopping Center (Project Site) located within the Warner Center 2035 Specific Plan (Warner Center Plan) area of the City of Los Angeles (City) with a new multiple-phase, mixed-use development consisting of residential, retail/restaurant, office, hotel and entertainment uses (Project). The Project would specifically include up to 1,432 multi-family residential units, approximately 244,000 square feet of retail/restaurant uses, approximately 629,000 square feet of office space, up to 572 hotel rooms, and an Entertainment and Sports Center approximately 320,050 square feet and 15,000 seats in size. The proposed uses would be provided in several buildings throughout the Project Site that would transition in height from one story and three to four stories at the corner of Topanga Canyon Boulevard and Erwin Street, to 28 stories at the opposite corner of Owensmouth Avenue and Oxnard Street. The proposed uses would be supported by 5,610 on-site parking spaces at buildout. The Project would also include approximately 5.6 acres of ground-level, publically accessible open space, including a central green area and a number of plaza areas connecting the various uses. Overall, at buildout, the Project would remove 641,164 square feet of existing floor area and construct 3,271,050 square feet of new floor area, resulting in a net increase of 2,629,886 square feet of new floor area within the Project Site.

**Response to Comment No. 16-2**

This comment accurately summarizes the project description. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 16-3****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 in the draft DSEIR. It will have a significant impact on air quality, water, natural resources, population, noise, geology, energy, and population growth.

**Response to Comment No. 16-3**

The Draft Supplemental EIR is comprehensive and fully complies with CEQA. As demonstrated by the response to comments below, impacts related to air quality, water, natural resources, population, noise, geology, energy and population growth have been fully addressed.

**Comment No. 16-4**

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 your draft DSEIR you have relied upon “mitigations” that are required by law or official regulations and these are unacceptable. Such measures cannot serve as mitigations to satisfy the requirements of the California Environmental Quality Act (CEQA). Nor can mitigations be acceptable that are considered to be standard operating practices by developers who could be found negligent, if such operating procedures were not met.

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

**Response to Comment No. 16-4**

The analysis of cumulative impacts throughout the Draft Supplemental EIR fully complies with Guidelines Section 15065 as well as CEQA Guidelines 15130. Refer to Section III, Environmental Setting, of the Draft Supplemental EIR, for the comprehensive

list of related projects that was used to evaluate the potential cumulative impacts of the Project.

In accordance with CEQA Guidelines Section 15126.4, the Draft Supplemental EIR includes feasible mitigation measures to minimize significant adverse impacts. Mitigation measures include those from the original Warner Center Plan EIR as well as additional mitigation measures that are specific to the Project. Also refer to Section IV, Mitigation Monitoring Program, of this Final Supplemental EIR, regarding how implementation of each of the mitigation measures will be verified.

Furthermore, each of the environmental impact sections for all of the environmental topics evaluated within the Draft Supplemental EIR includes a detailed discussion of the regulatory requirements that would be implemented as part of the Project. The subsequent impact analyses within each of the environmental impact sections account for implementation of these regulatory requirements.

#### **Comment No. 16-5**

#### **IV. IMPACTS ON EARTH**

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.

#### **Response to Comment No. 16-5**

Details regarding the amount of soils to be excavated and the anticipated haul route are found in Section II, Project Description, of the Draft Supplemental EIR. As discussed on page II-24, it is estimated that approximately 1,430,000 cubic yards of export and 344,000 cubic yards of import may be hauled from the Project Site over the Project's entire buildout; less export may be needed if multiple phases are constructed at the same time and the soil can be kept on site. In addition, a detailed description of the starting and ending dates of all grading and construction activities by phase is provided in Appendix D, of the Draft Supplemental EIR. Also refer to Topical Response No. 3, Traffic and Parking, for more information regarding the conservative assumptions used in the construction traffic impact analysis.

As discussed in Section II, Project Description, of the Draft Supplemental EIR, and within other sections of the Draft Supplemental EIR, two potential haul routes have been identified. Consistent with the Warner Center Plan, the Project's primary haul route would

travel south to the US-101 and Topanga Canyon Boulevard. As noted in Mobility Plan 2035, Topanga Canyon Boulevard is a designated truck route that generally avoids travel near schools.<sup>34</sup> Given the Project Site's proximity to US-101, haul truck traffic would take the most direct route to the appropriate freeway ramp. A secondary haul route, if traveling south on Topanga Canyon Boulevard is infeasible, is identified as north on Topanga Canyon Boulevard to the Ronald Reagan Freeway (SR-118). Haul trucks would travel on approved truck routes designated by the City.

Impacts from hauling of soil are discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As discussed therein, the implementation of the Construction Management Plan, through Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1, is anticipated to limit almost all haul truck activity to outside of the morning and afternoon peak hours. Additionally, as discussed further in Topical Response No. 3, Traffic and Parking, to mitigate impacts to intersections, the Project will be required by LADOT to mitigate impacts through: (1) the physical roadway and streetscape mitigation measure improvements as outlined in the Warner Center Mitigation Program; (2) payment of the Mobility Fee to fund the Warner Center Mitigation Program; or (3) the combination of both the Warner Center Mitigation Program outlined in Appendix E, of the Warner Center Plan, and the payment of the Mobility Fee. However, until either the Project construction activity is completed or the Warner Center Mitigation Program is implemented, which would reduce impacts, construction transportation impacts, including those related to hauling, are conservatively considered temporary but significant.

### **Comment No. 16-6**

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 will fully 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. Please see that the final EIR conforms fully to the recommendations in the

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<sup>34</sup> Los Angeles Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

“Guidelines for Geologic/Seismic Considerations in Environmental Impacts Reports”, and the Department of Mines and Geology’s Note 43, “Recommended Guidelines for Determining the Maximum Credible and the Maximum Probably Earthquakes.”

### **Response to Comment No. 16-6**

The Project’s impacts associated with geology and soils were analyzed in the Initial Study, provided in Appendix A, of the Draft Supplemental EIR. Analysis of impacts from geology and soils is based, in part, on the *Soils and Geology Issues Report* (Geologic and Soils Report), prepared by Geotechnologies, Inc., dated October 2016, which references the *Preliminary Geotechnical Engineering Investigation*, also prepared for the Project by Geotechnologies, Inc., dated October 2016. Both were included in Appendix IS-2, of the Initial Study, and included in the Draft Supplemental EIR. As analyzed further in the Initial Study, the Project would result in no impacts related to the ability of soils to support the use of septic tanks and less-than-significant impacts associated with surface rupture from a known earthquake fault, strong seismic ground shaking, landslides, soils erosion and loss of topsoil, lateral spreading, subsidence, liquefaction, collapse, expansive soils. Seismic-related ground failure associated with the potential for liquefaction at the Project Site would be less than significant with mitigation. As discussed in the Initial Study, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Project would implement Warner Center Plan Mitigation Measures GEO-1 through GEO-13. Potential zone of inundation from flooding, due to a 100 year flood was also analyzed in the Initial Study. As discussed therein, the Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City. According to FEMA, the Project Site is located within Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain. Thus, based on the above, the analysis provided in the Initial Study sufficiently addressed impacts related to geology and soils. No further analysis is necessary in the Final Supplemental EIR. As the commenter does not provide a copy of the relevant portion of the “Guidelines for Geologic/Seismic Considerations in Environmental Impacts Reports,” and the Department of Mines and Geology’s Note 43, “Recommended Guidelines for Determining the Maximum Credible and the Maximum Probably Earthquakes,” it is unclear which recommendations the commenter is referring to in these documents.

### **Comment No. 16-7**

#### **V. AIR IMPACTS**

The draft DSEIR did not fully consider the air impacts. A project of this size will have a deteriorating effect on air quality in the region, which is located in a locality which does not



meet Federal and State air quality standards. The construction of the project will generate Carbon Monoxide, Nitrous Oxide, Ozone and particulate matter, making it more difficult to attain the required air standards in the basin. Please identify in the final EIR the specific increases of air pollutants generated by this project, and the cumulative impacts on the air quality in the region.

### **Response to Comment No. 16-7**

Section IV.B, Air Quality, of the Draft Supplemental EIR, fully addressed potential Project-related construction, operational and cumulative air quality impacts consistent with SCAQMD's *CEQA Air Quality Handbook* and City of Los Angeles *L.A. CEQA Thresholds Guide*. This general comment does not identify any specific gaps in the air quality analysis. The commenter is referred to Section IV.B, Air Quality, of the Draft Supplemental EIR for the detailed analysis of the Project's construction and operational air quality impacts. Nevertheless, for informational purposes, a summary of the analysis is provided below.

#### **Construction Emissions**

As discussed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, construction assumptions were developed for the maximum potential overlap of construction phases ("Overlapping Construction Plan") in which two scenarios were analyzed: (1) Total grading on the Project Site would require approximately 1,086,000 cubic yards of export; (2) In the event that soil on the Project Site is not suitable for recompaction or the Project is unable to stockpile and reuse the soil on site, then 1,430,000 cubic yards of export and 344,000 cubic yards of import would be required.

Under the first scenario, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) without mitigation, would not exceed the South Coast Air Quality Management District (SCAQMD) daily significance thresholds for carbon monoxide (CO), sulfates (SO<sub>x</sub>), PM<sub>10</sub>, PM<sub>2.5</sub>. Maximum unmitigated construction emissions would exceed the SCAQMD daily significance threshold for volatile organic compounds (VOC) during 2020 and 2021 and nitrogen oxides (NO<sub>x</sub>) during Years 2019, 2020, 2021, and 2031 primarily as a result of grading and hauling activities overlapping with building construction activities. However, with incorporation of Warner Center Plan Mitigation Measure AQ-1, regional VOC emissions would be reduced below the SCAQMD daily significance threshold and maximum regional NO<sub>x</sub> emissions would be substantially reduced by 49 percent in Year 2019, 43 percent in Year 2020, and to less than significant in Years 2021 and 2031. Nevertheless, regional NO<sub>x</sub> emissions would remain significant and unavoidable under the conservative Overlapping Construction Plan scenario. Please refer to Table IV.B-5 on page IV.B-37 of the Draft Supplemental EIR for specific increases of regional air pollutants generated by construction of the Project.

Under the second scenario, regional construction emissions with the additional export/import in comparison to the no import condition would decrease peak daily emissions by 5 percent for NO<sub>x</sub>, 2 percent for CO and PM<sub>2.5</sub>, and 1 percent for VOC, and increase by approximately 3 percent for PM<sub>10</sub>. Construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions with the additional export/import) without mitigation would not exceed the SCAQMD daily significance thresholds for CO, SO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. With incorporation of Warner Center Plan Mitigation Measure AQ-1, regional VOC emissions would be reduced below the SCAQMD daily significance threshold and maximum regional NO<sub>x</sub> emissions would be substantially reduced by 46 percent in Year 2019, 45 percent in Year 2020, and 44 percent in Year 2021, and to less than significant in Year 2022 and 2031. Nevertheless, regional NO<sub>x</sub> emissions with the additional export/import would remain significant and unavoidable for Years 2019 through 2021 as emissions would remain above the regional thresholds. Refer to Appendix D, of the Draft Supplemental EIR, for specific increases of regional air pollutants generated by construction of the Project in the event that soil on the Project Site is not suitable for recompaction.

As discussed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, the localized effects from Project emissions (e.g., on-site construction traffic and heavy-duty construction equipment) to sensitive land uses in close proximity to the Project Site (i.e., adjacent residences) were evaluated according to the SCAQMD's localized significance threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. These ambient air quality standards provide public health protection, including protecting the health of "sensitive" populations, such as asthmatics, children, and the elderly. As evaluated in Section IV.B, Air Quality, of the Draft Supplemental EIR, maximum localized construction emissions for off-site sensitive receptors with incorporation of Warner Center Plan Mitigation Measure AQ-1, would not exceed any of the SCAQMD-recommended localized screening thresholds under both construction scenarios. Please refer to Table IV.B-6 on page IV.B-40, in Section IV.B, Air Quality, of the Draft Supplemental EIR, for specific increases of localized air pollutants generated by construction of the Project under the first scenario. Refer to Appendix D, of the Draft Supplemental EIR, for specific increases of localized air pollutants generated by construction of the Project in the event that soil on the Project Site is not suitable for recompaction (second scenario).

As discussed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, the greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. The proximity of sensitive receptors to proposed

construction activities over a long duration would be limited since the Project is anticipated to be developed in phases. In addition, no residual emissions and corresponding individual cancer risk are anticipated after construction. Furthermore, Warner Center Plan Mitigation Measure AQ-1 requires the use of off-road diesel-powered construction equipment greater than 50 hp to meet the Tier 4 emission standards. Relative to previous emissions standards, Tier 4 compliant engines reduce emissions over 95 percent for most construction equipment. Because of these factors, construction impacts associated with TAC emissions were concluded to be less than significant.

### **Operational Emissions**

Emissions resulting from operation of the Project at its projected buildout year of 2033 are not expected to exceed the SCAQMD's daily regional operational thresholds for CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. However, the Project is expected to exceed the SCAQMD's daily regional operational thresholds for VOC and NO<sub>x</sub>. The VOC regional operational impact is primarily related to the use of consumer products (e.g., residential use of household cleaners and solvents that release VOC emissions). The NO<sub>x</sub> regional operational impact is from vehicular trips to and from the Project site. Thus, the Project would result in a significant and unavoidable regional operational air quality impact. Please refer to Table IV.B-7 on page IV.B-45 of the Draft Supplemental EIR for specific increases of regional air pollutants generated by operation of the Project. As a note, significant regional air quality impacts during operation are typical of a project of this size.

Operation of the Project would not introduce any major new sources of toxic air contaminants within the Project Site, as analyzed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR. Therefore, health impacts associated with toxic air contaminants would be less than significant. In addition, as evaluated in Section IV.B, Air Quality, of the Draft Supplemental EIR, on-site operational emissions would not exceed any of the LSTs. Please refer to Table IV.B-8 on page IV.B-46 of the Draft Supplemental EIR for specific increases of localized air pollutants generated by operation of the Project.

### **Cumulative Impacts**

According to the SCAQMD, individual projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. Project construction-related daily maximum regional construction emissions with mitigation would exceed the SCAQMD daily thresholds and consequently have a significant cumulative impact due to construction-related regional NO<sub>x</sub> emissions. Maximum localized construction emissions with mitigation would not exceed any of the SCAQMD-recommended localized screening thresholds and thus would have a less-than-significant cumulative impact.

As discussed above, operational emissions from the Project would exceed SCAQMD's regional VOC and NO<sub>x</sub> significance thresholds at Project buildout. Therefore, the emissions of non-attainment pollutants and precursors (i.e., related to VOC and NO<sub>x</sub> emissions) generated by Project operation would be cumulatively considerable. Maximum localized operational emissions would not exceed any of the SCAQMD-recommended localized screening thresholds and thus would have a less-than-significant cumulative impact.

On December 24, 2018, the California Supreme Court (Court) issued the *Sierra Club v. County of Fresno* (Friant Ranch) decision that concluded the EIR for Friant Ranch Project was deficient in its informational discussion of the human health impacts associated with the Project's significant and unavoidable impacts related to air quality. A supplemental discussion of the potential health effects related to the Project's significant and unavoidable criteria pollutant emissions is added as Appendix U, Public Health Impacts, to the Draft Supplemental EIR and is appended to this Final Supplemental EIR. Appendix U provides additional details regarding the potential health effects from the Project's significant and unavoidable criteria pollutant emissions, relating the effects in the context of relevant science, and explains why it is not scientifically feasible at the time of drafting of the Supplemental EIR to quantitatively and reliably connect this individual Project's air quality impacts to likely health consequences.

### **Comment No. 16-8**

Your assessment should show how this project, when taken together with all other proposed projects in the area will impact air quality. It should show threshold levels of significance for each type of air emission. The City of Los Angeles and the EPA have entered into an Consent Decree regarding growth within the Hyperion Service Area. They have agreed that growth within the area will not result in air emission increases, nor impede the region's progress toward National Ambient Air Quality Standards (NAAQS) attainment. Your final EIR should show that all impacts have been reduced to insignificance, in order to comply with the City of Los Angeles and EPA agreement. Anything short of this is a breach of the terms of the Federal consent decree, and actionable, with the possibility of substantial fines being imposed against the City.

### **Response to Comment No. 16-8**

The commenter does not provide a copy of the referenced Consent Decree or a citation thereof to support the assertion that the Consent Decree requires "that growth within the area will not result in air emission increases" or that "[a]nything short of this is a breach of the terms of the Federal consent decree, and actionable, with the possibility of substantial fines being imposed against the City." The comment does not describe how emissions from the Project would result in a breach of a Consent Decree for which the

Project is not a party. Because the comment does not focus on a potential environmental impact from the Project, but rather an alleged breach of the Consent Decree, no further response is warranted. However, for informational purposes, the following describes how the Draft Supplemental EIR analyzed the Project's potential impact on cumulative air quality emissions.

The Draft Supplemental EIR properly evaluates cumulative air quality impacts in accordance with SCAQMD recommended methodology. As discussed on pages IV.B-58 through IV.B-62 of the Draft Supplemental EIR and Response to Comment No. 16-7, SCAQMD has developed methodologies and thresholds of significance that are widely used by lead agencies throughout the air basin. As set forth in the *LA CEQA Thresholds Guide*, the City adopted the SCAQMD thresholds to assess the significance of a project's project-specific and cumulative air quality impacts. SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution prepared in August 2003 specifically states:

*As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR.... Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.*<sup>35</sup>

The cumulative analysis of air quality impacts within the Draft Supplemental EIR appropriately follows SCAQMD's specified methodology. Furthermore, air quality impacts are basin-wide, and air quality is affected by all pollutant sources in the basin. Therefore, the ambient air quality measurements provide a summary of basin-wide cumulative air quality impacts. As the individual project thresholds are designed to help achieve attainment with cumulative basin-wide standards, they are also appropriate for assessing the Project's contribution to cumulative impacts. Please refer to Response to Comment No. 16-7 for a summary of cumulative air quality impacts.

### **Comment No. 16-9**

Also address the air impacts at both the local level, and within the region. Explain how these impacts will be fully mitigated. Specifically, quantify all related vehicular air

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<sup>35</sup> *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, South Coast Air Quality Management District, August 2003.*

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. 16-9**

As described in Response to Comment No. 16-7, Section IV.B, Air Quality, of the Draft Supplemental EIR fully addressed potential Project-related construction, operational and cumulative air quality impacts consistent with SCAQMD and City of Los Angeles guidance. This general comment does not identify any specific deficiencies in the air quality analysis. The commenter is referred to that section of the Draft Supplemental EIR for the detailed analysis of the Project's construction and operational air quality impacts. Pollutant emissions from vehicular activity related to construction (e.g., employee, vendor, and haul truck trips) and operation (e.g., employee, vendor, residential, and commercial trips) were included in these calculations. For informational purposes, a summary of the analysis is provided here. The Draft Supplemental EIR analyzed regional and local construction air quality impacts. Specifically, as discussed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, regional effects from Project emissions (e.g., off-site construction traffic and on-site heavy-duty construction equipment) would exceed regional NO<sub>x</sub> emissions even with incorporation of Warner Center Plan Mitigation Measure AQ-1. Please refer to Table IV.B-5 on page IV.B-37 of the Draft Supplemental EIR for specific increases of regional air pollutants generated by construction of the Project. The localized effects from Project emissions (e.g., on-site construction traffic and heavy-duty construction equipment) to sensitive land uses in close proximity to the Project Site (i.e., adjacent residences) were evaluated according to the SCAQMD's localized significance threshold (LST) methodology. Maximum localized construction emissions for off-site sensitive receptors with incorporation of Warner Center Plan Mitigation Measure AQ-1, would not exceed any of the SCAQMD-recommended localized screening thresholds. Please refer to Table IV.B-6 on page IV.B-41 of the Draft Supplemental EIR for specific increases of localized air pollutants generated by construction of the Project.

The Draft Supplemental EIR analyzed regional and local operational air quality impacts. Specifically, as discussed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, emissions resulting from operation of the Project at its projected buildout year of 2033 are not expected to exceed the SCAQMD's daily regional operational thresholds for CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. However, the Project is expected to exceed the SCAQMD's daily regional operational thresholds for VOC and NO<sub>x</sub>. The VOC regional operational impact is primarily related to the use of consumer products (e.g., residential use of household cleaners and solvents that release VOC emissions). The NO<sub>x</sub> regional operational impact is from vehicular trips to and from the Project site. Thus, the Project would result in a significant and unavoidable regional operational air quality impact.

Please refer to Table IV.B-7 on page IV.B-45 of the Draft Supplemental EIR for specific increases of regional air pollutants generated by operation of the Project. As evaluated in Section IV.B, Air Quality, of the Draft Supplemental EIR, on-site operational emissions would not exceed any of the LSTs. Please refer to Table IV.B-8 on page IV.B-46 of the Draft Supplemental EIR for specific increases of localized air pollutants generated by operation of the Project. Furthermore, as discussed on page IV.B-46 of the Draft Supplemental EIR, Project-related vehicular traffic would not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. The Project's long-term influence would also be consistent with the goals and policies of the AQMP and was, therefore, considered consistent with the SCAQMD's AQMP. See Response to Comment No. 16-7, above, and page IV.B-50 in Section IV.B, Air Quality, of the Draft Supplemental EIR for a discussion of the Project's regional and localized emissions.

The commenter raises a general comment about including technical information in appendices. This information and analysis was provided in the Draft Supplemental EIR. Specifically, the Draft Supplemental EIR evaluation of air quality impacts was supported by detailed technical modeling and analysis. Appendix D, of the Draft Supplemental EIR provides the assumptions, methodology and calculations requested above. Specifically, Appendix D.1 provides a detailed discussion of the methodology used in the air quality and GHG analyses. Appendix D.2 provides the Construction Phasing, Equipment and Haul Plan that forms the basis for construction assumptions used in preparing the construction emissions inventory. Appendix D.3 provides the air quality worksheets and modeling output files. Appendix D.4 provides the GHG worksheets and modeling output files. The reader is referred to these documents for specific details. For informational purposes, a summary of the air quality methodology is provided here.

This analysis focused on the potential change in the air quality environment due to implementation of the Project. Air pollutant emissions would result from both construction and operation of the Project. Specific methodologies used to evaluate these emissions are discussed below.

Daily regional emissions during construction were estimated by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying mobile source and fugitive dust emissions factors. The emissions were estimated using CalEEMod (Version 2016.3.2) software, an emissions inventory software program recommended by SCAQMD. The CalEEMod model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with SCAQMD and received input from other California air districts, and is

currently used by numerous lead agencies in the Los Angeles area and within the state for quantifying the emissions associated with development projects undergoing environmental review, including by the City of Los Angeles.<sup>36</sup> The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling, where appropriate, to assess whether the Project's local emissions would exceed the SCAQMD's significance thresholds. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

Analysis of the Project's impact on regional air quality during long-term Project operations (i.e., after construction is complete) considered four types of sources: (1) area; (2) energy; (3) mobile; and (4) stationary. Area source emissions are generated by, among other things, landscape equipment, fireplaces, and the use of consumer products. Energy source emissions are generated as a result of activities in buildings for which natural gas is used (e.g., natural gas for heat or cooking). Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with operation of the Project. Stationary source emissions are generated from proposed emergency generators during routine maintenance/testing. Similar to construction, SCAQMD's CalEEMod model was used to estimate Project emissions during operation. To determine if a significant air quality impact would occur, the net increase in regional operational emissions generated by the Project was compared against the SCAQMD's significance thresholds. Localized impacts from Project operations included calculation of on-site emissions (e.g., combustion from natural gas usage) using SCAQMD's recommended CalEEMod and evaluation of these emissions consistent with the SCAQMD's LST methodology discussed above. Potential localized CO concentrations from induced traffic at nearby intersections was also addressed, consistent with the methodologies and assumptions used in the consistency analysis provided in the 2003 AQMP.

Potential TAC impacts were initially evaluated by conducting a qualitative analysis consistent with SCAQMD guidance and the CARB Handbook. The qualitative analysis consisted of reviewing the Project to identify any new or modified TAC emissions sources and evaluating the potential for such sources to cause significant TAC impacts. If the qualitative evaluation determined the potential for significant impacts from a new TAC source, or modification of an existing TAC emissions source, a more detailed dispersion analysis would be conducted to evaluate estimated Project TAC emissions against the

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<sup>36</sup> *CalEEMod*, [www.caleemod.com/](http://www.caleemod.com/).



applicable SCAQMD significance thresholds based on downwind sensitive receptor locations. Based on the analysis provided in Section IV.B, Air Quality, of the Draft Supplemental EIR, the qualitative evaluation did not determine that there would be a potential for significant TAC impacts and impacts on human health were concluded to be less than significant.

**Comment No. 16-10**

Please explain in the final EIR what effects diesel fumes, gasoline powered equipment fumes and construction odors will have upon those with respiratory problems, or the aged living nearby.

**Response to Comment No. 16-10**

As discussed above in Response to Comment No. 16-7 and Subsection IV.B.3.b in Section IV.B, Air Quality, of the Draft Supplemental EIR, the localized effects from Project emissions (e.g., on-site construction traffic from gasoline and diesel vehicles and heavy-duty diesel construction equipment) to sensitive land uses in close proximity to the Project Site (i.e., adjacent residences) were evaluated according to the SCAQMD's localized significance threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. These ambient air quality standards provide public health protection, including protecting the health of "sensitive" populations, such as asthmatics (e.g., respiratory problems), children, and the elderly. As evaluated in Section IV.B, Air Quality, of the Draft Supplemental EIR, maximum localized mitigated construction and operational emissions for off-site sensitive receptors would not exceed SCAQMD-recommended localized screening thresholds and impacts would be less than significant. Furthermore, the health effects from exposure to diesel exhaust have been evaluated and demonstrate that construction-related health risk impacts from cancer are approximately 0.9 in one million and below SCAQMD's significance threshold for cancer of 10 in one million. Refer to Appendix FSEIR-5, of this Final Supplemental EIR, for the quantitative Health Risk Assessment analysis.

With regard to potential odor impacts, as discussed in the Initial Study prepared for the Project, which is included as Appendix A, of the Draft Supplemental EIR, no objectionable odors are anticipated as a result of either construction or operation of the

Project. Furthermore, as shown in Table ES-2 of the Warner Center Plan EIR,<sup>37</sup> odor impacts from the Warner Center Plan were determined to be less than significant. Therefore, no further analysis regarding odors was provided in the Draft Supplemental EIR.

### **Comment No. 16-11**

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. Please contact the EPA in San Francisco, Div. IX, for consultation on this key aspect of your final EIR.

### **Response to Comment No. 16-11**

The Draft Supplemental EIR discussed and considered secondary air quality impacts to flora and fauna in accordance with ambient air quality standards. Specifically, the Clean Air Act identifies two types of national ambient air quality standards: primary standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly; and secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

The Draft Supplemental EIR evaluated the Project's air quality emissions against the primary and secondary standards to determine if the Project would cause local (ambient) impacts. As discussed above in Response to Comment No. 16-7 and Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, the localized effects from Project construction and operational emissions (e.g., on-site diesel vehicles and heavy-duty diesel construction equipment) to sensitive land uses in close proximity to the Project Site (i.e., adjacent residences) were evaluated according to the SCAQMD's localized significance threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard (primary and secondary standards), and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. As evaluated in Section IV.B, Air Quality, of the Draft Supplemental EIR, maximum localized mitigated construction and operational emissions for off-site sensitive receptors would not exceed SCAQMD-recommended localized screening thresholds and impacts would be less than significant.

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<sup>37</sup> See page ES-6 of the Warner Center Plan Draft EIR, [https://planning.lacity.org/eir/WarnerCntrRegionalCore/DEIR/Draft\\_EIR.pdf](https://planning.lacity.org/eir/WarnerCntrRegionalCore/DEIR/Draft_EIR.pdf).

Therefore, impacts on animals, crops, vegetation, and buildings associated with ambient air quality were considered in the Draft Supplemental EIR and determined to be less than significant.

Furthermore, SCAQMD's 2016 Air Quality Management Plan (AQMP) includes the integrated strategies and measures needed to meet the ambient air quality standards. As discussed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, the determination of AQMP consistency is primarily concerned with the long-term influence of the proposed Project on air quality in the Air Basin. While construction of the Project would result in short-term and long-term regional impacts, the Project represents an infill development near transit within an existing urbanized area that would concentrate new residential, retail/restaurant, office, hotel and entertainment uses within a high quality transit area (HQTa) reducing VMT. The Project would not have a significant 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 feasible 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 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 it was therefore considered consistent with the SCAQMD's AQMP. The comment requests consultation with the EPA but does not identify a specific legal requirement beyond considering secondary Ambient Air Quality Standards, which were already analyzed in the Draft Supplement EIR. In addition, the USEPA and CalEPA are not responsible agencies for this Project under CEQA. Furthermore, the Notice of Preparation and Draft Supplemental EIR was sent to the California Department of Fish and Wildlife—South Coast Region, which has jurisdiction over flora and fauna.

#### **Comment No. 16-12**

Please see that the final EIR conforms to the Air Quality Handbook for Preparing Environmental Impact Reports, revised, available from the South Coast Air Quality Management District. Also please fully comply with the Guidance for Implementation of Conformity Procedures, available from the Southern California Association of Governments. Your final EIR must also conform to the State of California Air Resources Board guidelines. Please see that short-term, long-term, local scale analysis, corridor analysis, hazardous pollutant analysis and cumulative impact analysis aspect of this project are addressed more fully. Specifically see that it conforms to the Guidelines for Air Quality Impact Assessments: General Development and Transportation Projects, Report No. RP-83-002, available from the State Air Resources Board.

## **Response to Comment No. 16-12**

The air quality analysis of the Draft Supplemental EIR was completed in conformance with applicable guidance from resource agencies. Section IV.B, Air Quality, of the Draft Supplemental EIR, addressed the air emissions generated by construction and operation of the Project consistent with criteria set forth in the SCAQMD's *CEQA Air Quality Handbook*<sup>38</sup> and the *L.A. CEQA Thresholds Guide*. See pages IV.B-26 through IV.B-33 of the Draft Supplemental EIR for a discussion of the applicable guidance documents, methodology, and significance thresholds.

This comment's reference to SCAQMD's "Air Quality Handbook for Preparing Environmental Impact Reports" may be referring to SCAQMD's *Air Quality Analysis Handbook*. As discussed on page IV.B-11 of the Draft Supplemental EIR, the SCAQMD published the *CEQA Air Quality Handbook* in November 1993 to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects proposed in the Air Basin. The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. The SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*.<sup>39</sup>

In order to assist the CEQA practitioner in conducting an air quality analysis in the interim while the replacement *Air Quality Analysis Guidance Handbook* is being prepared, supplemental guidance/information is provided on the SCAQMD website ([www.aqmd.gov/ceqa/hdbk.html](http://www.aqmd.gov/ceqa/hdbk.html)) and includes: (1) EMFAC on-road vehicle emission factors; (2) background CO concentrations; (3) localized significance thresholds; (4) mitigation measures and control efficiencies; (5) mobile source toxics analysis; (6) off-road mobile source emission factors; (7) PM<sub>2.5</sub> significance thresholds and calculation methodology; and (8) updated SCAQMD Air Quality Significance Thresholds. The SCAQMD also recommends using approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod). These recommendations were followed in the preparation of the air quality analyses provided in the Draft Supplemental EIR.

The comment references a document entitled "Guidance for Implementation of Conformity Procedures," available from the Southern California Association of Governments. While a document with this specific title was not available on SCAG's

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<sup>38</sup> SCAQMD, *SCAQMD Air Quality Significance Thresholds*, revised March 2015.

<sup>39</sup> SCAQMD, *Air Quality Analysis Handbook*, [www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook), accessed March 23, 2017.

website, SCAG does provide conformity guidance related to transportation projects (e.g., bridges, highways, airports) receiving federal funding. Federal transportation conformity is required under the Clean Air Act section 176(c) to ensure that federally supported highway and transit project activities “conform to” the purpose of the State Implementation Plan (essentially complying with ambient air quality standards). Conformity means that transportation activities will not cause new air quality violations, worsen existing violations, or delay timely attainment of the relevant ambient air quality standards.<sup>40</sup> The referenced SCAG guidance document is not applicable to this Project because the Project will not receive federal funding that triggers a general conformity analysis; therefore, the Draft Supplemental EIR need not include a general conformity analysis. Section IV.B, Air Quality, of the Draft Supplemental EIR, did evaluate whether the project would exceed any ambient air quality standards. As discussed above in Response to Comment No. 16-7, the Project would result in less-than-significant localized air quality impacts and, thus, would not exceed any ambient air quality standards.

The comment requests that the Final Supplemental EIR conform to the State of California Air Resources Board guidelines. Please refer to page IV.B-47 of the Draft Supplemental EIR for a detailed discussion on conformance with guidance from the California Air Resources Board on siting sensitive receptors near sources of air pollutants.<sup>41</sup> The comment references specific ARB guidance entitled “Guidelines for Air Quality Impact Assessments: General Development and Transportation Projects, Report No. RP-83-002,” available from the State Air Resources Board. While this document was not available on ARB’s website, it should be pointed out that the document is from 1983 and relates to transportation projects requiring a conformity determination, which is not applicable to this Project because a conformity determination is not required under the Clean Air Act or CEQA.

### **Comment No. 16-13**

## **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 addressed. 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.

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<sup>40</sup> SCAG, 2016–2040 RTP/SCS, December 2015.

<sup>41</sup> CARB, *Air Quality and Land Use Handbook, a Community Health Perspective*, April 2005.

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

### **Response to Comment No. 16-13**

Refer to Topical Response No. 6, Infrastructure, for a summary of the Project's quantitative water supply impacts; estimated water consumption during operation of the Project; and project design features which go above and beyond City required water conservation measures. In addition, Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft Supplemental EIR, provides a comprehensive quantitative analysis of the Project's impacts to water supply and infrastructure during construction and operation of the Project. As discussed in detail in the Draft Supplemental EIR, Project-level and cumulative impacts with regard to water supply and infrastructure would be less than significant with compliance with regulatory measures and implementation of Project Design Feature M.1-1, which includes implementation of additional water conservation measures beyond those required by the LAMC, as amended by Ordinance No. 184248. The relevant mitigation measures set forth in the Warner Center Plan EIR would also be implemented as part of the Project and include Warner Center Plan Mitigation Measures U-1 through U-11.

With regard to construction, construction activities for the Project would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. As described in the Utility Report, provided in Appendix P, of the Draft Supplemental EIR, based on a review of construction projects that are similar in size and duration to that of the Project, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd, which is substantially less than the approximately 532,835 gpd of estimated proposed water consumption at the Project Site. Furthermore, water consumption during construction would be less than the water demand of approximately 106,868 gpd for existing uses. Water for construction activities would be conveyed using the existing water infrastructure at the Project Site, and no major off-site infrastructure improvements would be needed.

As discussed in Topical Response No. 6, Infrastructure, the Promenade 2035 WSA, which was adopted by LADWP Board of Water and Power Commissioners in February

2017 and is included as Appendix O, of the Draft Supplemental EIR, concluded that the increase in water demand for the Project falls within the available and projected water supplies during an average year, single-dry year, and multiple-dry year through the year 2040, as well as the intervening years (i.e., 2033), as described in the 2015 Urban Water Management Plan. Therefore, the Project would not cause any secondary impacts to fresh water supply as suggested by the commenter.

**Comment No. 16-14**

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. 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 water impacts.

**Response to Comment No. 16-14**

Reclaimed sewage water is not proposed to be used by the Project for dust control.

**Comment No. 16-15****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.

**Response to Comment No. 16-15**

The Project's impacts associated with biological resources were analyzed in the Initial Study provided in Appendix A, of the Draft Supplemental EIR. As discussed therein, the Project Site is located in an urbanized area and is currently developed with the existing Shopping Center, which includes retail stores, restaurants, a movie theater, and surface parking areas. Due to the improved nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed urban settings.

The Warner Center Plan EIR found that construction of the Warner Center Plan area could potentially have a significant impact on the California leaf-nosed bat, a special-status

bat species, in areas located within 200 feet of a vehicle bridge. The Warner Center Plan EIR included Mitigation Measure BIO-3 to ensure that development within the Specific Plan area would avoid disturbance of the roosts of any special-status bat species. The Project Site is not located within 200 feet of a vehicle bridge which could potentially serve as a roost for special-status bat species. Therefore, the Project would not result in a potentially significant impact to the California leaf-nosed bat and would not require implementation of Mitigation Measure BIO-3.

In addition, the existing on-site trees that would be removed during construction of the Project could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. The requirements of the Migratory Bird Treaty Act are set forth in the Warner Center Plan EIR as Mitigation Measure BIO-1. Accordingly, the Project would continue to implement Mitigation Measure BIO-1.

Furthermore, as part of the Notice of Preparation process, public comments were received regarding bird and raptors on the Project Site. An avian survey was conducted on February 16, 2017 during the breeding season (February 1 through August 31) by GPA Consulting and is included as part of Appendix T, of the Draft Supplemental EIR. The survey found that no nesting birds were observed during the survey.

Based on the above, potential impacts to biological resources were adequately addressed in the Initial Study and found to be less than significant. No further analysis is necessary in the Final Supplemental EIR.

### **Comment No. 16-16**

#### **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. 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.

### **Response to Comment No. 16-16**

As provided in Section IV.H, Noise, of the Draft Supplemental EIR, a detailed noise impact analysis was conducted to evaluate potential noise impacts associated with Project construction activities, including site grading and excavation. As described on page IV.H-34 of the Draft Supplemental EIR, the noise analysis was based on conservative



assumptions. In particular, all pieces of construction equipment were assumed to operate simultaneously and at the nearest development area (i.e., Northwest, Northeast, Southwest and Southeast) to the affected receptors. These assumptions represent the worst-case noise scenario because construction activities would typically be spread out throughout the development area, and, thus, some equipment would be farther away from the affected receptors. The noise modeling is also conservative in that it assumes construction noise is constant, when, in fact, construction activities and associated noise levels are periodic and fluctuate based on the construction activities. Mitigation measures are proposed in Section IV.H, Noise, of the Draft Supplemental EIR, to reduce the on-site construction noise impacts to a less than significant level. These mitigation measures include using state-of-the-art noise control devices on construction equipment and installing temporary noise barriers to block line-of-sight (sound) between the construction equipment and any noise-sensitive receptors within 500 feet of a construction site. With implementation of these mitigation measures, on-site construction impacts to existing off-site sensitive receptors would be less than significant.

In addition, potential noise impacts associated with off-site construction (i.e., construction-related trucks) were also analyzed at the off-site noise sensitive receptors along the anticipated haul routes. Analyzing the peak number of delivery/vendor truck and worker trips, Project-related construction traffic is estimated to be below the 5-dBA significance threshold at all off-site receptors. In addition, the estimated construction-related traffic at the Canoga Park High School would be below the LAUSD 3-dBA significance threshold, if the construction haul trucks are required to travel north along Topanga Canyon Boulevard to the SR-118 due to the unavailability of the haul route south to the US-101. As concluded in the Draft Supplemental EIR, the noise impacts associated with off-site construction traffic would be less than significant.

#### **Comment No. 16-17**

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. 16-17**

As presented in Section IV.H, Noise, of the Draft Supplemental EIR, the noise impact analysis associated with Project construction was prepared in accordance with the applicable section of the State's CEQA Guidelines, the City of Los Angeles Municipal

Code, and *L.A. CEQA Thresholds Guide*. The noise significance thresholds provided by the City are utilized to evaluate potential impacts at the off-site noise sensitive receptors. As presented in the Draft Supplemental EIR (see page IV.H-11 in Section IV.H, Noise, of the Draft Supplemental EIR), noise sensitive receptors include: residences (single-family and multi-unit dwellings), transient lodgings (hotel and motel), hospitals, and long-term care facilities (nursing homes, convalescent and retirement facilities). Noise sensitive receptors used in the noise impact analysis include: single-family homes (receptor location R3); multi-unit dwellings (receptor locations R1 and R4); and hotel uses (receptor location R2). There are no known noise criteria related to emotional and physiological effects due to construction noise. The noise levels from the individual pieces of construction equipment are provided in Table IV.H-11 of the Draft Supplemental EIR. In addition, detailed calculations of the construction noise levels at the off-site noise sensitive receptors are provided in Tables IV.H-12, IV.H-13 and IV.H-14 of the Draft Supplemental EIR. Mitigation measures are proposed in Section IV.H, Noise, of the Draft Supplemental EIR, including using state-of-the-art noise control devices on construction equipment and installing temporary noise barriers, as discussed in Response to Comment No. 16-16. As concluded in the Draft Supplemental EIR, with implementation of the proposed mitigation measures, noise from on-site construction activities would be less than significant.

### **Comment No. 16-18**

#### **IX. LIGHT AND GLARE IMPACTS**

Light and glare was not adequately assessed in the draft DSEIR. 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.

### **Response to Comment No. 16-18**

As discussed further in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, the Project is located in a transit priority area pursuant to SB 743 and as defined by ZI 2452. As such, pursuant to SB 743 and ZI 2452, the Project's aesthetic impacts, including those associated with light and glare, shall not be considered a significant impact on the environment. Nevertheless, the Project would be required to comply with all regulatory requirements pertaining to light and glare, and Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, provides a comprehensive analysis of light and glare impacts during construction and operation of the Project.

As discussed on page IV.A-67 of the Draft Supplemental EIR, the Project would implement Warner Center Plan Mitigation Measure AES-9, which would require construction lighting be shielded and/or aimed so that no direct beam illumination would fall outside of the Project Site boundary. In addition, with regard to glare during construction, any glare would be transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities.

With regard to operation, a Lighting Report was prepared for the Project and is provided in Appendix B, of the Draft Supplemental EIR. The Lighting Report analyzed the most conservative Project scenarios. In particular, the Lighting Report conservatively assumed a partial roof for the Entertainment and Sports Center and assumed lighting levels and equipment required to provide for professional sports or entertainment facility illumination within the Entertainment and Sports Center. Furthermore, to provide a conservative analysis, the Lighting Report conservatively assumed the simultaneous use of all Project-related building and site lighting and assumed all signs would be operating at the maximum luminance level permitted by the Warner Center Sign District. As discussed in further detail in the Lighting Report, the illuminance (light trespass) associated with Project lighting with a partial roof for the Entertainment and Sports Center, at the calculated centerline of the public streets adjacent to each Project frontage, would range from 0.0 foot-candle to up to 0.7 foot-candle, which is lower than the LAMC's lighting threshold of 2.0 foot-candles and as such, impacts would be less than significant. With regard to illuminance associated with Project illuminated signage, illuminated signage would generate a maximum of 0.3 foot-candle at the property lines of the closest sensitive residential receptors. Thus, Project-related illuminance associated with illuminated signage would be below the 3.0-foot-candle significance threshold and would, therefore, be less than significant. In addition, the Project would comply with the applicable mitigation measures set forth in the Warner Center Plan EIR regarding lighting, including Warner Center Plan Mitigation Measure AES-10 and Warner Center Plan Mitigation Measure AES-11, Warner Center Plan Mitigation Measure AES-14, Warner Center Plan Mitigation Measure AES-16 through Warner Center Plan Mitigation Measure AES-20, and Warner Center Plan Mitigation Measure AES-22 through Warner Center Plan Mitigation Measure AES-25 and Warner Center Plan Mitigation Measure AES-27. Implementation of these mitigation measures would further reduce the Project's less-than-significant lighting impacts.

With regard to glare/contrast associated with Project signage during operation of the Project, the resulting contrast associated with proposed signage would range from 0.2 to up to 5.2. These contrast levels are considered low and Project Signs would not introduce a new source of high contrast or glare. Thus, potential impacts associated with glare/contrast related to Project signage would be less than significant. In addition, the Project would comply with the mitigation measures set forth in the Warner Center Plan EIR

to address glare from proposed buildings, signage, and lighting, including Warner Center Plan Mitigation Measure AES-12, Warner Center Plan Mitigation Measure AES-13, and Warner Center Plan Mitigation Measure AES-15. Implementation of these mitigation measures would further reduce the Project's less-than-significant glare impacts.

Based on the above, potential impacts from light and glare were adequately addressed in the Draft Supplemental EIR and no further analysis is necessary in the Final Supplemental EIR. Regardless, per the provisions of SB 743, this impact would not be considered significant.

#### **Comment No. 16-19**

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. 16-19**

As discussed above in Response to Comment No. 16-18, the Project is located in a transit priority area pursuant to SB 743 and as defined by ZI 2452. As such, pursuant to SB 743 and ZI 2452, the Project's aesthetic impacts, which include impacts related to shading, shall not be considered a significant impact on the environment. Nevertheless, Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, provides a comprehensive analysis of shading impacts during operation of the Project. As discussed in further detail in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, the areas shaded by the Project during the winter and summer solstice and spring and fall equinox would not include potentially routinely useable outdoor spaces, which include outdoor spaces associated with residential, recreational, or institutional land uses; commercial uses, such as pedestrian oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. Therefore, shading impacts would be less than significant. In addition, per the provisions of SB 743, this impact would not be considered significant.

#### **Comment No. 16-20**

#### **X. CHANGES IN POPULATION**

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

kinds and types of jobs will be created, as a result of this project. Analyze the effects on unemployment on individuals with various jobs skills. Also explore what housing is available to accommodate any increase in direct and indirect employment. How does this project conform to the Regional Housing Needs Assessment. Provide a detailed list of mitigation measures to deal with any job/housing imbalance created by the project.

### **Response to Comment No. 16-20**

The population, housing and employment impacts of the Project are analyzed in Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR. That section also describes the Regional Housing Needs Assessment and the Project's consistency with SCAG's housing policies. Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR notes that the Project's 1,432 new housing units represent 14 percent of the City of Los Angeles' average annual housing need of 10,250 units per the 5th Cycle of the Regional Housing Needs Assessment, which quantifies the need for housing within each of SCAG's member jurisdictions from planning period October 2013 to October 2021.

The Project is consistent with the nonresidential to residential balance required by the Warner Center Plan, as described further in Topical Response No. 1, Warner Center 2035 Specific Plan.

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 16-21**

#### **XI. HOUSING IMPACTS**

The project will raise land prices, and drive out affordable housing or small business in the area. The final EIR should mitigate the number of low-to moderate housing units that will be lost due to the project. The final EIR should explain how the loss of affordable housing stock will be replenished. It should also show the impact on nearby small retail and consumer serving shops and businesses.

### **Response to Comment No. 16-21**

As documented in Section II, Project Description, and Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, the Project will add 1,432 new housing units to an underutilized retail mall site. Although the Project does not propose affordable housing, it will not displace any existing affordable housing units.

The Project is consistent with the requirements of the Warner Center Plan, which does not include any inclusionary housing requirements. Additionally, the Project proposes to provide 1,432 housing units comprised of a variety of unit types and price points for different income levels. CEQA does not require review of a project's potential effects that are strictly economic or social in nature. CEQA is an environmental statute meant to address environmental impacts. The purpose of an EIR is to provide public agencies and the public with "detailed information about the effect which a proposed project is likely to have on the environment." (Pub. Resources Code, § 21061.) The CEQA Guidelines specifically state that "[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment." (CEQA Guidelines, §§ 15131(a); 15064(e).) When there is no evidence that potential economic or social impacts will result in some significant effect on the environment, "CEQA does not apply to such impacts." (Preserve Poway v. City of Poway (2016) 245 Cal.App.4th 560, 566.) In addition, when an indirect physical change "is speculative or unlikely to occur," that change is not "reasonably foreseeable," and should not be included in the EIR's analysis. (Citizens for a Sustainable Treasure Island v. City and County of San Francisco (2014) 227 Cal.App.4th 1036, 1061; see CEQA Guidelines, § 15145.)

This comment does not provide information on how those potential economic or social changes will lead to a direct or indirect physical impact on the environment, and such analysis of those potential impacts is speculative and not reasonably foreseeable. The comments regarding affordable housing are noted for the record and have been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 16-22**

## **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.

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. 16-22**

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the potential haul routes for the Project are approved truck routes designated by the City within the Mobility Plan 2035. Consistent with the Warner Center Plan, the Project's primary haul route would use US-101 and Topanga Canyon Boulevard. As noted in Mobility Plan 2035, Topanga Canyon Boulevard is a designated truck route that generally avoids travel near schools. Given the Project Site's proximity to US-101, haul truck traffic would take the most direct route to the appropriate freeway ramp. A secondary haul route, if traveling south on Topanga Canyon Boulevard is infeasible, is identified as north on Topanga Canyon Boulevard to the Ronald Reagan Freeway (SR-118).

Refer to Topical Response No. 3, Traffic and Parking, for information regarding the Project's operational traffic impact and construction traffic impact analyses. As detailed in Table IV.K-10, the Warner Center 2035 No Build condition (existing conditions plus ambient growth) anticipates 14 of the 49 analyzed intersections are projected to operate at LOS E or F. Nine of the 49 intersections analyzed by the Project are projected to operate at LOS E or F with one intersection remaining significantly impacted. Comparatively, with the completion of the Project, full buildout of the Warner Center Plan and implementation of the Warner Center Mitigation Program, 6 of the 49 analyzed intersections are projected to operate at LOS E or F; no intersections have been identified as significantly impacted. Completion of the Project is anticipated to result in improved intersection performance as compared to both the Warner Center 2035 No Build and Full Buildout conditions with fewer number of intersections projected to operate at LOS E or F. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board, the implementation of the Warner Center Mitigation Program, including those mitigation

measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking for further details regarding the Warner Center Plan Implementation Board.

Refer to Response to Comment No. 16-7, above, for information regarding air quality impacts during construction.

### **Comment No. 16-23**

Please consult with the South Coast Air Quality Management District and obtain a table of Potential Mitigation Measures. This table includes numerous incentives, controls and procedures which should be considered for inclusion in the final EIR.

### **Response to Comment No. 16-23**

SCAQMD guidance on mitigation measures has been considered in the preparation of the EIR. SCAQMD provided a comment letter (Comment Letter No. 3) regarding the Draft Supplemental EIR in which SCAQMD made specific recommendations concerning mitigation and modifications to proposed mitigation. Based on the comments provided by SCAQMD, Warner Center Mitigation Measure AQ-1 has been updated consistent with SCAQMD's recommendation. Please refer to Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, as well as Section IV, Mitigation Monitoring Program, of this Final Supplemental EIR.

In addition, SCAQMD's Air Quality Analysis Guidance Handbook provides a list of mitigation measures and control efficiencies for consideration to mitigate significant air quality impacts, which was considered when evaluating feasible mitigation measures as part of the Air Quality analysis for the Draft Supplement EIR.<sup>42</sup> The list of measures provided by SCAQMD are categorized by the following: (1) fugitive dust; (2) greenhouse gases; (3) harbor craft; (4) locomotives; (5) ocean going vessels; (6) off-road engines; and (7) on-road engines. SCAQMD's list of mitigation measures were considered in the air quality analyses prepared for the Project in Section IV.B., Air Quality, of the Draft Supplemental EIR when evaluating feasible mitigation measures to address significant air quality impacts. As the Project would not include use of harbor craft, locomotives, and ocean going vessels, measures related to such uses were not considered in the Draft Supplemental EIR

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<sup>42</sup> SCAQMD, *Mitigation Measures and Control Efficiencies*, [www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies), accessed October 5, 2018.



From a construction standpoint, the Warner Center Plan EIR incorporates feasible SCAQMD mitigation measures and, as applied to the Project, requires the following:

**Warner Center Plan Mitigation Measure AQ-1:** The City shall require that all projects use soil binders on soils exposed for extended periods of time (more than two weeks) to reduce fugitive dust and the speed on unpaved haul roads within the Project Site shall be limited to 15 miles per hour. In addition the City shall require that projects be required to include the following measures as applicable and feasible:

- i) Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- ii) Provide dedicated turn lanes for movement of construction trucks and equipment on-and off-site.
- iii) Reroute construction trucks away from congested streets or sensitive receptor areas.
- iv) 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.
- v) Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.
- vi) Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113.
- vii) Construct or build with materials that do not require painting.
- viii) Require the use of pre-painted construction materials.
- ix) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export).
- x) During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet the following:
  - Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet or exceed the Tier 4 emission 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.
  - A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall

be provided at the time of mobilization of each applicable unit of equipment.

- Encourage construction contractors to apply for AQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for AQMD “SOON” funds. The “SOON” program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy-duty construction equipment. More information on this program can be found at the following website: [www.aqmd.gov/tao/Implementation/SOONProgram.htm](http://www.aqmd.gov/tao/Implementation/SOONProgram.htm).

- xi) Other measures as applicable on a project by project basis and as may be recommended by SCAQMD on their web site or elsewhere: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

**Warner Center Plan Mitigation Measure AQ-2:** The City shall require that ground cover be reestablished on construction sites through seeding and watering on completion of construction (or if sites are to remain undeveloped for more than a year).

**Warner Center Plan Mitigation Measure AQ-3:** The City shall require that trucks leaving construction sites be washed to reduce track-out dirt and dust.

**Warner Center Plan Mitigation Measure AQ-4:** The City shall require that developers provide rideshare and transit incentives to construction personnel.

**Warner Center Plan Mitigation Measure AQ-5:** The City shall require that developers configure construction parking to minimize interference with traffic lanes.

**Warner Center Plan Mitigation Measure AQ-6:** The City shall require that developers and City Departments minimize the obstruction of through-traffic in the vicinity of construction sites.

**Warner Center Plan Mitigation Measure AQ-7:** The City shall require that developers and City Departments use flag people during construction to guide traffic properly.

**Warner Center Plan Mitigation Measure AQ-8:** The City shall require that construction activities that could affect roadways be scheduled for off-peak periods.

**Warner Center Plan Mitigation Measure AQ-9:** The City shall require that developers (as well as City construction personnel associated with construction of roadway and other infrastructure) ensure that construction vehicles avoid, to the extent feasible, travel on streets immediately adjacent to Canoga Park High School, Woodland Hills Academy Middle School and Hart Elementary School throughout the construction phase of each project to reduce potentially significant

project-specific and cumulative construction-related air quality impacts. The City shall ensure that haul routes are designed to comply with this measure.

With regard to construction fugitive dust, as discussed above in Response to Comment No. 16-9, PM<sub>10</sub> and PM<sub>2.5</sub> emissions were concluded to be less than significant and no additional mitigation measures would be required. Compliance with SCAQMD Rule 403 measures (fugitive dust) was incorporated into the mitigation measures provided above for the Project to reduce fugitive dust emissions.

With regard to off-road engines, the Draft Supplemental EIR includes a stringent mitigation measure recommended by the SCAQMD (Warner Center Plan Mitigation Measure AQ-1) requiring that all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In addition, Warner Center Plan Mitigation Measure AQ-1 requires use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) which is also a SCAQMD recommended measure.

As discussed in Section IV.B, Air Quality, of the Draft Supplemental EIR, implementation of the mitigation measures would reduce construction emissions for all pollutants. Regional VOC emissions would be reduced below the SCAQMD daily significance threshold and maximum regional NO<sub>x</sub> emissions would be substantially reduced by approximately 50 percent. However, peak daily regional NO<sub>x</sub> emissions would, nevertheless, exceed the SCAQMD regional significance threshold for NO<sub>x</sub> (100 pounds per day). As such, even with implementation of all feasible mitigation measures, Project construction would result in significant and unavoidable Project-level and cumulative regional impacts even with incorporation of all feasible mitigation measures.

With regard to operation emissions, the Draft Supplemental EIR discusses the SCAQMD-recommended CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, for reducing GHG emissions.<sup>43</sup> As described in Section IV.B, Air Quality, of the Draft Supplemental EIR and based on the CAPCOA guidance, the Project's characteristics as an infill development near existing modes of alternative transit, result in VMT and vehicle trips reductions for the Project Site relative to the standard trip and VMT rates in CalEEMod for projects within the air basin. The reduction in VMT corresponds to a relative reduction GHG emissions and criteria pollutant emissions. Incorporation of Project Design Features D-1 through D-6, provided in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR and relevant features applicable to the Project would decrease VOC emissions by 15 percent, NO<sub>x</sub> emissions by 49 percent, CO emissions by

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<sup>43</sup> CAPCOA, *Quantifying Greenhouse Gas Mitigation Measures*, 2010.

53 percent, PM<sub>10</sub> emissions by 85 percent, PM<sub>2.5</sub> emissions by 84 percent, and similar amounts of SO<sub>x</sub> relative to the standard rates in CalEEMod for projects within the air basin. However, even with this mitigation, regional operational emissions associated with the Project buildout analysis year (Year 2033) would still exceed the SCAQMD daily emission threshold for regional VOC and NO<sub>x</sub>. Thus, the Project would result in significant and unavoidable Project-level and cumulative regional operational air quality impacts.

#### **Comment No. 16-24**

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

#### **Response to Comment No. 16-24**

As identified in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the impact associated with the addition of full Project traffic to each analyzed study intersection is anticipated to be less than significant with the full implementation of the Warner Center Mitigation Program and Project specific project design features. Also refer to Topical Response No. 3, Traffic and Parking, above. Estimates of the number of trips generated and the methodologies and assumptions for the arrival of the Project trips are summarized in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. The scope of analysis of the Traffic Study was developed in consultation with LADOT staff, which reviewed and approved the Traffic Study; a copy of the Traffic Study and LADOT's assessment letter is provided in Appendix M, of the Draft Supplemental EIR.

As further discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, on page IV.K-4, of the Draft Supplemental EIR, a transit system analysis was performed for identification of Project transit impacts to ridership on regional transit systems based on the Congestion Management Program's Traffic Impact Analysis guidelines. Impacts associated with CMP transit analysis were determined to be less than significant.

A supplemental analysis of potential impacts to state facilities (freeways) was prepared based on Caltrans guidelines and is provided in Appendix M, of the Draft Supplemental EIR. As identified in Section IV.K Traffic, Access, and Parking, of the Draft Supplemental EIR, the Caltrans facilities analysis evaluated the Project's potential impacts on 11 freeway mainline segments. A total of 26 intersections along Topanga Canyon Boulevard and US-101 ramp terminal intersections under Caltrans jurisdiction were further analyzed using the HCM methodology according to Caltrans Traffic Impact Study (TIS)

Guidelines. Five off-ramps along US-101 were also evaluated to determine whether the length of the ramps were sufficient to accommodate vehicle queue lengths.

To identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an Entertainment and Sports Center (ESC) event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

### **Comment No. 16-25**

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 ATSAC, and the secondary highways. Explain thoroughly how you 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. 16-25**

Refer to Topical Response No. 3, Traffic and Parking, and Topical Response No. 2, the Entertainment and Sports Center, above, for a discussion of the traffic impact analysis methodology, which assumes full buildout under the Warner Center Plan, as well as the six different time periods analyzed by the Traffic Study. Refer to Response to Comment No. 16-24 for a discussion regarding analysis of state facilities. In addition, Sections IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, provide full descriptions of the underlying assumptions used in the traffic impact analysis. This includes the development of background conditions, which take into account the projected growth from the full buildout of the Warner Center Plan. The calculation methodology accounts for the use of the ATSC/ATCS signal control systems in the intersection LOS projections; the analysis periods are also identified. The Project trip generation rates and trip distribution patterns are also detailed. In summary, trip generation rates for the non-event uses are primarily based on the Institute of Transportation Engineers' *Trip Generation, 9th Edition* (2012). The ESC trip rates were developed from an average occupancy and hourly arrival pattern researched from other event centers; LADOT reviewed the assumptions and requested the use of a specific average occupancy rate, for trip generation purposes. The distribution of both the non-event and ESC trips onto the street network relied on the Warner Center Plan Model's dynamic trip distribution feature, which assigned trips to the least congested routes on the street network based on model calculations. The analysis periods selected for analysis were developed in conjunction with LADOT and include six time periods to provide a comprehensive analysis of the Entertainment Center's potential impacts: three weekday evening times (pre-event time periods of 5:00 P.M.–6:00 P.M. and 6:00 P.M.–7:00 P.M., and post-event time period of 10:00 P.M.–11:00 P.M.); Saturday midday (12:00 P.M.–1:00 P.M. and 1:00 P.M.–2:00 P.M.) and Saturday evening (10:00 P.M.–11:00 P.M.). The resulting intersection impact analyses are fully detailed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR.

**Comment No. 16-26**

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 your steps, and your conclusions with regard to traffic impacts.

**Response to Comment No. 16-26**

Refer to Topical Response No. 3, Traffic and Parking, which summarizes the Project's phasing and analysis of traffic impacts by phase. The Project's phasing plan

describes the geographic area covered by each phase of the Project, with the order of buildout of these geographic phases subject to change. An anticipated order of buildout is analyzed in the Traffic Study, but if ultimate buildout of the Project changes the order or overlaps any of the Project phases described above, then an updated analysis would be provided to LADOT confirming that the impacts identified in the Project's Traffic Study remain unchanged.

The mitigation measures would also be implemented by phase. As stated in DOT's Traffic Assessment Letter, included in Appendix M, of the Draft Supplemental EIR, the Applicant is required to pay the required Mobility Fee for each project phase, prior to issuance of any building permits for that phase. This is also required by Mitigation Measure K-2, which states that "The Project shall be required by LADOT to mitigate impacts by phase through: (1) the physical roadway and streetscape mitigation measure improvements as outlined in Appendix E, of the Warner Center Plan; (2) payment of the Mobility Fees in-lieu of any physical improvements; or (3) the combination of both the mitigation measures outlined in Appendix E, of the Warner Center Plan, and the payment of the Mobility Fee." Additionally the mitigation measures in the Warner Center Mitigation Program directly adjacent to the Project Site would be implemented by Project phase, as required by Project Design Feature K-2, Project Design Feature K-8, and Section 7.7, Street Improvements and Dedications, of the Warner Center Plan. Finally, Mitigation Measure K-3, details a process for implementing a Neighborhood Protection Program by phase, to be initiated by the first Project phase that could result in neighborhood intrusion impacts. As a note, until Project construction is completed or the Warner Center Mitigation Program is implemented, the Project-level and cumulative construction impacts will be temporarily significant and unavoidable.

Refer to Topical Response No. 3, Traffic and Parking, above, for a description of the traffic impact analysis methodology and the proposed mitigation measures. Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, provides a full description of the development of the Project trip generation and analysis periods, along with discussion of a phased analysis, and the resulting intersection impact analyses. Appendix M, of the Draft Supplemental EIR, includes the Traffic Study with all supporting documentations and technical worksheets.

### **Comment No. 16-27**

## **XIII. PUBLIC SERVICE IMPACTS**

The final EIR should fully address 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. 16-27**

With regard to impacts to police and fire services, refer to Topical Response No. 5, Public Services, above. As discussed therein, based on the *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, the need for or deficiency in adequate police and fire protection services in and of itself is not a CEQA impact.

### **Comment No. 16-28**

Your final EIR should thoroughly cover the adequacy of fire-flow requirements for the necessary level of protection, response distance from existing fire stations, etc. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Show what improvements will be needed to provide the adequate G.P.M. for fire-flow. The final EIR should contain a thorough analysis of this topic, in consultation with the Water Services Section of the Department of Water and Power. It should also show how the G.P.M. requirements for the first-due Engine Company will be met, and the distance of the first-due Truck company.

### **Response to Comment No. 16-28**

The Draft Supplemental EIR provides a comprehensive analysis regarding fire-flow requirements in both Section IV.J.2, Public Services—Fire Protection, and Section IV.M.1, Utilities and Services Systems—Water Supply and Infrastructure. As discussed further in the Draft Supplemental EIR, fire flow to the Project Site would be required to meet City fire flow requirements. The land uses proposed by the Project fall within the High Density Industrial and Commercial category, which has a required fire flow of 12,000 gpm available to any block with a residual pressure of 20 psi. This translates to a requirement of 1,500 gpm for each of the eight hydrants that were tested within the immediate vicinity of the Project Site. As discussed in the Utility Report, provided in Appendix P, of the Draft Supplemental EIR, an Information of Fire Flow Availability Request was submitted to LADWP to determine available fire hydrant flow from the existing public fire hydrants. Based on the completed information request (see Exhibit 3 of Appendix P, of the Draft Supplemental EIR), the existing eight hydrants flowing simultaneously for a combined flow of 16,000 gpm would be available. This is greater than the 12,000 gpm required at a minimum residual pressure of 20 psi. Therefore, the Project would comply with flow standards specified in Section 57.507.3.1 of the LAMC.



As discussed in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, with regard to response distances, based on the distance of the nearest fire station to the Project Site, the Project Site is located outside of the response distance of 0.75 mile for an engine company and 1 mile for a truck company. Therefore, pursuant to the requirements of Section 57.507.3.3 of the LAMC and various provisions of the 2016 California Building Standards Code, the Project would install automatic fire sprinklers in all proposed buildings, which would reduce potential impacts to fire protection services.

#### **Comment No. 16-29**

You will also need to show at least two different ingress/egress roads that will accommodate major fire apparatus, and provide for major evacuation during emergency situations. Include off-site and on-site location of fire hydrants, fire lane widths, and how the project will affect staffing for existing facilities, or there [sic] location of present fire protection facilities.

#### **Response to Comment No. 16-29**

As discussed in Section II, Project Description, of the Draft Supplemental EIR, the Project proposes to break down the existing superblock with a combination of required “New Streets” and other additional access ways, all of which will serve to provide multiple ingress/egress roads that will accommodate fire apparatus. All buildings will be designed to comply with all the code requirements related to access, fire exiting, and evacuation.

As discussed in Section IV.J.2 Public Services—Fire Protection, of the Draft Supplemental EIR, the existing site is currently served with fire hydrants located at approximately 300-foot intervals around the perimeter. These existing hydrants will be supplemented with additional hydrants within the Project Site that would comply with all the requirements of Chapter 5 in the Los Angeles Fire Code.

#### **Comment No. 16-30**

Your final EIR should conform to the guidelines in the Fire Protection and Fire Prevention Plans, as well as the Safety Plan, which are elements of the Los Angeles General Plan C.P.C. 19708). 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. 16-30**

With regard to police and fire services, refer to Topical Response No. 5, Public Services, above.

With regard to fire services, Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, provides an analysis of the Project's compliance with the LAMC. As discussed therein, the LAMC includes provisions for new construction projects within the City. It contains, by reference, the California Building Code building construction standards, including the California Fire Code, and reflects the policies of the City's General Plan Safety Element. Chapter V, Article 7, Fire Prevention and Protection (also known as the Fire Code), of the LAMC sets forth regulatory requirements pertaining to the prevention of fires; the investigation of fires and life safety hazards; the elimination of fire and life safety hazards in any building or structure (including buildings under construction); the maintenance of fire protection equipment and systems; and the storage, use, and handling of hazardous materials. The Project would comply with the requirements of the Fire Code, as applicable.

With regard to police services, existing average response times are provided on page IV.J.1-5 in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR. However, as there are no established thresholds, average response times are not used to evaluate the ability of LAPD to provide police services. As discussed further in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, during construction, with the implementation of Warner Center Plan Mitigation Measures PS-12 through PS-14, temporary construction activities associated with the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site, nor would Project construction cause a substantial increase in emergency response times as a result of increased traffic congestion. With regard to operation, upon buildout of the Project (Future With Project Conditions) and with implementation of the Warner Center Mitigation Program assumed in the Warner Center Plan EIR and project design features, traffic generated by the Project would not result in significant impacts along Topanga Canyon Boulevard. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial increase in emergency response times due to traffic congestion.

The commenter suggests including data on burglary from autos, auto theft and assaults. This information is included in Table IV.J.1-2 on page IV.J.1-8 in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR.

As discussed further in Topical Response No. 5, Public Services, above, the Project would implement several project design features and mitigation measures that would address potential impacts to police and fire services.

**Comment No. 16-31****XIV. IMPACT ON ENERGY AND UTILITIES**

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

**Response to Comment No. 16-31**

Section IV.M.3, Utilities and Service Systems—Solid Waste, of the Draft Supplemental EIR, provides a comprehensive analysis regarding the Project's impacts to solid waste facilities during construction and operation of the Project.

As discussed therein, it is anticipated that construction of the Project would generate a total of approximately 77,832 tons of demolition debris and 11,473 tons of construction debris, for a combined total of 89,304 tons of construction-related waste generation. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used as a cover material. Thus, soil export is not included in these totals. The Project would also implement Warner Center Plan Mitigation Measure U-12, which includes a minimum 75-percent diversion from landfills. Applying this rate, the Project would dispose of approximately 22,326 tons of construction-related waste in the County's inert landfill throughout the construction period, which would represent approximately 0.037 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 59.83 million ton. Thus, the total amount of construction and demolition waste generated by the Project would represent a fraction of the remaining capacity at the unclassified landfill serving Los Angeles County. Since the County's unclassified landfill generally does not face capacity shortages, and the County's unclassified landfill would be able to accommodate Project-generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste. Therefore, construction impacts to solid waste facilities would be less than significant.

With regard to operation, when accounting for the removal of the existing uses, operation of the Project would result in a net increase of approximately 6,476 tons of solid waste generated on the Project Site annually, or approximately 18.18 tons per day. Assuming a diversion rate of 62 percent, the net increase in solid waste disposal associated with the Project would be approximately 2,461 tons per year. The net increase

in solid waste disposal associated with the Project would represent an approximate 0.13-percent increase in the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 1.91 million tons. In addition, the Project's net increase of 2,461 tons of annual solid waste disposal would represent approximately 0.03 percent of the estimated remaining Class III landfill capacity available to the City of Los Angeles. Therefore, it is not anticipated that the disposal needs of the County would be exceeded by Project buildout. Thus, based on the amount of solid waste to be generated by the Project, the waste reduction measures that would be implemented, and the existing capacity of Los Angeles County landfills, potential impacts associated with solid waste disposal would be less than significant.

With regard to haul routes, refer to Response to Comment No. 16-5, above.

### **Comment No. 16-32**

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. 16-32**

The electricity needs of the Project are analyzed in Section IV.N, Appendix F—Energy Conservation, of the Draft Supplemental EIR. As discussed therein, with compliance with applicable 2016 CALGreen requirements, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 19,246 MWh/year. The Project also includes various project design features to reduce electricity use on the Project Site. In addition to complying with CalGreen requirements, the Project Applicant would also implement Project Design Feature D-1 in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR, which states that the design of the new buildings shall incorporate features of the LEED program to be capable of meeting the standards of LEED Silver or equivalent. Energy-related measures include exceeding the California's Building Energy Efficiency Standards by 25 percent for energy efficiency, the use of Energy Star-labeled products and appliances, and use of light-emitting diode (LED) lighting where appropriate. In addition, under Project Design Feature D-6, the Project would provide a minimum of 500 kilowatts of photovoltaic panels on the Project Site. Furthermore, in response to the commenter's question regarding back up energy sources, it is anticipated that the Project would include the use of emergency generators when appropriate. This was accounted for in the air quality, GHG, and energy analyses of the Draft Supplemental EIR. Also refer to Topical Response No. 6, Infrastructure, above, for further information regarding electricity infrastructure.

**Comment No. 16-33**

What will be the impact on the sewage system. Show the volume of sewage produced by the project, and how it will impact the Hyperion, Los Angeles–Glendale and Tillman plants. Show which sewage lines will need to be upsized, which streets will be affected, and for how long a period. The final EIR should analyze the availability of hydraulic capacity for the anticipated flow in the local and interceptor sewers serving the proposed project area. The quantity and quality of wastewater to be discharged to the sewer system should be more thoroughly analyzed.

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

**Response to Comment No. 16-33**

A provided in the Utility Infrastructure Technical Report, included as part of Appendix P, of the Draft Supplemental EIR, and summarized in Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft Supplemental EIR, a comprehensive analysis regarding the Project's impacts to wastewater facilities during construction and operation of the Project was performed.

Construction activities for the Project would result in a temporary increase in wastewater generation as a result of construction workers on-site. Wastewater generation would occur incrementally throughout construction of the Project. However, such use would be temporary and nominal when compared with the Project Site wastewater generation under baseline conditions.

As discussed in further detail in Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft Supplemental EIR, with regard to operation, the Project would generate a net increase in wastewater flow from the Project Site of approximately 420,082 gpd, or approximately 0.42 mgd. The Project's increase in average daily wastewater flow of 0.42 mgd would represent approximately 0.24 percent of the current 175 mgd remaining available capacity of the Hyperion Treatment Plant. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the Hyperion Treatment Plant, and impacts would be less than significant. Also refer to Topical

Response No. 6, Infrastructure, above, for further information regarding wastewater infrastructure.

**Comment No. 16-34**

**XV. AESTHETIC IMPACTS**

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.

**Response to Comment No. 16-34**

As discussed above in Response to Comment No. 16-18, the Project is located in a transit priority area pursuant to SB 743 and as defined by ZI 2452. As such, pursuant to SB 743 and ZI 2452, the Project's aesthetic impacts shall not be considered a significant impact on the environment. Nevertheless, Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, provides a comprehensive analysis of the Project's aesthetic and views impacts for informational purposes.

As discussed in further detail in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, the Project Site is currently developed with buildings, surface parking areas, and landscaping. These uses currently within the Project Site do not contribute to the valued visual character or image of the surrounding community. Specifically, as shown in the visual simulations provided in Figures IV.A-2 through IV.A-9 of the Draft Supplemental EIR, the visual character of the Project Site is that of an underutilized site with freestanding buildings and large expanses of surface parking. The Project would visually alter the Project Site by removing the existing structures and introducing a new mixed-use development that would include residential, retail/restaurant, office, hotel, and entertainment uses that would be integrated by landscaped pedestrian walkways and landscaped pedestrian-oriented open space, creating a unified site.

With regard to the visual character of the surrounding uses, the Project's uses would be compatible with the existing retail/restaurant uses of the Village at Westfield Topanga and the additional retail, restaurant, and office uses along Erwin Street. The Project would also be compatible with other high-rise office uses across the Project Site, along Oxnard Street and Owensmouth Avenue. The large expanses of existing on-site surface parking would be replaced with parking structures located internal to the Project Site and screened from view along surrounding streets by proposed buildings.

The height of the Project's various mixed-use buildings would be compatible with the existing character of the area by locating the proposed buildings adjacent to existing buildings of similar scale. The Project's lowest heights at 35 feet and 55 feet are proposed along Topanga Canyon Boulevard on the north side of the Project Site, continuing the heights of the buildings at the Village at Westfield Topanga and across Topanga Canyon Boulevard. In particular, the Project's taller buildings are proposed in the southeast corner of the Project Site, with the tallest building sited at the corner of Owensmouth Avenue and Oxnard Street opposite similarly tall office towers on the south side of Oxnard Street. The Entertainment and Sports Center would also be stepped down in height, with a lower roof line along the Topanga Canyon Boulevard frontage (approximately 58 feet along the northern portion of the building and approximately 85 feet along the southern portion of the building), consistent with adjacent buildings. Under the closed roof option, the highest point of the roof (approximately 155 feet) would be located internal to the structure and within the vicinity of the taller buildings on the Project Site.

As detailed in the visual simulations provided in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, the proposed heights would not create a substantial contrast in the context of the varied low-, mid-, and high-rise developments that characterize the Warner Center area. The varying heights throughout the Project Site would create a gradual visual transition from the Project's lower buildings to the Project's taller buildings. Furthermore, the site-wide variation in heights would add to the varying skyline in the Warner Center area, thereby providing visual interest. The Project would also incorporate variations in building planes to reduce the effect of massing and provide a pedestrian scale within and adjacent to surrounding public streets.

With regard to views, visual resources within and in the vicinity of the Project Site that are available from public view locations include views of the Macy's building, an historical resource; views of the Guy Martin Oldsmobile and Livingston Pontiac building, located across the Project Site at 6133 North Topanga Canyon Boulevard, which is considered a visual resource for the purposes of this analysis because of its historical significance; views of the Allison Plaza Historic District, which is bounded by Oxnard Street to the north, Canoga Avenue to the east, and Califa Street to the south; views of the Santa Susana Mountains and the Santa Monica Mountains in the distant backdrop; collective views of the distinctive high-rise buildings that make up the Warner Center skyline from near view locations; and panoramic views of the Warner Center skyline, from distant locations. While the Project would partially obstruct focal north-facing views of portions of the Santa Susana Mountains along Topanga Canyon Boulevard and along Owensmouth Avenue, the obstruction of the view would be limited and the majority of the view would remain. Therefore, the reduction in publicly-available intermittent views of the Santa Susana Mountains that would result from the Project would not be considered a substantial obstruction of existing views of these visual resources. In addition, east-facing views of the Guy Martin Oldsmobile and Livingston Pontiac building, located across the

Project Site at 6133 North Topanga Canyon Boulevard, are available from Erwin Street. However, the Project would be located east of the building and would not obstruct views of the Guy Martin Oldsmobile and Livingston Pontiac building. Furthermore, while the Project would partially obstruct existing views of one of the office towers that comprise the Warner Center towers, views of the majority of the office campus would remain. Additionally, west-facing views of the Macy's building are not available due to remaining portions of the Shopping Center building. Therefore, the Project would not result in the loss of a recognized view. West-facing views of the Santa Susan Mountains would be predominately maintained and while the Project would partially obstruct existing views of one of the office towers that comprise the Warner Center towers, views of the majority of the office campus would remain.

### **Comment No. 16-35**

What impact will this project have on the other business establishments, access to businesses and the present viewscape? What impact will it have on the marketability of homes nearby?

### **Response to Comment No. 16-35**

As discussed above, in accordance with SB 743, aesthetics impacts of the Project, including potential view impact are less than significant. Nonetheless, an analysis of potential view impacts is included in Section IV.A, Aesthetics of the Draft Supplemental EIR. Also refer to Response to Comment No. 16-34, above. As demonstrated therein, the Project would not result in significant view impacts. The remainder of this comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. CEQA does not require review of a project's potential effects that are strictly economic or social in nature. CEQA is an environmental statute meant to address environmental impacts. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 16-36**

## **XVI. GROWTH INDUCING IMPACTS**

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. Please include a detailed forecast of growth for each phase of the project, if phased. What will be the cumulative impacts of growth in the region? How is this related to the Growth Management Plan forecast, at the expected date of project or phase completion? In *Laurel Heights Improvement Assoc. of San Francisco, Inc. v. Regents of the University*



of California (88 Daily Journal D.A.R.15037), [sic] the California Supreme Courts laid down clear guidelines and requirements for the preparation of an environmental document.

Specifically the Supreme Court stated that “a final EIR must include an analysis of the environmental effects of future expansion or other actions if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” Please be sure the final EIR properly addresses and mitigates growth inducing impacts which will have individually limited, but cumulatively considerable impact. A final EIR must be prepared which gives thoughtful discussion to dealing with short-term versus long term effects.

### **Response to Comment No. 16-36**

In accordance with Section 15126.2(d) of the CEQA Guidelines, a detailed discussion of potential growth-inducing impacts of the Project is provided in Section VI, Other Environmental Considerations, of the Draft Supplemental EIR. As discussed in Section VI, Other CEQA Considerations, of the Draft Supplemental EIR, the Project’s population, housing, and employment generation would be well within SCAG’s respective projections for the SCAG Region and the City of Los Angeles. As such, the Project would not cause an exceedance of SCAG’s population, housing, or employment projections, nor would it induce substantial indirect population or housing growth related to Project-generated employment opportunities. Overall, the Project would be consistent with the growth forecast for the SCAG Region and the City of Los Angeles, and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled and proximity to public transit options, including the Warner Center Transit Hub, which is directly serviced by five Metro local lines, one Metro Rapid line, one Antelope Valley Transit Authority line, one Santa Clarita Transit Line, and beginning June 2018, a new Warner Center circulator connecting to the Metro Orange Line, which will maintain comparable service frequency to the Metro Orange Line currently provided at the Project Site. Therefore, the Draft Supplemental EIR found that growth-inducing impacts would be less than significant.

### **Comment No. 16-37**

## **XVII. 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. You should be aware of this requirement in the preparation of the final EIR. Pub. Res. Code Seqs. 21002 and 21002.1(b) affirmatively mandate that public agencies take concrete actions to protect the environment “whenever it is feasible to do so.” This substantive duty is enforced through the findings requirements of Seq. 21081 and Guidelines Sec.15091. [sic] These sections require a public agency to make detailed findings regarding the feasibility of all environmentally superior alternatives or additional mitigation measures available prior to approving any project which may cause significant impacts on the environment. See Village Laguna of Laguna Beach, Inc. v. Board of Supervisors (1982) 134 Cal.App.3d 1022, 1034–1035, 185 Cal.Rptr. 41.

Where the project, as approved, will result in significant environmental impacts, the agency must make the finding, pursuant to Seq. 21081(c) [Guidelines Sec. 15091(a)(3)] that each environmentally superior alternative to the project proposed in the EIR but rejected by the agency is “infeasible” for specific economic, social, technical or other reasons. Village Laguna, 134 Cal.App.3d 1022, 1034. The [sic] findings must also expressly identify the “specific economic, social or other considerations” relied upon by the agency in determining that the alternative is infeasible. Id. at 1034–1036. 16 Each [sic] 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. 16-37**

In accordance with CEQA, an analysis of Project alternatives was provided in Section V, Alternatives, of the Draft Supplemental EIR. The Draft Supplemental EIR analyzed five alternatives including the No Project/No Build Alternative, the No Project/Base Maximum Development in Accordance with the Warner Center Plan Alternative, the Reduced Density Alternative, the Studio Mixed-Use Development Alternative, and the Reduced Entertainment and Sports Center Seating Alternative. In addition, an environmentally superior alternative was identified and analysis was provided in accordance with Section 15126.6(e)(2) of the CEQA Guidelines. In addition to providing a comparative analysis of the impacts of the alternative with those of the Project, a

discussion of the consistency of the alternative with the Project objectives was also provided. As discussed in Section V, Alternatives, Alternative 4, the Studio Mixed-Use Development Alternative, would be the Environmentally Superior Alternative.

Should the Project be approved, the City will make the required findings for the Project, prior to such approval, as set forth by CEQA Guidelines Section 15091 and Public Resources Code Section 21081.

### **Comment No. 16-38**

#### **XVIII. ALCOHOLIC BEVERAGE LICENSE REQUIREMENTS**

The need for a Conditional Use Permit (CUP) related to the operation of the restaurants must be addressed in the final EIR. In *Friends of Mammoth v. Board of Supervisors of Mono County* (1972) 8Cal.3d 247, 262, the Supreme Court held the term “project” included not only government-initiated actions, but also “permits, leases, and other entitlements.” This was codified under CEQA in Section 21065. The [sic] final EIR should explore the permits, liquor licenses and other entitlements related to restaurant operations. Since 1939 the number of retail liquor licenses has been limited. At present, the ratio is one on-sale general license for each 2,000 persons [sic] in the county, and one off-sale general license for each 2,500 [sic] persons. (See Business and Professions Code, Sec. 23000, et. Seq.) The final EIR should analyze this issue and report on the number of Conditional Use Permits in the area, and whether ABC limits have been reached or exceeded. Failure to address this matter in the final EIR may mean that a CUP may not be granted later.

### **Response to Comment No. 16-38**

The Project’s Master Conditional Use Permit (“Master CUP”) request is described in Section II, Project Description, and Section IV.G, Land Use, of the Draft Supplemental EIR.<sup>44</sup> The Applicant seeks a Master CUP for alcohol sales for on-site consumption in connection with the Project’s residential buildings, restaurants, hotels, and Entertainment and Sports Center, and off-site consumption for a grocery store and pharmacy. The decision maker will evaluate and determine whether the request will adversely affect the welfare of the pertinent community, result in or contribute to an undue concentration, and that the request will not detrimentally affect nearby residentially zoned communities as required under LAMC Section 12.24.W.1. In addition, Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, includes a number of project design features related to the provision of private security at the Project Site that will reduce reliance on public police protection services and ensure that alcohol sales and

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<sup>44</sup> Also note that the application is publicly available on file with the Department of City Planning.

consumption pursuant to the Master CUP do not result in public nuisance. Project Design Feature J.1-2 requires the preparation of a Security Plan specific to the Entertainment and Sports Center, which shall be developed and implemented in consultation with LAPD and LAFD, and Project Design Feature J.1-7 requires the preparation of an enhanced security plan for the entire Project Site. The information contained in the Project's Draft Supplemental EIR and application materials will be considered by the decision-maker in determining whether to approve the Master CUP request.

### **Comment No. 16-39**

#### **XIX. PUBLIC CONTROVERSY SURROUNDING PROJECT**

There has been much public controversy surrounding this project. Community organizations have held meetings objecting to the scope of the project. Numerous articles have appeared in print in which community members have voiced opposition to the project. The draft DSEIR is silent on this controversy. The public outcry against the project and the local concern expressed about its environmental impacts were not reported in the draft DSEIR. In fact, the draft DSEIR only includes the written comments in response to the Notice of Preparation. The final EIR should include copies of all letters, written comments, and objections raised by elected officials to the size and scope of the project, which led up to the EIR. It should also include all letters, and a summary of public comment regarding the issuance of the Mitigated Negative Declaration.

### **Response to Comment No. 16-39**

The Draft Supplemental EIR acknowledges areas of controversy in Section I, Executive Summary, which notes that potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant unavoidable impact has been identified, as well as other issues of concern. All comments submitted by the public on the Project's Draft Supplemental EIR, along with responses to those comments, have been included in the Final Supplemental EIR. In addition, comments submitted as part of the NOP comment period are included as Appendix A, of the Draft Supplemental EIR. Any other comments submitted to the Department of City Planning are included in the related case files for review and consideration by the decision-makers prior to any action on the Project. Note that the environmental document under consideration for this Project is a Supplemental EIR, and as such, there has been no issuance of a Mitigated Negative Declaration for the Project.

**Comment No. 16-40**

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 to afford 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 DEIR, 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.

**Response to Comment No. 16-40**

The approvals required for development of the Project are described in Section II, Project Description, and Section IV.G., Land Use, of the Draft Supplemental EIR. As explained therein, the Project’s approvals include discretionary actions. The Draft Supplemental EIR concludes that the Project would result in significant environmental impacts. As such, prior to any Project approval, a Statement of Overriding Considerations will be prepared in accordance with the CEQA Guidelines and the Public Resources Code, for consideration by the decision-makers prior to any action on the Project.

**Comment No. 16-41**

We appreciate your allowing us the opportunity to comment on the draft DSEIR. We look forward to receiving a detailed and comprehensive final EIR, fully in compliance with CEQA, State and local Guidelines.

**Response to Comment No. 16-41**

The Draft Supplemental EIR has been completed in full compliance with CEQA.

**Comment Letter No. 17**

Kathryn S. Schloessman  
President  
Los Angeles Sports & Entertainment Commission  
633 W. Fifth St., Ste. 1800  
Los Angeles, CA 90071-2087

**Comment No. 17-1**

The Los Angeles Sports & Entertainment Commission (LASEC) is excited about the proposed Westfield Promenade 2035 project and their plans to create an entertainment and sports venue in the heart of the San Fernando Valley.

The West Valley has been lacking a proper sports and entertainment center for far too long. The proposed venue would be a tremendous addition and meet pent-up demand by area residents but more importantly to us, offer us another attractive venue for the major sports and entertainment events we are trying to attract.

Westfield's plan is to have an attractive, multi-use design with flexible seating to accommodate smaller and larger audiences and, therefore, would increase its appeal to these major events, who also host smaller events as part of their programs. The venue's location will also help ensure a hub of activity and a downtown feel with residences, restaurants and shops all within walking distance and more importantly, allows us to increase awareness of these events throughout the City. Further reach is very desirable to these events.

Our goal is to bring major sports and entertainment events to Los Angeles that have a significant impact on the local economy and continue to spotlight Los Angeles as the sports and entertainment capital of the world. This venue helps support our efforts.

Westfield shares LASEC's commitment to seek, host, promote and retain major sporting and entertainment events that positively impact the local economy by attracting visitors to the city. We urge decision-makers to approve this most important project.

**Response to Comment No. 17-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 18**

Auza Rosenberg  
Manager  
Board and Office Administration  
Los Angeles Tourism & Convention Board  
633 W. Fifth St, Ste. 1800  
Los Angeles, CA 90071-2087

Ernest Wooden Jr.  
President and CEO  
Los Angeles Tourism & Convention Board  
633 W. Fifth St, Ste. 1800  
Los Angeles, CA 90071-2087

**Comment No. 18-1**

Please see the attached letter of support for Westfield's Promenade 2035 project from Los Angeles Tourism.

The Los Angeles Tourism & Convention Board enthusiastically supports Westfield's Promenade 2035 project.

Replacing the Promenade mall with a new mixed-use development that includes hotels, shops, restaurants and an entertainment and sports venue is a clever idea that will further enhance the city's reputation as a premier destination for leisure travel, meetings and conventions.

As you are aware, tourism is one of the largest industries in L.A. County, generating important tax revenues for vital public services. A key economic development tool, tourism sparks investment in hospitality infrastructure and attractions, supports hundreds of thousands of area jobs and enhances the overall quality of life for residents and their local community.

The San Fernando Valley is sorely lacking in hotels and entertainment, and the Promenade project will certainly help put the Warner Center on the map among tourists and residents. A suitable entertainment and sports center is long overdue and will be a focal point for concerts, sporting events and live performances.

The venue will encourage hotel stays, shopping and dining in the area, and Promenade's attractively designed "activity nodes" and public open space will further allow visitors to linger and invest more time in the area.

The city will benefit in numerous ways from this project. We urge your support. Doing so will advance the prosperity of L.A.'s tourism economy and the livelihoods that depend on it.

**Response to Comment No. 18-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 19**

Rebecca L. Morales  
r1m@m-consultants.net

Ron Miller  
Executive Secretary  
Los Angeles/Orange County Building and Construction Trades Council  
1626 Beverly Blvd.  
Los Angeles, CA 90026-5784

**Comment No. 19-1**

Please see the attached comment letters on the Promenade 2035 ENV-2016-39-9-EIR from the following organizations:

- Southern California Pipe Trades District Council 16
- CREED LA
- Los Angeles and Orange County Building Trades Council

Attachment: Promenade Support Letter-Southern California Pipe Trades.pdf

Attachment: Promenade Support Letter-Southern California Pipe Trades.pdf

Attachment: PROM\_EIR\_Letter.pdf

On behalf of the Los Angeles and Orange County Building and Construction Trades Council I am writing to express our strong support for the Promenade 2035 project.

In my role as Executive Secretary, I work closely with developers that build projects throughout the region to ensure that they have an appropriately trained, local, workforce to build their projects. Our organization represents more than 140,000 skilled and trained women and men that have a long history of working throughout Los Angeles and specifically in the Warner Center community.

Westfields [sic] Promenade 2035 project will help to revitalize the Warner Center by transforming the 34-acre [sic] promenade site into a new lifestyle center with 150,000 square feet of creative office space, 470,000 square feet of Class A office, and 60,000 square feet of work/live space. The project will create more than 12,500 good-paying full

time and part time jobs during construction and generate nearly \$2 billion in economic output. After completion, the project will create more than 7,900 total good-paying full-and part-time jobs and generate nearly \$12 million in net new annual revenues to the City's General Fund.

The Los Angeles and Orange County Building and Construction Trades Council enthusiastically supports this project and ask for the City Council's approval to keep our union brothers and sisters working.

**Response to Comment No. 19-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 20**

Carolyn Uhri  
President  
San Fernando Valley Arts & Cultural Center  
18312 Oxnard St.  
Tarzana, CA 91356-1502

**Comment No. 20-1**

Attached is a letter of support from the San Fernando Valley Arts & Cultural Center for the Westfield Promenade project.

The San Fernando Valley Arts & Cultural Center supports Westfield's plans to redevelop the Promenade property in Warner Center. We believe the Promenade 2035 project will significantly benefit the area, and we are particularly excited about the company's proposal to create an entertainment and sports venue.

The SFVAA advocates art and culture through exhibitions, education, music and theater. Westfield's proposed venue would support our commitment of promoting visual and performing arts by Valley-based artists, providing a cultural hub for our community and enriching the lives of artists and others.

The entertainment and sports venue would go a long way in creating a rich, artistic legacy in the San Fernando Valley. This would most definitely enhance the lives of people who work, live and enjoy leisure activities in the area.

We're pleased that the Draft Environmental Impact Report thoroughly analyzed the center in such areas as noise, traffic, lighting and parking and addressed its impacts through sound and design features and an event management plan.

We look forward to this project, staying involved, working with Westfield as the project progresses, and seeing our community further enhanced.

**Response to Comment No. 20-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

## **Comment Letter No. 21**

Rebecca L. Morales  
r1m@m-consultants.net

Mike Layton  
Business Manager  
Southern California Pipe Trades District Council 16  
501 Shatto Pl., Ste. 400  
Los Angeles, CA 90020-1748

### **Comment No. 21-1**

Please see the attached comment letters on the Promenade 2035 ENV-2016-39-9-EIR [sic] from the following organizations:

- Southern California Pipe Trades District Council 16
- CREED LA
- Los Angeles and Orange County Building Trades Council

Attachment: Promenade Support Letter-Southern California Pipe Trades.pdf

Attachment: Promenade Support Letter-Southern California Pipe Trades.pdf

Attachment: PROM\_EIR\_Letter.pdf

On behalf of the Southern California Pipe Trades District Council 16, I am writing to express our strong support for the Promenade 2035 project.

The District Council 16 represents 13 local unions in Southern California. We are members of the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada. Our members deliver the highest level of craftsmanship in the industry and have a long history of working throughout Los Angeles.

It is important to our Council to support projects throughout the region, like Westfield's Promenade 2035, where the developer has made commitments to ensure local hiring and support local workforce training and development.

Westfields [sic] Promenade 2035 project will help to revitalize the Warner Center by creating jobs and generating additional tax revenue to fund critical city services. The project will create more than 12,500 good-paying full time and part time jobs during construction and generate nearly \$2 billion in economic output. After completion, the project will create more than 7,900 total good-paying full- and part-time jobs and generate nearly millions in net new annual revenues to the City's General Fund.

Southern California Pipe Trades District Council 16 enthusiastically supports this project and ask and respectfully requests your approval to keep our union brothers and sisters working.

#### **Response to Comment No. 21-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 21-2**

On behalf of the Southern California Pipe Trades District Council 16, I am writing to express our strong support for the Promenade 2035 project.

The District Council 16 represents 13 local unions in Southern California. We are members of the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada. Our members deliver the highest level of craftsmanship in the industry and have a long history of working throughout Los Angeles.

It is important to our Council to support projects throughout the region, like Westfield's Promenade 2035, where the developer has made commitments to ensure local hiring and support local workforce training and development.

Westfields [sic] Promenade 2035 project will help to revitalize the Warner Center by creating jobs and generating additional tax revenue to fund critical city services. The project will create more than 12,500 good-paying full time and part time jobs during construction and generate nearly \$2 billion in economic output. After completion, the project will create more than 7,900 total good-paying full- and part-time jobs and generate nearly millions in net new annual revenues to the City's General Fund.

Southern California Pipe Trades District Council 16 enthusiastically supports this project and ask and respectfully requests your approval to keep our union brothers and sisters working.

**Response to Comment No. 21-2**

This comment is a duplicate of Comment No. 21-1, above. No further response is required.

**Comment Letter No. 22**

Angela Taslakian  
The Valley Economic Alliance  
5121 Van Nuys Blvd., Ste. 200  
Sherman Oaks, CA 91403-1497

Kenn Phillips  
President & CEO  
The Valley Economic Alliance  
5121 Van Nuys Blvd., Ste. 200  
Sherman Oaks, CA 91403-1497

**Comment No. 22-1**

Attached please find a letter on behalf of Kenn Phillips and The Valley Economic Alliance regarding The Promenade 2035 project.

The Valley Economic Alliance (TVEA) wholeheartedly supports the Westfield Promenade 2035 project as it will help elevate the economic vitality and stability of the San Fernando Valley and its residents.

Repurposing the old Promenade mall into an innovative, new green urban center is a smart idea that will generate thousands of new jobs for years to come and offer much needed amenities in the Warner Center. With new options for living, working, shopping and entertainment in the area, people won't have to trek great distances to find them, which greatly affects quality of life.

Furthermore, the project will provide a significant boost to the local economy and to city tax revenues that support public services. Importantly, it will also offer approximately 1,400 residential units; this is a positive step that will help to address the city's current housing crisis.

We're pleased to hear that after carefully analyzing a wide range of issues, including traffic and noise, the Draft Environmental Impact Report found no significant reason why this project shouldn't move forward.

By all accounts, Westfield Promenade is a win-win. We applaud the company for its investment in the area and in the community and look forward to the Promenade's economic benefits and job growth. TVEA urges you to allow this important project to move forward.

**Response to Comment No. 22-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 23**

Johntommy Rosas  
Tongva Ancestral Territorial Tribal Nation  
tattnlaw@gmail.com

**Comment No. 23-1**

TATTN is responding to the defective mitigation and the process on the above cited proposed project - [sic] We are concerned with the City of L A 's [sic] insufficient /defective tribal consultation - [sic] as Chairman Salas/Admin Brandy Salas commented and cited TATTN for the admin record supports their expressed concerns and TATTN is requesting a reconsideration of CLA Planning dept's determinations- [sic] to resolve the defective issues as expressed - [sic]

TATTN also objects to the defective tribal Consultation process including the premature "conclusion" unilaterally decided by you or your office - [sic] TATTN is requesting the TC continue until the remaining issues are resolved and because TATTN was not notified of this project - [sic] CLA is very inconsistent on the notice we do get and dont, [sic] so please make sure we get all the notices for all your projects- [sic]

Please send us the DSEIR. by link or file - [sic] Please feel free to contact us directly - [sic]

TATTN requests that you respond promptly in a timely manner - [sic]

Thank you for your attention to this matter - [sic]

**Response to Comment No. 23-1**

Refer to Response to Comment No. 13-1, above, for a discussion regarding the City's consultation process in compliance with AB 52. As discussed therein, the Gabrieleño Band of Mission Indians—Kizh Nation, was the only tribal representative that responded with a written request for consultation in response during the 30-day project notification conducted by the City of Los Angeles Department of City Planning. Subsequent to the publication of the Draft Supplemental EIR, the City updated its tribal cultural resources mitigation measure. As such, Mitigation Measure L-1 has been updated to reflect this updated mitigation measure. See Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR.

**Comment Letter No. 24**

Roger Pugliese  
Topanga Association for a Scenic Community  
P.O. Box 352  
Topanga, CA 90290-0352

Stacy Sledge  
Topanga Town Council  
P.O. Box 1085  
Topanga, CA 90290-1085

Ron Fomalont  
Topanga Chamber of Commerce  
101 S. Topanga Canyon Blvd., #185  
Topanga, CA 90290-2005

Carrie Carrier  
Topanga Creek Watershed Committee  
21936 Canon Dr.  
Topanga, CA 90290-4335

**Comment No. 24-1**

Please see the letter we sent to Councilman Blumenfelds [sic] office care of Michael Owens. We are requesting an extension [sic] to review the SEIR of Promenade 2030. [sic]

The Topanga Association for a Scenic Community, Topanga Town Council, Topanga Chamber of Commerce and the Topanga Creek Watershed Committee are requesting an extension of the review period of the SEIR for the massive Westfield Development project.

Our community, as well as others in the Santa Monica Mountains, have not been given enough time to adequately address all of the significant impacts this major project will bring.

There needs to be a thorough vetting of these issues and, due to their workload, our experts need more time.

Please get back to us as soon as possible with your response.

**Response to Comment No. 24-1**

The Department of City Planning extended the Draft Supplemental EIR comment period by 45 days, until 4:00 P.M. on Thursday July 26, 2018, for a total comment period of 92 days, as shown in Appendix FSEIR-4. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 25**

Roger Pugliese  
Chairperson  
Topanga Association for a Scenic Community  
P.O. Box 352  
Topanga, CA 90290-0352

**Comment No. 25-1**

Attached you will find our comments in regards to the Draft SEIR  
To [sic] be put into the record.  
Environmental Case No: ENV-2016-3909-EIR  
Promenade [sic] 2035

Our organization the TOPANGA ASSOCIATION FOR A SCENIC COMMUNITY represents over 200 residents living in Topanga Canyon in the Santa Monica Mountains. Our organization has been involved in every land use battle in Topanga since 1963.

**Response to Comment No. 25-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 25-2**

We have had the opportunity to review the above mentioned draft SEIR with an emphasis on the traffic studies. We are concerned that the traffic impacts to our community have not been considered nor addressed. We believe the SEIR traffic study is inadequate for the following reasons:

A. Proposed Project Traffic Impacts to Topanga Canyon

The entire town of Topanga has only one primary artery—Topanga Canyon Blvd. There are no alternative routes, so every commuter, every concert/sporting event attendee, and every shopper further clogs an already over-burdened highway, making the road more congested and hazardous for residents and our children. In 2008, a traffic study showed that over 18,000 cars per day traverse our canyon road, which has only increased in recent years.

Furthermore, Topanga Canyon Blvd is the first State highway west of the 405 freeway to connect Woodland Hills with the Pacific Coast Highway. As such, the proposed project will increase traffic substantially on Topanga Canyon Blvd. We have not seen nor has any traffic Study been done by Caltrans or the LA County Dept of Public Works. We are requesting that a full study be done before any approvals be given.

### **Response to Comment No. 25-2**

It is unclear which traffic study from 2008 references “over 18,000 cars per day traverse our canyon road.” A review of 2008 Caltrans traffic volume data (accessed from <http://www.dot.ca.gov/trafficops/census/>) indicates that approximately 16,500 daily vehicles travelled along Topanga Canyon Boulevard, south of Mulholland Drive; this is lower than the volume identified by the commenter. Review of Caltrans traffic volume data from 2016 (the most recent available data) indicates a total daily volume of approximately 14,700 daily vehicles along Topanga Canyon Boulevard, south of Mulholland Drive. This represents a general decline in traffic volume through this portion of Topanga Canyon Boulevard.

The Traffic Study analyzed a Study Area which included 49 intersections with the greatest potential to experience significant traffic impacts due to the Project. This Study Area was developed in consultation with both LADOT and Caltrans. Intersections at the periphery of the Project’s Study Area were determined not to have significant impacts as a result of the addition of Project traffic. Therefore, the intersections beyond the Study Area would not experience significant impacts, given that Project traffic dissipates farther from the Project Site, and the intersections within the community of Topanga would not be significantly impacted by the Project.

To identify the Project’s contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project’s proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project’s impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project’s financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate

impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an Entertainment and Sports Center (ESC) event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

### **Comment No. 25-3**

Some primary concerns are:

- Westfield's proposed expanded center will increase daily traffic by the multiples of thousands on Topanga Canyon Blvd, which is already overloaded.
- The 15,000 seat arena, in particular, will draw people from the west side, not only increasing the number of cars on the road, but likely having drivers under the influence and/or smoking who will be navigating an unfamiliar, winding road as they return home.
- Traffic violations increase in direct correlation to the number of cars on the road. Most violations in Topanga are due to driving at unsafe speeds and DUI's. [sic] Many times, wildfires and death are the result.

### **Response to Comment No. 25-3**

Refer to Topical Response No. 3, Traffic and Parking, above, for a summary of the Project's traffic analysis and impacts. Refer to Topical Response No. 2, Entertainment and Sports Center, for a summary of the traffic analysis associated with the Entertainment and Sports Center. In addition, as discussed in Topical Response No. 2, Entertainment and Sports Center, the Project would include crowd management and control through implementation of Project Design Features J-1 through J.1-5, as provided in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR. The remainder of this comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 25-4**

Increased traffic will lead to the following impacts to Topanga:

1. Increased fire risks. The threat of wildfire is so great in Topanga, and escape time so narrow, that Topanga Canyon conducts periodic fire safety meetings with LA County Fire personnel to remind residents to be vigilant in fire safety. Commuters traveling through Topanga Canyon to a stadium are most likely unaware of the extreme fire dangers that are caused by a simple cigarette butt.
2. More congestion, longer travel times.
3. Trash along Topanga Canyon Blvd, which is also hazardous to the creek and animals.
4. Increased sound. This is especially problematic at night after an event—include in the proposed Traffic study a sound test must be included.
5. Reduced air quality, as exhaust pollution gets trapped between the mountains.
6. Ingress and egress problems with County neighborhood streets flowing onto Topanga Canyon Blvd.
7. Increased risk to wildlife crossing along Topanga Canyon Blvd.

**Response to Comment No. 25-4**

It is noted that the comment references portions of the County of Los Angeles not within the Project's study area. Refer to Sections IV.B, Air Quality; IV.E, Hazards and Hazardous Materials; IV.H, Noise; IV.J.2, Public Services—Fire Protection; and IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR regarding the analysis of potential impacts associated for each environmental topic. Refer to Topical Response No. 2, Entertainment and Sports Center, for a summary of the noise analysis conducted for the Entertainment and Sports Center. In particular, with regard to fire risks, as discussed in the Initial Study, provided in Appendix A, of the Draft Supplemental EIR, there are no wildlands located in the vicinity of the Project Site. Furthermore, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.<sup>45</sup> Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. The commenter's concern regarding increased risk to wildlife

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<sup>45</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed August 2, 2016. The VHFHSZ was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

crossing along Topanga Canyon Boulevard is outside of the purview of CEQA as the habitat where wildlife would live is not within the Study Area of the Project Site, but is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 25-5**

B. The SEIR is incomplete and inadequate with examples below

The SEIR completely fails to take into account the impact that the proposed project will have on Topanga. In fact, Topanga Canyon was not even mentioned as an area of study in the SEIR. This is extremely concerning for the following reasons:

1. On p. IV.K-17, the SEIR states that 47 intersections were analyzed for the proposed project. Yet none of those 47 intersections were located in Topanga Canyon, which is a glaring omission.

**Response to Comment No. 25-5**

As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, a traffic impact analysis was prepared for both the City of Los Angeles and Caltrans. The Study Area analysis was developed and approved in consultation with LADOT and Caltrans for their respective facilities. Contrary to the commenter's statement, the Study Area included intersections located along Topanga Canyon Boulevard, including 11 intersections analyzed under LADOT criteria and 20 intersections under Caltrans methodology. Intersections at the periphery of the Project's Study Area were determined not to have significant impacts as a result of the addition of Project traffic. Therefore, the intersections beyond the Study Area would not experience significant impacts, given that Project traffic dissipates farther from the Project Site, and the intersections within the community of Topanga would not be significantly impacted by the Project.

According to LADOT criteria, the Traffic Study determined that the Project would have less than significant impacts at all of the Topanga Canyon Boulevard intersections after implementation of the project design features and Warner Center Mitigation Program, discussed further in Topical Response No. 3, Traffic and Parking.

The comment incorrectly states that 47 intersections were analyzed in the Traffic Study. As discussed in in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project's Traffic Study analyzed 49 intersections within the Study Area, of which 47 coincide with the analysis conducted by the Warner Center Plan EIR. The Project's Traffic Study also tiers off of the Warner Center Plan EIR, which analyzed 152 intersections.



**Comment No. 25-6**

2. Of the 47 intersections analyzed, 4 were determined to operate at LOS E or worse, which is defined as POOR and indicates long lines of waiting traffic. One of these 4 LOS E intersections is the intersection of Topanga Canyon Blvd and Ventura Blvd. As a point of reference, virtually every vehicle that travels north on Topanga Canyon Blvd, including residents of Topanga, already must encounter that intersection at TCB and Ventura Blvds. The fact that this intersection has already been determined to have the very POOREST conditions indicates that there is an existing major problem. The proposed project will increase traffic immensely at this already problematic intersection. This is unacceptable to residents of Topanga, and must be addressed.

**Response to Comment No. 25-6**

As noted above in Response to Comment No. 25-5, a total of 49 intersections were analyzed in the Project's Traffic Study. This comment indicates that 4 intersections operate at LOS E or F; this is a reference to Table IV.K-8, a summary of the existing conditions analysis. While the existing conditions indicate LOS E operation at the intersection of Topanga Canyon Boulevard and Ventura Boulevard, the full buildout of the Project with project design features and full implementation of the Warner Center Mitigation Program is projected to improve operations at these intersections to LOS D and E, respectively, with and without a sold out Entertainment and Sports Center event, respectively. As discussed in Topical Response No. 3, Traffic and Parking, above, through implementation of Mitigation Measure K-2 the Project would be required by LADOT to mitigate impacts by phase through: (1) the physical roadway and streetscape mitigation measure improvements as outlined in Appendix E, of the Warner Center Plan; (2) payment of the Mobility Fee in-lieu of any physical improvements; or (3) the combination of both the mitigation measures outlined in Appendix E, of the Warner Center Plan and the payment of the Mobility Fee. Payment of the Mobility Fee would be utilized towards the implementation of the Warner Center Mitigation Program. Warner Center Mitigation Measure TR-45 identifies a specific improvement at this location (the addition of additional eastbound left-turn, southbound left-turn, southbound right-turn, and westbound right-turn lanes), which will be implemented by the Warner Center Mitigation Program. Consistent with the Warner Center Plan EIR, this improvement is anticipated to mitigate significant impacts at this location to less than significant levels. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

**Comment No. 25-7**

3. Even worse, on p. IV.K-78, the SEIR studied the 47 intersections under the category “Existing with Full Promenade (Including ESC) Plus EMP”. This study determined that 2 of the 47 intersections received the absolute worst rating, which is LOS F. The definition of LOS F = FAILURE. Incredibly, both of these 2 FAILURE intersections are 2 intersections in which Topangans are directly impacted, including the intersection of TCB and Ventura Blvd.

**Response to Comment No. 25-7**

This comment references Table IV.K-8 of the Draft Supplemental EIR, which indicates that two intersections are projected to operate at LOS F under the “Existing with Full Promenade (Including ESC) Plus EMP” conditions, including Topanga Canyon Boulevard and Ventura Boulevard. The table further identifies whether the analyzed intersections are: impacted under Warner Center Plan EIR “2035 with Project”; mitigation measures in the Warner Center Mitigation Program are available; and if impacted under Warner Center Plan EIR 2035 with Project with Mitigation. Although Topanga Canyon Boulevard and Ventura Boulevard is potentially impacted under the specific operating conditions summarized in Table IV.K-8, a mitigation measure for this intersection is identified as part of the Warner Center Mitigation Program. Therefore, upon implementation of this mitigation measure, impacts at this intersection would be reduced to less than significant levels.

While the “Existing with Full Promenade (Including ESC) Plus EMP” is provided, the full Project is not proposed to be constructed until 2033 and the Future with Project conditions summarized in Table IV.K-10 is the more relevant reference to assess traffic impacts.

**Comment No. 25-8**

4. Mitigation: Throughout the SEIR, there are mentions of mitigation. Yet nowhere in the SEIR does it state any specific mitigations when it comes to the problematic intersection of TCB and Ventura Blvds. There is also no mention of any impact to Topanga traffic, much less any possible mitigation.

**Response to Comment No. 25-8**

Refer to Response to Comment No. 25-5 for a discussion of the intersections on Topanga Canyon Boulevard that were analyzed in the Traffic Study. The Warner Center Mitigation Program has identified a mitigation measure for the intersection of Topanga Canyon Boulevard and Ventura Boulevard (see Warner Center Plan Mitigation Measure TR-45). To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center

Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking for further details regarding the Warner Center Plan Implementation Board. Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion of the Project's proposed mitigation measures and the implementation process.

### **Comment No. 25-9**

We believe that the traffic portion of the SEIR is inadequate. We ask that you incorporate the impacts that the proposed project will have on the 8000 residents of Topanga Canyon.

### **Response to Comment No. 25-9**

Refer to Topical Response No. 3, Traffic and Parking, above, for a summary of the traffic impact analyses prepared for LADOT and Caltrans. Refer to Response to Comment No. 25-5 for a discussion of the intersections on Topanga Canyon Boulevard that were analyzed in the Traffic Study based on LADOT criteria. At the study area boundary, the intersections of Topanga Canyon Boulevard & Martinez Street (Intersection No. 48) and Topanga Canyon Boulevard & Mulholland Drive (Intersection No. 49) are not projected to result in significant impacts with the addition of Project traffic, project design features, and implementation of Warner Center Mitigation Program; this finding is also consistent with the Warner Center Plan EIR analysis. As the community of Topanga is located beyond the study area, significant impacts are not anticipated.

**Comment Letter No. 26**

Marian E. Jocz  
Executive Director  
United Chambers of Commerce of the San Fernando Valley  
5121 Van Nuys Blvd., #203  
Sherman Oaks, CA 91403-6122

**Comment No. 26-1**

Please find attached a letter of support for the Westfield Promenade Project.

If you have any questions or concerns please give me a call.

Thank you for your time.

The United Chambers of Commerce has long been committed to promoting the San Fernando Valley's overall welfare, progress and economic prosperity. We are dedicated to encouraging community investments that will improve the quality of life for area residents and provide a boost to our local economy. That's why we fully support the Westfield Promenade 2035 project.

The project will go a long way towards transforming the valley into an attractive downtown live/work/play community, generating new residences, creative work spaces, public gathering areas and more leisure and entertainment opportunities. We're particularly pleased that the project will create thousands of jobs—more than 12,500 full- and part-time jobs during construction and another 8,000 jobs at full completion.

Developments that can generate more than \$3.5 billion in economic output—with an expected gain of \$12 million annually in net new revenues to the city—don't come along very often, and it's gratifying that Westfield has chosen the valley to make this unprecedented investment.

We endorsed this project before the release of the Draft Environmental Impact Report (DEIR) and the report's findings solidify our support.

The company has already brought new excitement to the area with its remodeled Westfield Topanga and the Village. We look forward to partnering with Westfield on the Promenade project and offering our support to ensure it becomes a reality.

**Response to Comment No. 26-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 27**

Casey Maddren  
President  
United Neighborhoods for Los Angeles  
2141 Cahuenga Blvd., Apt. 17  
Los Angeles, CA 90068-2781

**Comment No. 27-1**

United Neighborhoods for Los Angeles (UN4LA) has reviewed the EIR for the proposed Promenade 2035 project. Upon examining the EIR, we must say we were surprised that crucial questions have not been addressed, and important information has been omitted. When considering a project of this size, which will have significant impacts not just on the surrounding community but on the entire West Valley, it is crucial that the Department of City Planning demand a thorough environmental assessment. The EIR that has been prepared by the developers' consultant falls short in many ways, and should not be approved in its current form.

Our comments follow.

**Response to Comment No. 27-1**

The Draft Supplemental EIR has been prepared by the City of Los Angeles (not the Applicant) in full compliance with CEQA and reflects the independent judgement of the Lead Agency. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 27-2****1. Noise**

The EIR contains an extensive technical discussion of noise impacts to the community, but ignores common sense. If the roof of the Entertainment and Sports Center is left open, sound from concerts and other events will inevitably be heard by the surrounding community. The author's claims regarding decibel levels and sound system design are familiar, sounding very much like language included in environmental assessments for projects in the Hollywood area. Yet in spite of repeated promises that mitigation measures will render impacts less than significant, noise from live events is still an ongoing problem in the Hollywood area.

**Response to Comment No. 27-2**

Refer to Topical Response No. 2, Entertainment and Sports Center, for a summary of the detailed noise impact analysis that was conducted to evaluate potential noise impacts associated with the Entertainment and Sports Center. As explained in Section IV.H, Noise, of the Draft Supplemental EIR, to represent a conservative analysis, the noise analysis for the Entertainment and Sports Center was evaluated based on a partial roof option. In addition, the sound levels for the Entertainment and Sports Center amplified sound system that were used in the noise analysis are based on actual measurements of sound levels from a similar music concert, as described on page IV.H-53 of the Draft Supplemental EIR. Furthermore, as specified by Project Design Feature H-5, the proposed amplified sound system for the Entertainment and Sports Center would be limited to generating a sound level of approximately 95 dBA ( $L_{eq}$ ) at a distance of 130 feet from the loudspeaker system. Additionally, a site specific sound propagation test was conducted to establish the site specific acoustics propagation from the Project Site to the residential community to the southwest, and to validate the output of the Project site-specific 3-dimensional computer noise prediction model. As presented on page IV.H-22 of the Draft Supplemental EIR, the measured noise levels from the sound propagation test are actually lower than the results from the Project site-specific 3-dimensional computer noise model. As such, the Project noise analysis is accurate and conservative (i.e., noise levels should be even lower than the estimated levels shown in the Draft Supplemental EIR). As demonstrated from the analysis included in Section IV.H, Noise, of the Draft Supplemental EIR, noise levels associated with use of the Entertainment and Sports Center, with the partial roof option, would be less than significant.

**Comment No. 27-3**

Rather than addressing the problem in the planning stage, the DCP continues to leave it to an understaffed and overworked LAPD to try to rein in operators who are more concerned about making money than the well-being of the community.

**Response to Comment No. 27-3**

Refer to Topical Response No. 5, Public Services, above, for a summary of the Project's impacts on police protection services. As discussed above, the Project would include private on-site security for both the Entertainment and Sports Center and the entire Project Site. The Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site and potential impacts associated with police protection would be less than significant.

**Comment No. 27-4**

If the Entertainment and Sports Center is to be built, it needs to be constructed with a fixed roof to suppress noise from events. Period.

**Response to Comment No. 27-4**

This comment does not raise an issue specific to the Draft Supplemental EIR. As discussed in Response to Comment No. 27-2, above, under the partial roof scenario, the Entertainment and Sports Center would not result in significant impacts related to noise during operation of the Project. Nonetheless, this comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 27-5****2. Public Services**

The EIR's analysis of impacts to public services is incomplete and seriously flawed. Under Analysis of Project Impacts it states, "The Warner Center Plan EIR included mitigation measures to reduce these potential impacts to a less-than-significant level." The EIR then lists these measures as though they would completely address any issues. **However, the Warner Center Plan did not include any provision for an entertainment/sports center, and this is a special use that will have significant adverse impacts. The mitigation measures from the Warner Center Plan do not begin to address these impacts.**

**Response to Comment No. 27-5**

While the Draft Supplemental EIR does include implementation of mitigation measures from the Warner Center Plan EIR for various public services, including police protection, fire protection, schools, parks and recreation, and libraries, the Draft Supplemental EIR also includes project design features that address implementation of the Entertainment and Sports Center. In particular, Project Design Features J.1-1 through J.1-5 include measures that would reduce the Entertainment and Sports Center's impacts to police protection and fire protection. Refer to Topical Response No. 2, Entertainment and Sports Center, and Topical Response No. 5, Public Services, for further detail. The Draft Supplemental EIR's analysis of Project impacts, including impacts from the Entertainment and Sports Center, to public services was comprehensive. Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, for information regarding the relationship of the Project's Draft Supplemental EIR to the Warner Center EIR and its mitigation measures.



**Comment No. 27-6****Police**

**While the Promenade EIR states that the Entertainment and Sports Center will have additional security on-site, there is no doubt that events at the site will also bring thousands of people into the surrounding area. This will certainly bring about an increased need for law enforcement beyond the additional on-site security.** Though the EIR points out that crime in the project area is currently low, the addition of SUBSTANTIAL amounts of new housing, retail and office space will doubtless increase the need for services provided by the LAPD.

**Response to Comment No. 27-6**

Refer to Topical Response No. 2, Entertainment and Sports Center, and Topical Response No. 5, Public Services, for further detail on the Project's proposed project design features and mitigation measures which address the Entertainment and Sports Center and the overall Project's impacts to police services. As discussed above, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site and potential impacts associated with police protection would be less than significant.

**Comment No. 27-7**

**Though developers routinely claim that increased revenues to the City from their project will make it possible to hire more officers, this no longer seems to be the case. For years the LAPD has been having difficulty finding qualified recruits. Possibly because unemployment is low, and possibly because of negative media coverage, law enforcement agencies nationwide are unable to hire qualified officers.**

"California asks: where have all the cops gone?" from USA Today, Sept. 2015

<https://www.usatoday.com/story/news/nation/2015/09/17/california-police-shortage/72364360/>

The LAPD currently has funds to hire more officers, and has been trying to increase its staffing for years with little success. At this point, there is no reason to believe that increased revenues to the City will enable the LAPD to grow its ranks.

**Response to Comment No. 27-7**

As discussed in Topical Response No. 5, Public Services, above, potential impacts of the Project associated with police projection would be less than significant. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed above, consistent with *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services that would not have a physical environmental impact is not an environmental impact that CEQA requires a project proponent to mitigate.

**Comment No. 27-8**

**Ordinarily a project of this size would bring about a significant increase in demand for law enforcement services, but the addition of the Entertainment and Sports Center makes the situation acute.** The EIR fails to adequately analyze the increased need for police services this project will create. The design-out-crime features outlined in the EIR will probably have the same impact as similar features incorporated into projects in Downtown and Hollywood. In other words, none. Numerous projects in these areas have touted design-out-crime features, but crime in both Downtown and Hollywood remains significantly higher than the citywide average.

**Response to Comment No. 27-8**

Refer to Topical Response No. 2, Entertainment and Sports Center, and Topical Response No. 5, Public Services, for further detail on the Project's proposed project design features and mitigation measures that address the Entertainment and Sports Center and the overall Project's impacts to police services. As discussed above, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site, and, thus, potential impacts associated with police protection would be less than significant.

**Comment No. 27-9****Emergency Services**

**Again, the Promenade EIR relies on mitigation measures from the Warner Center Plan EIR to address the need for emergency services, but the Warner Center Plan EIR did not anticipate an entertainment/sports center and the increased need for emergency medical services associated with this type of venue.** An entertainment/

sports center is a specialized use, and brings with it a variety of special medical needs related to large crowds attending sports and concert events. Even if additional revenue to the City could be used to hire more personnel and purchase necessary equipment, the impacts need to be adequately assessed so that they can be completely addressed. By relying on the Warner Center Plan EIR, the Promenade EIR utterly fails to address impacts to emergency services from the Entertainment and Sports Center.

### **Response to Comment No. 27-9**

Refer to Response to Comment No. 27-5, above.

### **Comment No. 27-10**

#### **3. Hydrology, Surface Water Quality, and Groundwater**

##### **Wastewater**

**For its analysis of impacts regarding wastewater, the Promenade EIR again relies on the Warner Center Plan EIR, which makes no mention of an entertainment/sports center. The Warner Center Plan EIR only considers Residential and Non-Residential (Office, Industrial, Retail) uses when calculating wastewater impacts. An entertainment/sports center is a specialized, water-intensive use.**

Entertainment/sports centers can consume millions of gallons of water due to uses which include food preparation, cleaning, and sanitary facilities. While significant progress has been made in recent years in reducing water consumption and wastewater produced by these types of venues, they still make heavy demands on local infrastructure. By relying on the Warner Center Plan EIR for its discussion of wastewater impacts and mitigation measures, the Promenade EIR completely fails to assess actual impacts. The proposed Entertainment and Sports Center requires an additional, separate study to adequately assess the impacts it will have on local wastewater infrastructure.

### **Response to Comment No. 27-10**

The commenter incorrectly states that the Entertainment and Sports Center was not accounted for in the wastewater analysis in Draft Supplemental EIR. As shown in Table IV.M.2-2 on page IV.M.2-13 of Section IV.M.2, Utilities and Service Systems—Wastewater, of the Draft Supplemental EIR, the Entertainment and Sports Center would generate approximately 45,000 gpd of wastewater out of the Project's total wastewater generation of 526,950 gpd. The wastewater generation rate for the Entertainment and Sports Center is based on the auditorium/theater sewage generation rates provided by LA Sanitation, which are comparable to the Entertainment and Sports Center use. As discussed further in Section IV.M.2, Utilities and Service Systems—Wastewater, of the

Draft Supplemental EIR, the Bureau of Sanitation analyzed the Project demands in conjunction with existing conditions and forecasted growth, and approved the Project to discharge up to 526,950 gpd of wastewater to the 15-inch vitrified clay pipe (VCP) sewer line in Owensmouth Avenue and the 8-inch VCP sewer line in Erwin Street. Based on the current approximate flow levels and design capacities in the sewer system, and the Project's estimated wastewater flow, the City determined that the existing capacity of the above sewer mains would be adequate to accommodate the additional wastewater infrastructure demand created by the Project. Specifically, the Project's net increase of 420,082 gpd would be below the approved discharge of up to 526,950 gpd for the sewer lines along Topanga Canyon Boulevard, Owensmouth Avenue and Erwin Street. The Project would also comply with LAMC Section 64.14 to obtain final approval of sewer capacity and connection permit during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LA Sanitation and California Plumbing Code standards. Therefore, the Project would not 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. In addition, the water conservation features provided in Project Design Feature M.1-1 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft Supplemental EIR, would also result in a reduction in wastewater. Project Design Feature M.1-1 was developed in coordination with LADWP and includes implementation of additional water conservation measures beyond those required by the LAMC. The project design feature is applicable to all portions of the Project Site, including the Entertainment and Sports Center. Thus, impacts related to wastewater generation and infrastructure capacity would be less than significant.

### **Comment No. 27-11**

#### **Water Consumption**

The Promenade EIR does not directly assess water consumption, and generally speaking this issue is not addressed in environmental assessments under CEQA. However, in the Initial Study, under the section entitled Hydrology, the question is asked whether the project will...

### **Response to Comment No. 27-11**

The commenter incorrectly states that the Draft Supplemental EIR does not directly assess water consumption. Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft Supplemental EIR, includes a description of the regional water supplies and existing water infrastructure serving the Project Site, estimates the water demand associated with the Project, and assesses whether there is sufficient water supply and infrastructure capacity to meet that demand. The analysis is based on the

Promenade 2035 WSA, adopted by the LADWP Board of Water and Power Commissioners in February 2017 and included as Appendix O, of the Draft Supplemental EIR. Table IV.M.1-4 on page IV.M.1-29 of Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft Supplemental EIR, summarizes the Promenade 2035 WSA's estimated water demand for the Project. As shown therein, it is estimated that the Project would generate an average daily water demand of approximately 627,011 gpd or approximately 702.39 AFY. The Project would implement Project Design Feature M.1-1, which includes implementation of additional water conservation measures beyond those required by the LAMC, as amended by Ordinance No. 184248. With the removal of the existing uses and implementation of Project Design Feature M.1-1, the Project would result in a net average daily water demand of approximately 532,835 gpd, or approximately 597 AFY. The Promenade 2035 WSA concluded that the projected water supplies for normal, single-dry, and multiple-dry years reported in LADWP's 2015 Urban Water Management Plan would be sufficient to meet the Project's estimated water demand of 597 AFY, in addition to the existing and planned future water demands within LADWP's service area through the year 2040.

#### **Comment No. 27-12**

##### *f) Otherwise substantially degrade water quality?*

In the case of the Promenade 2035 project it's necessary to state that the project could potentially have severe negative impacts to water quality. The Promenade EIR again refers to the Warner Center Plan EIR. While the Warner Center Plan EIR was adopted in 2013, the text was completed in 2011, and it bases its assumptions about water resources on a plan put forward by the Mayor's Office in 2008.

#### **Response to Comment No. 27-12**

The commenter inaccurately conveys that the Draft Supplemental EIR relied on the analysis in the Warner Center Plan EIR to reach an impact determination with regard to hydrology and water quality. The analysis of the Project's impacts to hydrology and water quality is provided in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, and is based on the Water Resources Technical Report prepared by KPFF Consulting Engineers and included as Appendix H, of the Draft Supplemental EIR. The analysis provided in the Draft Supplemental EIR is specific to the Project Site and is based on recent data. The analysis demonstrates that similar to the conclusion reached in the Warner Center Plan EIR, the Project would not generate any significant impacts related to hydrology and water quality after implementation of mitigation measures. Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, for information regarding the relationship of the Project's Draft Supplemental EIR to the Warner Center EIR and its mitigation measures.

**Comment No. 27-13**

In the section entitled Existing Conditions on page 456, the Warner Center Plan EIR states, “In response to water supply uncertainties, including those impacting the MWD, the Mayor and LADWP released a Water Supply Action Plan (Action Plan) on May 15, 2008. The plan, entitled “Securing L.A.’s Water Supply,” serves as a blueprint for creating sustainable sources of water for the future of Los Angeles to reduce dependence on imported supplies.” The EIR then goes on to list measures included in the Mayor’s plan.

**As stated above, the plan referenced was issued in 2008. Since then the City has experienced many more years with low precipitation. Even more concerning, the snowpacks that ordinarily produce the water which the region relies on have shrunk considerably. In fact, every source of water that LA has historically relied on for water is declining, and available evidence seems to indicate that these sources will continue to decline. We can no longer be sure of receiving water from the Owens Valley. From April through October 2015 the LA Aqueduct was closed in order to comply with an agreement to restore the ecosystem in the Owens Valley. As a result of declining snowpacks, deliveries from the State Water Project and the Colorado River have both decreased, and may well decrease further. And the wells in the San Fernando Valley that the City has relied on for groundwater have been plagued by contamination. Since the 2008 plan was released, more wells have been closed. While the DWP is pursuing new approaches to water recycling and groundwater recharge, and LA residents have shown a willingness to reduce consumption, the future of LA’s water supply is far from certain.**

The situation has changed substantially since the Mayor’s plan was released in 2008, and our water resources are more stressed than ever. For the authors of the EIR to blithely assume that the City will have no trouble providing water for a project the size of the Promenade based on assumptions made in a plan written a decade ago is irresponsible. **The EIR’s failure to adequately analyze impacts to water resources only becomes more glaring when we consider the inclusion of a water-intensive use like an entertainment/sports center.** The proposed Entertainment and Sports Center will require massive amounts of water for cleaning, sanitation, and food preparation. None of these activities are analyzed in the Warner Center Plan EIR, which only considers Residential and Non-Residential (Office, Industrial, Retail) uses.

**Response to Comment No. 27-13**

As discussed in Response to Comment No. 27-11, above, the analysis of impacts associated with water supply is based on a WSA adopted by LADWP in February 2017, for the Project and accounts for the proposed Entertainment and Sports Center. The WSA is based on recent data regarding water supplies and availability.

**Comment No. 27-14**

The Promenade EIR relies on an outdated analysis to project impacts to the water supply, and fails to consider the substantial changes to LA's hydrology that have occurred over the past decade. For this reason, it must not be approved in its current form.

**Response to Comment No. 27-14**

The commenter inaccurately states that the Draft Supplemental EIR relies on outdated analysis. As demonstrated in Response to Comment Nos. 27-10 through 27-13, above, the Draft Supplemental EIR provided analysis of Project impacts to water supply specific to the Project Site with the most current information at the time of the Draft Supplemental EIR publication.

**Comment No. 27-15****4. Master CUP for On-Site and Off-Site Alcohol Sales**

It is troubling that the developer is requesting a Master CUP for on-site and off-site alcohol sales without specifying the number of venues to be covered by this permit. There is no way to gauge the impacts to police and emergency services without knowing how many alcohol-related uses the project will include. Because no information is provided regarding the number of venues included under the Master CUP, the project description is incomplete.

This is especially disturbing in light of the City's recent practice of approving Master CUPs covering from 10 to 20 venues within a single project. How is the community to adequately assess project impacts without this important piece of information?

**Response to Comment No. 27-15**

The Project's Master Conditional Use Permit ("Master CUP") request is described in Section II, Project Description, and Section IV.G, Land Use, of the Draft Supplemental EIR, and the number of venues requested under the Master CUP is described in the application publicly available on file with the Department of City Planning. The Applicant seeks a Master CUP for alcohol sales for on-site consumption in connection with the Project's residential buildings, restaurants, hotels, and Entertainment and Sports Center, and off-site consumption for a grocery store and pharmacy. The decision maker will evaluate and determine whether the request will adversely affect the welfare of the pertinent community, result in or contribute to an undue concentration, and that the request will not detrimentally affect nearby residentially zoned communities as required under LAMC Section 12.24.W.1. In addition, the Police Protection section of the Draft Supplemental EIR includes a number

of project design features related to the provision of private security at the Project Site that will reduce reliance on public police protection services and ensure that alcohol sales and consumption pursuant to the Master CUP do not result in public nuisance. Project Design Feature J.1-2 requires the preparation of a Security Plan specific to the Entertainment and Sports Center, which shall be developed and implemented in consultation with LAPD and LAFD, and Project Design Feature J.1-7 requires the preparation of an enhanced security plan for the entire Project Site. The information contained in the Project's Draft Supplemental EIR and application materials will be considered by the decision-maker in determining whether to grant the Master CUP request.

**Comment No. 27-16**

For the reasons given above, the EIR is inadequate and cannot be approved in its current form.

Thank you for your time.

**Response to Comment No. 27-16**

This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. The Draft Supplemental EIR is comprehensive and has been prepared in accordance with CEQA requirements.

**Comment No. 27-17**

Attachment: UN4LA Promenade 2035 EIR Ltr 180723 (5 pages)

**Response to Comment No. 27-17**

This attachment is a duplicate of the comments provided above. No further responses are necessary.

**Comment No. 27-18**

Thanks for the info. Here's the mailing address.

Casey Maddren  
2141 Cahuenga Blvd., Apt 17  
Los Angeles, CA 90068



**Response to Comment No. 27-18**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 28**

Nora Ross  
Executive Director  
Valley Cultural Center  
21550 Oxnard St., Ste. 470  
Woodland Hills, CA 91367-7116

**Comment No. 28-1**

Attached is a letter of support for the above referenced subject.

Please call if you have questions 818-704-1358

For more than 40 years, the Valley Cultural Center has provided diverse programs and events in the arts that bring together talent, community and business throughout the San Fernando Valley. Our many concerts, movies in the park, awards and scholarships and special events provide rich opportunities for Valley residents to participate in and enjoy the artistic diversity that defines our unique neighborhood.

The Westfield Promenade 2035 project would further enhance the lives of area residents with its “work/play/live” lifestyle opportunities. We are particularly excited about Westfield’s plans for a Promenade Square to host such gatherings as movies, farmers markets and evening concerts; mews that provide easy access to artist galleries, shops and pocket parks; and an entertainment and sports center that can be used in a variety of ways.

It’s reassuring to know that the Supplemental Draft Environmental Impact Report evaluated such impacts as noise, traffic, lighting and parking, and all can be addressed through mitigation measures and an Event Management Plan. I agree with Westfield’s project design to maximize excitement in the venue while minimizing impacts outside.

New entertainment options would be a wonderful complement to the Valley Cultural Center’s activities while bringing exciting new amenities for residents and businesses. We look forward to continuing our partnership with Westfield in promoting the performing and visual arts.

We are in full support of Westfield’s Promenade 2035 project, and hope you will quickly give it your approval so it can move forward.

**Response to Comment No. 28-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 29**

Lisa Gritzner  
VICA Chair  
Valley Industry & Commerce Association  
16600 Sherman Way, Ste. 170  
Van Nuys, CA 91406-3861

Stuart Waldman  
VICA President  
Valley Industry & Commerce Association  
16600 Sherman Way, Ste. 170  
Van Nuys, CA 91406-3861

**Comment No. 29-1**

The Valley Industry and Commerce Association (VICA) strongly supports the construction of Westfield's Promenade 2035 project, which will bring numerous benefits to the West San Fernando Valley, including much needed housing, thousands of jobs, open space and more retail, dining and entertainment options, in addition to generating new revenues for the city.

During construction, Promenade 2035 is estimated to create over 12,500 full and part-time jobs and generate nearly \$2 billion in total economic output. Once Promenade 2035 is fully developed, the new space will create nearly 8,000 full and part-time jobs while generating an estimated \$1.6 billion in economic output. Upon completion, Promenade 2035 will generate nearly \$12 million in new net annual revenues for the city's General Fund.

Consistent with the Warner Center 2035 Plan, Promenade 2035 guides the Warner Center toward a mixed-used, transit-oriented regional center, in line with state and city efforts to reduce traffic congestion and improve air quality.

The recently released Draft Environmental Impact Report on Westfield Promenade provides strong evidence to support its approval.

Redeveloping the former Promenade Mall property represents a major investment in the San Fernando Valley and will help enhance the economic vitality of the greater San Fernando Valley region.

We respectfully ask for your support and approval of Westfield's Promenade 2035 project.

**Response to Comment No. 29-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 29-2**

Attachment: VICA Letter—Westfield Promenade 2035 SUPPORT (1 page)

**Response to Comment No. 29-2**

This attachment is a duplicate of the comments provided above. No further responses are necessary.

**Comment Letter No. 30**

Diana Williams  
CEO  
West Valley–Warner Center Chamber of Commerce  
diana@woodlandhillsgcc.net

**Comment No. 30-1**

I have attached the letter for your consideration. Thank you for your time.

Westfield's ongoing investment in the Warner Center has made it a desirable place to live and work, and we are looking forward to the company's plans to replace the outdated Promenade mall with exciting new amenities for local residents and businesses with its Promenade 2035 project. This letter is in support of the Promenade 2035 plan as presented. If there are any changes we reserve the right to change our position.

The project fully supports West Valley–Warner Center Chamber of Commerce's mission to "improve the quality of life for those who live and work here... now and in the future." It will bring much-needed energy to the area, as well as more housing, jobs, retail, dining and entertainment options while generating important new revenues to the city.

Furthermore, we're pleased Westfield Promenade is consistent with the Warner Center Specific Plan and will meet its sustainability goals, such as LEED silver buildings, rain water capture/reuse for irrigation and landscaping and energy-saving measures, and promote a transit-oriented, pedestrian friendly downtown district.

We're also glad that the recently released Draft Environmental Impact Report demonstrates the project furthers the Warner Center Plan's goal to be one of the cleanest and greenest growth plans in all of Los Angeles.

We've seen how The Village has become a hub of activity as a central gathering spot in the Valley, but frankly, we're not surprised by its success. There is a real demand for more leisure and lifestyle activities among residents, and the thoughtfully designed project will be a wonderful addition. It will certainly make the area more inviting and solidify Warner Center's standing as an attractive place for individuals and families to live, work and enjoy leisurely activities.

Our board respectfully asks you and your department to give strong consideration to the Westfield Promenade 2035 project.

**Response to Comment No. 30-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 31**

John M. Walker  
President  
Woodland Hills Homeowners Organization, Inc.  
P.O. Box 6368  
Woodland Hills, CA 91365-6368

**Comment No. 31-1**

Please find attached the Woodland Hills Homeowners (WHHO) Request for a 90 Extension to the Public Comment Period for the Draft Supplemental Environmental Impact Report, Promenade 2035 Project, Environmental Case NO. ENV-2016-3909-EIR.

Please provide us with Notice of your action regarding the Requested Extension.

Thank you for your anticipated cooperation and understanding.

This letter shall serve as the Woodland Hills Homeowners Organization's formal **request for an extension of the public comment period** related to the Draft Supplemental Environmental Impact Report for the Promenade 2035 Project. We are requesting the extension to be an additional 90 days to accomplish the following:

1. Given the complexity and length of the environmental document, allow the applicant/ developer Westfield Promenade LLC, Promenade Buyer LLC and their consultants to adequately present, in person, the information contained in the document to the stakeholders, including the multitude of parties and organizations that may be interested in providing responses and input to the lead agency.
2. Provide an adequate time period that is appropriate considering the amount of significant and unavoidable impacts and the analysis that may be desired by stakeholders to adequately respond to their initial concerns.
3. Recognizing the EIR for the WC 2035 Plan and its already vetted public process, the addition of the arena to the proposed project and its potential widespread effect on a wider area of stakeholders that more than justifies an increase in the public comment period. Time needs to be allocated to allow not only the applicant, but the multiple Neighborhood Councils, Homeowners Organizations, Business Groups, Chambers of Commerce, and individual activists to provide outreach and avenues for input to their memberships. 4. Before any conclusions of overriding considerations are deemed appropriate for even one of the significant and unavoidable items in the document, a proper allowance for communication and establishment of administrative record should be provided.



You will recall that *California Public Resources Code*, §21091 (a) provides in part that:

**“The public review period for a draft environmental impact report shall not be less than 30 days. If the draft environmental impact report is submitted to the State Clearinghouse for review, the review period shall be at least 45 days, ... ”** (Emphasis added).

You have provided for only the basic minimum Public Review Period for the largest project in the Woodland Hills Community. This Project, which includes a 15,000 Seat Sports Stadium the size of which was never anticipated by the Warner Center Specific Plan 2035 will also include:

- up to 1,432 multi-family residential units,
- approximately 244,000 square feet of retail/restaurant uses,
- approximately 629,000 square feet of office space,
- up to 572 hotel rooms,
- an Entertainment and Sports Center approximately 320,050 square feet and 15,000 seats in size,
- 5,610 on-site parking spaces at buildout,
- approximately 5.6 acres of ground-level, publically accessible open space, including a central green area and a number of plaza areas connecting the various uses,
- the Project would remove 641,164 square feet of existing floor area and **construct 3,271,050 square feet** of new floor area, resulting in a **net increase of 2,629,886 square feet of new floor area** within the Project Site.

It is noted that several buildings would transition in height from one (1) story and three (3) to four (4) stories at the corner of Topanga Canyon Boulevard and Erwin Street, to 28 stories at the opposite corner of Owensmouth Avenue and Oxnard Street. Overall, at buildout, the Project would remove 641,164 square of existing floor area and construct 3,271,050 square feet of new floor area, resulting in a net increase of 2,629,886 square feet of new floor area within the Project Site or more than 5 times the existing floor area presently on site.

Even the *Notice of Completion and Availability of Draft Supplemental Environmental Impact Report*, at pages 1–2, noted that “Based on the analysis included in the Draft SEIR, the Project would result in **significant and unavoidable impacts** related to ... ” some

10 recognized and agreed areas that will affect the quality of enjoyment of life in our community.

Our community has a **“Right to Due Process”** as guaranteed under both the *Fifth and Fourteenth Amendments* to the Federal Constitution and under *Article 1, Section 3*, of the California State Constitution. Attempting to rely on a bare minimum is not the standard but rather to scope, size and **“significant unavoidable impacts”** of this Project requires a fair and reasonable opportunity to review the materials and an adequate opportunity to be heard. An extension of 90 days will provide a true opportunity to review the document and an adequate time to respond as needed.

We cannot stress enough our concern for an adequate public comment period and **respectfully request consideration of the extension of an additional 90 days.**

Thank you for your attention to this matter.

#### **Response to Comment No. 31-1**

The initial comment period for the Draft Supplemental EIR was based on the 45 days required by CEQA. Nonetheless, the Department of City Planning extended the Draft Supplemental EIR comment period by 45 days, until 4:00 P.M. on Thursday July 26, 2018, for a total comment period of 92 days, as shown in Appendix FSEIR-4. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

## **Comment Letter No. 32**

John M. Walker  
President  
Woodland Hills Homeowners Organization, Inc.  
P.O. Box 6368  
Woodland Hills, CA 91365-6368

### **Comment No. 32-1**

Attached please find the WHHO Comments to the Draft Supplemental Environmental Impact Report (SDEIR) [sic].

Please make these part of the Public Administrative Record.

Also, please confirm your receipt of the Comments.

Thank you for your assistance and we hope you have a Blessed day.

The Board of the Woodland Hills Homeowners Organization (WHHO) hereby submits the following Comments to the Draft Supplemental Environmental Impact Report, **ENV-2016-3909-EIR**.

### **Response to Comment No. 32-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Receipt of comments was confirmed by the City. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

### **Comment No. 32-2**

**I. DENIAL OF DUE PROCESS**—the DSEIR denies the Public their Constitutional right to Due Process:

From the outset it should be noted that the Woodland Hills Homeowners Organization (WHHO) objects to this DSEIR due to its substantial lack of specific project facts. Instead the focus is on pure speculation, especially when looking at the Stadium. Further, the “project” will drag on for such an extended period and will not be fully completed in a “reasonable” time. Throughout the many “public” presentations by the Developer, they

have consistently refused to provide sufficient detailed facts to permit an informed discussion.

The *Public Resource Code* (hereinafter PUC), Section 21061 provides in relevant part:

“An environmental impact report is an informational document... **The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment**”. (Emphasis added).

PUC Section 21003 (b) goes on to clarify that:

“21003. (b) Documents prepared pursuant to this division [must] be organized and written in a manner that will be **meaningful and useful to decisionmakers and to the public.**” (Emphasis added).

There are too many moving parts over too long a period for this DSEIR to be “meaningful and useful” to decisionmakers and to the public. With the details lacking, no one can know what this project will look like on completion and thereby the public does not have any informed insight concerning its effect on the community. The lack of details thereby denies the public an opportunity to make an informed discussion on what comments should be considered.

### **Response to Comment No. 32-2**

Contrary to the commenter’s statement that the Project would “drag on”, the Project does have an anticipated buildout year of 2033. As explained in Section I, Executive Summary, of the Draft Supplemental EIR, in accordance with the CEQA Guidelines, the Draft Supplemental EIR is an informational document intended to inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. The Draft Supplemental EIR is comprehensive and was prepared in accordance with CEQA and the CEQA Guidelines. Section I, Executive Summary, sets forth the Draft Supplemental EIR organization and describes the sections and content of the Draft Supplemental EIR. In addition, a detailed description of the Project is provided in Section II, Project Description, of the Draft Supplemental EIR. The project description provides the essential information needed to fully evaluate the environmental impacts of the Project. With regard to the proposed Entertainment and Sports Center, refer to Topical Response No. 2, Entertainment and Sports Center, above. This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 32-3**

The purpose of filing an EIR—and here the DSEIR, is to alert the public about environmental decisions. “Public notification serves the public’s right ‘to be informed in such a way that it can intelligently weigh the environmental consequences of any contemplated action and have an appropriate voice in the formulation of any decision.’ (*Karlson v. City of Camarillo* (1980) 100 Cal.App.3d 789, 804.) This public participation assists the agency in weighing mitigation measures and alternatives to a proposed project. ([PUC]§§ 21100, 21151.)” (*Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929,938.)

This inherent prejudicial failure to provide sufficient details for this project prevents the Lead Agency and, most importantly, the public in general from knowing, understanding and reflecting on the actual facts and to understand the real effect on the community. Such a failure by the DSEIR denies the public their constitutional due process right to understand what really is being proposed and to give full and informed comments about the project and the contents of the DSEIR.

It should appear clear that the people of California, in enacting the CEQA legislation, find that in a democracy, due process, fairness, and the responsible exercise of authority are all essential elements of good government.

There is no fairness here, and the public’s constitutional substantive and procedural due process rights are violated by this DSEIR. The Lead Agency must reject this DSEIR and require the Developer to return with specifics facts so both the Lead Agency and the public in general may give the project proper consideration.

**Response to Comment No. 32-3**

Refer to Response to Comment No. 32-2, above.

**Comment No. 32-4****II. FAILURE OF DSEIR TO FULLY ANALYZE CUMULATIVE EFFECT(S) OF ALL RECENT AND SUBMITTED WC PROJECTS.**

The fast evolving nature of the Environmental Setting within the Warner Center Area due to hyper-development activity, a reconsideration of the related projects section of the DSEIR is deemed appropriate for a prudent and fair analysis of the cumulative effects intended by the California Environmental Quality Act. Section III.B Related Projects, considers 29 past, present and probable future projects producing related or cumulative impacts. However, more projects, many more, are being proposed since the DSEIR was submitted, and all

must be included in the related projects. A complete analysis must use an adjusted datum, not from the time of the original filing of the Project, but data that includes all projects submitted up to September 2018—or an even later date. The duration of the entitlement period and the duration required for the environmental analysis due to the project's sheer size, makes freezing the datum to the original filing date a flawed process that provides inaccurate conclusions and thus prevents real due process.

#### **Response to Comment No. 32-4**

As discussed in the CEQA Guidelines, an “EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published.... This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” (CEQA Guidelines, Section 15125(a).) The Notice of Preparation for the Project was prepared on November 9, 2016. The list of related projects used to evaluate cumulative impacts was based on data from LADOT and the Department of City Planning. The list was updated in February 2017, subsequent to preparation of the NOP. As such, the list of related projects fully complies with CEQA requirements. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 32-5**

Furthermore, the only way to properly evaluate the ESC (Entertainment and Sports Center—aka the Stadium) with an eye to due process is to assume a full build-out of the entire WC 2035 Specific Plan as was assumed in the original WC 2035 Specific Plan.

Such a detailed evaluation of the ESC is consistent with CEQA and the WC 2035 Specific Plan.

#### **Response to Comment No. 32-5**

As discussed in Topical Response No. 3, Traffic and Parking, full buildout of the entire Warner Center Plan is assumed in the Project's traffic analysis. As explained in Section I, Executive Summary, of the Draft Supplemental EIR, the City certified a programmatic EIR to evaluate the potential environmental impacts of approving the Warner Center Plan in 2013. The Warner Center Plan EIR evaluated the anticipated development within the Warner Center Plan area, including the anticipated development on the Project Site. The Draft Supplemental EIR for the Project was prepared based on the Warner Center Plan's analysis and pursuant to the conditions set forth in CEQA Guidelines 15162 and 15163 to evaluate the Project-specific environmental impacts. The Project's Draft Supplemental EIR analysis tiers off of the approved and certified Warner Center Plan EIR

by analyzing Project-specific environmental impacts for the Project Site that may not have been covered under the Warner Center Plan EIR, for instance, impacts associated with the Entertainment and Sports Center. For each impact area, the Draft Supplemental EIR relies on the Warner Center Plan EIR analysis to the extent that it accounts for the Project's potential environmental impacts. For each impact area where the Warner Center Plan EIR did not address the Project's impacts, the Draft Supplemental EIR provides a supplemental analysis. The Project's Draft Supplemental EIR incorporates mitigation from the Warner Center Plan EIR as well as additional mitigation measures that are specific to the Project. In addition, specific to the impacts on population, housing, and employment growth, the Draft Supplemental EIR analyzed the potential population, housing, and employment effects of the Project in relation to growth forecasts adopted by the Southern California Association of Governments (SCAG) and to relevant policies and programs regarding population, housing and employment set forth in adopted land use plans, to address Appendix G of the CEQA Guidelines. Refer to Topical Response No. 2, Entertainment and Sports Center, above, for more information regarding the Entertainment and Sports Center. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 32-6**

### **III. POPULATION GROWTH AND THE PROMENADE 2035 PROJECT IS IMPROPERLY EVALUATED**

The DSEIR fails to properly analyze the Population Impacts. On page IV.I-17 of Chapter IV, Environmental Impact Analysis, Section I, Population, Housing, and Employment, subsection 3.d(2)(a) titled Direct Population Impacts, the impacts of the projected additional 3,714 residents generated by the project, using a household size of 2.73 persons per household in multi-family dwelling units and a 95% occupancy rate, has been deemed by the DSEIR as "less than significant." However, these additional residents must be considered as part of the greater whole of the forced and planned population increase in Warner Center and Woodland Hills caused by the addition of many thousands of residential units in a short period of time.

The DSEIR relates this projected population growth on a 34-acre parcel within the 1.7-square-mile Warner Center to the 503-square-mile City of Los Angeles and the entire six-county region encompassed by the purview of the Southern California Association of Governments. Placing the projected population increase caused by the Promenade 2035 project within this much larger, regional context is nonsensical and misleading.

Instead, the DSEIR should have considered this projected population growth in its local context, that of Woodland Hills, where thousands of residential units built in the last

10 years have already had deleterious effects on traffic, water and electric infrastructure, air quality, noise and light pollution, and community-serving businesses, such as grocery stores, clinics, and pharmacies. Many thousands more are currently being built or planned.

#### **Response to Comment No. 32-6**

As the comment notes, Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, analyzes the impacts of the Project's number of housing units and associated population relative to projected growth for Warner Center and the City of Los Angeles as a whole, and concludes that both Project growth and cumulative growth are consistent with the long-range regional growth forecast prepared by SCAG. There are no growth forecast data available from SCAG for an "intermediate geography," such as Woodland Hills. The comment will be provided to City decision makers for their information.

#### **Comment No. 32-7**

The DSEIR is wholly deficient in considering the cumulative effects to the local community of not only the additional residents at Promenade 2035 but also the many thousands of guests and employees who would be expected to frequent the site on a daily basis. The local community must be defined as Woodland Hills and the western half of the San Fernando Valley. Therefore, the final SEIR [sic] must estimate the impacts of the projected population growth as they relate to Warner Center, Woodland Hills, and the adjacent communities of Canoga Park, Winnetka, West Hills, Calabasas, and Hidden Hills, not to the City of Los Angeles or region as a whole. This new calculation must be made, since if all units envisioned in the Warner Center 2035 Specific Plan are built and occupied at a rate of 2.73 persons per household, at full build-out, the population of Woodland Hills will grow by more than approximately 82% in a short period of time over its 2008 level of 63,414. Again, the DSEIR is defective.

#### **Response to Comment No. 32-7**

Refer to Response to Comment No. 32-6, above.

#### **Comment No. 32-8**

### **IV. DENIAL OF DUE PROCESS-REQUIRES CLEAR NOTICE AND A RIGHT TO RESPOND.**

With the Promenade 2035 DSEIR, there is a consistent lack of specificity which reflects a lack of commitment as to what is actually being proposed concerning major issues and proposals. This lack of specificity denies the public the ability to properly and accurately



gauge the critical issue and then fully respond within the allowed legal time framework. Many factual details for critical elements of this proposal have been omitted or ignored thereby denying the public the right to know what is entailed and circumventing the ability to properly respond. That is a denial of due process.

Examples of the lack of specificity include, but are not limited, to the following:

- Page I-10: “The southerly residential building within the Northeast Area (Northeast–B) would include approximately 326 residential units...” (Emphasis added).
- Page I-12: “The Entertainment and Sports Center could be as large as 15,000 seats but would be designed to include flexible seating to accommodate smaller gatherings”. (Emphasis added).
- Page I-20: “The project includes the option to either construct one or two levels of subterranean parking in the Southwest Area which would be constructed with the development of the Southwest Area or alternatively construct five levels of subterranean parking in the Southeast area, which would be constructed when that area is developed.” (Emphasis added).

As indicated earlier “**The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information...**” (PUC §21061, *ibid*). (Emphasis [sic] added). This is a requirement that *must* be followed and obeyed.

The underlined words and similarly intended words occur throughout this DSEIR and reflect the applicant’s intent to leave options open once the public input process either during the Environmental or the Entitlement process is complete. It is prudent and required that commitments be made that are more appropriate and specific in order to assess the scope of the project and its impacts on the environment, and the community’s quality of life.

### **Response to Comment No. 32-8**

As explained in Section I, Executive Summary, of the Draft Supplemental EIR, the CEQA Guidelines describe an EIR as an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. The Draft Supplemental EIR was prepared in accordance with CEQA and the CEQA Guidelines. A detailed description of the proposed Project is provided in Section II, Project Description, of the Draft Supplemental EIR. Pursuant to CEQA Guidelines Section 15124, the description of the project should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.

With regard to the number of residential units, Section II, Project Description, of the Draft Supplemental EIR, states that “up to” 1,432 multi-family residential units would be constructed. While the exact number of residential units within each building may be slightly modified upon development of construction plans, the total maximum of 1,432 residential units has been analyzed in the Draft Supplemental EIR consistent with CEQA. With regard to the size of the Entertainment and Sports Center, the Draft Supplemental EIR analyzed the maximum seating capacity of 15,000 seats, even though the venue may ultimately be smaller in size, to provide a conservative environmental impact analysis. Refer to Topical Response No. 2, the Entertainment and Sports Center, for more information. With regard to subterranean parking, Section II, Project Description, of the Draft Supplemental EIR, notes that “For each issue area, the Draft Supplemental EIR will conservatively analyze the option with the potential for greater environmental impacts.” In addition, consistent with CEQA, the Draft Supplemental EIR analyzed alternatives that were chosen based primarily on the ability to avoid or substantially lessen significant impacts relative to the Project.

The information provided regarding the Project in the Draft Supplemental EIR is consistent with the requirements of CEQA and sufficiently detailed for evaluation and review of the Project’s potential environmental impacts. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 32-9**

Required “details” that are sadly missing: The size of the ESC (Stadium), whether it is roofed or not, the maximum size, height, floor area and unit counts within all buildings, the programmed uses and amenities of publicly accessible open space, the parking solutions, the actual traffic solutions whether in the City’s or CalTrans’ [sic] jurisdiction, the exact infrastructure improvements required, actual police and fire solutions that will be carried out, LAUSD commitments as to a plan of action regarding provisions for appropriate public education and when all of these required actions will occur need to be presented.

#### **Response to Comment No. 32-9**

Contrary to the commenter’s statement that details of the Project are missing, the Draft Supplemental EIR does include the necessary details in order to analyze the Project consistent with CEQA. Refer to Response to Comment No. 32-8, above; Topical Response No. 2, Entertainment and Sports Center; Topical Response No. 3, Traffic and Parking; Topical Response No. 5, Public Services; Topical Response No. 6, Infrastructure, and Topical Response No. 7, Open Space, of this Final Supplemental EIR for more information. The comment is noted for the record and has been incorporated into the Final

Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 32-10**

A commitment of exact actions, all encompassing, is mandatory at this point with the requirement that any change to what is specifically stated must be reassessed by additional due process at the time the change is proposed. The ability for real due process can only be obtained with full disclosure.

**Response to Comment No. 32-10**

As discussed above in Response to Comment No. 32-8, the Draft Supplemental EIR is consistent with the requirements of CEQA and the project is described in a sufficient level of detail for purposes of the environmental analysis. The approvals required for development of the Project are described in Section II, Project Description, and Section IV.G, Land Use, of the Draft Supplemental EIR. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 32-11**

**V. THE WC 2035 SPECIFIC PLAN WAS NEVER INTENDED TO RELY ON A DIRECTOR'S INTERPRETATION TO ADDRESS A PROJECT AS LARGE AS THIS.**

Administrative decisions on a project as large as the ESC (Stadium) in the Promenade project are outside of the original considerations of the WC2035 Specific Plan. Having filed a project of this magnitude (which includes a super-sized sports arena), it is no longer appropriate to be controlled by administrative decisions, and the applicant must not be allowed to stick them in under a process that it was never intended to be used in. Relying on a Director's Interpretation for the ESC circumvents due process for the public and allows the developer and the Lead Agency to arrive at decisions outside of the public purview and must not be permitted.

**Response to Comment No. 32-11**

As discussed in Topical Response No. 2, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. A Project Permit Compliance approval for the proposed Entertainment Use is requested, as required by the Warner Center Plan for all entertainment

uses. The Project Permit will also confirm the Project's consistency with the Warner Center Plan. As the Warner Center Plan does not specify a maximum size for entertainment uses permitted under the Plan, a Director's Interpretation is requested to approve the proposed number of seats at the Entertainment and Sports Center, which must be approved by the Director of Planning. As part of the Director's Interpretation, the Director must find that the Entertainment and Sports Center will not be detrimental to the public welfare or injurious to property in the immediate vicinity, would not result in practical difficulties or unnecessary hardships inconsistent with the overall intent of the Warner Center Plan, and will protect the best interests of and assure a development more compatible with the surrounding neighborhood. Additionally, contrary to the commenter's statement, these requests are subject to public input and public hearings in accordance with the LAMC and Warner Center Plan. The Director's Interpretation and Project Permit Compliance will be part of the Project's public hearings, which will be noticed and open to public comment. Please refer to Topical Response No. 2, Entertainment and Sports Center, of this Final Supplemental EIR for more information. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 32-12**

#### **VI. DECEPTIVE RELIANCE ON OTHER CITY DEPARTMENTS TO MAKE THE DSEIR WORK.**

The developer provides few if any realistic answers in the DSEIR as to how the City can mitigate many of the problems created for the community by their project. There is a tremendous reliance that those problems will be addressed and rectified in the future by already over-burdened City and State Departments, which is a fallacy. The DSEIR does not fully evaluate or offer solutions, but instead gives deference to others to provide answers. Any plans for solving the major problems created by construction of this project are left unanswered or are shifted instead to other entities, which is deceptive.

#### **Response to Comment No. 32-12**

In accordance with CEQA Guidelines Section 15126.4, the Draft Supplemental EIR includes feasible mitigation measures to minimize significant adverse impacts. Mitigation measures include those from the original Warner Center Plan EIR as well as additional mitigation measures that are specific to the Project. Also refer to Section IV, Mitigation Monitoring Program, of this Final Supplemental EIR, regarding how implementation of each of the mitigation measures will be verified.

**Comment No. 32-13**

- **Cal Trans**—Examples [sic] of traffic impacts are numerous within the DSEIR and the following are only examples as selected from page I-155 and I-156 of the DSEIR;
  1. “The addition of Full Project traffic is projected to result in the operation at LOS [Level of Service] E or F of nine of 11 mainline segments along the 101.....”
  2. “The westbound off-ramp to North Topanga Canyon Boulevard...; (and) the US 1010 Westbound off-ramp at Canoga Avenue is also projected to exceed the available queue storage capacity...”
  3. “Future with Project Year 2033 Projects..... Intersections..... 21 of the 26... operate D or better.... the remaining 5 LOS E or F.....”
  4. “...the average proportionate share of mainline freeway growth at project build-out is 2.51 percent without an ESC event; the corresponding proportionate share with a sold out ESC event is 5.20 percent in 2033.”

Exact mitigation measures that have real timelines, legal nexus, commitments in writing, beyond paying fees to the authorities having jurisdiction, must be carefully spelled out for these and all the impacts enumerated in the DSEIR. It must be noted that this is a response to actions beyond the City’s direct purview including those listed in the DSEIR on pages I-161 through I-167. The solutions that are committed to by all agencies *must* address succinctly the freeway and surface street intersections that are assessed at a LOS [Level of Service] below D either currently or upon implementation of the project, the ramps with current or full project traffic exceeding the available queuing storage, and/or the affects to the freeway mainline need to be spelled out in detail. Not only the problems and related solutions, but the descriptions of the physical improvements and when they would occur (in relation to specific project improvements) needs to be presented and committed to for public assessment. The conclusion that “if the improvements aren’t made then the impacts will remain significant” cannot be considered as the fair and prudent result of this DSEIR or the decision-maker’s findings of overriding considerations.

**Response to Comment No. 32-13**

This comment correctly cites text directly from the Draft Supplemental EIR regarding the analysis of Caltrans facilities prepared in accordance with Caltrans TIS Guide.

To identify the Project’s contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as

discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an Entertainment and Sports Center (ESC) event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

#### **Comment No. 32-14**

- **Police**—The effect on the Police Department due to population and employment increases and especially with consideration of a sold out ESC event cannot be understated. Numerous mitigation measures are presented in the DSEIR regarding the effects that are anticipated. Issues to consider have been presented as follow:
  1. Page I-115: The project would increase the police service population **“from 196,840 persons to 218,634 persons.”**
  2. Page I-115: The project could potentially increase the annual number of reported crimes in the Topanga area **“from 110 to 123 reported crimes per year, an increase of 12%.”** It also states this is a very conservative, likely overestimation of crime based on daily sold out event of the ESC.

Recognizing the commitment to implement the Proposed Design Features, the provision of private security for the ESC, the Emergency Response Plan proposed, and the implementation of the WC Plan Mitigation Measures, the Police Department and the Lead Agency must still include a serious plan from the Police Department in this DSEIR that spells out and commits to a safer community through increased staffing and facilities. This is in direct response to fees collected, increased tax revenue and the nexus for this project, and including the cumulative impacts of the recent development activity in Warner Center as a whole. (See the comments related to cumulative impacts above.)

### **Response to Comment No. 32-14**

Refer to Topical Response No. 5, Public Services, above. As stated therein, consistent with *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services that would not have a physical environmental impact is not an environmental impact that CEQA requires a project proponent to mitigate. In addition, as discussed further in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, in accordance with the police protection-related goals, objectives, and policies set forth in the City of Los Angeles General Plan Framework Element (Framework Element), the LAPD would also continue to monitor population growth and land development throughout the City for the purpose of evaluating existing and future police protection needs, as specified by Objective 9.13 and Policy 9.13.1, and provide adequate police services, facilities, equipment, and personnel are available to meet such needs, as required by Objective 9.14. Furthermore, the Project would implement various project design features and mitigation measures to reduce the Project's impacts on police protection. In particular, the Applicant would consult with LAPD regarding the incorporation of several project design features, including the development of a security plan and a First Responder Communications Plan, as required by Project Design Feature J.1-2, and an Emergency Procedures Plan, as required by Project Design Feature J.1-4, among others.

### **Comment No. 32-15**

- **Fire**—Similar to the Police Department, the effect on the Fire Department due to population and employment increases and especially with consideration of a sold out ESC event must not be understated. Consider these issues:
  1. Page I-125: **“The development.....would result in an increase of approximately 3,714 residents.”**

2. Page 126: **“Project related traffic would have the potential to increase emergency vehicle response times to the project site and surrounding properties...”**

Similar to the issues discussed related to the Police Department, the Fire Department and the Lead Agency must include a serious plan by the Fire Department in this DSEIR that spells out and commits to a safer community through increased staffing and facilities in direct response to fees collected, increased tax revenue and the nexus for this project and the cumulative impacts of the recent development activity in Warner Center as a whole. See the comments related to cumulative impacts above.

### **Response to Comment No. 32-15**

Refer to Topical Response No. 5, Public Services, above. As discussed therein, consistent with *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional fire protection services that would not have a physical environmental impact is not an environmental impact that CEQA requires the Project to mitigate. In addition, as discussed further in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, the Safety Element, and the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan, as listed in the regulatory framework above, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities (Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Policy 9-1.1 of the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan) and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). Furthermore, the Project would implement various project design features and mitigation measures to reduce the Project’s impacts on fire protection. In particular, the Applicant would consult with LAFD regarding the incorporation of several project design features, including the development of a security plan and a First Responder Communications Plan, as required by Project Design Feature J.1-2, and an Emergency Procedures Plan, as required by Project Design Feature J.1-4, among others.

### **Comment No. 32-16**

The Warner Center **“Mitigations Measures”** covered on pages I-129 and I-130 [PS-1 through and including PS-10] are recognized as critical issues, but also are noted simply as reiterations of building and fire code that would be required in any project. As a result, this



does not provide a proper response to the increases in population and traffic that will burden the Fire Department when the Promenade 2035 project is fully built-out.

### **Response to Comment No. 32-16**

While the Project includes implementation of the same mitigation measures as required in the Warner Center Plan EIR, the Project also provides for Project specific project design features that would also address impacts to fire protection. In particular, Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, includes Project Design Features J.1-2, J.1-4, and J.1-9, which would reduce impacts for both police protection and fire protection. Specifically, Project Design Feature J.1-2 requires preparation of a Security Plan that would be developed in consultation with LAPD and LAFD outlining the security services and features to be provided in conjunction with the proposed Entertainment and Sports Center. In addition, Project Design Features J.1-4 and J.1-9 require the development of an Emergency Procedures Plan for both the Entertainment and Sports Center and the Project's other buildings that would outline employee guidelines and procedures in event of fire, medical emergency, civil disturbance, injuries to multiple individuals, evacuation, and other times of emergencies. The Emergency Procedures Plan would be subject to review by LAPD and LAFD. Additionally, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, pursuant to Mitigation Measure K-1, the Project Applicant would implement a Construction Management Plan that would include provisions to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Refer to Topical Response No. 5, Public Services, for further detail regarding Project impacts to fire protection.

### **Comment No. 32-17**

- **Public Schools (LAUSD)**—By adding the thousands of new residences at this project, the existing school structure will be challenged. The DSEIR fails to provide adequate consideration on this issue and relegates it to paying a mitigation fee to LAUSD without stipulating exactly where those fees are to be used. **There must be detailed solutions** to the influx of new students who will have to be accommodated. These solutions must be presented specifically in this DSEIR and committed to by LAUSD and the Lead Agency. The following comment in the DSEIR is insufficient to truly provide the adequate actions and mitigations required:
  1. Page I-133: “Project-level and cumulative impacts with regard to schools would be less than significant with the **payment of development fees** to LAUSD prior to the issuance of building permits.” (Emphasis added).

Our specific comment to the information of I-133 is that **developers have been paying these fees for years while little or no expansion or investment have occurred to**

**schools in the West Valley.** Population migration to other areas, an aging population, a lack of families moving to the area and the movement to private schools has been the product of mismanagement of the school system. The influx of high density housing will bring a younger populous and the increased opportunity for young families. LAUSD must publically and consistently be surveying the West Valley for current needs. An LAUSD plan and commitment regarding implementation of planned improvements and public outreach must be included in this DSEIR to adequately assess the impacts that are project specific and also the impacts that are cumulative. Failure to do so denies families coming into the community the opportunity and right for a good and affordable education.

### **Response to Comment No. 32-17**

As discussed in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, the number of Project-generated students who would attend LAUSD schools serving the Project Site would likely be less than the estimate in the Draft Supplemental EIR because this analysis does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools (i.e., Magnet Schools and Pilot Schools) located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Furthermore, this analysis does not account for Project residents who may also attend charter schools. Other LAUSD options that may be available to Project students include the following:

- Open enrollment that enables students anywhere within LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and magnet centers (such as Welby Way Charter Elementary School and Gifted-High Ability Magnet and Columbus Middle School Math, Science, and Medical Magnet), which are open to qualified students in LAUSD;
- The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school.<sup>46</sup> LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within LAUSD;

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<sup>46</sup> A feeder pattern is the linkage from elementary school, middle school, and high school.

- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Child care permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

As discussed in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, Senate Bill 50 (SB 50) allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, LAUSD collects development fees for new construction within its district boundaries. Currently, LAUSD collects the maximum new school construction facility fee at a rate of \$3.79 per square foot of new residential construction, \$0.61 per square foot of commercial/industrial construction, \$0.28 per square foot of self-storage structure, and \$0.39 per square foot of parking structure.<sup>47</sup> Payment of these fees is required prior to issuance of building permits. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels.

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 32-18**

- **Homeless and Transient Services**—the Entertainment and Sports Center (ESC) and open central park space will both be an attractive nuisance for the homeless and transient individuals. The DSEIR does not address the problem - and must provide a detailed type of plan that enumerates details about practical solutions if the problem arises. Again, the lack of details and procedures prohibits a proper response from the community on this critical matter.

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<sup>47</sup> Los Angeles Department of Building and Safety, *Permit Fee Estimate*, <http://netinfo.ladbs.org/feecalculator.nsf/3950786566dd7fcc88258152007def26?OpenForm>, accessed January 7, 2019.

**Response to Comment No. 32-18**

Refer to Topical Response No. 5, Public Services, above, for further information regarding measures that will be implemented by the Project for the Entertainment and Sports Center and well as the overall Project Site which would address the commenter's concern with homeless and transient individuals.

**Comment No. 32-19**

- **DWP**—Section M [Pages I-174–I-193] (Utilities and Service Systems) concludes that all systems (Water supply, Wastewater, Solid Waste, Natural Gas, and Electricity) will be available for the project at full build-out and with consideration of cumulative effects. However, mitigation measures and design features must be required to reduce the burden on the infrastructure. Given the recent power outages and the increasing problems of the aged infrastructure, major DWP improvements are needed to satisfy the proposed development—especially with the soaring increase in demand for water and power. A detailed explanation by the City and a full assessment of the costs of the needed improvements must be presented in the DSEIR. Failure to do so prohibits the public's ability to properly respond to this critical issue. There is a difference between the needs being met by available capacity and the certain increased demands for both more water and additional power to be taxing our aging systems.

**Response to Comment No. 32-19**

Refer to Topical Response No. 6, Infrastructure, above, for further detail regarding the Project's impacts to various utilities and service systems and the project design features and mitigation measures that would be implemented by the Project to ensure that adequate infrastructure would be available to accommodate the Project.

**Comment No. 32-20****VII. DSEIR ANALYSIS OF REASONABLE RANGE OF ALTERNATIVES**

Page I-22–I-24—11. Summary of Alternatives—The conclusions ascertained in the overall DSEIR for all of the Alternatives 1–5, are required to be added to the Executive Summary as only the descriptions of the Alternatives are included currently. The executive summary includes conclusions of impacts for all other categories and this is the only section where this information is missing. Only in the case of the Alternatives is the public forced to delve into the overly complex and lengthy main body of the DSEIR. This reduces the ability of the public to properly review and provide input, thus reducing fair due process.

**Response to Comment No. 32-20**

Table V-2 of Section V, Alternatives, of the Draft Supplemental EIR, provides an overall summary of the impacts for the various alternatives. CEQA does not require that the conclusions of the alternatives analysis be included in the Executive Summary.

**Comment No. 32-21**

A critical alternative is Alternative No. 5, which includes 2 options for Reduced Entertainment and Sports Center Seating capacity. The Alternative includes an option for a reduction from 15,000 seats to 10,000 seats and an option reflecting a reduction to 7,500 seats. However, the Alternative 5 does not propose a reduction in square footage overall for the ESC but only the options of smaller venues within the complex. The statement on Page I-24 illustrates this as follows,

“While this alternative analyzes a reduction in seating provided in the Entertainment and Sports Center, the building area of the Entertainment and Sports Center under Alternative 5 is assumed to be the same as that proposed under the project for the Entertainment and Sports Center. This will provide for a variety of smaller seating areas within the same building”

Clarity is lacking with the statement above and requires further scrutiny. The naming of Alternative 5 insinuates that a real reduction in overall seating capacity for the building is being studied. The statement above reflects the possibility that, in fact, the capacity could stay the same and that the venue is just being broken up into smaller rooms. Under that scenario, there would be little difference in environmental effects between Alternative 5 and the Proposed Project when comparing sold out events in all rooms, the worst case scenario.

The deception caused by the Description of Alternative 5 prevents fair and prudent public input and due process. An alternative that clearly studies reduced seating capacities for the overall building should be included in place of the current Alternative 5. If the intent of Alternative 5 was to analyze reduced overall seating capacity, then this will require clarification and will require an opportunity for further public input.

**Response to Comment No. 32-21**

The commenter is incorrect in the assumption that Alternative 5 did not analyze reduced overall seating capacity. Based on the description of Alternative 5 two options were analyzed. Specifically, this alternative analyzed a 10,000-seat Entertainment and Sports Center (Option 1) and a 7,500-seat Entertainment and Sports Center (Option 2). The number of seats is the driving factor of the number of vehicles trips, the day-time

population of the Project Site and the water, wastewater and solid waste generation, and 10,000 seats and 7,500 seats were used for each of these analyses.

The square footage of the Entertainment and Sports Center is proposed to remain the same in Alternative 5 because the square footage of the Entertainment and Sports Center is not directly related to the number of seats provided. As stated in the Draft Supplemental EIR, a reduced size Entertainment and Sports Center “will provide for a variety of smaller seating areas within the same building”, which would result in similar building volume. To illustrate this, Figure V-4 in Alternative 5 of the Draft Supplemental EIR provides a conceptual site plan for a reduced size Entertainment and Sports Center building that includes three different areas for sports or entertainment; as shown, there are multiple smaller seating areas with different field or stage uses. Each of these three areas for sports or entertainment would require its own back of house space, for instance for equipment storage, changing rooms, and associated support facilities. As a result, the Entertainment and Sports Center building in Alternative 5 would utilize a higher proportion of floor area for back of house support facilities, and a lower proportion of floor area for seating, as compared to the proposed Project. The Entertainment and Sports Center in Alternative 5 would thus have the same building volume and floor area as the Project, but with reduced seating capacity.

As described in Section V, Alternatives, of the Draft Supplemental EIR, Alternative 5 would eliminate the significant and unavoidable regional operational air quality impacts and off-site noise impacts during operation of the Project. However, Alternative 5 would not eliminate impacts related to regional air quality impacts during construction of the Project, historical resources, on-site construction noise impacts at on-site receptors, vibration impacts from off-site construction with respect to human annoyance, and traffic impacts during construction and operation of the Project. Nor would Alternative 5 eliminate the cumulative on-site and off-site construction noise impacts, off-site construction vibration impacts with respect to human annoyance, and traffic impacts during construction and operation of the Project.

### **Comment No. 32-22**

## **VIII. TRAFFIC MITIGATION**

There is no adequate traffic analysis of the impacts on our major streets and intersections in this DSEIR, since the proposed Promenade 2035 project includes the major ECS (Entertainment and Sports Center) that was not even anticipated or evaluated in the original WC 2035 Plan EIR. Nor does this traffic analysis fully include all of the major residential projects that are either under construction or are going through the Planning process. Additionally, the 2035 WC EIR assessments also failed to take into consideration the ongoing densification of the Reseda, Winnetka and Northridge areas, which

substantially add to traffic on major thoroughfares traveling through Warner Center as those area drivers connect to the 101 Freeway.

### **Response to Comment No. 32-22**

As discussed further in Topical Response No. 1, Warner Center 2035 Specific Plan, above, the City certified a programmatic EIR in 2013 evaluating the potential environmental impacts associated with full buildout under the Warner Center Plan. The Project's Draft Supplemental EIR analysis tiers off of the approved and certified Warner Center Plan EIR by analyzing Project-specific environmental impacts for the Project Site that may not have been covered under the Warner Center Plan EIR, for instance, impacts associated with the Entertainment and Sports Center. For each substantive impact area, the Draft Supplemental EIR describes and relies on the analysis in the Warner Center Plan EIR to the extent that analysis evaluates the Project's potential environmental impacts. For each substantive impact area where the Warner Center Plan EIR did not address the Project's specific impacts, the Draft Supplemental EIR provides in-depth supplemental analysis of the Project-specific construction and operational impacts. The Draft Supplemental EIR relies on and incorporates the applicable and feasible mitigation measures from the Warner Center Plan EIR. Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion about the Project traffic impact analysis that was reviewed and approved by LADOT consistent with the Warner Center Plan EIR. As described therein, and in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project's Traffic Study assumed full buildout under the Warner Center Plan. Additionally, the Draft Supplemental EIR's list of related projects includes all projects that had an application filed with the Department of City Planning or LADOT and was last updated in February 2017.

Further, the Project Traffic Study's growth assumptions related to background development in the Warner Center Model were the same ones used by the Warner Center Plan EIR. Those assumptions are based on socio-economic data including employment and household projections associated with the full development of the Warner Center Plan; additionally, the Warner Center EIR used a model (the Warner Center Model) that was developed from the Southern California Association of Governments' [SCAG] Regional Transportation Demand Model, which is based on the 2008 Regional Transportation Plan (RTP): Making Connections [SCAG, 2008]. Sub-regional growth outside of Warner Center is inherent to the Warner Center Model, to the extent that growth was projected for those areas, which are within the SCAG Regional Transportation Demand Model. Thus, the future traffic conditions capture the traffic growth from adjacent areas of the Warner Center. In addition, actual traffic counts were conducted in 2016, the year of the Project's NOP, to compare to the Warner Center EIR's projected traffic growth for 2016, as provided in Appendix FSEIR-2, of this Final Supplemental EIR. These empirical counts were lower than the Warner Center EIR's projected traffic volumes for 2016. Therefore the area-wide growth used by the Warner Center Plan EIR, and the Project EIR, is conservative.

**Comment No. 32-23**

The failure to consider all of the cumulative effects of traffic coming from the addition of the ECS, and from surrounding areas not considered in the original WC 2035 EIR, mean that a new and more comprehensive survey must be conducted—and a list of necessary mitigations completed—before this project begins construction:

1. The DSEIR lists (8) intersections that will have stated significant traffic impacts: Canoga & Vanowen, DeSoto and Vanowen, Owensmouth and Victory, Canoga and Victory, Shoup and Oxnard, Topanga and Oxnard, Topanga and Ventura. However, the ESC adds (4) intersections with stated significant impacts: Canoga and Oxnard, Topanga and Burbank, Topanga and the 101 West-bound off-ramp and Topanga and Clarendon. Seven (7) of those intersections are already rated “F” by DOT. A complete updated analysis of those intersections and the spill-over impacts onto the other 8 intersections cannot be accurately studied or assessed since there is no determination of the capacity and operating hours (during a game or performance) of the facility that can dramatically impact traffic at those locations.

**Response to Comment No. 32-23**

This comment does not specify under which project scenario and conditions the impacts stated would occur, but it is assumed that the comment describes Existing with Promenade Project Conditions as shown in Table IV.K-8 in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As shown in that table, each of the identified locations are also impacted under the full build out condition of the Warner Center Plan. However, a Warner Center Mitigation Measure has been identified for each of these intersections and projected to mitigate the impact. Therefore, each of the impacted intersections identified can be mitigated by the Warner Center Mitigation Program. As the full Project is not proposed to be constructed until 2033, the Future with Project conditions analyzed in Table IV.K-10 is the more relevant reference to assess traffic impacts. Under this analysis, all intersections would be mitigated to less than significant levels with implementation of the Warner Center Mitigation Program, as discussed further in Topical Response No. 3, Traffic and Parking, above.

Refer to Response to Comment No. 32-22 regarding the Traffic Study’s consideration of cumulative impacts. Refer to Topical Response No. 3, Traffic and Parking, for a discussion of the Project’s traffic impact analysis methodology and proposed mitigation measures. Refer to Topical Response No. 2, Entertainment and Sports Center, for a summary of the traffic analysis conducted for the Entertainment and Sports Center, which assumed a sold-out event at 15,000 seats occurring on a weekday evening and Saturday mid-day and evening periods.



As a note, the commenter correctly states that eight intersections will have stated significant traffic impacts; however, the commenter only lists seven. The commenter is missing the De Soto Avenue & Victory Boulevard intersection from this list.

**Comment No. 32-24**

2. Traffic estimates for Topanga Canyon, Owensmouth, DeSoto, Winnetka, and Victory: Estimates for traffic on the main thoroughfares to, through and from Warner Center fail to use fully-updated traffic counts and revised 2018 numbers. Estimates for the original WC 2035 Plan did not take into account all the densification currently occurring in adjacent areas and in connected areas like Chatsworth, Northridge and Reseda which greatly impact traffic trying to reach the 101 Freeway and the Valley travel core.

**Response to Comment No. 32-24**

Refer to Response to Comment No. 32-22 regarding the Traffic Study's consideration of cumulative impacts. Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion about the traffic impact analysis methodology. Actual traffic counts, which are included in Appendix FSEIR-2, of this Final Supplemental EIR, were conducted in 2016, the year of the Project's NOP, to compare to the Warner Center EIR's projected traffic growth for 2016. These empirical counts were lower than the Warner Center EIR's projected traffic volumes for 2016. Therefore the area-wide growth used by the Warner Center Plan EIR, and the Project EIR, is conservative.

**Comment No. 32-25**

3. The DSEIR clearly designates the only mitigations for these intersections are the planned physical improvements implemented as part of the original 2035 Warner Center Plan Mitigation Program. The DSEIR fails to incorporate the latest traffic counts and forecasts and factor in the traffic counts for the built-out ESC. This means all DSEIR traffic projections must be reevaluated using updated, accurate data that includes these factors.

**Response to Comment No. 32-25**

Refer to Response to Comment No. 32-22 and 32-24. Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion about the traffic impact analysis methodology, as well as a discussion about the proposed mitigation measures.

**Comment No. 32-26**

4. The critical on/off ramps to access and exit the 101 Freeway from Topanga Canyon Blvd. have not been adequately researched using updated traffic figures

that include the full build-out of the WC 2035 plan, or the ESC. The specifics on how CalTrans [sic] will accommodate and mitigate the influx and out-pouring of additional automobiles to and from the ESC have not been established, and mitigation fees from the developer cannot physically reduce the congestion or confusion that will be generated by the complex. The DSEIR must be revised to accurately incorporate all of that data in order for the public to render cogent and accurate commentary.

### **Response to Comment No. 32-26**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion about the traffic impact analysis methodology. Refer to Response to Comment Nos. 32-22 and No. 32-24, above, for a description about the background traffic volumes developed as part of this analysis. Topical Response No. 3, Traffic and Parking, also describes the proposed mitigation measures and the Event Management Plan, which will be implemented during Entertainment and Sports Center events. In addition, refer to Response to Comment No. 32-13, above, for a discussion regarding the supplemental Caltrans analysis provided in the Draft Supplemental EIR.

### **Comment No. 32-27**

5. In the DSEIR, the traffic impact analysis assumes a full implementation of all measures in the mitigation plans. However, many of those measures—especially the ones requiring Caltrans involvement—have not been implemented, and the DSEIR assumptions are overly optimistic in terms of mitigation capabilities, as well as the reliance on mitigations from the yet-to-be-formed Neighborhood Protection Committee—the body expected to implement the Neighborhood Protection Plan for residential streets, as called for in the 2035 Warner Center Specific Plan. The DSEIR must be reconsidered and revised to provide the public with accurate analysis so that the community can respond with commentary that is succinct and targeted.

### **Response to Comment No. 32-27**

Refer to Topical Response No. 3, Traffic and Parking, above which discusses the traffic impact analysis methodology, Warner Center Mitigation Program and Warner Center Plan Implementation Board, and neighborhood protection.

### **Comment No. 32-28**

6. The DSEIR relies on 2008 Data, which used a growth rate factor of .56%. This does not accurately reflect the true area growth due to recent housing and apartment construction and a surrounding area increase of approximately 17,000 residents since 2008 which is not accounted for in the original 2035 Warner Center EIR. More up-to-date data must be used to rewrite the DSEIR so that it

more accurately presents the traffic problems we will face, and provide specific mitigations for it.

### **Response to Comment No. 32-28**

Refer to Response to Comment No. 32-22, above, for a discussion of the background assumptions used to develop the traffic volumes for this analysis. Actual traffic counts, as provided in Appendix FSEIR-2, of this Final Supplemental EIR, were conducted in 2016, the year of the Project's NOP, to compare to the Warner Center EIR's projected traffic growth for 2016. These empirical counts were lower than the Warner Center EIR's projected traffic volumes for 2016. Therefore the area-wide growth used by the Warner Center Plan EIR, and the Project EIR, is conservative.

### **Comment No. 32-29**

## **IX. COMMERCIAL AND RETAIL PHASE PLAN CONSTRUCTION AND LACK OF BALANCE**

**Commercial Phase Balance:** There is no guarantee when—or even if—the commercial phases of many WC projects will be built since their unresolved construction dates exploits a flaw in the 2035 WC Specific Plan by hedging the requirement with the notation, “subject to market conditions.” The DSEIR fails to recognize this situation and provides flawed estimates to the impacts this project will have by failing to balance Residential with Commercial as development proceeds.

1. **Intention of 2035 WC Specific Plan was to balance live, work, and play.** By indefinitely postponing the “work” element of proposed developments—including the Promenade 2035 project—and leaving commercial construction for a final phase that may never get built due to unspecified “market conditions,” the anticipated balance is dramatically tipped to residential use without any conditioning or guarantee(s) necessitating the construction of the commercial work elements within a specified time limit. The DSEIR fails to discuss or determine any penalty or guarantee that would mandate the required commercial balance for the Promenade 2035 project. The DSEIR must compel the developer to maintain a balance of residential to commercial as the Promenade project is being constructed.

### **Response to Comment No. 32-29**

The Project's phasing plan is intended to describe the geographic area covered by each phase of the Project, with the order of buildout of these geographic phases subject to change. As such, the Southeast Phase, or any other geographic phase, could be the first phase built. However, even under the current proposed phasing order, the commenter is incorrect that there would no employment opportunities at the Project until the last phase.

The Northeast Phase contains 85,000 square feet of non-residential area, which includes both work-live units and retail uses. Each of the remaining phases also include office uses: the Northwest Phase has 114,000 square feet of creative office uses, the Southwest Phase has 43,000 square feet of office uses, and the Southeast Phase has 472,000 square feet of office uses.

The environmental analysis contained in the Draft Supplemental EIR is based on the Project-specific proposed square footage of non-residential and residential uses. Additionally, the Project's mix of uses is consistent with the Warner Center Plan's requirement that projects within the Downtown District include a balance of non-residential to residential uses. Specifically, for an FAR of 2.3:1, the Plan limits residential uses in the Downtown District to a maximum 48 percent of the allowable FAR and requires at least 52 percent of the required FAR be non-residential uses. In compliance with this requirement, the Project proposes 48 percent residential development and 52 percent non-residential development.<sup>48</sup> This ratio of non-residential to residential floor area would be achieved at buildout, consistent with the Warner Center Plan.<sup>49</sup>

### **Comment No. 32-30**

2. **“Market Conditions” and “Market Rate” terminology cannot be adequately or fully evaluated by the DSEIR.** Those two terms are used throughout the DSEIR to give the developer unrestrained leeway as to fulfilling the requirements of the 2035 WC Plan. Those terms provide no established boundaries, timelines or specifics, thus depriving the public of the ability to make an accurate evaluation of the feasibility or timing of critical elements of the Promenade 2035 project. The DSEIR must enumerate the specifics and parameters for each of these terms so that the public has due process in order to provide accurate comments.

### **Response to Comment No. 32-30**

The term “Market Conditions” is used in the Draft Supplemental EIR to describe how the order of buildout of the Project's geographic phases will be determined. Basing the order of buildout on market conditions means that the phases will be constructed in the order that best meets demand at the time of construction. For instance, if there is strong demand for office uses at the time of Project construction, then the phase with the greatest

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<sup>48</sup> *At buildout, the Project would provide 3,271,050 square feet of floor area, comprising 1,726,050 square feet of Non-Residential Floor Area (52 percent) and 1,545,000 square feet of Residential Floor Area (48 percent)*

<sup>49</sup> *Appendix B, Graduated FAR table, Note 6, of the Warner Center Plan provides that “[m]ulti-phased projects may reserve floor area for the required non-residential component in a future phase on-site.”*

square footage of office may be built as one of the first phases. Constructing a phased project based on market demand minimizes the chances of constructing a building and use that is not needed and will remain vacant, which does not benefit the community.

“Market Rate” is not used in the Draft Supplemental analysis. The consistency of the Project’s residential uses with land use policies and objectives is analyzed in Section IV.G, Land Use, of the Draft Supplemental EIR. As discussed in Section IV.G, Land Use, of the Draft Supplemental EIR, the Project would develop 1,432 multi-family residential units consisting of studio, one-, two-, and three bedroom rental units would be rented at different price points providing options to meet the needs of the potential renters.

As analyzed in Section IV.G, Land Use, of the Draft Supplemental EIR, the Project will comply with all requirements of the Warner Center Plan and other regulatory requirements. The Warner Center Plan includes a process for the approval of Multiple Phase projects like the Project, and the Draft Supplemental EIR analyzes the phasing of the Project where appropriate, including the construction analysis of air quality, noise, and traffic, throughout the environmental analysis.

### **Comment No. 32-31**

3. **Future proposed changes must require each “Phase” of the Promenade 2035 project to be reevaluated by the public.** Future changes in “market conditions” can change the build-out proposals of the Promenade 2035 project, the size and look of specific project elements, transportation and mobility mitigations, and other important factors. The DSEIR does not factor any of those specific changes into its DSEIR. To guess what will “come down the road” is to speculate or guess what the developer may do, and that is a denial of process for the public which must be reconsidered in the DSEIR.

### **Response to Comment No. 32-31**

The Draft Supplemental EIR analyzes the phasing of the Project where appropriate, including the construction analysis of air quality, noise, and traffic, throughout the environmental analysis. For instance, as discussed in Topical Response No. 3, Traffic and Parking, the Traffic Study provides a phased analysis for both Project construction and operations and the Project’s traffic mitigation measures are phased. Additionally, as discussed on page IV.K-21, in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, if ultimate buildout of the Project changes the order or overlaps any of the Project phases, then LADOT shall request an updated analysis confirming that the impacts identified in this analysis remain unchanged.

The Warner Center Plan includes detailed requirements for the approval of Multiple Phase projects. Based on the information submitted, the Director may approve,

conditionally approve, or disapprove all phases of the Project. Provided that the subsequent phases are in full compliance with the terms and conditions of the Multiple-Phase Project approval, no future compliance review is required, in accordance with the Warner Center Plan. However, if the future phases are not consistent with Project approvals, then the future phases of the Project would be subject to further review by the Director.

#### **Comment No. 32-32**

4. **Imbalance of residential to commercial:** Leaving the major commercial components of the project to “Phase IV” of the construction plan and building an Entertainment and Sports Complex (ESC) in Phase III sublimates the intended live/work balance of the 2035 WC Plan. This important aspect of the 2035 WC Plan was not adequately evaluated in the DSEIR and must be reconsidered. This is vital because the DSEIR’s environmental and traffic assumptions rely on sustaining the live/work balance and mitigating negative impacts. Without an accurate reassessment, the public is unable to render accurate commentary, which is a failure to provide due process. **The Lead Agency must consider and require that “Phase III” (the Stadium) be moved to “Phase IV” and re-evaluated when the Developer has sufficient details to make a review meaningful.**

#### **Response to Comment No. 32-32**

Refer to Response to Comment No. 32-29, above.

#### **Comment No. 32-33**

### **X. ENTERTAINMENT AND SPORTS COMPLEX STADIUM/ARENA**

One of the most contentious and critical elements of the Promenade 2035 application is the proposed Entertainment/Sports Complex (ESC). It by any other name is a huge Stadium. The DSEIR fails to adequately address, detail or mitigate crucial factors concerning this major structure including its exact size and capacity, its exact format, and its impacts on traffic, neighboring residences, or nearby buildings. The proposal for this structure is not specific. Therefore, conclusions in the DSEIR can only be arbitrary and without accurate data to evaluate the project, therefore denying the public due process.

1. **The wrong standard:** The real flaw in the DSEIR is attempting to analyze the Entertainment/Sports Complex (ESC) is the reliance on a false standard. The Complex has always used the “seats” as the standard when it is the “Occupant Load” that is the proper standard. To permit a Stadium to be restricted by the number of seats and not the Occupant Load encourages deceptions of putting in

“standing room viewing” that can be substantial. Analysis with the wrong standard results in the wrong conclusions.

### **Response to Comment No. 32-33**

Refer to Topical Response No. 2, the Entertainment and Sports Center, above, regarding the Draft Supplemental EIR’s comprehensive analysis of the potential environmental impacts of the Entertainment and Sports Center. The Entertainment and Event Center trip generation methodology, which was approved by LADOT and consistent with the ITE Trip Generation Manual, based event center trip rates on event center seating. Consistent with this methodology, the Traffic Study evaluated traffic studies of other large scale event venues in Los Angeles (all previously approved by LADOT) to determine a trip generation rate for the Entertainment and Sports Center. Those event center traffic studies identified a typical average vehicle ridership (AVR) of 2.5 to 3.5.<sup>50</sup> The AVR represents the average number of persons arriving by a typical vehicle and accounts for all vehicular modes of travel, including single/high occupancy vehicles, carpools, special event buses, and public transportation. To provide a conservative analysis, an AVR of 2.3, as approved by LADOT, was used for the purposes of developing the Entertainment Center trip-generation estimate. That AVR rate was applied to the number of seats at the Entertainment Center to develop a rate of vehicle trips per seat.

### **Comment No. 32-34**

2. **Director’s Determination:** The DSEIR section(s) dealing with this proposed structure delegate key decisions as to size, capacity and roof determination (roof/no roof) to a Director’s determination. The developer has had adequate time and resources to make their own determinations as to maximum occupancy capacity and a specific roof-style but didn’t include those final decisions in the DSEIR. Instead, the DSEIR offers a smorgasbord of choices that is proposed to be left to a Director’s determination. The submission of all of these “Alternatives,” denies the public access to a single set of specifics and accurate projections for some of the most critical elements of this structure. That prevents the public from being able to accurately and specifically raise issues and respond in the legal time limit. The DSEIR must be resubmitted with specific, final choices from the developer so that the public is presented with a definite and accurate picture of what is being planned.

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<sup>50</sup> The traffic studies for the Los Angeles Sports & Entertainment District (LA Live), [https://planning.lacity.org/eir/LA\\_Entertainment\\_District/draft/text/appendices/Volume%20II/Appendix%20E/Cover\\_and\\_TOC.pdf](https://planning.lacity.org/eir/LA_Entertainment_District/draft/text/appendices/Volume%20II/Appendix%20E/Cover_and_TOC.pdf), and Los Angeles Convention Center Modernization and Farmers Field Project, [https://planning.lacity.org/eir/ConventionCntr/DEIR/files/Appendix%20I.1%20-%20Traffic%20Report\\_vol%205.pdf](https://planning.lacity.org/eir/ConventionCntr/DEIR/files/Appendix%20I.1%20-%20Traffic%20Report_vol%205.pdf), identified a range of 2.5–3.5 AVR.

**Response to Comment No. 32-34**

As discussed in Topical Response No. 2, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan, which is being requested for the Project. As the Warner Center Plan does not specify a maximum size for entertainment uses permitted under the Plan, a Director's Interpretation is requested to approve the proposed number of seats at the Entertainment and Sports Center, which must be approved by the Director of Planning.

Refer to Topical Response No. 2, the Entertainment and Sports Center, regarding the Draft Supplemental EIR's comprehensive analysis of the potential environmental impacts of the Entertainment and Sports Center. The Draft Supplemental EIR provides a conservative analysis of all aspects of the Entertainment and Sports Center, and the operator ultimately identified for the Entertainment and Sports Center will be required to operate within the scope of environmental impacts identified in the Draft Supplemental EIR and implement all required mitigation measures. For instance, the Project includes the option for constructing the Entertainment and Sports Center with a closed roof or partial roof, and the Project's environmental analysis analyzes whichever option has greater environmental impacts for each impact issue area, in order to provide a conservative analysis. Similarly, while the Entertainment and Sports Center may be smaller than 15,000 seats, this maximum seating capacity is analyzed in the Draft Supplemental EIR as the greatest potential environmental impact. In addition, as required by and consistent with the CEQA Guidelines Section 15126.6(a), the Draft Supplemental EIR analyzed alternatives that would avoid or substantially lessen significant impacts relative to the Project.

**Comment No. 32-35**

3. **No Specific 2035 WC Permission:** Additionally, there is NO specific language in the WC 2035 Specific Plan that determines if a complex of the size and scope of the proposed ESC in the Promenade 2035 project is even allowed by WC 2035 guidelines. The Applicant states that a structure of this size and use is "not specifically prohibited." However, many community groups and individuals believe that after 8 years of debates and negotiations with the City, the WC 2035 Plan is a finalized law that would have addressed this issue if the Specific Plan was intended to allow a stadium/arena of this size in Warner Center. Omission in the 2035 Plan must not be considered an endorsement for any complex of this nature and size. The ESC complex cannot legally be considered an "Entertainment" use that is permitted, contemplated, discussed or encouraged by the WC 2035 Specific Plan, and therefore it must not be permitted in the Promenade 2035 project.



**Response to Comment No. 32-35**

Refer to Topical Response No. 2, the Entertainment and Sports Center, regarding consistency of the Entertainment and Sports Center with the Warner Center Plan. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 32-36**

4. **Undetermined Aspects:** In the DSEIR, the developer fails to make a firm decision on the issue of maximum occupancy capacity and if there will be a roof or no roof. The public must have a definite proposal as to the capacity and roof issues, or else it leaves the options open for the Applicant, but leaves the community with no information as to specific mitigations needed and offered as far as traffic, noise, lighting and other factors impacting the surrounding neighborhoods. When evaluating the DSEIR, the public has a right to have complete and final information in order to render a fair evaluation and generate an accurate response. Again, this is a failure to provide due process and the DSEIR must be rewritten to include a final determination by the Applicant.

**Response to Comment No. 32-36**

Refer to Response to Comment No. 32-34 and Topical Response No. 2, the Entertainment and Sports Center, regarding the Draft Supplemental EIR's comprehensive analysis of the potential environmental impacts of the Entertainment and Sports Center.

**Comment No. 32-37**

5. **“Phase III” should be moved to “Phase IV”:** It is strongly our position that future proposed changes must require each “Phase” of the Promenade 2035 project to be reevaluated by the public. This is especially true with the Stadium (ESC). The lack of detail—and commitment on behalf of the Developer—require that the Lead Agency require the Developer to move the ESC to the last Phase. This will permit the commercial/residential ratios to be in balance before the ESC is undertaken. Further, the size of the ECS is so large that it is a “project” within itself and the “details” of the “project” as it will then relate to the community must be brought back to the for both community and Lead Agency review and comment. To do otherwise is again a denial of the community's substantive and procedural due process rights.

### **Response to Comment No. 32-37**

The Warner Center Plan requires that any Project on a site greater than 217,800 square feet (5 acres) be master planned.<sup>51</sup> The purpose of this requirement is “to ensure that pedestrian and walkability goals of the Warner Center Plan are preserved and/or enhanced. The Master Planned Project requirement is designed to protect large lots from incremental development that, over time, would prevent the larger development goals of the Plan from being realized.”<sup>52</sup> Therefore, the Applicant is required to submit a development application for the entire Project Site, to ensure that the design requirements of the Warner Center Plan are met.

Further, the Warner Center Plan also includes detailed requirements for the approval of Multiple Phase projects. Based on the information submitted, the Director may approve, conditionally approve, or disapprove all phases of the Project. Provided that the subsequent phases are in full compliance with the terms and conditions of the Multiple-Phase Project approval, no future compliance review is required, in accordance with the Warner Center Plan. However, if the future phases are not consistent with Project approvals, then the future phases of the Project would be subject to further review by the Director.

Refer to Response to Comment No. 32-29 regarding the non-residential to residential ratio of the Project. Also refer to Topical Response No. 2, Entertainment and Sports Center, for further details regarding the assumptions made in the Draft Supplemental EIR for analysis of the Entertainment and Sports Center.

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 32-38**

6. **Director’s Interpretation:** The DSEIR’s designation of a “Director’s Interpretation” to be made by the Lead Agency as to size, capacity and roof choice of the ESC denies the public due process. By inserting this procedure in the DSEIR, the applicant has avoided presenting accurate information and analysis to the public—instead assigning these crucial determinations to a Lead Agency that will not be under public scrutiny when these critical decisions are made. This precludes a complete lack of transparency and a failure to provide

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<sup>51</sup> Warner Center Plan, Section 5.3.3.2

<sup>52</sup> Warner Center Plan, Section 5.3.3.1.

due process in the EIR process. The community would not have any real oversight of this project, or the Director's interpretations. That is wrong, unfair to the community, and does not fulfil [sic] the purpose and public interest of CEQA.

### **Response to Comment No. 32-38**

Refer to Response to Comment No. 32-11, above.

### **Comment No. 32-39**

7. **Inaccurate Traffic Counts:** Traffic estimations that are not accurate for the ESC are provided in the DSEIR. Neither the Applicant nor the City can make accurate estimates, because the maximum occupancy capacity and use factors for the Entertainment and Sports Center are undecided at the time the DSEIR is being evaluated. Accurate traffic projections and mitigations concerning the project cannot be made until final decisions on the maximum occupancy capacity and specific usages of the complex are submitted and evaluated. Not having accurate traffic projections burdens key routes on Ventura Boulevard, Topanga, Oxnard and the 101 Freeway for which no realistic mitigation plans have been provided. On page I-154 of the Executive Summary, the Caltrans Analysis does not include impacts to On-Ramp queuing or on proposed mitigation efforts for existing LOS E and F segments.

### **Response to Comment No. 32-39**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion of the traffic impact analysis methodology, including the trip generation estimates. Section IV.K, Traffic, Access, and Parking, in the Draft Supplemental EIR, provides a full description of the development of the Project trip generation and analysis periods. The analysis of the Entertainment and Sports Center is based on a sold-out event with 15,000 seats, and therefore analyzes the maximum potential environmental impact. Refer to Response to Comment No. 32-13 regarding the supplemental analysis of potential impacts to state facilities (freeways) prepared based on Caltrans guidelines.

### **Comment No. 32-40**

8. **Roof Options:** Undecided roof option makes evaluation of the entertainment and sports complex unreliable. The developer has failed to make a decision in the DSEIR as to whether their proposed entertainment/sports arena would have a fully enclosed roof, or if it is to be an open-air stadium. The failure to make a final roof decision makes it impossible to evaluate a number of critical impacts that can affect the community. Accurate estimates as to noise, lighting impacts, traffic counts and other vital factors cannot be accurately judged in the DSEIR, and any determinations in that document cannot be considered as factual until a final roof decision is made and submitted, and another study is conducted to

measure all of the potential impacts of the ESC project. Moving forward with any decisions on the entertainment/sports complex denies the public due process.

### **Response to Comment No. 32-40**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion of the Draft Supplemental EIR's conservative analysis of the Entertainment and Sports Center's maximum environmental impacts.

### **Comment No. 32-41**

9. **Lighting Impacts:** The impacts of sports or entertainment lighting on neighboring residences and on nearby businesses from an open-air entertainment/sports complex have not been studied or included in the DSEIR. Proposed lighting configurations and specifications have not been provided by the developer in the studies, and therefore cannot be accurately analyzed or evaluated by the public. Any consideration of the proposed ESC must be rejected since the potential impact(s) of the bulb size, lumens, direction and physical placement of the lighting banks cannot be studied and evaluated. Total lumens, light glare, light seepage and impacts to neighboring areas must all be thoroughly analyzed by the DSEIR and they have not been. Sporting events require substantially more candlepower than many other open-air events which can have substantial impacts on neighboring residential homes and complexes. Also, potential lighting techniques like strobes, sky searchlights and other lighting effects frequently used in outdoor concerts have not been studied in the DSEIR and must be included for an accurate analysis.

### **Response to Comment No. 32-41**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion of the Draft Supplemental EIR's conservative analysis of the Entertainment and Sports Center's maximum lighting impacts.

### **Comment No. 32-42**

10. **Sound and Noise Impacts:** Noise and sound issues emanating from the ECS have not been accurately addressed or thoroughly analyzed in the DSEIR due to the failure of the developer to specify whether the structure will be open-air, or have a roof. Consideration of the ESC must be removed from the Promenade 2035 project's EIR process until a final decision on the roof configuration, the maximum occupancy capacity figures and the types of events/performers it intends to feature in the complex is included in the studies. The DSEIR states that the level of noise from the complex will be "less than significant." However, no studies can be conducted or evaluated because the size, configuration, and

roofing for the facility have not yet been decided. Therefore all resolutions made for this project in the DSEIR actually deprive the public of an accurate evaluation made in the context of a fully developed plan with their accompanying factual data. Additionally, many sports and entertainment acts require significant amplification which is unmeasured and not evaluated in the DSEIR. Sporting events also generate “excitement moments” that are many dBs higher than the underlying crowd noise. Moreover, it is common practice in the hours preceding concert events for event crowds to perform loud sound checks. Those factors have not been analyzed in the DSEIR. In addition, the DSEIR does not suggest any type of monitoring systems for the noise factor, nor has a threshold noise level been set for the venue so that violations and penalties can be established. All of those factors create a denial of due process, and deny the community the ability to offer input that can protect their residences and the enjoyment of their neighborhood(s).

### **Response to Comment No. 32-42**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion of the Draft Supplemental EIR’s conservative analysis of the Entertainment and Sports Center’s noise impacts. The commenter is incorrect that no threshold noise level has been set for the Entertainment and Sports Center. As described in Topical Response No. 2, Entertainment and Sports Center, above, and Section IV.H, Noise, of the Draft Supplemental EIR, Project Design Features H-4 and H-5 impose a maximum noise level for all outdoor amplified sound systems, including at the Entertainment and Sports Center, which would be monitored and enforced by the Mitigation Monitoring Program, provided in Section IV, Mitigation Monitoring Program, of this Final Supplemental EIR. As described in the Draft Supplemental EIR, the noise impacts analysis for the Entertainment and Sports Center was based on a sold-out event (full capacity) live music/concert, which would generate the highest noise levels as compared to noise generation for typical sport events. In addition, the sound levels generated by the amplified sound system for a music concert would be louder than the typical PA system used for a sporting event. There would be “excitement moments” during a sporting event, which would generate cheering noise from the fans. However, noise levels associated with crowd cheering are included in the noise analysis. As described in the Draft Supplemental EIR, the noise analysis utilized shouting sound levels as a basis of the crowd cheering noise for the concert goers (full capacity crowd noise), which would be similar to crowd cheering at a sporting event. Furthermore, the excitement moments would be intermittent and brief in duration during a sporting event. Therefore, the noise analysis represent the most conservative analysis.

Additionally, the actual measured sound spectrum from typical concerts was used for the Entertainment and Sports Center noise analysis (as discussed on page IV.H-53 of

the Draft Supplemental EIR). As discussed on page IV.H-22 of the Draft Supplemental EIR, a pink noise source<sup>53</sup> was used only for the site specific sound propagation test, conducted to identify any potential sound amplification due to presence of the existing natural land topography and the intervening landscape in the existing hills southwest of the Project Site. The use of pink noise as sound source is a standard engineering method to measure the outdoor sound attenuations due to distance, topography, meteorological and other existing natural components in the outdoor environment. The results of the site specific sound propagation test are provided in Figure IV.H-3 and Table IV.H-10 of the Draft Supplemental EIR. As discussed on page IV.H-22 and presented on Figure IV.H-3 of the Draft Supplemental EIR, the empirical measured noise levels from the sound propagation test are actually lower than the results from the site-specific 3-dimensional computer noise model. As such, the Project noise analysis is conservative, as actual noise levels should be even lower than the levels estimated in the Draft Supplemental EIR.

### **Comment No. 32-43**

11. **Shared Parking Agreements:** Shared parking for events with neighboring properties not owned or controlled by the developer has not been accurately analyzed. A considerable amount of the required parking for a 15,000-seat ECS is projected to be provided through parking covenants and agreements with neighboring commercial buildings near the complex site. However, there is no guarantee that the “shared parking” will be available in the future, as availability will be determined by the buildings’ occupancy rates and usage, as well as the days and times of the sports/entertainment complex event(s). The DSEIR fails to ensure that there will be verified long-term parking contracts with neighboring buildings before an ESC gets built. It also fails to specify that if the parking agreements should terminate, that the use of the stadium will also terminate unless other parking structures of equal or greater size are provided. **The Lead Agency MUST require that the adequate parking agreements are in place before any certificates of occupancy are issued for the ESC and if any should lapse or terminate, then any certificates of occupancy must terminate until the parking is corrected.**

### **Response to Comment No. 32-43**

Refer to Topical Response No. 2, Entertainment and Sports Center, and Topical Response No. 3, Traffic and Parking, above, for a discussion of the Project’s shared parking and the parking associated with the Entertainment and Sports Center. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

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<sup>53</sup> “Pink noise is a random noise source, which has equal sound levels in the audio octave band frequencies (from 63 Hz to 8 kHz).”

**Comment No. 32-44**

12. **Private Security:** The DSEIR fails to adequately address the issue of additional stadium/arena security that will be necessitated by a very large entertainment and sports venue. Because the Topanga Division of the LAPD operates with tremendous manpower constraints, it cannot be reasonably expected that the LAPD will have the resources to monitor and control on-going crowds at a potential 15,000-seat venue. However, specific details for security and additional LAPD support have not been provided in the DSEIR or by the Applicant. This is crucial information that is necessary for the public to have when making a realistic assessment of this issue in the DSEIR. A new DSEIR must be submitted containing this information and the public must be granted additional time to assess this information and submit their comments.

**Response to Comment No. 32-44**

Refer to Topical Response No. 2, Entertainment and Sports Center, and Topical Response No. 5, Public Services, above.

**Comment No. 32-45****XI. NEIGHBORHOOD PROTECTION PLAN AND PROCEDURES**

Neighborhood Protection Plans are an important component of the WC 2035 Specific Plan. However, this DSEIR provides little or no insights on what protection procedures are intended by the developer, or what specific procedures it will be compelled to follow:

- By failing to articulate the plans and procedures to protect surrounding neighborhoods from impacts caused by the Promenade 2035 development, the public has no facts on which to file comments or objections. The community is essentially left “voiceless” on some of the most important mitigation measures that the developer is expected to provide. That includes cut-through traffic from the Promenade development, overflow parking, and other important issues. Each measure must be spelled-out, and the mitigation plans articulated in the DSEIR so that the community knows what they can expect, and can accurately comment on them.

**Response to Comment No. 32-45**

Refer to Topical Response No. 3, Traffic and Parking, above regarding neighborhood protection plans, traffic and parking.

**Comment No. 32-46****XII. OPEN SPACE / PAOS ISSUES**

While the Promenade 2035 meets the WC 2035 Specific Plan's requirement for Open Space and Public ally Accessible Open Space (PAOS), there are many critical factors that are either overlooked, omitted or unresolved in the DSEIR:

1. The security plans (and security measures) for patrolling and controlling the large open areas within the project (The central park, small residential green areas) are not adequately adduced. The DSEIR does not fully explain the role or scope of the private security force it proposes. Will the private security force have the training and capabilities to handle issues so that the LAPD is not burdened? If not, how much time and how many LAPD personnel will be required to augment the private security force? These specific issues must be raised and addressed in the DSEIR.
2. Will all PAOS be under the scrutiny and control of the private security? Will that scrutiny extend to monitoring public bathrooms? Will the private security force have authority to close off PAOS spaces within the Promenade? What are the prevention plans to discourage the homeless and transients from residing or setting up camps in the main park? Again, the public is denied due process because these issues and mitigations are not clearly enumerated in the DSEIR.
3. This DSEIR does not specifically address security in the form of security lights and cameras or present an accurate picture of how and where they will be used. Nor does the DSEIR verify that Westfield (Unibail–Rodamco–Westfield) will be responsible for hiring, training and deputizing security staff so the LAPD will not be required to respond to all security calls related to the site. These are all critical safety issues that the community needs specific answers for, and which the DSEIR fails to provide. These issues must be addressed in a new DSEIR and the public must be given adequate time to analyze them and respond.
4. What are the limitations on usages for the open spaces and PAOS-and who will set the standards? The City? The developer? The community must be able to have input on what those standards are. Because they are not presented in the DSEIR, the public cannot accurately comment on those standards. This is critical because the usage will affect the community-and impact on their quality and enjoyment of life. The DSEIR must be rewritten to incorporate this information and the public must be granted adequate time to analyze the data and provide comments.

**Response to Comment No. 32-46**

Refer to Topical Response No. 5, Public Services, and Topical Response No. 7, Open Space, regarding security and the Project's open space uses.



**Comment No. 32-47**

5. Macy's Bells: While the Macy's building itself may not have any community historical significance the bells are at least a symbol of the past that must be retained. We understand that these bells are in the possession of the developer and should be part of the open space development on the Project to maintain some historical reference to the Woodland Hills past.

**Response to Comment No. 32-47**

The Macy's bells are no longer a part of the building, having been removed several years ago prior to the initiation of the Project, and therefore are not a current character-defining feature of the building. At the time of removal, a set of the bells were donated to the San Fernando Valley Relics Museum to be put on public display.<sup>54</sup>

**Comment No. 32-48****XIII. CONCLUSION:**

This Draft Supplemental Environmental Impact Report (DSEIR) is defective, misleading and fails to meet the basic needs and requirements of CEQA. It must be rejected by the Lead Agency and a new DETAILED project with sufficient facts and proposals to be properly evaluated must be proposed. Not what has now been presented to the public.

Even the Public Resource Code, Section 21061, makes it clear that "details" are required. "An environmental impact report is an informational document... **The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment**". (Emphasis added).

A fundamental governmental concept that makes democracy so admired is the right of the public to due process—the right to know and to be heard. With insufficient facts, we all—including the Lead Agency—are deprived of our rights.

**Response to Comment No. 32-48**

The Draft Supplemental EIR meets the requirements of CEQA. The Draft Supplemental EIR includes the necessary details to fully evaluate the environmental

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<sup>54</sup> *The San Fernando Valley Relics Museum is located at 7900 Balboa Blvd. C3 & C4 Entrance on, Stagg St, Van Nuys, CA 91406.*

impacts of the Project. None of the circumstances requiring recirculation of a draft EIR set forth in CEQA Guidelines Section 15088.5 have been met. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 33**

Joyce Fletcher  
President  
Woodland Hills–Warner Center Neighborhood Council  
20929 Ventura Blvd., Ste. 47-535  
Woodland Hills, CA 91364-2334

**Comment No. 33-1**

**On May 9, 2018 the Board of the Woodland Hills–Warner Center Neighborhood Council (WHWCNC) met at a publicly held Board meeting and voted to approve a motion to Request a 90 Day Extension of the Public Comment Period to review the SEIR for the Promenade 2035 Project**

**Vote: Ayes 17 – Nay 1 – Abstain 0**

Motion for the Board to approve President, [sic] Joyce Fletcher to request the City Planner/ City Planning to extend the June 11, 2018 comment period at a minimum of 90 days to September 7, 2018, so the WHWCNC Promenade 2035 Ad hoc Committee can have enough time to adequately review the Promenade 2035 SEIR (Supplemental Environmental Impact Report) published by City Planning and made available to the public on April 26, 2018.

As the City requires the WHWCNC to conduct committee review and a Board vote, this cannot be accomplished in the time permitted by the City, as the SEIR is several thousand pages long and the Executive Summary is 204 pages. The length of the document and the 45 day comment period presents an untenable burden on the Council and the stakeholders we represent, as it does not allow time for the WHWCNC Board to review and vote on a recommendation.

The City has already determined based on the analysis included in the Draft SEIR, the Project would result in significant and unavoidable impacts on the citizens of Woodland Hills; therefore the June 11, 2018 deadline also greatly prohibits the ability of the WHWCNC to schedule outreach forums to provide information and obtain stakeholder input; which is the role of the WHWCNC as directed by the City of Los Angeles.

***See attached letter.***

Thank you in advance for you [sic] time and consideration of this matter.

**Response to Comment No. 33-1**

The initial comment period for the Draft Supplemental EIR was based on the 45 days required by CEQA. Nonetheless, the Department of City Planning extended the Draft Supplemental EIR comment period by 45 days, until 4:00 P.M. on Thursday July 26, 2018, for a total comment period of 92 days, as shown in Appendix FSEIR-4. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 33-2**

**On May 9, 2018 the Board of the Woodland Hills–Warner Center Neighborhood Council (WHWCNC) met at a publicly held Board meeting and voted to approve a motion to Request a 90 Day Extension of the Public Comment Period to review the SEIR for the Promenade 2035 Project**

**Vote: Ayes 17 – Nay 1 – Abstain 0**

Motion for the Board to approve President, [sic] Joyce Fletcher to request the City Planner/ City Planning to extend the June 11, 2018 comment period at a minimum of 90 days to September 7, 2018, so the WHWCNC Promenade 2035 Ad hoc Committee can have enough time to adequately review the Promenade 2035 SEIR (Supplemental Environmental Impact Report) published by City Planning and made available to the public on April 26, 2018.

As the City requires the WHWCNC to conduct committee review and a Board vote, this cannot be accomplished in the time permitted by the City, as the SEIR is several thousand pages long and the Executive Summary is 204 pages. The length of the document and the 45 day comment period presents an untenable burden on the Council and the stakeholders we represent, as it does not allow time for the WHWCNC Board to review and vote on a recommendation.

The City has already determined based on the analysis included in the Draft SEIR, the Project would result in significant and unavoidable impacts on the citizens of Woodland Hills; therefore the June 11, 2018 deadline also greatly prohibits the ability of the WHWCNC to schedule outreach forums to provide information and obtain stakeholder input; which is the role of the WHWCNC as directed by the City of Los Angeles.

Thank you in advance for you [sic] time and consideration of this matter.

**Response to Comment No. 33-2**

This Comment is a duplicate of the previous comment. See Response to Comment No. 33-1.

**Comment Letter No. 34**

Joyce Fletcher  
President  
Woodland Hills–Warner Center Neighborhood Council  
20929 Ventura Blvd., Ste. 47-535  
Woodland Hills, CA 91364-2334

**Comment No. 34-1****As pertaining to the Westfield Promenade 2035 Project—Draft Supplemental Environmental Impact Report (SEIR):**

The Woodland Hills Warner Center Neighborhood Council having held several public meetings to review the application filed by Westfield Corporation, for the Westfield Promenade 2035 Project, and having held two public meetings to review the Westfield Promenade 2035 Project DSEIR; the Woodland Hills–Warner Center Neighborhood Council voted on July 11, 2018 at a publicly held Neighborhood Council Board meeting to approve the following recommendations related to the DSEIR.

Please see the attached document.

Thank you for your time and consideration

**Response to Comment No. 34-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 34-2****As pertaining to the Westfield Promenade 2035 Project—Draft Supplemental Environmental Impact Report (SEIR):**

The Woodland Hills Warner Center Neighborhood Council having held several public meetings to review the application filed by Westfield Corporation, for the Westfield Promenade 2035 Project, and having held two public meetings to review the Westfield Promenade 2035 Project DSEIR; the Woodland Hills–Warner Center Neighborhood Council voted on July 11, 2018 at a publicly held Neighborhood Council Board meeting to approve the following recommendations related to the DSEIR:

**Response to Comment No. 34-2**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 34-3**

WHWCNC Board Vote: Aye 13      Nay 2      Abstain 0

WHEREAS: Westfield's Promenade 2035 master plan offers great potential for the West Valley and the DSEIR outlines the risks and benefits that a project of this scale and breadth entails and evaluates how this project could impact the West Valley and the offers suggested mitigations, and

**Response to Comment No. 34-3**

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 34-4**

WHEREAS: significant impacts on traffic, parking, noise and air pollution, population, public services and schools were identified, the Woodland Hills–Warner Center Neighborhood Council (WHWCNC) will continue to hold monthly WHWCNC Promenade 2035 Ad Hoc Committee public meetings to discuss with Westfield viable and creative solutions to these impacts to make this project better for the community, and

**Response to Comment No. 34-4**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 34-5**

WHEREAS: the WHWCNC searches for opportunities to better understand Westfield's intentions with their proposed Sports and Entertainment Center so that the WHWCNC and community can make an informed decision on the project.

**Response to Comment No. 34-5**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 34-6**

In the coming months, the WHWCNC requests that Westfield provide information as what the Sports and Entertainment Center will entail, as no specific details have been provided at this time, and as it is unreasonable to request the WCWCNC [sic] and the stakeholders to comment on something that is undefined yet creates the most significant impacts, and

**Response to Comment No. 34-6**

Refer to Topical Response No. 2, Entertainment and Sports Center regarding the analysis prepared for the Entertainment and Sports Center. As discussed therein, the Draft Supplemental EIR included sufficient details to fully evaluate the potential environmental impacts of the Entertainment and Sports Center.

**Comment No. 34-7**

WHEREAS: This project, in total, could have a substantial impact on our community, **as noted in the DSEIR**, the WHWCNC offers the following comments:

**Response to Comment No. 34-7**

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 34-8****Stadium/Entertainment Complex**

1. WHEREAS, of particular concern is the proposed 15,000 seat “open roof” Entertainment & Sports Complex (ECS) and the noise, traffic, and public safety concerns potentially generated by, in particular, large scale music events. Of further concern is, that as of this date, we do not have any design details of the proposed ECS building nor the intended programming.



THEREFORE, without those details, it would seem difficult to create both an accurate SEIR and opinion of this element of the project, and

### **Response to Comment No. 34-8**

Refer to Topical Response No. 2, the Entertainment and Sports Center, above, for further details regarding the assumptions made in the Draft Supplemental EIR for analysis of the Entertainment and Sports Center as well as a comprehensive analysis of the Entertainment and Sports Center's environmental impacts. The Draft Supplemental EIR provides a conservative analysis of all aspects of the Entertainment and Sports Center, and the operator ultimately identified for the Entertainment and Sports Center will be required to operate within the scope of environmental impacts identified in the Draft and Final Supplemental EIR and implement all required mitigation measures. For instance, the Project includes the option for constructing the Entertainment and Sports Center with a closed roof or partial roof, and the Project's environmental analysis analyzes whichever option has greater environmental impacts for each impact issue area, in order to provide a conservative analysis. Similarly, while the Entertainment and Sports Center may be smaller than 15,000 seats, this maximum seating capacity is analyzed in the Draft Supplemental EIR as the greatest potential environmental impact.

### **Comment No. 34-9**

2. WHEREAS, the Warner Center Specific Plan (WCSP) does not specifically address a stadium nor any large-scale auditorium style building/entertainment complex to be built in Warner Center. The WCSP simply says there can be "entertainment" and this has always been understood to mean small venue entertainment as part of a hotel, restaurant, club or other small venue, and

WHEREAS, as the proposed stadium/entertainment & sports complex has been presented to the WHWCNC as being possibly built without a roof, and the WHWCNC believes the WCSP also does not specifically address/allow that any large-scale building in Warner Center can be designed without a roof as part of the design, and

WHEREAS, a large part of the mitigations addressed in the DEIR directly relates to the stadium/entertainment complex: noise, parking, traffic congestion at major intersections, 101 Freeway on ramps and off ramps, and on neighborhood streets

THEREFORE, the WHWCNC requests the City further review the WCSP to verify allowed/not allowed uses and address the environmental impact issues in much more detail with realistic and detailed resolutions and fixes prior to approving the project, and

**Response to Comment No. 34-9**

Refer to Topical Response No. 2, the Entertainment and Sports Center, above, regarding the comprehensive analysis of the Entertainment and Sports Center's environmental impacts and consistency with the Warner Center Plan.

**Comment No. 34-10**

3. WHEREAS, there are many issues that required mitigation based on the EIR for the Westfield Village Project and, to date, there are numerous cases in which the mitigation has not yet occurred and where we have not been given details on the planned and proposed mitigations—including those by public agencies where Westfield may have opted to make a mitigation payment in lieu of performing the work. These issues are especially true in relation to traffic mitigation.

THEREFORE, the WHWCNC requests that all mitigations be agreed to and an implementation plan be created and approved by the City, Westfield, The Council Office and the WHWCNC prior to PHASE 1 of the Project.

**Response to Comment No. 34-10**

Refer to Topical Response No. 4, The Village at Westfield Topanga, above, for further detail regarding the implementation of mitigation measures for The Village project, and Topical Response No. 3, Traffic and Parking, for a discussion of the Project's mitigation measures and phasing of mitigation measures. All mitigation measures for the Project will be implemented as set forth in the Mitigation Monitoring Program included as Section IV, Mitigation Monitoring Program, of this Final Supplemental EIR.

**Comment No. 34-11**

ADDITIONALLY: Strong Consideration should be given to Alternative 4—the Studio/Mixed Use Alternative: Per the SEIR—this is the Most Environmentally Superior proposal. It seems more likely to provide a better jobs mix, compared to retail, in terms of jobs that pay well enough to support employees with a desire to live near their work—a key goal of the Warner Center 2035 Plan. Further, per the SEIR—this option creates less impact on City services, traffic, the environment, and surrounding neighborhoods.

**Response to Comment No. 34-11**

The commenter's preference for Alternative 4 is noted for the record and has been incorporated into this Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed in detail in Section V, Alternatives, of the Draft Supplemental EIR, while Alternative 4 would eliminate some of the Project's

significant and unavoidable impacts, Alternative 4 would not achieve the Project objectives to the same extent as the Project, including encouraging entertainment and nightlife uses in the Downtown District of Warner Center and providing for an Entertainment and Sports Center that serves as a flexible space and community-oriented entertainment destination for families and residents.

### **Comment No. 34-12**

#### **Traffic. Streets, Parking**

1. WHEREAS, Under Phase 1 of the Project widening of Owensmouth Street should contain the entire block and the SEIR also does not discuss the need to also widen the Warner Center hub arches located on Owensmouth when Owensmouth is widen.

THEREFORE, the WHWCNC requests a study be included in the EIR that addresses these two issues.

### **Response to Comment No. 34-12**

As detailed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project would provide the required right-of-way dedication along the Project frontages of Owensmouth Avenue between Erwin Street and Oxnard Street by phase as required by Section 7.7, Street Improvements and Dedications, of the Warner Center Plan and complete a partial implementation of Warner Center Plan Mitigation Measure TR-8. As detailed in Table 1 of the Warner Center Plan, the roadway width of Owensmouth Avenue within the Warner Center Transit Hub (between Erwin Street and Oxnard Street) is identified with a 54-foot width; the existing roadway width of this section of Owensmouth Avenue is also 54 feet. Therefore, the Warner Center Plan does not require additional roadway widening through this section of Owensmouth Avenue. While the existing conditions along this section of Owensmouth Avenue meets the Warner Center Specific Plan street requirements, the Warner Center Plan identified mitigation for the corner of Owensmouth Avenue and Erwin Street which may require additional roadway width (Warner Center Plan Mitigation Measure TR-8). The partial implementation of Warner Center Plan Mitigation Measure TR-8 is included in the Draft Supplement EIR as Project Design Feature K-8. Final detailed roadway improvement design, as reviewed and approved by LADOT B-Permit section, will determine whether the minor curb adjustment associated with Warner Center Plan Mitigation Measure TR-8 can be accommodated within the existing space between the curb and the support column for the Warner Center hub arches.

**Comment No. 34-13**

2. WHEREAS, Traffic/ Public [sic] Transportation Flow and Blockage at Owensmouth/ Erwin is a concern and the possible lack of adequate bus loading/unloading area offset from Owensmouth main traffic lanes and with completion of the Promenade Project with added cars and people using the Erwin/Owensmouth nexus during busy days, busses will have to temporarily park in one of 2 north-bound lanes to pick up and discharge passengers—dramatically impacting traffic evaluations and flows at the critical Owensmouth/Erwin juncture.

THEREFORE, we request that an additional indented bus area along the project on Owensmouth be added to the study as this was not addressed in the SEIR.

**Response to Comment No. 34-13**

As discussed in Response to Comment No. 34-12, above, Owensmouth Boulevard currently meets the street widths identified in the Warner Center Plan. The existing operation of the Warner Center Transit Hub on Owensmouth Avenue is such that the two lanes in both the north and south directions are utilized as one travel lane and one transit loading/layover lane; this existing condition for Owensmouth Avenue was assumed in the Traffic Study. The Project is not proposing to alter the existing operation of the Warner Center Transit Hub. Additionally, bus pullout lanes are not preferred by Metro operations, as there are operational challenges related to moving the bus back into the travel lanes and the potential safety issues associated with this type of maneuver.<sup>55</sup>

**Comment No. 34-14**

3. WHEREAS, the Project SEIR lists (8) intersections that will have stated significant impacts, Canoga & Vanowen, DeSoto and Vanowen, Owensmouth and Victory, Canoga and Victory, Shoup and Oxnard, Topanga and Oxnard, Topanga and Ventura.

The sport/entertainment complex adds (4) intersections with stated significant impacts: Canoga and Oxnard, Topanga and Burbank, Topanga and the 101 West bound off-ramp and Topanga and Clarendon, and

Traffic estimates for Topanga Canyon, Owensmouth, DeSoto, Winnetka, and Victory: Estimates for traffic on the main thoroughfares to, through and from Warner Center failed to use fully updated traffic counts and revised 2018 numbers. Estimates for the original WC

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<sup>55</sup> Gibson Transportation Consulting, Inc., telephone conversation with Carl Torres, LA Metro Manager, Transportation Planning, Service Planning & Scheduling on March 11, 2019.

2035 Plan did not take into account all of the densification currently going on in adjacent areas and connected areas like Chatsworth, Northridge and Reseda which greatly impact traffic trying to reach the 101 Freeway and travel core.

THEREFORE, as the Project SEIR clearly defines the only mitigations for these intersections are planned physical improvements implemented as part of the Warner Center Plan Mitigation Program, the WCWHNC [sic] requests the Warner Center Plan Mitigation Program be immediately implemented prior to PHASE 1 of the Project.

#### **Response to Comment No. 34-14**

As discussed further in Topical Response No. 1, Warner Center 2035 Specific plan, above, the City certified a programmatic EIR in 2013 evaluating the potential environmental impacts associated with full buildout under the Warner Center Plan. The Project's Draft Supplemental EIR analysis tiers off of the approved and certified Warner Center Plan EIR by analyzing Project-specific environmental impacts for the Project Site that may not have been covered under the Warner Center Plan EIR, for instance, impacts associated with the Entertainment and Sports Center. As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project's Traffic Study assumed full buildout under the Warner Center Plan. Additionally, actual traffic counts, included as Appendix FSEIR-2, of this Final Supplemental EIR, were conducted in 2016, the year of the Project's NOP, to compare to the Warner Center EIR's projected traffic growth for 2016. These empirical counts were lower than the Warner Center EIR's projected traffic volumes for 2016. Therefore, the area-wide growth used by the Warner Center Plan EIR, and the Project EIR, is conservative.

Further, the Project Traffic Study's growth assumptions related to background development in the Warner Center Model were the same ones used by the Warner Center Plan EIR. Those assumptions are based on socio-economic data including employment and household projections associated with the full development of the Warner Center Plan; additionally, the Warner Center EIR used a model (the Warner Center Model) that was developed from the Southern California Association of Governments' [SCAG] Regional Transportation Demand Model, which is based on the 2008 Regional Transportation Plan (RTP): Making Connections [SCAG, 2008]. Sub-regional growth outside of Warner Center is inherent to the Warner Center Model, to the extent that growth was projected for those areas. Thus, the future traffic conditions capture the traffic growth from adjacent areas of the Warner Center.

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion of the Project's mitigation measures and associated phasing.

As a note, the commenter correctly states that eight intersections will have significant traffic impacts; however, the commenter only lists seven. The commenter is missing the De Soto Avenue & Victory Boulevard intersection from this list.

**Comment No. 34-15**

4. WHEREAS, the parking for the stadium/entertainment/sports complex relies on shared parking at other buildings in Warner Center and the DSEIR does not address the feasibility of reduced available shared parking should these shared buildings be sold, and the land and parking be built out to accommodate uncooperative new owners and residents.

THEREFORE, we request the City and Westfield provide a parking study for the entertainment complex that does not rely on shared parking that may not be available in the future, and

**Response to Comment No. 34-15**

Refer to Topical Response No. 2, Entertainment and Sports Center, and Topical Response No. 3, Traffic and Parking, above, which provides a discussion of the Project's proposed shared parking. As detailed Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Event Management Plan required by Project Design Feature K-6 will identify off-site parking needed to accommodate parking demand based on time of year, day/time of event, and number of attendees. The Applicant will also be required to annually provide DOT evidence of agreements that identify/secure the location and quantity of available off-site parking prior to the issuance of a temporary or permanent certificate of occupancy for the Entertainment and Sports Center (ESC).

**Comment No. 34-16**

5. WHEREAS, for Residential Parking: 1 space per Unit is allowed within WCSP plan, however the reality of the number of cars per unit is subject to various factors including more than one occupant per unit, the nature of the live-work environment envisioned, future transit options and the overflow parking accommodations available when the ESC (Entertainment Sports Complex) is in use.

THEREFORE, we find that the SEIR residential parking ratio to be unrealistic in view of the current and proposed residential development in all areas of Warner Center with almost no office commercial development; and in view of that fact, there is no guarantee that the envisioned live work environment will be built as originally outlined in the WCSP, and

**Response to Comment No. 34-16**

As detailed Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project is consistent with the residential parking ratio required in the Warner Center Plan. Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for discussion about the Project's overall consistency with the Warner Center Plan. The Warner Center Plan identified as one of its guiding principles to: "Provide a comprehensive parking strategy that limits the over-production of parking and encourages both existing and proposed parking to be shared amongst many developments (Section 2—Purpose)." The use of the one space per unit residential parking rate is consistent with the intent and parking requirements of the Warner Center Plan.

**Comment No. 34-17**

6. WHEREAS, the WHWCNC agrees on the nature of a pedestrian friendly Project site; however, the SEIR analysis may not accurately represent daily commuting traffic if the live-work balance is not achieved and also does not address the current commuting congestion within Woodland Hills and on the 101 Freeway.

THEREFORE, the WHWCNC requests further impact studies take into account possible significant Promenade 2035 Project resident and other commuting traffic that could occur should live/work not reach favorable commercial real estate market conditions.

**Response to Comment No. 34-17**

The Draft Supplemental EIR's traffic analysis was reviewed and approved by LADOT for the Project-specific proposed square footage of non-residential and residential uses.

**Comment No. 34-18**

7. WHEREAS, the following Intersections [sic] not studied for the SEIR.

Topanga Canyon Blvd/101—EB on-ramps not studied. Would be impacted by additional SB Topanga Canyon Blvd construction and SB and NB Topanga operational traffic.

Topanga at WB 101 On-Ramp not discussed [sic]

Canoga at 101 Off Ramp WB—not discussed.

Canoga at 101 On Ramps/Ventura Blvd not discussed.

Canoga at Burbank Blvd not discussed [sic]

Topanga Canyon further south & north of project not discussed in summary; however, noted in detailed pages. Impact of ECS on Topanga Canyon Blvd north and south of the Project Site needs additional study.

THEREFORE, Impact of ECS on Topanga Canyon Blvd north and south of the Project Site needs additional study.

Note: page I-154—Caltrans Analysis does not include impacts to On-Ramps queuing OR proposed mitigation efforts for existing LOS E/F segments, and

### **Response to Comment No. 34-18**

This comment incorrectly states that the listed intersections were not studied in the Draft Supplemental EIR. As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, four of the five locations identified by the comment were fully analyzed for Project traffic impacts. The fifth location, Topanga Canyon Boulevard and US-101 eastbound on-ramp, is an uncontrolled ramp onto US-101. This location is not a signalized intersection, and as such, does not meet the LADOT analysis criteria.

To identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an ESC event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant



would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

The Draft Supplemental EIR's traffic analysis Study Area did include intersections located along Topanga Canyon Boulevard, including 11 intersections analyzed under LADOT criteria and 20 intersections under Caltrans methodology. Intersections at the periphery of the Project's Study Area were determined not to have significant impacts as a result of the addition of Project traffic. Therefore, the intersections beyond the Study Area would not experience significant impacts, given that Project traffic dissipates farther from the Project Site. According to LADOT criteria, the Traffic Study determined that the Project would have less than significant impacts at all of the Topanga Canyon Boulevard intersections after implementation of the project design features and Warner Center Mitigation Program, discussed further in Topical Response No. 3, Traffic and Parking.

### **Comment No. 34-19**

8. WHEREAS, all traffic impact analysis assumes a full implementation of all measures in the Mitigation plans:

THEREFORE, when based on the existing EIRs for the Westfield Village, and many of those measures, especially Caltrans related, have not been implemented, the assumptions are probably overly optimistic in terms of mitigation and as The Neighborhood Protection Committee to implement Neighborhood Protection Plan for residential streets, as called for in Warner Center Specific Plan, has not yet been created and the status of funds is unknown to the WHWCNC.

The SEIR uses 2008 Data used with a growth rate factor of .56% This may not accurately reflect the true growth in the area due to recent housing and apartment construction and an increase of approximately 17,000 residents since 2008.

We have serious concerns that major intersection/freeway improvements will not be completed in time to mitigate even current existing impacts.

### **Response to Comment No. 34-19**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion of the proposed mitigation measures and the mitigation process in Warner Center. Refer to Response to Comment No. 34-14 regarding cumulative growth. Refer to Topical Response No. 4, The Village at Westfield Topanga Topical, for a discussion of the Village's mitigation measures. In addition, refer to Response to Comment No. 34-18, above, for a discussion

regarding the supplemental Caltrans analysis provided in the Draft Supplemental EIR, with regard to freeways.

### **Comment No. 34-20**

#### **Historical Resources**

1. WHEREAS, in the development of Warner Center everything is being wiped clean leaving no memory of the history of Warner Center or familiar sights, and the Macy's building would be eligible for a listing in the California Register as a Los Angeles Historic-Cultural Monument as an example of the New Formalism style with regional variations.

THEREFORE, the WHWCNC requests the City conduct an extensive review, and creative efforts be made by the City and Westfield, to find ways to integrate architectural significant elements of the Macy's Building into the site plan as Macy's has been designated a historical resource and visual resource and a loss of a recognized view.

### **Response to Comment No. 34-20**

The Macy's building was found eligible for listing in the California Register and as a Los Angeles Historic-Cultural Monument, but it has not been designated at national, state or local levels.

The Draft Supplemental EIR includes a seismic evaluation by structural engineer Nabih Youssef & Associates that examines what would be required to bring the Macy's building into compliance with the City of Los Angeles' mandatory standards for non-ductile concrete buildings. The historic preservation consultants at Page & Turnbull reviewed the structural engineer's recommendations and concluded that the proposed seismic strengthening would involve substantial modifications to the building's exterior, including several character-defining features such as the projecting volumes, cylindrical columns, and decorative wall tiles. The modifications would alter the design of the building in such a way that its design integrity would be compromised, and it would no longer be an eligible historic resource.

Much of the building's architectural significance is in its massing, and the ways it breaks out of the utilitarian box-like forms associated with previous department stores. Retaining only a portion, or integrating the various masses into a new project, would not retain the building's design integrity nor convey the aspects that made it historic. Aside from the massing, the building has limited distinct architectural features or materials that are worth salvaging for re-use.

The Macy's bells are no longer a part of the building, having been removed several years ago prior to the initiation of the Project, and therefore are not a current character-defining feature of the building. At the time of removal, a set of the bells were donated to the San Fernando Valley Relics Museum to be put on public display.

The Draft Supplemental EIR includes Mitigation Measure C-1, which requires documentation of the Macy's building to the standards of the Historic American Building Survey (HABS) program prior to issuance of a demolition permit. This documentation will be sent to City of Los Angeles Department of City Planning Office of Historic Resources and materials will be posted in digital format on HistoricPlacesLA, the City's Historic Resources Inventory and Management System. In addition, copies of the documentation materials will be offered and sent if requested to appropriate archives and repositories, including the Southern California Information Center at Cal State University, Fullerton; Los Angeles Public Library Central Library and/or local branch as appropriate; the University of Southern California Library, Special Collections; California State University, Northridge; the Museum of the San Fernando Valley; and local preservation organizations and historical societies.

#### **Comment No. 34-21**

##### **Open Space**

1. WHEREAS, the Valley is underserved by community parks and in Warner Center the new development including the Promenade 2035 Project places all significant open space internally and hidden from the public and therefore provides no visual open space to rest the eye or invite the public to rest and play.

THEREFORE, we request the site plan be opened up to reach to the perimeter of the site to be more accessible to the community thereby providing significant visual and easily accessible open space for public use and enjoyment. And for Westfield to give back to the community by providing free surface parking for the proposed public park to accommodate access to the public park for the benefit of serving the public. At this time the proposed public park is only accessible to the public by paid underground parking.

#### **Response to Comment No. 34-21**

Refer to Topical Response No. 7, Open Space, regarding the visibility of the Project's open spaces; modifications to the Project's site plan to enhance Promenade Square's visibility from Topanga Canyon Boulevard; and Promenade Square's accessibility to people who walk, bike or take transit to the Project Site, in addition to those who choose to park on-site. Contrary to the commenter's statement, Promenade Square is not only accessible to those who choose to park on-site. Section 6.2.2.2.2, Internally Integrated, of

the Warner Center Plan requires that the major Publically Accessible Open Space (PAOS) be centrally located to the site plan area, and the proposed site plan for the Project complies with such requirement. In addition, the Project proposes a variety of other spaces located throughout the site which are publically accessible and visible, as described in more detail in Topical Response No. 7, Open Space. Finally, the Project also includes landscaped setbacks around the entire perimeter that are in full compliance with the setback requirements in the Specific Plan.

The Warner Center Plan promotes walkability and bike access throughout the entire Specific Plan area as the principal means for local connectivity. Public parking will be located in both above and below grade parking structures, and vehicular drop-off areas will be located adjacent to the public park for convenience and enhanced access.

#### **Comment No. 34-22**

2. WHEREAS, related to public park safety—the Promenade 2035 SEIR does not specifically address security in the form of security lights and cameras. Nor does the SEIR verify that Westfield will be responsible for hiring, training and providing a significant security staff so the police will not be required to, in fact, respond to all security calls related to the site.

THEREFORE, we request that the City either add more police officers to the local Police Departments or Westfield be held responsible for hiring and maintaining its own significant private onsite security force and submit a detailed security plan prior to City approval.

#### **Response to Comment No. 34-22**

Refer to Topical Response No. 5, Public Services, above regarding potential impacts to police protection.

#### **Comment No. 34-23**

##### **The Live / Work Component of the Warner Center Specific Plan (WCSP)**

**The City and Westfield needs to look at Warner Center as a whole. The overall plan for the WCSP was to create a live/work/play environment. While numerous apartments are being built there are few plans in the near future to build office buildings or attract viable employers with high paying jobs.**

1. WHEREAS, the SEIR Environmental and traffic assumptions rely on a live-work balance:

THEREFORE, when considering that Promenade 2035 project elements such as the office towers scheduled for the project's **final phase** and "subject to market conditions" this may mean that the intended balance and, therefore, mitigating effects are never achieved creating a negative impact on the surrounding neighborhood., [sic] and

THEREFORE, the WHWCNC concludes that without the creation of nearby jobs which provide a level of income commensurate with the ability to afford the proposed market value housing, the environmental and services impact will be far greater than anticipated within the SEIR.

THEREFORE, we suggest a mitigation requirement, monetary or other, in the event the project is not built as proposed and does not achieve the live-work balance.

### **Response to Comment No. 34-23**

The Project's phasing plan is intended to describe the geographic area covered by each phase of the Project, with the order of buildout of these geographic phases subject to change. As such, the Southeast Phase, or any other geographic phase, could be the first phase built. However, even under the current proposed phasing order, the commenter is incorrect that there would be no work or office component of the Project until the last phase. The Northeast Phase contains 85,000 square feet of non-residential area, which includes both work-live units and retail. Each of the remaining phases also include office uses: the Northwest Phase has 114,000 square feet of creative office, the Southwest Phase has 43,000 square feet of office, and the Southeast Phase has 472,000 square feet of office.

The environmental analysis contained in the Draft Supplemental EIR is based on the Project-specific proposed square footage of non-residential and residential uses. Additionally, the Project's mix of uses is consistent with the Warner Center Plan's requirement that projects within the Downtown District include a balance of non-residential to residential uses. Specifically, for an FAR of 2.3:1, the Plan limits residential uses in the Downtown District to a maximum 48 percent of the allowable FAR and requires at least 52 percent of the required FAR be non-residential uses. In compliance with this requirement, the Project proposes 48 percent residential development and 52 percent non-residential development.<sup>56</sup> This ratio of non-residential to residential floor area would be achieved at buildout, consistent with the Warner Center Plan.<sup>57</sup>

<sup>56</sup> *At buildout, the Project would provide 3,271,050 square feet of floor area, comprising 1,726,050 square feet of Non-Residential Floor Area (52 percent) and 1,545,000 square feet of Residential Floor Area (48 percent).*

<sup>57</sup> *Appendix B, Graduated FAR table, Note 6, of the Warner Center Plan provides that "[m]ulti-phased projects may reserve floor area for the required non-residential component in a future phase on-site."*

**Comment No. 34-24****Schools and Libraries**

1. WHEREAS, Library demand in Woodland Hills is already over extended and provides a variety of services. The SEIR requests \$200 per capita in population for mitigations (however request for funds is not noted in Summary).

THEREFORE, as the summary does not state how the developer proposes to mitigate off-site demand and all new demand is being proposed to be mitigated by the project's on-site library facilities: the WHWCNC requests the onsite Project library be commensurate with normal Los Angeles Public Library services including technical/computer support for residents.

**Response to Comment No. 34-24**

As discussed in Section IV.J.5, Public Services—Libraries, of the Draft Supplemental EIR, the Project would implement Warner Center Mitigation Measure PS-22, which requires that the Project would offset the burden of existing libraries through: (1) payment of a fee based on an established nexus between the new development, demand and the need for additional personnel and facilities; (2) provision of on-site facilities commensurate with the demand generated; or (3) some combination of the above. In addition, the Project would also implement Project Design Feature J.5-1, which states that the Project would incorporate a library room of approximately 800 square feet in each residential building for use by Project residents. The library room will include computers, free internet access, periodicals, books for loan, seating areas and tables. The proposed library rooms would be commensurate with normal Los Angeles Public Library services including technical/computer support for residents, as suggested by the commenter.

**Comment No. 34-25**

2. WHEREAS, Schools—in the SEIR Westfield is required to pay development fees for schools to LAUSD to off-set [sic] a 34% increase in student population.

*The SEIR does not state how LAUSD should use those fees.*

THEREFORE: the WCWHNC [sic] requests the City works with LAUSD to place the development fees in a separate account ear marked [sic] for additional classrooms, teacher salaries and student resources to be spent only in Woodland Hills public and charter schools. LAUSD should be requested to provide and sign an agreement stating it's [sic] intent and purpose for Woodland Hills development fees.

### **Response to Comment No. 34-25**

As discussed in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, Senate Bill 50 (SB 50) allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, LAUSD collects development fees for new construction within its district boundaries. Currently, LAUSD collects the maximum new school construction facility fee at a rate of \$3.79 per square foot of new residential construction, \$0.61 per square foot of commercial/industrial construction, \$0.28 per square foot of self-storage structure, and \$0.39 per square foot of parking structure.<sup>58</sup> Payment of these fees is required prior to issuance of building permits. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels. As such, with payment of the development fees set forth by LAUSD, potential impacts of the Project on school facilities would be less than significant. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 34-26**

#### **Police and Fire Department**

1. WHEREAS, the SEIR states this Project will generate a police service population increase of about 21,792 persons within the Topanga area and with other proposed projects will reduce officer-to-resident from 1.2 officers per 1000 residents to 0.8 officers per residents. LAPD Topanga Division is currently experiencing service impacts due to increased calls for service related to a significant expansion of residents—US Census data estimated 17,000 additional residents in the area from 2009–1015, additional businesses, homelessness, on street drug abuse, and a general increase in crime above the 2014 levels.

THEREFORE, Police service expansion should be strongly considered prior Phase 1 of the Project.

2. WHEREAS, only private security solutions are discussed in the SEIR relative to event security management.

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<sup>58</sup> Los Angeles Department of Building and Safety, *Permit Fee Estimate*, <http://netinfo.ladbs.org/feecalculator/3950786566dd7fcc88258152007def26?OpenForm>, accessed September 8, 2017.

THEREFORE, we can only assume public police resources will be used and will impact availability of limited resources for the surrounding areas serviced by the Topanga Division.

#### **Response to Comment No. 34-26**

Refer to Topical Response No. 5, Public Services. As discussed therein, with implementation of a comprehensive on-site private security plan for the Entertainment and Sports Center and overall Project Site through Project Design Features J.1-1 through J.1-9, and Warner Center Plan Mitigation Measures PS-16, PS-17, and PS-19, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site, nor is the need for additional police protection services an environmental impact that CEQA requires the Project to mitigate. Furthermore, the Project would not result in a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. As such, impacts on police protection services during Project operation would be less than significant.

#### **Comment No. 34-27**

3. WHEREAS, WC Plan Mitigation Measure PS-15 is struck—*the City shall ensure Police Protection levels are maintained*:

THEREFORE, while a strikethrough may be appropriate since it is a City responsibility—the question has not been answered in the SEIR as to whether the City can support this requirement—especially in relation to the other projects that will add a police service population estimated to total 75,336 persons and the WHWCNC must request that Westfield and the City are held responsible for providing police protection to its residents and paying public.

#### **Response to Comment No. 34-27**

Refer to Topical Response No. 5, Public Services. In addition, as discussed in Section IV.J.1 Public Services—Police Protection, of the Draft Supplemental EIR, it is anticipated that the related projects would implement project design features similar to the Project, such as security personnel or provision of closed-circuit television, among others, which would reduce cumulative impacts to police protection services. Additionally, each related project would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented



to reduce potential impacts to police protection services. Furthermore, as discussed in Topical Response No. 5, Public Services, based on the *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, the need for or deficiency in adequate police protection services in and of itself is not a CEQA impact.

#### **Comment No. 34-28**

4. WHEREAS, the SEIR does not include any analysis of the LAPD Traffic Division impacts and resources.

THEREFORE, as currently, the Woodland Hills area is already allocated only minimal regular traffic enforcement and recently had multiple streets near the proposed development added to the Vision Zero High Injury Network (May 2018) and those streets included segments of: Ventura Blvd, DeSoto, Canoga, Fallbrook, and Owensmouth—we request further analysis of traffic accidents and availability of traffic enforcement related to the Project.

#### **Response to Comment No. 34-28**

This comment discusses portions of the Vision Zero High Injury Network located nearby the Project Site. As detailed in the Traffic Study, LADOT's Vision Zero initiative (see: <http://visionzero.lacity.org/>) promotes traffic safety strategies to virtually eliminate traffic collisions that may result in severe injury or death by the year 2025. The High Injury Network identified in Vision Zero is a network of streets based on a review of collision data from the most recent 5-year period, where strategic investments will have the biggest impact in reducing traffic collisions resulting in death and severe injury. The Project Site is not located immediately adjacent to a street identified in the High Injury Network.

All Project street improvements would be constructed in accordance with City requirements related to the safety of vehicles, pedestrians, and bicycles. Refer to Topical Response No. 7, Open Space, regarding the Project's landscaped and tree-lined setbacks bordering the entire perimeter of the Project Site, consistent with the Warner Center Plan. Refer to Topical Response No. 5, Public Services, above regarding how the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services; this provision would also apply to traffic enforcement. However, the analysis of traffic accidents is not required under CEQA.

The Warner Center Mitigation Program includes categories for roadway improvements, streetscape improvements, and neighborhood protection that may include safety elements consistent with Vision Zero. As described in Topical Response No. 3, Traffic and Parking, pursuant to Mitigation Measure K-2, the Project will be required to pay

the Warner Center Mobility Fee, which will be used to implement the Warner Center Mitigation Program, including those improvements consistent with Vision Zero.

### **Comment No. 34-29**

5. WHEREAS, the SEIR defines Fire & Emergency Medical Services—while future service delays may be considered “less than significant” the current EMS response times are already close to 5 min or more for each servicing station—which, per the American Heart Association, would result in likely serious injury or death in the event of a cardiac incident.

THEREFORE, as even minor further delays in medical resources could significantly impact life-saving services we request the SEIR should address increased current and future medical calls for residents and the growing homeless and transient population in Woodland Hills, and

THEREFORE, as “Level of Significance” for impacts on Emergency Services assumes that the City provides upgraded services, we ask for a detailed analysis of how the City will upgrade services prior to PHASE 1 of the Project. The WHWCNC finds mitigations such as emergency vehicles using sirens to mitigate impacted streets and intersections to be an unacceptable mitigation.

### **Response to Comment No. 34-29**

As discussed in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, and in Topical Response No. 5, Public Services, above, the Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service, nor is the need for additional fire protection services, including emergency medical services, an environmental impact that CEQA requires the Project to mitigate.

### **Comment No. 34-30**

#### **Construction Noise and Traffic Impacts**

1. WHEREAS, Page 1-29: Construction trucking appears to understate the impact of the construction trucking -especially given the impact on adjacent major arteries—i.e. US 101. In particular, the intersecting traffic pattern of the 101 Eastbound On-Ramp from southbound Topanga Canyon Blvd. and the 101 West Bound Off-Ramp for Topanga Blvd. South, and

The Promenade 2035 SEIR does not address the additional impact to Woodland Hills by truck traffic during the proposed *clean-up of the Santa Susana Field Laboratory*.

THEREFORE, inbound traffic from the Ventura Blvd/Topanga Canyon East Bound 101 Off Ramp would be greatly impacted at the Topanga/Ventura and adjacent intersections as this is already an impacted intersection in the flow pattern that would lead toward the project site, and

THEREFORE, we request that serious consideration be given to the impact of all scheduled construction traffic in the area as well as the interaction between trucks and cars in relation to the ramp and roadway flow patterns in the impacted areas.

### **Response to Comment No. 34-30**

Refer to Topical Response No. 3, Traffic and Parking, for an analysis of the Project's construction traffic impacts, including truck traffic, and haul routes, which would all be approved truck routes designated within the City. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the potential exists for the construction-related activities and/or haul routes of the Project and the related projects to overlap particularly with respect to related projects that access US-101 near the Project Site. Specifically, there is a potential for these related projects and the Project to use the same haul routes at the same time. In addition, as with the Project, other nearby related projects could require temporary lane closures during construction. However, it is anticipated that like the Project, the related projects would be required to prepare a Construction Management Plan to ensure that potential construction-related impacts are reduced. Similarly, the Santa Susana Field Laboratory, although not a related project due to its distance from the Project Site (i.e., four miles northwest of the Project Site) would also be required to prepare a Construction Management Plan to ensure that potential construction-related impacts are reduced. This is addressed further in the Environmental Impact Statement prepared for this project.<sup>59</sup> Nonetheless, to the extent that construction trips of related projects and those projects outside of the Project's Study Area (i.e., the Santa Susana Field Laboratory) were to occur concurrently with the Project, significant cumulative construction traffic impacts are anticipated.

### **Comment No. 34-31**

2. WHEREAS, Traffic concerns regarding the following intersections as we did not see studies related to these intersections in the SEIR.

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<sup>59</sup> Visit the California Department of Toxic Substances Control webpage, [www.dtsc.ca.gov/SiteCleanup/Santa\\_Susana\\_Field\\_Lab/ssfl\\_document\\_library.cfm](http://www.dtsc.ca.gov/SiteCleanup/Santa_Susana_Field_Lab/ssfl_document_library.cfm), to access the Environmental Impact Statement prepared for the Santa Susana Field Laboratory.

Topanga Canyon Blvd/101—EB on-ramps not studied. Would be impacted by additional SB Topanga Canyon Blvd construction and SB and NB Topanga operational traffic.

Topanga at WB 101 On-Ramp not discussed [sic]

Canoga at 101 Off Ramp WB—not discussed.

Canoga at 101 On Ramps/Ventura Blvd not discussed.

Canoga at Burbank Blvd not discussed [sic]

Topanga Canyon further south & north of project not discussed in summary; however, noted in detailed pages. Impact of ECS on Topanga Canyon Blvd north and south of the Project Site needs additional study.

THEREFORE, we request a study of these intersection be included in the Final EIR.

### **Response to Comment No. 34-31**

Refer to Response to Comment No. 34-18, above.

### **Comment No. 34-32**

3. WHEREAS, the SEIR allows construction activities within the Project to be restricted to hours 7:00 A.M. to 9:00 P.M., Monday through Friday and on Saturday 8:00 A.M. to 6:00 P.M.

THEREFORE, the WHWCNC requests that construction activities be consistent and construction for all days be restricted to 8:00am [sic] to 6:00pm [sic] Monday through Saturday.

### **Response to Comment No. 34-32**

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, and set forth under Mitigation Measure K-1, the Project would prepare a detailed Construction Management Plan (CMP). As part of the CMP, construction-related deliveries, haul trips, and construction worker trips would be scheduled to occur outside of typical commuter peak hours to the extent feasible. Construction activities would occur from 7:00 A.M. to 9:00 P.M., Monday through Friday and on Saturday from 8:00 A.M. to 6:00 P.M. pursuant to Section 41.40 of the Los Angeles Municipal Code (LAMC).

**Comment No. 34-33****Sports/Entertainment Complex Noise and Light Concerns**

1. WHEREAS, the proposed Entertainment/Sports complex noise issues are not adequately addressed because key impacting decisions like roof/no roof and capacity have not been resolved by the developer before the DSEIR was launched, and

WHEREAS, the DSEIR states that the level of noise emanating from an open-roof Sports/Entertainment Complex (E/S-Complex) [sic] will be “Less Than Significant.” However, we believe since all studies were based on assumptions. (*Page 99 of Exec. Sum*), and

WHEREAS, it is difficult to accurately estimate the impact of amplified music acts, the crowd noise generated during “excitement moments” of a sporting/music event, and the true noise channeling characteristics of a roof design including its sound capturing features without knowing the final design and programming proposed for the facility, and

**Response to Comment No. 34-33**

Refer to Topical Response No. 2, Entertainment and Sports Center, for a summary of the Draft Supplemental EIR’s conservative noise impact analysis. With regard to “excitement moments,” the actual measured sound spectrum from typical concerts was used for the Entertainment and Sports Center noise analysis (as discussed on page IV.H-53 of the Draft Supplemental EIR). As discussed on page IV.H-22 of the Draft Supplemental EIR, a pink noise source was used only for the site specific sound propagation test, conducted to identify any potential sound amplification due to presence of the existing natural land topography and the intervening landscape in the existing hills southwest of the Project Site. The use of pink noise as sound source is a standard engineering method to measure the outdoor sound attenuations due to distance, topography, metrological and other existing natural components in the outdoor environment. The results of the site specific sound propagation test are provided in Figure IV.H-3 and Table IV.H-10 of the Draft Supplemental EIR. As discussed on page IV.H-22 and presented on Figure IV.H-3 of the Draft Supplemental EIR, the empirical measured noise levels from the sound propagation test are actually lower than the results from the site-specific 3-dimensional computer noise model. As such, the Project noise analysis is conservative, as actual noise levels should be even lower than the levels estimated in the Draft Supplemental EIR.

**Comment No. 34-34**

ADDITIONALLY, specific hours of potential noise problems are not considered in the DSEIR—such as sporting/music events that go beyond expected time limits because of ties, etc., or music performances that are geared to later time slots, and

As a finding of “Less than Significant” depends entirely on various levels of amplification in addition to the time and environmental factors present during amplification.

THEREFORE, the WHWCNC requests that further studies be conducted after a determination has been made by Westfield as to the actual size and use of the proposed Complex. Since tonal, dynamic and constantly changing noise (ie: [sic] music) has more perceived impact than pink noise, we strongly suggest a test at 115 dBA [sic] playing music as the source be performed. Additional testing should be performed in the hills surrounding the site as sound waves would tend to rise.

**Response to Comment No. 34-34**

Refer to Topical Response No. 2, Entertainment and Sports Center, for a summary of the Draft Supplemental EIR’s conservative noise impact analysis. As presented in Section IV.H, Noise, of the Draft Supplemental EIR, the noise impact analysis for the Entertainment and Sports Center was based on the nighttime ambient noise levels, to represent the worst-case condition, as the nighttime ambient noise levels are lower than the daytime ambient levels (see Table IV.H-7 of the Draft Supplemental EIR). The project design features in Section IV.H, Noise, of the Draft Supplemental EIR, impose a maximum noise level for all amplified sound systems, which would be monitored and enforced by Mitigation Monitoring Program, provided in Section IV, Mitigation Monitoring Program, of this Final Supplemental EIR. Specifically, under Project Design Feature H-5, the proposed amplified sound system for the Entertainment and Sports Center would be limited to generating a sound level of approximately 95 dBA ( $L_{eq}$ ) at a distance of 130 feet from the loudspeaker system.

As provided in Section IV.H, Noise, of the Draft Supplemental EIR, a site specific sound propagation test was conducted to establish the site specific acoustic propagation (sound reduction as a function of distance) from the Project Site to the residential community to the southwest. The sound propagation test was conducted to identify any potential sound amplification due to presence of the existing natural land topography and the intervening landscape in the existing hills southwest of the Project Site. As discussed on page IV.H-22 of the Draft Supplemental EIR, a pink noise source was used for the site specific sound propagation test. The use of pink noise as sound source is a standard engineering method to measure the outdoor sound attenuations due to distance, topography, metrological and other existing natural components in the outdoor environment. In addition,

pink noise provides a constant noise level, which provide a more accurate in measuring sound propagation, as compared to using music as sound source. Furthermore, the sound propagation test was conducted with a pink noise source level of 103 dBA. The results of the site specific sound propagation test are provided in Figure IV.H-3 and Table IV.H-10 of the Draft Supplemental EIR. As discussed on page IV.H-22 and presented on Figure IV.H-3 of the Draft Supplemental EIR, the empirical measured noise levels from the sound propagation test are actually lower than the results from the site-specific 3-dimensional computer noise model. For clarification, the actual measured sound levels from typical concerts was used for the Entertainment and Sports Center noise analysis (as discussed on page IV.H-53 of the Draft Supplemental EIR). As such, the Project noise analysis is conservative, as indicated by the Draft Supplemental EIR results of sound propagation test the actual noise levels should be even lower than the estimated levels. Therefore, the additional sound test of using actual music and with level of 115 dBA is not warranted.

### **Comment No. 34-35**

2. WHERE AS, [sic] lighting glare and impacts of the proposed Entertainment/Sports complex cannot be addressed until the decision of open air/roof have been made by the developer, and

WHEREAS, an open-air venue will require substantial lighting for sporting events, and may feature lighting techniques (strobes, spotlights, etc.) for some music events., and

The DSEIR does little research of these critical lighting problems that can/will impact nearby residences as well as the hotel directly across Oxnard (*Page 34 of Exec. Summary*) with no discussion of total lumens or locations of lighting banks is provided, and

No suggestions to controlling light seepage from stadium is offered, and

The entry for parking lots could require substantially more lighting than has been considered in the DSEIR.

THEREFORE, we request that the City require further studies be conducted to verify noise and lighting issues that will greatly affect the entire Warner Center area and surrounding neighborhoods, and

ADDITIONALLY, adequate lighting within and around the Project and proposed ESC is also vital as Woodland Hills has a large homeless population centered near Warner Center.

**Response to Comment No. 34-35**

Refer to Topical Response No. 2, Entertainment and Sports Center, above for further details regarding the conservative assumptions used for the lighting analysis in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, and in the Lighting Report prepared by Francis Krahe & Associates, Inc. and provided in Appendix B, of the Draft Supplemental EIR. As demonstrated by the detailed analysis of lighting in the Draft Supplemental EIR, lighting impacts associated with the Project, including the Entertainment and Sports Center, would be less than significant. Also refer to Topical Response No. 5, Public Services, above, for a discussion regarding the project design features and mitigation measures that would be implemented by the Project which would help to address Project Site security and the homeless population.

**Comment No. 34-36****Billboard Lighting**

1. WHEREAS, no studies are submitted for lighting from “billboards” (possibly animated) that lists the event/show and performers, performances, and

We also have various Digital Signage concerns: the number of signs allowed, the proposed sizes allowed, allowed locations, allowed content and lumens.

THEREFORE, [sic] we request the Final EIR address these specific lighting concerns.

**Response to Comment No. 34-36**

Refer to Topical Response No. 2, Entertainment and Sports Center, above for a summary of the Project's lighting impacts from digital and illuminated signage. A detailed analysis of lighting associated with signage is included in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, and in the Lighting Report prepared by Francis Krahe & Associates, Inc and provided in Appendix B, of the Draft Supplemental EIR. As demonstrated therein, potential lighting impacts associated with Project signage would be less than significant.

**Comment No. 34-37****Hotel Entrance**

1. WHERE AS, [sic] the hotel's only entry/exit opens onto a mid-block area of Topanga Canyon Blvd., and this was not adequately studied in the DSEIR to weigh issues with waiting cars inside the cul-de-sac of the hotel entry and possible back up into the of traffic flow on Topanga Canyon Blvd.



THEREFORE, we request further traffic studies on the impacts of hotel entrance queuing traffic and various valet parking proposals on Topanga Canyon Blvd.

**Response to Comment No. 34-37**

Two driveways are available for the western Project hotel: on Topanga Canyon Boulevard, mid-block between Promenade Boulevard and Erwin Street; and on Erwin Street, immediately east of Topanga Canyon Boulevard. The hotel curbside provides approximately 160 feet for use as a drop-off/pick-up area that provides capacity for the equivalent of 8 vehicles in a single row and 16 vehicles in a double row with valet operations. Access to the subterranean garage parking is also available immediately to the north and south of the hotel of the drop-off area with an additional egress ramp to the south. In addition, there are several short-term surface parking spaces immediately adjacent to support the drop-off/pick-up area. These design features of the hotel and internal circulation will ensure efficient hotel operations and minimize the potential for queue spillback onto the public street. Additionally, all driveways and internal circulation will be reviewed and approved by LADOT prior to the issuance of building permits, pursuant to LADOT's Assessment Letter, included in Appendix M, of the Draft Supplemental EIR.

**Comment No. 34-38**

**Proposed Entertainment and Sports Complex: "Director's Interpretation" for requested size: (Page 21 of Executive Summary):**

1. WHEREAS, the SEIR proposes to leave it to the Planning Director's discretion to make the most critical decisions concerning the proposed Entertainment and Sports Complex, this does not provide adequate input or oversight by the public for one of the most crucial pieces of the proposed Project.

THEREFORE, as the inclusion of a large scale entertainment facility such as the ESC is not addressed in the Warner Center 2035 Specific Plan, the inclusion of such facility should require a more equitable decision making process. We ask that Westfield be required to submit a final decision as to use, size and roof determination of the ECS before any further steps are made in the Planning decision related to the Complex.

Westfield's failure to provide the exact size/seating and configuration of the facility greatly impacts the ability to create an accurate DSEIR that fully considers potential community impacts, is a major failure of the DSEIR, thus the developer should be required to specify the exact size, configuration, usage and whether the facility will have a roof or be left open air.

**The DSEIR should leave all considerations of the Sports/Entertainment Complex to the final phase of the project—after adequate office/commercial space has been built, all traffic issues have been mitigated and all community concerns have been addressed.**

**The CD-3 and Planning should only address possible approval of the construction of Sports-Entertainment Complex after Westfield has built viable commercial/office space, a hotel, and added additional residential units.**

### **Response to Comment No. 34-38**

As discussed in Topical Response No. 2, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. As the Warner Center Plan does not specify a maximum size for entertainment uses permitted under the Plan, a Director's Interpretation is requested to approve the proposed number of seats at the Entertainment and Sports Center, which must be approved by the Director of Planning. Additionally, a Project Permit Compliance approval for the proposed Entertainment Use is requested consistent with the requirements of the Warner Center Plan. Contrary to the commenter's statement, these requests are subject to public input and public hearings. The Director's Interpretation and Project Permit Compliance will be part of the Project's public hearings, which will be noticed and open to public comment.

As discussed in the Section II, Project Description, of the Draft Supplemental EIR, and Topical Response No. 2, the Entertainment and Sports Center, the Project includes the option for constructing the Entertainment and Sports Center with a roof or partial roof, and the Project's environmental analysis analyzes whichever option has greater environmental impacts for each issue area, to provide a conservative analysis. Similarly, while the Entertainment and Sports Center may be smaller than 15,000 seats, this maximum seating capacity is analyzed in the Draft Supplemental EIR as the greatest potential environmental impact. The operator ultimately identified for the Entertainment and Sports Center will be required to operate within the scope of environmental impacts identified in the Draft Supplemental EIR and implement all required mitigation measures.

The Warner Center Plan requires that any Project on a site greater than 217,800 square feet (5 acres) be master planned.<sup>60</sup> The purpose of this requirement is "to ensure that pedestrian and walkability goals of the Warner Center Plan are preserved and/or enhanced. The Master Planned Project requirement is designed to protect large lots from

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<sup>60</sup> Warner Center Plan, Section 5.3.3.2

incremental development that, over time, would prevent the larger development goals of the Plan from being realized.”<sup>61</sup> Therefore the Applicant is required to submit a development application for the entire Project Site, to ensure that the design requirements of the Warner Center Plan are met.

Further, the Warner Center Plan also includes detailed requirements for the approval of Multiple Phase projects. Based on the information submitted, the Director may approve, conditionally approve, or disapprove all phases of the Project. Provided that the subsequent phases are in full compliance with the terms and conditions of the Multiple-Phase Project approval, no future compliance review is required, in accordance with the Warner Center Plan. However, if the future phases are not consistent with Project approvals, then the future phases of the Project would be subject to further review by the Director. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 34-39**

#### **The Past and the Present**

WHEREAS, Westfield reneged on plans to include a commercial building, small integrated entertainment venues and a hotel in the **Village project, after the plans had been submitted and approved by the City and the community, and**

WHEREAS, in 2013/2014 renderings and a final project plan for the Village at Westfield was repeatedly presented to the Neighborhood Council. However, after community approval, the plan was vastly changed to exclude community amenities promised to the community as a means to obtain approval, and

WHEREAS, excluded amenities included: a hotel at the corner of Topanga and Erwin which was to contain public meeting space, banquet and ballroom space. Also, an integrated community center with onsite meeting space, space for daily activities for seniors and adults and easily available public open space dedicated to winding bike/walking paths as opposed to current open space within parking lots and heavy foot/car traffic routes, and

The “community center” would eventually be an empty room to be rented to the community by Westfield and not on-site at the Village.

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<sup>61</sup> *Warner Center Plan, Section 5.3.3.1*

THEREFORE, the WHWCNC requests that the City and Westfield, is committed to open, transparent and public notification of all changes made to the Promenade 2035 Project and all related decisions/changes are open to further Public Comment and Public Hearings prior to a final approval.

**Response to Comment No. 34-39**

Please refer to Topical Response No. 4, The Village at Westfield Topanga, above. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 34-40**

The Board of the Woodland Hills–Warner Center Neighborhood Council advises the City of Los Angeles Planning Department and Council District 3 Councilmember Bob Blumenfield of its findings and supporting recommendations.

**Response to Comment No. 34-40**

This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 35**

Damian Acevedo  
22900 Califa St.  
Woodland Hills, CA 91367-4211

**Comment No. 35-1**

I am a homeowner in Woodland Hills, CA. My growing family has enjoyed this area for many years and are very concerned about the proposed increases in housing projects and the addition of a STADIUM(?)

As a resident of the West Valley for the past 18 years, I've seen the increases in Traffic, [sic] Crime [sic] and the impact on schools first hand. I haven't seen anything within the plan that adequately [sic] demonstrates how these resources won't be further impacted. I can see many ways that these problems will get worse.

**Response to Comment No. 35-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Topical Response 5, Public Services, regarding police protection and to Topical Response No. 3, Traffic and Parking, regarding traffic. As discussed in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, the potential impacts to schools associated with the Project would be less than significant.

**Comment No. 35-2**

Every neighbor I've spoken to is baffled by the idea of a stadium in the area. Nobody I know was in need of one. We know a lot of people, as I'm sure you do. If you know someone that needs one, I can recommend quite a few that already exist.

**Response to Comment No. 35-2**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 35-3**

My water bill is increasing consistently. The reason given for the increase is that there is a limited supply of the water and we need to CONSERVE the water being used in our area. Assuming the reason given is true, how will adding thousands of new residents to Woodland Hills relieve the stress on our limited water supply? ... if [sic] we increase the number of people in the area, we will be needing MORE WATER. Making more water without a significant increase in cost doesn't appear possible, since the answer has been to simply keep increasing the cost for those of us who live here.

**Response to Comment No. 35-3**

Details regarding water supply and infrastructure are provided above in Topical Response No. 6, Infrastructure. In addition, Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft Supplemental EIR, as well as the Promenade 2035 WSA, which was adopted by LADWP Board of Water and Power Commissioners in February 2017 and is included as Appendix O, of the Draft Supplemental EIR, provides a comprehensive quantitative analysis of the Project's impacts to water supply and infrastructure during construction and operation of the Project. As discussed further in the Draft Supplemental EIR, Project-level and cumulative impacts with regard to water supply and infrastructure would be less than significant with compliance with regulatory measures and implementation of Project Design Feature M.1-1, which includes implementation of additional water conservation measures beyond those required by the LAMC, as amended by Ordinance No. 184248. Nonetheless, the relevant mitigation measures set forth in the Warner Center Plan EIR, would be implemented as part of the Project and include Warner Center Plan Mitigation Measures U-2 through U-11.

**Comment No. 35-4**

I attend the neighborhood watch meetings for our area and to say the police are understaffed is an understatement. With increases in population the crime will also increase and further tax our under represented [sic] police force. I have little reason to believe that this building plan will ultimately deliver on the increases in police presence. Furthermore, I'm not sure I want tons of police all over the city like some sort of military occupation. I'd much rather not increase crime by adding thousands of people to an area already at the comfortable capacity.

**Response to Comment No. 35-4**

Refer to Topical Response No. 5, Public Services, regarding police protection. The Project would implement several project design features and mitigation measures that would reduce the demand for police services.

**Comment No. 35-5**

The bottom line is that I don't see how these plans help those of us who already live here. We invested large amounts of money and time into this neighborhood for the qualities that it had. Now these ambitious and short-sided [sic] plans threaten the makeup of our community with overcrowding schools, added crime, added traffic, added power consumption, added drain on the water supply, increased costs, etc.

**Response to Comment No. 35-5**

This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 36**

Eliza Ahn  
5737 Laityan Dr.  
Woodland Hills, CA 91367

**Comment No. 36-1**

This letter is to convey my support for the Westfield Promenade project. I like everything about it—the mix of residences, office space, retail, dining, entertainment, Promenade Square, etc.

My support has been strengthened with the draft environmental impact report's release. I'm pleased the report evaluated the proposed entertainment and sports center (noise, traffic, parking, lighting, etc.) and addressed its impacts.

I see no reason why this project shouldn't be approved.

**Response to Comment No. 36-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 37**

Nancy Allison  
5727 Topanga Canyon Blvd., Apt. 5  
Woodland Hills, CA 91367-4847

**Comment No. 37-1**

I learned about Westfield's Promenade project and signed up as a supporter because I like the creative and smart approach the company is taking with overhauling the Promenade Mall property.

I love their plan to break up long blocks and create new streets and pedestrian paths to promote walking. I also like the large public open green spaces and Westfield's commitment to employ sustainable practices.

The new "downtown district" will be a great addition to the neighborhood and I can see it being attractive to young and old alike.

The Draft Environmental Impact Report provided a thorough analysis and found no major reasons why the project shouldn't move forward, so why wait? Let's get this approved now.

**Response to Comment No. 37-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 38**

Franck Amiach  
Fountain Park Cooperative  
22050 Calvert St., Unit 7  
Woodland Hills, CA 91367-3501

**Comment No. 38-1**

My name is Franck Amiach. I am a Shareholder of Fountain Park Cooperative, the 220 community of homeowners situated right across Topanga Blvd, next to the Promenade Mall.

Like many people in Woodland Hills, I am aware of the Promenade 2035 project that Westfield has in our area. As I am sure you know, Woodland Hills is a beautiful community with a lot of shops, restaurants, schools, businesses, homes located in one of the most pleasant areas of Los Angeles with beautiful mountains and close to Malibu. Westfield has recently built a huge Mall plus the Village: I DO THINK THIS IS FAR ENOUGH.

I understand Westfield owns this mall that they decided to pretty much abandon, living [sic] the neighborhood with a huge empty lot for a long time now but I do not believe they need to build the humongous Promenade2035 [sic] project right here. As I am sure you know, there are large areas existing in several other places of the Valley that would be a good opportunity for such development in these neighborhoods. After Fallbrook, Westfield and the Village, our area definitely doesn't need another huge project. The name of the place we love here is Wood Land [sic] Hills: that says it all...

I hope you will thoroughly consider the beauty of our area, the number of houses and peaceful communities that exist here because of the landscape against the terrible impact that this project would have during and after construction: pollution, noise, traffic...

I really believe Los Angeles is an amazing city because of all those various neighborhoods. Woodland Hills and the Valley stand for nature and peace and I do believe they have to remain as such. I arrived in Los Angeles several years ago and if I had wanted to be surrounded by huge buildings I would have picked Downtown, Hollywood, Westwood and so many other locations in town that are way behind Woodland Hills when it comes to nature, beauty and peace.

**Response to Comment No. 38-1**

As discussed in Section IV.G, Land Use, of the Draft Supplemental EIR, the Project Site is located within the Downtown District of the Warner Center Plan area. Refer to

Topical Response No. 1, Warner Center 2035 Specific Plan, above, for further detail on the Warner Center Plan. The Downtown District serves as Warner Center's primary employment and entertainment center, designated for high-density and mixed-use development providing a mix of restaurant and specialty retail uses intended to attract office workers during the day and area residents and families in the evenings and on weekends. A base maximum FAR of 5.0:1 is permitted in the Downtown District, with an FAR of 6.0:1 permitted with a project's inclusion of specified incentives. As the Project proposes an FAR of 2.3:1 at full buildout, development of the Project would be less than the maximum FAR permitted within the Downtown District of the Warner Center Plan. As such, the Project is consistent with the Warner Center Plan and the vision for the Project Site. Refer to Sections IV.B, Air Quality, IV.H, Noise, and IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, regarding the analysis of potential significant impacts during construction and operation of the Project associated with air quality, noise and traffic, respectively.

### **Comment No. 38-2**

Among the phases of the project, I do believe the stadium more specifically has no place in our residential area. Not only this would be a disruption of the Woodland Hills community, but also the increased traffic, the air pollution and the noise would be unbearable. If the city really believes for some reason that we do need a sport center right here please at least consider the option to build it covered of course and on the corner of Oxnard and Owensmouth, next to the businesses.

### **Response to Comment No. 38-2**

As discussed in the Draft Supplemental EIR, above, the Project Site is located in the Downtown District of the Warner Center Plan, and not in a residential area, as the commenter states. Topanga Canyon Boulevard, which forms the western boundary of the Project Site, is classified as a Boulevard II, Arterial Street, which is defined as a major street that serves through traffic and provides regional access to major designations. Topanga Canyon Boulevard provides direct access to the US-101, and is, therefore, an appropriate commercial corridor for location of the Entertainment and Sports Center. Refer to Topical Response No. 2, Entertainment and Sport Center, above, for a discussion regarding the potential impacts associated with operation of the Entertainment and Sports Center.

### **Comment No. 38-3**

I am one of 220 homeowner within Fountain Park alone. Our 8.5 acres community has been here for decades and our lot represents the surface of each phase of the current project. I hope Westfield and the City will have the courtesy to hear our voice and act based on what we feel as residents as much as how much money can be made. Even

though all of us might not speak up, I do believe we could all be badly impacted by this project as it is.

I therefore would appreciate to have further information on Westfield [sic] intention regarding the use of this area and see which development they could offer that would indeed benefit the people who live in Woodland Hills more than Westfield's business alone.

Thank you so much for your time and consideration.

**Response to Comment No. 38-3**

This comment does not raise an environmental issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. The commenter will continue to be included on the Project's mailing list for future environmental and hearing notices related to the Project.

**Comment Letter No. 39**

Carol Anthony  
livingair2005@aol.com

**Comment No. 39-1**

Please either scrap altogether the Warner Center Promenade 2035 Plan or find a way to scale this down. The West Valley has been sold out in my opinion.

**Response to Comment No. 39-1**

Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, for a discussion regarding the Warner Center Plan. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 39-2**

The proposed project will have a major negative impact on he [sic] entire area, we do not have the infrastructure in place to handle the increase in an already horrific traffic problem. Crime will undoubtedly increase, we do not have enough Police to handle that as well as Fire and EMS will be overwhelmed.

**Response to Comment No. 39-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for further details on the Project's impacts to traffic, and Topical Response No. 5, Public Services, for a summary of impacts to police protection and fire services. As discussed further in the Draft Supplemental EIR, the Project would implement several project design features and mitigation measures that would address the demand for police and fire services.

**Comment No. 39-3**

You are putting the citizens at Woodland Hills/ West [sic]Valley at great negative risk! I implore you to reconsider this project , [sic]

**Response to Comment No. 39-3**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 40**

Marc Arjang  
Mina Kasra  
22049 Oxnard St.  
Woodland Hills, CA 91367-3546

**Comment No. 40-1**

I am sending my opposition to the Promenade 2035 proposed plan.

Fountain park RESIDENTIAL community with 220 Homeowners in 8.5 acres will be the First [sic] most close community to this environmental impact proposed plan.

Building 15.000 seats [sic] stadium at cross [sic] street of our bed rooms [sic] as well as many others is unbelievable! Also many single family homeowners located at [sic] south west of the Fountain park will be exposed as well.

**Response to Comment No. 40-1**

This introductory comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 40-2**

Most concern:

1—Noise

we [sic] are experiencing all kind of noise during the day and nights, [sic] such as:

more [sic] traffic noise, including car and motorcycle racing

Noise from Marriott hotel in the summer time music pool party.

What is the capacity of extra noise will we get from 15000 seats [sic] stadium with digital surround sound system technology at cross [sic] street?

**Response to Comment No. 40-2**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for further details on the Entertainment and Sports Center's impacts related to noise during operation of the Project, as well as a summary of the Project's composite noise impacts.

**Comment No. 40-3**

2—Pollution

Daily transient operations and cone zones face our community with the greater exposure to extra noise and daily pollutions. [sic]

**Response to Comment No. 40-3**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for further details on the Entertainment and Sports Center's impacts related to air quality. Localized air quality impacts associated with the Project, including the Entertainment and Sports Center would be less than significant. While the mobile emissions resulting from the amount of trips generated by the Entertainment and Sports Center would contribute to the significant and unavoidable regional operational air quality impact, the Project would include a Transportation Demand Management (TDM) Program as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, that would be developed and would include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips, which would help to reduce operational air quality emissions.

**Comment No. 40-4**

Please build your 15000 seat stadium elsewhere in your business zone not in residential community.

**Response to Comment No. 40-4**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for further details regarding the Entertainment and Sports Center's compatibility with surrounding uses and consistency with the uses under the Warner Center Plan. The intent of the Warner Center Plan is to locate dense development adjacent to transit that has a mix of uses designed to reduce vehicle trips and vehicle miles traveled. The commenter's opposition to the Entertainment and Sports Center is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 41**

Jack Aroyan  
20410 Clark St.  
Woodland Hills, CA 91367-6819

**Comment No. 41-1**

I object to the huge plans and development at Westfield. I don't believe there was a thorough study on the heat that these developments will cause. Woodland Hills hit 118 degrees last week. A Woodland Hills mail carrier was found dead in her mail truck. Woodland Hills is at the southwest end of the valley where it's [sic] air circulation is at a minimum. It's hotter here than anywhere else in Los Angeles. I believe that hundreds of senior citizens will die here if the high rises continue. Cars create an extreme amount of heat also so adding a stadium will cause this area to heat up to unbearable levels. There are limited resources, as the rise in our utility bills indicate. Our bills will all rise if these buildings steal away what little resources we have. Black outs will also occur (76,000 customers lost service last week)as [sic] DWP has no plans to add any new stations.

I used to visit an 82 year old neighbor with my dog, just to give her company as her family lives in Texas. This past year, with utilities rising, she can't pay her bills and refuses to put on her a/c. Not only is she suffering in the heat, but she is also missing out on social interaction because nobody wants to visit her in her hot home. Please Please [sic] do not build anymore in Woodland Hills. The heat island effect needs to be investigated before more people die.

**Response to Comment No. 41-1**

With regard to additional heat, the Project includes a number of design features that are consistent with the strategies identified by the United States Environmental Protection Agency (EPA) to address heat island effects, such as: including trees and landscaping within development areas and implementing building standards that incorporate heat island reduction strategies. As discussed in Section IV.I.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, the Project would provide a variety of open space and recreational amenities, including 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres. The EPA has also identified the enactment of green building ordinances by local jurisdictions as a means of addressing heat island effects. The Project would be consistent with the City of Los Angeles Green Building Code, as further discussed in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR. Based on these and other measures incorporated into the EIR, there is no evidence to suggest that the Project will result in an increase in temperature or a hot zone. The comment is noted for the record and has been



incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 42**

Jack Aroyan  
20410 Clark St.  
Woodland Hills, CA 91367-6819

**Comment No. 42-1**

Coincidentally, I came across this article yesterday as well as another informative piece. Please add this information to my previous comments.

Thank you.

I'll keep in contact with others that are on your list so that you can save money on postage.

According to the Centers for Disease Control and Prevention, each year **extreme heat causes more deaths in the United States than all other weather-related causes combined**. In LA, the average five-day heat wave results in 4.1% more deaths than cooler weather on the first day, and 11.9% more on the fifth day.

Realistically, the coming heat event will result in some Angelenos going to the emergency room... and others dying at home.

Extreme heat does not just cause heat exhaustion or heat stroke. Many chronic medical conditions are exacerbated, and the situation worsens the longer a heat wave lasts—especially when there is little relief at night, [sic]

The human body has to work hard to keep you cool under these conditions, and the task becomes very difficult when the body is unable to take a break at night. Our elderly and under-resourced communities are at the highest risk -due to a combination of living in neighborhoods with less tree canopy cover, limited access to air conditioning, and housing with poor insulation.

**How Do Urban Heat Islands Form?**

As vegetation in rural areas is gradually replaced by asphalt and concrete for roads, buildings and other structures closer to cities, urban heat islands develop. Asphalt and concrete absorb the sun's heat rather than reflect it, causing surface temperatures to rise.

Additionally, tall buildings and narrow streets trap the heat from the afternoon and reduce air flow, preventing the heat from escaping and keeping temperatures warmer overnight.

The urban heat island effect can also be enhanced by heat emitted by vehicles, factories and air conditioners.

**Response to Comment No. 42-1**

With regard to the urban heat island effect, the Project includes a number of design features that are consistent with the strategies identified by the United States Environmental Protection Agency (EPA) to address heat island effects, such as: including trees and landscaping within development areas and implementing building standards that incorporate heat island reduction strategies. As discussed in Section IV.I.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, the Project would provide a variety of open space and recreational amenities, including 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres. The EPA has also identified the enactment of green building ordinances by local jurisdictions as a means of addressing heat island effects. The Project would be consistent with the City of Los Angeles Green Building Code, as further discussed in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR. Based on these and other measures incorporated into the EIR, there is no evidence to suggest that the Project will result in an increase in temperature or a hot zone. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 42-2**

Jack Aroyan  
20410 Clark St  
Woodland Hills, Ca [sic]  
91367

**Response to Comment No. 42-2**

The commenter will be properly notified of any future notifications using the provided address.

**Comment Letter No. 43**

Nicole Arslanian  
18980 Ventura Blvd., Ste. 300  
Tarzana, CA 91356-3297

**Comment No. 43-1**

I wanted to begin by commending City Planning's commitment to reviewing projects responsibly and ensuring that only quality projects move forward. You serve an important role and as a resident, I appreciate it.

I felt it was important to write today and share with you how impressed my family has been by the Westfield team when it comes to the Promenade 2035 development plan. From day one the team has reached out to the community to share its plans in great detail. Outreach has been consistent and has included mailers, email communications, and in person meetings.

It's nice to see that the environmental studies bear out everything that they have shared. They assured the community that the project would be sensitive to the water supply and water use and I was pleased to see just what steps the project is taking to be sensitive to water.

Including:

- Only using recycled water for landscaping and focusing on drought tolerant planting throughout the property.
- Utilizing high efficiency toilets, kitchen faucets and showerheads.
- Using solar water heating for pools and spas.
- Employing rainwater-harvesting systems to reuse where possible.

Those are just a few of the steps that Westfield is taking, and I hope that they will continue to find new ways to conserve throughout the life of the project.

I hope that you will move this project forward.

**Response to Comment No. 43-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 44**

Sabine Arslanian  
18980 Ventura Blvd., Ste. 300  
Tarzana, CA 91356-3297

**Comment No. 44-1**

It is important to me that any development in Los Angeles commits to strong sustainability measures. It is for that reason that I support the Promenade 2035 Plan. As I discovered in the Draft Environmental Impact Report released by the City, the project is taking major steps to build a community where residents, employees and visitors can live and work in sustainable ways.

Committing to LED and energy-efficient lighting technologies such as occupancy sensors, daylight harvesting and dimming controls make the work place work for the environment.

Equally important is their commitment to provide a minimum of 500 kilowatts of photovoltaic panels on the project site. I hope that they will even consider increasing that even more over the course of the project.

With measures like these, as well as those required for the Warner Center Plan, Promenade 2035 is sure to be a boon to the area, and in a way that makes sustainability a new way of life.

**Response to Comment No. 44-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 45**

Serge Arslanian  
18980 Ventura Blvd., Ste. 300  
Tarzana, CA 91356-3297

**Comment No. 45-1**

The Westfield Promenade is one of the smartest development projects to come to the West Valley in years, so I'm not sure why the public comment period for the Draft Environmental Impact Report was extended to 90 days.

I understand these types of delays are becoming increasingly common, making it difficult for any development projects to get off the ground. I know it is already hard to do business in California, so let's not discourage Westfield from moving forward with this project by slowing the process down even more. As a nearby resident, I'm rooting for them to succeed.

I'm hopeful the company will persevere with its plans to remake the old Promenade Mall and turn it into an active, vibrant, urban downtown with apartments, restaurants, shops and entertainment for all to enjoy. And, I'm hopeful there will not be further, needless delays.

**Response to Comment No. 45-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 46**

Taline Arslanian  
18980 Ventura Blvd., Ste. 300  
Tarzana, CA 91356-3297

**Comment No. 46-1**

Now that the long-awaited Draft Supplemental Environmental Impact Report has been released and found no significant issues with Westfield Promenade, it's time to allow this project to move forward.

I've been impressed with this project from the start. I like how Westfield has reimagined the Promenade property and is turning it into a smart, attractive development that is sensitive to the community and environment through various design features and architectural elements.

The large public open space is terrific, and I can see the area becoming a popular gathering space like The Village.

Let's get this project approved soon.

**Response to Comment No. 46-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 47**

Penny Bahn  
23045 Collins St.  
Woodland Hills, CA 91367-4224

**Comment No. 47-1**

please [sic] document the attached letter regarding the DEIR for the Westfield development which is due prior to 4pm [sic] today. I assume it will be included in the ENV-documentation [sic] and filed with the City Clerk.

**Response to Comment No. 47-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 47-2**

As a Woodland Hills stakeholder I am again not surprised that this inappropriate development continues to move forward without adequate controls by either the Area 3 City Councilman or the City. We in the West Valley are experiencing record heat with blackouts, exorbitant water rates and threats of restrictions, unmaintained local streets with potholes that are fixed eventually with mounds of extra asphalt (Woodlake and Ostronic) that are a danger both before, and after, long awaited “repairs”. [sic] Traffic that continues to load onto all our streets and the 101, and development that is out of control; allowing residential growth that far exceeds the current infrastructure and the demands for office space and housing in Warner Center and the surrounding areas. All pushed forward to beat the next downturn in the economy and the coming rising interest rates. It’s time to think a little more broadly and curtail this development.

**Response to Comment No. 47-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the Project’s impacts related to traffic during construction and operation of the Project. Also refer to Topical Response No. 6, Infrastructure, for a discussion regarding the Project’s impacts on water, wastewater, and energy infrastructure. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 47-3**

The DEIR points out the construction issues including air, noise, vibration, congestion etc. but doesn't note that this will go on for years, actually decades, before this planned oversized behemoth is completed. Decades.

**Response to Comment No. 47-3**

As provided in Section II, Project Description, of the Draft Supplemental EIR, the Project is anticipated to be constructed in multiple phases, over a period of 15 years. A description of each phase of the Project is summarized in Table II-2 on page II-22 of the Draft Supplemental EIR.

**Comment No. 47-4**

The stadium is on the corner of Oxnard which is a 2-lane residential road going west, and Topanga; an already grossly congested boulevard used as an option for Santa Clarita residents to get from the 118 to the 101 every AM and PM. What this will do is push more speeding workers down Fallbrook and Shoup—the only 2 remaining N/S streets west of Topanga that the Santa Clarita crowd already use to fly down to the 101 avoiding the 405. Fallbrook and Shoup are both residential roads, not commercial highways. This will push thousands of cars into the residential neighborhoods for many, many years to avoid this construction which will increase air pollution and risk the safety of our residents. Clocking drivers on either of these residential roads shows they are speeding at 50–60 much of the commuting hours down those streets. It is ludicrous.

**Response to Comment No. 47-4**

Refer to Topical Response No. 3, Traffic and Parking, above regarding the Project's traffic impacts and for a discussion of the Project's neighborhood protection plans.

**Comment No. 47-5**

Again, the City is putting property tax dollars and whatever other revenue they are getting for this development, before the needs of the residents in Area 3. This is a gross misuse of political power and the City should insist the development be pared down, stadium eliminated (is there anyone that thinks that is a good idea except for Westfield?), and the infrastructure put in place BEFORE subjecting the area to such a massive development.

**Response to Comment No. 47-5**

Refer to Topical Response No. 6, Infrastructure regarding the adequacy of infrastructure to accommodate the Project. The remaining comments are not related to the

environmental implications of the Project but are noted for the record and have been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 47-6**

This facility will not be “off the grid” rather it will demand massive water, electricity, police and fire resources that we have not been allocated now. The construction will make living and traveling around the area untenable. Then after development, when no additional infrastructure is in place, the area is made even hotter by the amount of buildings and concrete, we will be forever negatively impacted by the short-sighted approval of the Westfield project.

**Response to Comment No. 47-6**

Refer to Topical Response No. 5, Public Services, and No. 6, Infrastructure with regard to the Project’s impacts to police and fire protection and water and electricity infrastructure. With regard to additional heat, the Project includes a number of design features that are consistent with the strategies identified by the United States Environmental Protection Agency (EPA) to address heat island effects, such as: including trees and landscaping within development areas and implementing building standards that incorporate heat island reduction strategies. As discussed in Section IV.I.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, the Project would provide a variety of open space and recreational amenities, including 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres. The EPA has also identified the enactment of green building ordinances by local jurisdictions as a means of addressing heat island effects. The Project would be consistent with the City of Los Angeles Green Building Code, as further discussed in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR. Based on these and other measures incorporated into the EIR, there is no evidence to suggest that the Project will result in an increase in temperature or a hot zone.

**Comment No. 47-7**

Lastly, the West Valley has historically been a refuge from the busy westside and one we suffer the heat and distances to enjoy. That includes dark night sky, quiet neighborhoods and less congestion getting from A to B. That will all be gone forever the minute this starts and I object whole-heartedly to it.

Please note all the above issues in the ENV-20 16-3909-EIR file. [sic]

**Response to Comment No. 47-7**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 47-8**

please [sic] add my address for notification purposes:

23045 Collins St.  
Woodland Hills, CA  
91367

**Response to Comment No. 47-8**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 48**

Dennis & Yuko Barron  
6021 N. Pointe Pl.  
Woodland Hills, CA 91367-5500

**Comment No. 48-1**

We live about three miles from Westfield Promenade, and have an interest in any development on the Promenade property.

The "Village," a similar near-by development has been a huge success and has attracted us to its establishments. Thus, we are similarly interested in and support Westfield's plans for their Promenade project.

We understand that the Environmental Impact Report has identified mitigation measures to minimize any impact of traffic conditions, which would be of most concern to us. That other issues such as air quality and noise have also been considered is important.

We are looking forward to a prompt fruition of the Westfield project.

**Response to Comment No. 48-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 49**

Barbara Baum  
23015 Dolarosa St.  
Woodland Hills, CA 91367-6106

**Comment No. 49-1**

Thank you for taking the time to read this:

This proposal strikes me as an overblown concept with no fail safe. Many of the ideas are valid and may offer benefit to existing residents, as well as, encouragement [sic] for new residents to live, work and enjoy the benefits of a centralized community center. The problem lies in access to this new center whether it be by individual vehicle, mass transportation [sic] or bicycle and walking access. As a long time resident I have seen movement within the community triple in terms of time commitment. This plan does not adequately address the existing movement issues and seeks to expand building for employment, residence and recreation.

There is no question that this area will grow and attract more people to enjoy the benefits that are all ready here. Adding more residential units, offices, [sic] and general businesses is a great idea if the existing infrastructure [sic] is supported. It is my belief that none of the existing businesses should be asked to leave or relocate. We recently added an area called the Village to the Topanga Owensmouth area it was inadequately planned for and has suffered from poor parking, few incentives, to help businesses survive and no attention to affordable housing for job holders in the area.

**Response to Comment No. 49-1**

With regard to traffic and parking issues, refer to Topical Response No. 3, Traffic and Parking, above. Also refer to Topical Response No. 4, The Village at Westfield Topanga, above for further discussion regarding the Village. In addition, refer to Topical Response No. 6, Infrastructure, for a discussion of the Project's impacts to existing infrastructure.

**Comment No. 49-2**

The ideas in this new plan are not without merit but must be scaled down by more than 50 percent of its intent. We do not possess the ability to support such expansion all at once. Police services and city maintenance personnel are just a few of [sic] the areas all ready overwhelmed. To even consider an Entertainment center of the magnitude proposed seems too early in what should be an orderly roll out of meeting the needs of the

existing area. Having a proposal of the magintude [sic] to aspire to is valid. Destroying what currently exists and is functioning is counter productive [sic] and ruins countless ambitions along the way. Profitability, employment and better lives go hand and hand and are built by supportive structures over time. I ask thatwe [sic] move forward carefully and not forget to support what pre exists.

#### **Response to Comment No. 49-2**

The commenter's concerns regarding the existing infrastructure and City services are addressed in the Draft Supplemental EIR. Refer to Topical Response No. 5, Public Services, and No. 6, Infrastructure, above, for further information. It should also be noted that the Project will be constructed in phases, as described further in Section II, Project Description, of the Draft Supplemental EIR, rather than an expansion that would happen all at once as described by the commenter.

#### **Comment No. 49-3**

Thank you so much for your kind reply it is Barbara Baum 23015 Dolarosa Street Woodland Hills CA 91367 Thanks Again [sic]

#### **Response to Comment No. 49-3**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 50**

Kelly and Ted Beder  
kbeder@att.net

**Comment No. 50-1**

We are writing to express that we do not support the addition of a 15,000 person arena in Woodland Hills where the Westfield Promenade Mall is located. Traffic is already a major concern in the area, and with the addition of the new residential communities already under construction, traffic will only get worse.

**Response to Comment No. 50-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, and Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic impacts of the Project.

**Comment No. 50-2**

From our home, we can hear the Concerts in the Park each Sunday.

Although we are supportive of the Concerts in the Park as it is a very family friendly activity we do not support a large commercial venture which would bring additional traffic and noise the [sic] area. Please keep Woodland Hills the way it is, which is a lovely place to live.

**Response to Comment No. 50-2**

Refer to Topical Response No. 2, Entertainment and Sports Center, and Topical Response No. 3, Traffic and Parking, above, for a discussion regarding impacts of the Entertainment and Sports Center, including noise and traffic impacts associated with the Project. With regard to noise, as discussed in Section IV.H, Noise, of the Draft Supplemental EIR, an evaluation of potential composite noise level increases (i.e., noise levels from all on-site noise sources combined, including the Entertainment and Sports Center) at the analyzed sensitive receptor locations was performed. As demonstrated therein, composite noise levels from Project operation at all off-site sensitive receptor locations would be less than significant. As a note, the sensitive receptor locations chosen were the closest sensitive receptors to the Project Site. Sensitive receptors include hotel uses 145 feet south of the Project Site, residential uses 170 feet northeast of the Project Site, residential uses 245 feet southwest of the Project Site, and 380 feet west of the Project Site. Thus, any receptors farther away would have reduced noise impacts.



**Comment No. 50-3**

Thanks for the quick response. Our address is 20611 Aetna St, Woodland Hills, 91367

Thank you!

**Response to Comment No. 50-3**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 51**

Jed Behar  
7031 Keokuk Ave.  
Winnetka, CA 91306-3546

**Comment No. 51-1**

I can appreciate the time that went into preparing the Supplemental Draft Environmental Impact Report for the Westfield Promenade project. Thank you for your thorough review—it's great to hear that any project impacts can be mitigated through improvements, good planning and smart design.

I especially like the fact that the DEIR fully analyzed noise, lighting, traffic, parking and construction related to the Entertainment and Sports Center and addressed the impacts through lighting and sound design features as well as an event management plan.

It's also good to hear that Westfield has designed a sustainable lifestyle community that minimizes environmental impacts by having housing, offices, retail and entertainment options in one location, promoting a more walkable neighborhood and reducing our reliance on cars.

In addition, Westfield is to be commended for achieving LEED Silver in all buildings and utilizing energy and water-saving practices.

I hope you will approve this project.

**Response to Comment No. 51-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 52**

Fran Bernstein  
22119 Oxnard St.  
Woodland Hills, CA 91367-3547

**Comment No. 52-1**

I appreciate the work that the City of Los Angeles has put forth into evaluating the environmental impacts and viability of Westfield Promenade 2035. With the newly released draft environmental impact report, it appears that there are few major issues. Therefore, it is time to approve this project.

I'm pleased the draft EIR has confirmed that the project complies with the Warner Center 2035 Plan by taking a thoughtful approach to planned growth that balances the need for housing, jobs and services for the broader community. I also like that it encourages walkability and promotes green building standards that foster smart and sustainable growth.

Importantly, Promenade offers open space that will encourage public gatherings and create a hub of activity, as will the new entertainment and sports center. It's obvious that Westfield really studied the Warner Center Plan because the design and scale of their project really adheres to the goals of that community-created plan. The draft EIR shows the project is environmentally sound and can move forward.

**Response to Comment No. 52-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 53**

Francie Bemstein  
24120 Park Riviera  
Calabasas, CA 91302-2533

**Comment No. 53-1**

I am absolutely opposed to the proposed stadium urban village planned for Warner Center. The traffic will be a nightmare in the area and backed up on the freeway. It already backs up at Christmas to go to the mall. The stadium is unnecessary. A scaled down mixed use center could be acceptable.

**Response to Comment No. 53-1**

With regard to traffic issues, refer to Topical Response No. 3, Traffic and Parking above. This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 53-2**

Francie Bemstein  
24120 Park Riviera  
Calabasas, CA 91302

**Response to Comment No. 53-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 54**

Robert Bernstein  
7551 Atherton Ln.  
West Hills, CA 91304-5214

**Comment No. 54-1**

*Just a quick note to voice my support for the replacement project of the Promenade in Woodland Hills.*

*Since we all recognize that many 'old school' shopping malls are either dying or are dead, I think it is the time for this land to be re purposed.*

*I think that the proposed project would be a major aesthetic and financial (tax base) improvement to the West Valley.*

*Much like the addition of big box stores, such as Costco, and their related shopping areas, I think that the Westfield proposal is a step in the right direction.*

*So much for my two cents.*

**Response to Comment No. 54-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 55**

Tony Blake  
4819 Poe Ave.  
Woodland Hills, CA 91364-4621

**Comment No. 55-1**

I'm writing to express my objection to one of the aspects of the proposed re-development of the Promenade Mall. That would be the 15,000 SEAT ARENA that is planned. Having lived here for 20 years I can tell you it doesn't take a rocket scientist to know that having approximately 6 or 7 THOUSAND CARS coming into that area in a compressed time frame for an event to know it would create massive traffic and environmental issues. Clearly the EIR is deficient about this issue.

**Response to Comment No. 55-1**

Refer to Topical Response No. 3, Traffic and Parking, and Topical Response No. 2, Entertainment and Sports Center, above, for a summary on the Project's traffic analysis, including the analysis of vehicle trips associated with the Entertainment and Sports Center. As discussed therein, Project Design Feature K-6 provides for the development and implementation of an Event Management Plan to address traffic associated with the Entertainment and Sports Center. As discussed in Section IV.K, Traffic, Access and Parking, of the Draft Supplemental EIR, intersections are projected to operate with less than significant impacts during sold out event days, with implementation of the Warner Center Mitigation Program and Project specific project design features. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical

Response No. 3, Traffic and Parking for further details regarding the Warner Center Plan Implementation Board.

**Comment No. 55-2**

With the continuing development of high density apartment buildings going up in Warner Center that are already causing serious traffic issues, the idea of a 15,000 seat arena is insane. It's clear this is motivated by the greed of both the developers and the City Councilman and not by concern for the quality of life for those of us who live in this neighborhood.

Thank you for listening.

**Response to Comment No. 55-2**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Also refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion of the Entertainment and Sport Center's environmental impacts.

**Comment No. 55-3**

Thank you for your prompt response.

My mailing address is: 4819 Poe Ave. Woodland Hills, 91364.

**Response to Comment No. 55-3**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 56**

Judith Bluestone  
22241 1/2 Erwin St.  
Woodland Hills, CA 91367-0948

**Comment No. 56-1**

I live on Erwin Street 2 short blocks west of the Promenade.

I am opposed to the proposed stadium.

I'm in favor of a neighbor friendly complex with minimal traffic and environmental impact.

**Response to Comment No. 56-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Also refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion of the Entertainment and Sport Center's environmental impacts.

**Comment No. 56-2**

Thank you.

Judy Bluestone  
22241 1/2 Erwin St  
Woodland Hills, CA 91367

**Response to Comment No. 56-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.



**Comment Letter No. 57**

Jeff Bornstein  
7507 Winnetka Ave.  
Canoga Park, CA 91306-2929

**Comment No. 57-1**

Canoga Park, CA 91306-2929

The plan as a whole lacks specific information. The worst case in lacking specifics is the area known as The Stadium/Arena. This should make studies and actions thereafter invalid. Specifics are needed for legitimacy of the process for the community in the case of this Promenade project Environmental Case No: ENV-2016-3909-EIR.

Without specific information on the whole project there is no way to accurately comment on flow and interacting with the existing traffic patterns and other aspects of the existing community.

**Response to Comment No. 57-1**

A detailed description of the Project is provided in Section II, Project Description, of the Draft Supplemental EIR. The project description provides the essential information needed to fully evaluate the environmental impacts of the Project, including potential traffic impacts associated with the Entertainment and Sports Center. As discussed in Section IV.K, Traffic, Access and Parking, of the Draft Supplemental EIR, intersections are projected to operate with less than significant impacts during sold out event days, with implementation of the Warner Center Mitigation Program and Project specific project design features. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council

Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking for further details regarding the Warner Center Plan Implementation Board.

Further details regarding the Entertainment and Sports Center are discussed in Topical Response No. 2, Entertainment and Sports Center, above.

### **Comment No. 57-2**

We need to plan One [sic] Phase [sic] at a time. The plan itself is further flawed in the fact it is asking for approval for all phases of the project when the proposal provides for building it in different stages. If it is going to be built in phases it makes sense to plan it and get approval individually. In Phases. [sic] Projects and plans should be submitted only by phase. Treating each individual phase as a separate entity. If the Stadium/Arena is to be built in 10 years. Planning should start in an appropriate time prior to project. Not, [sic] projects that are proposed for the future with so many variables . This does not seem to make sense. Planning should be done as close to the project being built as possible. To give all participants, Developers [sic] and Community [sic] to have the most updated opportunity to comment on projects that will change their communities. The Developer [sic] should only get approval for projects it is legally bound to start construction in a normal time. And built in a normal and timely timely [sic] manner not to evade the intent of" One Phase at a Time". [sic]

Further the lack of information only cements the need for Planning One Phase [sic] at a time. Doing anything contrary seems to stifle comment on buildings and Stadium/Arena to be built sometime in the future. We need more specifics. We need more information. And updated information [sic]

### **Response to Comment No. 57-2**

The Warner Center Plan requires that any Project on a site greater than 217,800 square feet (5 acres) be master planned. The purpose of this requirement is "to ensure that pedestrian and walkability goals of the Warner Center Plan are preserved and/or enhanced. The Master Planned Project requirement is designed to protect large lots from incremental development that, over time, would prevent the larger development goals of the Plan from being realized." Therefore, the Applicant is required to submit a development application for the entire Project Site, to ensure that the design requirements of the Warner Center Plan are met, and the associated Draft Supplemental EIR must analyze environmental impacts from the entire Project.

Further, the Warner Center Plan also includes detailed requirements for the approval of Multiple Phase projects. Based on the information submitted, the Director may approve, conditionally approve, or disapprove all phases of the Project. Provided that the subsequent phases are in full compliance with the terms and conditions of the Multiple-Phase Project approval, no future compliance review is required, in accordance with the Warner Center Plan. However, if the future phases are not consistent with Project approvals, then the future phases of the Project would be subject to further review by the Director.

The Draft Supplemental EIR was prepared in accordance with CEQA and the CEQA Guidelines. As discussed in Response to Comment No. 57-1, a detailed description of the Project is provided in Section II, Project Description, of the Draft Supplemental EIR and the project description provides the essential information needed to fully evaluate the environmental impacts of the Project.

### **Comment No. 57-3**

With information lacking there is still the fact this plan adds thousands of residents and others to an already dense area. Yet this plan lacks basic public safety needs for the area. The plan allows for developers to make enticing profits, yet allows for no funds to help plan and provide for a LA City full scale Police Station. With the addition of thousands upon thousands of apartment residents this Developer [sic] and other Large Developers [sic] need to participate in planning and providing for a Police Station in a timely fashion. Warner Center needs a full scale LAPD Police Station in Warner Center to offset the planned 20,000 new residences and 40,000 to 80,000 new jobs stated in the Warner Center 2035 Specific Plan. Chapter 3 CommunityVision [sic] Statement WC2035SP Warner Center 2035 Specific Plan [sic]

“Increase jobs in Warner Center from the existing approximately 40,000 to 80,000 by 2035, including Research/Development, Professional/Technical and other “creative class” jobs.

- Create an environment to attract jobs, provide quality residential neighborhoods with amenities, including open space, a community shopping center, neighborhood-serving retail, entertainment and walkable streets, add 20,000 new residential units of various types and sizes by the year 2035.”

A Police Station is needed. The best place probably would be next to LA City Fire Station 84 on Burbank Blvd. Burbank Blvd. [sic] just west of De Soto Ave. ( South side ). [sic] being practically adjacent to the only Hospital in the area and next to Fire Station 84 is the least intrusive. Another property maybe easier to acquire, but in any case a Police Station is needed and anyone who cares about the community should recognize that. Neglecting the

need for health and safety should not be the job of Large Scale and large profit developers such as Westfield has presented with the Promenade project.

### **Response to Comment No. 57-3**

Refer to Topical Response No. 5, Public Services, above. As discussed therein, consistent with *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate, unless the need for additional police protection services will cause a direct or indirect physical impact. The CEQA Guidelines state that economic or social impacts by themselves are not considered significant effects on the environment. (CEQA Guidelines § 15382). In addition, the Project would implement several project design features and mitigation measures that would address the demand for police services. As determined in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site and potential impacts associated with police protection would be less than significant. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 57-4**

Beyond that this project avoids the two core arteries of transportation in the west San Fernando Valley. Avoiding the Ventura Fwy (101 Fwy) and the Orange Line guarantees a ride on City streets more than 3/4 of a mile and more. Only exceptions are pedestrians and bicyclists. Large 17 story apartments would be better suited closer to the Orange Line or Ventura Fwy. This plan avoids that. This plan is a guarantee of clogging local City streets even for those taking the Orange Line and the 101 Freeway.

A project of this magnitude would better serve the community closer to the Orange Line. The Orange Line, now running only on the dedicated former Southern Pacific rail track has been successful and for the West Valley to be served appropriately the Orange Line should be light rail. Light rail is faster, more efficient and healthier for the neighbors as well as riders and the physically limited. Building this building near the Orange Line would be ideal in stating to the MTA the West San Fernando Valley wants its fare share and deserves a light rail akin to the Blue Line, Gold Line and Expo Line. West Valley residents participate in paying extra sales tax for Propositions providing for public transportation. Proposition M funds, as well as other proposition driven funds are not being spent in the West San

Fernando Valley because Developers are building large skyscrapers away from the Orange Line. This needs to be remedied [sic]

#### **Response to Comment No. 57-4**

The Project Site is directly adjacent to the Warner Center Transit Hub, which is serviced by Metro's Warner Center circulator connection to the Metro Orange Line Canoga Station. The Warner Center Transit Hub also includes service from five Metro local lines, one Metro Rapid line, one Antelope Valley Transit Authority line, and one Santa Clarita Transit Line. As discussed in the Draft Supplemental EIR as well as in Topical Response No. 1, Warner Center 2035 Specific Plan, above, the Project's development program is consistent with the uses envisioned in the Warner Center Plan and in furtherance of the Warner Center Plan's purpose to create a vital mixed-use, transit-oriented district for the Warner Center Plan area and surrounding communities. Refer to Topical Response No. 3, Traffic and Parking, for a summary of the Project's traffic impact analysis. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 57-5**

The MTA parking lot on Canoga Ave just South of Vanowen Ave. is a perfect location for a 17 story apartment building. Adjacent to the Orange Line, that parking lot owned by the MTA, would be need to be part of a land swap. The parking lot has no toxic history as does the Rocketdyne Facility across Canoga Ave.

#### **Response to Comment No. 57-5**

The MTA parking lot on Canoga Avenue is not owned by the Applicant and not a part of the Project. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 57-6**

The Promenade plan lacks an Emergency Plan. With this many new residence [sic] an internal Emergency Plan will not only help residents, but will help Police, Fire and the Local community as well. An extensive plan for Earthquakes and Power outages with stored water and generators for the physically challenged would seem like a proper investment for a large apartment building. Planning before building for areas and protected water and devices will pay big dividends in the future, As [sic] well as a selling point for future tenants. This subject of Emergencies, [sic] earthquakes, disasters and power outages are part of our reality and they should be addressed. This subject is hard to cover because of the lack of specifics in terms of the proposed " Stadium/Arena". [sic] How can you have an

Emergency plan without a specific facility? Lastly on the subject of emergencies. The fact we will have Emergencies [sic] in the future only magnifies the need for another Police Station in Warner Center to take care of those 20,000 new apartments or apartment-style condominiums.

**Response to Comment No. 57-6**

As specified in Project Design Features J.1-4, the Project will include an Emergency Procedures Plan in conjunction with the proposed Entertainment and Sports Center. The Emergency Procedures Plan shall outline employee guidelines and procedures in the event of fire, medical emergency, civil disturbance, injuries to multiple individuals, evacuation, and other types of emergencies. The Emergency Procedures Plan shall be subject to review by the LAPD and LAFD. In addition, the Emergency Procedures Plan shall include an Emergency Medical Response Plan developed by the Applicant in consultation with the LAFD, outlining the first aid and medical services and the safety features to be provided by the Applicant during events. Additionally, pursuant to Project Design Feature J.1-9, an Emergency Procedures Plan would also be established and implemented for the Project's other buildings. Project Design Feature J.1-2 also requires a Security Plan for the Entertainment and Sports Center, which includes a First Responder Communications Plan. This plan would provide planned routes for emergency personnel, staging locations, detailed diagrams of the facility, and a list procedures for employees to follow in the event of a fire, medical emergency, civil disturbance, evacuation, and/or other emergency. Refer to Topical Response No. 2, Entertainment and Sports Center, for additional information regarding security associated with the Entertainment and Sports Center. Refer to Response to Comment No. 57-3 and Topical Response No. 5, Public Services, above, with regard to the need for another police station.

**Comment Letter No. 58**

Ann C. Bose  
22115 Avenue Morelos  
Woodland Hills, CA 91364-5004

**Comment No. 58-1**

I've lived in the West Valley for 42 years and raised my family here, so I have a strong interest in what's going on in the community. I wanted to let you know that I support Westfield's Promenade project.

I am very happy with the time and effort Westfield has invested in our community. Every time they propose a new development, they meet with the neighbors and work to address our issues and most importantly, keep their promises when they build and operate their projects.

I think we can all agree that the Promenade needs to change. The plan Westfield has proposed is consistent with the Warner Center Plan and will bring much needed housing to the Valley.

I also like the balance of uses in the project and that the Valley will finally have a premier place to go to concerts, speaking forums or sports games.

The Warner Center 2035 Plan encourages entertainment and nightlife uses in the Downtown District, where Promenade is located. The Valley needs a venue for special events; because residents now have to travel down to LA or up to Santa Barbara to go to a concert or show. The Promenade is a great location for an Entertainment and Sports Center because it is conveniently located near transit and will be accessible to all Valley residents.

Please allow this project to move forward.

**Response to Comment No. 58-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 59**

Angela Bravoderueda  
22723 Bassett St.  
West Hills, CA 91307

**Comment No. 59-1**

With any development project, I'm sure you hear from both supporters as well as opponents. Let me add my voice to those who support Westfield Promenade.

I've looked at the arguments for and against the project, and I don't understand why anyone would be opposed to revamping the old Promenade Mall and turning it into something useful for the community. More new housing at various price points, shops and restaurants, parks, offices, hotels—these are all desperately needed in the West Valley. We also need more entertainment options, so we don't have to drive to LA or other faraway places to enjoy a concert.

I understand the argument about traffic, parking and noise, but the Draft Environmental Impact Report laid these concerns to rest.

Please give Westfield Promenade the green light so we can enjoy everything it has to offer.

**Response to Comment No. 59-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 60**

Boni Bruno  
22314 Haynes St.  
Woodland Hills, CA 91303-2424

**Comment No. 60-1**

Please find attached my signed DEIR Comment on the Westfield Promenade Project.

I've been living in Woodland Hills, CA since 2002 and I am grateful for the work Westfield has done thus far for our community. I whole heartedly support the new Westfield Promenade Project and would ask the City of Los Angeles and elected council members to support and help push the project forward! I've read through the Draft Supplemental Environment Report located here: [https://planning.lacity.org/eir/Promenade\\_2035/deir/index.html](https://planning.lacity.org/eir/Promenade_2035/deir/index.html)

I strongly feel the environmental effects cited in the report are minor while the benefits are significant to the community. This project will help bring needed housing and jobs while also beautifying the area further. Westfield has shown they know how to build successful projects. I'm sure there will be impact to traffic during construction and this is probably the number one concern for those that may oppose the project, but that is a shortsighted concern.

The City of Los Angeles was built on the back of visionary and innovative ideas and strong leadership, in similar fashion the Westfield Promenade Project is fueled with great vision, innovation, and leadership. I for one would like to see the project come to fruition and humbly ask for your unwavering support.

Thank you to the City Planning Department for the work you all have done to get Westfield's Promenade Plan to this stage of the review process.

After reviewing the environmental report released by the city, I can tell you I wholeheartedly support the Promenade project and appreciate its adherence to the ideas set forth in the Warner Center Plan.

I look forward to the next stages of this process and the release of the Final Environmental Impact Report.

**Response to Comment No. 60-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 60-2**

Thank you for the quick response Mrs. Nuno-O'Donnell, my mailing address is:

22314 Haynes Street, Woodland Hills, CA 91303-2424

**Response to Comment No. 60-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 61**

Eugene Burke  
P.O. Box 95  
Woodland Hills, CA 91365-0095

**Comment No. 61-1**

This public comment from me personally pertains entirely to the Draft Supplemental Environmental Impact Report (DSEIR) and ENV-2016-3909-EIR—Public Comment.

As a ret'd environ. health consultant-investigator, a board certified Naturopath (ANMD, July '90), and a WH homeowner-resident since 1970, I'm extremely concerned about basically ALL aspects of this smoggy/murky DSEIR matter.

The **HEALTH** narrative(s) about present and DSEIR activities seem mostly absent and/or virtually ignored or unknown (or taboo politically?).

Seems to me & some others that L.A. politics—esp. around the SF Valley—wants to keep it subdued?

**Response to Comment No. 61-1**

All topics under CEQA guidelines Appendix G related to public health were addressed in the Draft Supplemental EIR. These include topics related to air quality, including toxic air contaminants. On the regional level, the Project would result in significant and unavoidable construction and operation impacts. However, as discussed in Section IV.B, Air Quality, of the Draft Supplemental EIR, during construction, localized construction emissions resulting from the Project would result in a less-than-significant short-term impact with incorporation of mitigation. In addition, construction of the Project would result in less than significant impacts to the public from emissions of toxic air contaminants. Operation of the Project would similarly result in less than significant localized air quality impacts, as well as less than significant impacts related to CO “hot spots” and toxic air contaminates. Concurrent construction and operational emissions would also result in less than significant localized air quality impacts. Furthermore, the health effects from exposure to diesel exhaust have been evaluated and demonstrate that construction-related health risk impacts from cancer are approximately 0.9 in one million and below SCAQMD’s significance threshold for cancer of 10 in one million. Refer to Appendix FSEIR-5, of this Final Supplemental EIR, for the quantitative Health Risk Assessment analysis. In addition, refer to Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR, for additional discussion in Section IV.B, Air Quality, of the Draft Supplemental EIR, regarding the

California Supreme Court decision, *Sierra Club v. County of Fresno* (Friant Ranch, L.P.), S219783 (Friant Ranch decision).

### **Comment No. 61-2**

Major concerns to the following, I now request, must clearly begin to be built in deeply to this DSEIR project.

Examples: seasonal Air [sic] quality influences (via traffic, etc); summer-time natural “Inversion layer” impacts; the decades-long highly toxic chemical/radioactive soil which, liquefied as it reportedly has become, continues NOT to be cleaned up (from Rocketdyne reckless days & beyond)! Are the present Developers and the LA City Council zero-ing [sic] in on that!?

### **Response to Comment No. 61-2**

Refer to Response to Comment No. 61-1, above with regard to localized air quality. In addition, with regard to the Rocketdyne site, as discussed in Section IV.E, Hazards and Hazardous Materials, of the Draft Supplemental EIR, the Rocketdyne site at Victory Boulevard and Canoga Avenue is located approximately 0.6 mile northeast of the Project Site. Numerous environmental investigations and remediation activities for contaminated soil have been conducted across the site since 1984. Elevated levels of chemicals of potential concern include chlorinated solvents from historic manufacturing activities at the site. The LARWQCB (Los Angeles Regional Water Quality Control Board) issued a mitigated negative declaration (MND) in July 2016 for a soil management plan for demolition of the facility buildings and removal of impacted materials, which is ongoing (based on documents from GeoTracker). Based on the down gradient location and distance from the Project Site, this listing is not considered to represent a significant environmental concern for the Project. In addition, as discussed on page IV.E-20 in Section IV.E, Hazards and Hazardous Materials, of the Draft Supplemental EIR, the Phase I Environmental Site Assessment did not identify any Recognized Environmental Conditions (RECs) at the Project Site. While the Phase I Environmental Site Assessment did not identify any RECs at, nor recommend any further environmental investigation of, the Project Site, because of the known off-site groundwater impacts further from the Project Site, to be conservative, soil and groundwater sampling was conducted at the Project Site. Soil samples were collected at thirteen locations along the Project Site perimeter. Groundwater samples were collected from three locations at the Project Site: the northwest corner, the northeast corner and the southern perimeter. Samples were analyzed for VOCs. No VOCs were detected in the soil samples. VOCs were not detected above screening levels in groundwater in the northern portion of the Project Site, but were detected (specifically PCE) above screening levels at one location in the southern perimeter. PCE is a solvent commonly used in dry cleaners. It is anticipated that the

detected VOCs are migrating from off-site. The groundwater data was evaluated using Project Site specific geotechnical information and standard modeling tools, and it was concluded that the estimated potential for such contaminants to migrate into indoor air at the Project Site are below risk-based thresholds for both commercial and potential future residential scenarios.

**Comment No. 61-3**

To my immense alarm, I find that by their present actions, they are NOT.

Where are the medical & bio-chemical folks and disciplines on all of this?

Why is not this [sic] city of L A picking up strongly these obviously critical matters?

HEALTH—not Profits, nor building “beautifications”—must come first please. In action; not just in talk. Shouldn’t THAT essential be a matter of common sense?

Btw, as a member of WHHO, I happen to heartily agree with WHHO’s written submission to this ENV-2016-3909-EIR when it comes to the other complexities they’ve sent to you recently.

Thanks for your attention to these matters.

**Response to Comment No. 61-3**

The Draft Supplemental EIR provides a comprehensive analysis of the potential environmental impacts of the Project, including those that are related to public health (e.g., air quality, hazards, noise etc.). This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 62**

Garrison Burrell  
garrisonburrell7@gmail.com

**Comment No. 62-1**

This email is to address my concerns for the proposed scope of work at the Westfield Mall in West Hills. I am very much against the Hotels and Sports Stadium as well the density of people this whole development adds. I understand Alternative 4 plan is somewhat less impactful. So I am pushing for that. Thank you for your consideration.

**Response to Comment No. 62-1**

This comment expressing opposition to the Project and support for Alternative 4 within the Draft Supplemental EIR is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed in detail in Section V, Alternatives, of the Draft Supplemental EIR, while Alternative 4 would eliminate some of the Project's significant and unavoidable impacts, Alternative 4 would not achieve the Project objectives to the same extent as the Project.

**Comment Letter No. 63**

James Caldwell  
jascaldwell7@gmail.com

**Comment No. 63-1**

It is obvious that Promenade 2035 has recognized that the 15,000-seat entertainment/sports arena will be difficult to sell; will draw considerable negative comments from the public and have offered Alternative 5 with reduced seating of 10,000 and 7,500 as an option. Assuming an average of 3 persons in every vehicle, the proposed parking would be marginally sufficient if the 7,500-seating option was adopted. With the Staples Center in LA, and the new football stadiums under construction I see little support for this project. Currently, weekend parking is limited even using the parking lot at the Promenade.

**Response to Comment No. 63-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion of the parking analysis for the Entertainment and Sports Center. With regard to Alternative 5, while less parking would be required of the smaller venues proposed under this alternative, Alternative 5 would not achieve all of the Project objectives to the same extent as the Project. In addition, see Appendix FSEIR-6 for additional information regarding the demand for a 15,000 seat Entertainment and Sports Center as proposed by the Project.

**Comment No. 63-2**

Topanga has the only east-west on ramp for the 101 freeway, near the project. Topanga and its feeder cross streets are currently heavily congested; and a sports facility will only further impact traffic in the area. Traffic, noise and light pollution will reduce the quality of life for those living near Topanga and the feeder cross streets.

**Response to Comment No. 63-2**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion on the Entertainment and Sport Center's impacts on light, noise, and traffic.

**Comment No. 63-3**

We are totally against ANY size sports facility for Promenade 2035 and demand that the City of Los Angeles reject any and all attempts by the developer to obtain approval.

**Response to Comment No. 63-3**

This comment expressing opposition to a sports facility is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 64**

Gail C. Cane  
Rodeo Realty—Woodland Hills Office  
21031 Ventura Blvd., Ste. 100  
Woodland Hills, CA 91364-2208

**Comment No. 64-1**

As a 48 yr resident of Woodland Hills, I urge you to carefully review the current Planned urban development.

Everyday homes with every day [sic] people. The current mantra of live, work and play here may capture some new residents. On the other hand, we who will leave our homes to our grown children who will be moving on to other areas of non-congestion, peace and quality of living. A Sports [sic] arena,? [sic] more [sic] multi-level housing? why? [sic] it appears that we already have more than necessary. Plus, Lucy (the Earthquake lady) stated that with a decent earthquake, “there’s not a person who’ll escape alive”. [sic] Please I urge you to consider the future of once beautiful Woodland Hills to be ultimately ruined by zealous, greedy developers.

Thank you for your attention to this matter,

**Response to Comment No. 64-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 65**

Mitch Carter  
24650 Gilmore St.  
West Hills, CA 91307-2723

**Comment No. 65-1**

Please put into the public record my strong opposition to the Promenade 2035 Plan as it exists.

**Response to Comment No. 65-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 65-2**

I am appalled that, due to corrupt, behind-the-scenes deal making, the enormous negative environmental and quality of life implications of this project will be considered as “not significant”.

**Response to Comment No. 65-2**

The commenter incorrectly states that the negative environmental implications of the Project would be considered as “not significant.” The Draft Supplemental EIR identified a number of mitigation measures required to reduce impacts to less than significant levels. However, the Draft Supplemental EIR also identified several areas where significant impacts would remain unavoidable: (1) Project and cumulative construction-related regional air quality emissions; (2) Project and cumulative operational regional air quality emissions; (3) historical resources; (4) on-site construction noise impacts at on-site receptors; (5) cumulative on- and off-site construction noise impacts to off-site receptors; (6) Project and cumulative noise impacts from off-site construction vibration related to the significance threshold for human annoyance; (7) Project and cumulative construction traffic; (8) Project and cumulative intersection impacts for operation of Phases 1–3 (interim) conditions in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3; and (9) Project and cumulative traffic impacts to neighborhood street segments during operation. This comment otherwise does not raise specific concerns related to the Draft Supplemental EIR. This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 65-3**

Traffic congestion is already a significant problem in the Warner Center area, receiving an “F” rating from Caltrans. It should not be intentionally worsened.

**Response to Comment No. 65-3**

The comment states that Caltrans has rated traffic congestion in the Warner Center area as an “F”. The Level of Service calculation methodologies used by Caltrans do not provide operational performance at an area-wide level, rather the individual performance of the facility is identified. The existing conditions analysis does identify some Caltrans facilities as operating at LOS F without Project traffic. Measures to address the projected operation with the addition of Project traffic are described below.

Refer to Topical Response No. 3, Traffic and Parking, above, for an overview of the traffic analysis that was completed for the Project. In addition, to identify the Project’s contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project’s proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project’s impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project’s financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project’s percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an Entertainment and Sports Center (ESC)

event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

**Comment No. 65-4**

Noise will go up, air quality will go down, current neighborhoods will be degraded with coming parking problems, trash left by concert goers will litter the streets... have you ever been stuck in the nightmare of traffic trying to get in or out of the parking lots at Honda Center? Car horns honking, motors idling, packs of people tromping through on foot, liquor bottles discarded on streets and sidewalks, vehicles crawling forward at the rate of one block in a half hour... awful. I experienced that once, never went back and, at that time, pitied the poor folks who lived around the venue.

**Response to Comment No. 65-4**

Refer to Topical Response No. 2 regarding the environmental impacts associated with the Entertainment and Sports Center.

**Comment No. 65-5**

Anyone suggesting that this development is a “live/work” creation is a liar. Who can work at the Starbucks on the ground floor and live in one of the high-cost apartments above? It’s an appealing fairy tale but a fairy tale nonetheless. We will just create more commuters.

**Response to Comment No. 65-5**

As described in Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, the Project would generate a net increase of approximately 3,048 employees associated with the commercial, office, hotel and Entertainment and Sports Center uses. In addition, the Project would provide 1,432 housing units comprised of a variety of unit types. As such, both existing area residents and new Project residents are anticipated to be able to work in the employment centers created by the Project, and new Project residents are anticipated to be able to work either at the Project site or in existing jobs centers surrounding the site. In addition, the Project’s mix of uses is consistent with the Warner Center Plan’s requirement that projects within the Downtown District include a balance of non-residential to residential uses, as discussed further above in Topical Response No. 1, Warner Center 2035 Specific Plan. As such, the Project would improve the jobs and housing balance within the area. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 65-6**

If we in the West Valley wanted to live downtown, we would. We've already seen far too much development, far too much increase in traffic and crime and addict transient encampments. Enough! BEFORE further development occurs, we need a convenient, TIME-SAVING [not time-wasting], clean, safe, efficient system of mass transit. That does NOT currently exist in the West Valley. BEFORE further development, we need our electrical grid updated and upgraded. BEFORE further development, we need our water infrastructure upgrade and updated and we need to know how, in a state that just added coming penalties for going over rationed water allocations, we're going to have enough water for all of these additional people and units. BEFORE further development, we need to KNOW that the West Valley will be allocated the additional law enforcement and fire resources that will be required to keep residents safe with the proposed influx of new buyers/renters, traffic and event-goers. BEFORE further development, we need to create an effective means of dealing with the explosion of encampments of transient addicts, criminals and the mentally ill that we have seen in the West Valley.

This is a greedy, ill-conceived project, obviously made to benefit the developers and politicians involved and the residents of the West Valley be damned.

**Response to Comment No. 65-6**

Potential impacts associated with traffic, energy, water, police protection, and fire protection are discussed in detail in the Draft Supplemental EIR. Also refer to Topical Responses 3, Traffic and Parking; 5, Public Services; and 6, Infrastructure, of this Final Supplemental EIR. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 65-7**

Thank you, Elva.

24650 Gilmore Street  
West Hills, CA 91307

**Response to Comment No. 65-7**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 66**

Helene Chemel  
23840 Calvert St.  
Woodland Hills, CA 91367-1213

**Comment No. 66-1**

I'm a longtime resident (40 years) of Woodland Hills and I urge you to quickly approve Westfield Promenade 2035.

Westfield has done some beautiful things with their properties and has demonstrated they are forward-thinking with great integrity. I am in favor of the company's plans to add new housing, retail and dining options, publicly accessible open space and an entertainment/sports center (roof or no roof).

People are going to complain about traffic, but this will be almost a moot point as the younger generation drives less. The whole world is changing and in a few years, there may even be a kiosk for jet packs at Westfield malls! Also, the recent July 4th extravaganza had 40,000 people and traffic cleared in less than 20 minutes. So, I believe the traffic argument is not a valid one.

Let's allow Westfield to move forward with their plans so they can provide another world-class property that offers shopping, dining and other experiences for the community to enjoy.

**Response to Comment No. 66-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 67**

Joseph Choe  
6300 Variel Ave., Apt. 240  
Woodland Hills, CA 91367-7761

**Comment No. 67-1**

I'd like to submit my comments on the Draft Environmental Impact Report (DEIR) for the Promenade 2035 project. I live nearby, and this project has been the subject of numerous community meetings and a lot of discussion. I think the majority of my neighbors believe that it's a long-overdue reinvestment in a property that has outlived its time. The new proposal reflects current thinking about public accessibility, sustainable building and operating, and creating a mix of uses that encourage walking rather than driving. As the DEIR substantiates, the project adheres to the Warner Center 2035 Plan and has many more benefits than impacts.

Westfield has spent a lot of time answering questions and responding to community concerns. They have proven to be reliable partners, making good on promises and delivering projects that are welcomed by the community. With the addition of the Promenade 2035 project, they will have reclaimed and revitalized a large portion of Warner Center, staying with us to assure that quality is maintained. The proposed Promenade 2035 project will not only create a real neighborhood, but with the entertainment venue and the open public space, it will become a true center for our area.

I hope the project is approved and moves forward quickly.

**Response to Comment No. 67-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 68**

Nadia S. Choe  
6300 Variel Ave., Apt. 240  
Woodland Hills, CA 91367-7761

**Comment No. 68-1**

I would like to submit my comments on the Draft Environmental Impact Report (DEIR) for the Promenade 2035 project. I live and work nearby, and this project has been the subject of numerous community meetings and a lot of discussion. I think the majority of my neighbors believe that it's a long-overdue reinvestment in a property that has outlived its time. The new proposal reflects current thinking about public accessibility, sustainable building and operating, and creating a mix of uses that encourage walking rather than driving. As the DEIR substantiates, the project adheres to the Warner Center 2035 Plan and has many more benefits than impacts.

Westfield has spent a lot of time answering questions and responding to community concerns. They have proven to be reliable partners, making good on promises and delivering projects that are welcomed by the community. With the addition of the Promenade 2035 project, they will have reclaimed and revitalized a large portion of Warner Center, staying with us to assure that quality is maintained. The proposed Promenade 2035 project will not only create a real neighborhood, but with the entertainment venue and the open public space, it will become a true center for our area.

I hope the project is approved and moves forward quickly.

**Response to Comment No. 68-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 69**

Ronald B. Clary  
7222 Owensmouth Ave., Ste. 102  
Canoga Park, CA 91303-1580

**Comment No. 69-1**

Attached is a comment on the Promenade 2035 SEIR.

**Response to Comment No. 69-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 69-2**

My mailing address is as follows:  
Ronald Clary  
7222 Owensmouth  
Suite 102  
Canoga Park, CA 91303

Thank you!

**Response to Comment No. 69-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment No. 69-3**

In accordance with previous instructions, I am submitting the following comments concerning the Supplemental Environmental Impact Report for the Promenade 2035 project. I am the owner of a business in an adjacent area in Canoga Park and the owner of a home in Winnetka. For identification purposes only, I am the current Chairman of the Planning and Land Use Committee of the Canoga Park Neighborhood Council. The comments below do not reflect the opinions of the Council or the Planning and Land Use Committee. They are mine and mine alone.

**Response to Comment No. 69-3**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 69-4**

**Canoga Park High School.** One item that is of some concern is that the Report confirms the project will result in overcrowding at Canoga Park High School and other LAUSD campuses. In the opinion of the Planning Department, a payment to be made to the government in compensation for this will be adequate mitigation. However, there is no explanation given concerning how such compensation will be used by the government to correct the problem at the schools. Indeed, there is no assurance that any funds will actually be used to address the problem. The community needs assurance that specific actions that will be taken to assure that the Project does not benefit to the detriment to the students and staff of Canoga Park High School and other campuses. This should be addressed to a level of certainty before the project is allowed to proceed.

**Response to Comment No. 69-4**

As discussed in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, Senate Bill 50 (SB 50) allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, LAUSD collects development fees for new construction within its district boundaries. Currently, LAUSD collects the maximum new school construction facility fee at a rate of \$3.79 per square foot of new residential construction, \$0.61 per square foot of commercial/industrial construction, \$0.28 per square foot of self-storage structure, and \$0.39 per square foot of parking structure.<sup>62</sup> Payment of these fees is required prior to issuance of building permits. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels. As such, with payment of the development fees set forth by LAUSD, potential impacts of the Project on school facilities would be less than significant. The comments stating that specific actions should be taken to assure that the Project does not benefit to the detriment to the students and staff of Canoga Park High School and other campuses are outside of the purview of CEQA but are noted for the record and have been incorporated into the Final

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<sup>62</sup> Los Angeles Department of Building and Safety, *Permit Fee Estimate*, <http://netinfo.ladbs.org/feecalculator/3950786566dd7fcc88258152007def26?OpenForm>, accessed September 8, 2017.

Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 69-5**

**Traffic.** An additional concern is that all traffic flow issues depend upon the City of Los Angeles to take appropriate remedial action in mitigation of possible congestion. The Appendix referencing traffic mitigation runs nearly three thousand pages. The study reviewed activity at 49 affected intersections in the region. Proposed mitigation activity includes modification of several significant intersections and freeway ramps. In view of past performance, there is no assurance that the City will take such actions in a timely and appropriate manner. The SEIR Traffic Appedix [sic] confirms this: it expressly states that **“...the timing of the roadway improvement may not be guaranteed before the 2035 horizon year.”** (Emphasis added.) In other words, even the appropriate government agencies have confirmed that the necessary road improvements now identified and admitted to be required cannot be assured to be ready even SEVENTEEN YEARS FROM NOW! And this regardless of the fact that Westfield has agreed to pay the necessary assessments required to pay for the improvements. This is not hard to believe, based on current performance. It has been indicated to me that the City has still not completed all mitigation activity in regard to The Village project. which has essentially been completed. The mitigation here is much more complex and the factors involved almost infinite. I do not have confidence that the City is competent to make the required changes in a timely and efficient manner, particularly when they already concede this to be the case. The project should not be permitted to proceed unless and until the necessary modifications are identified, designed, and budgeted. Actual construction should not commence until the modifications and improvements are underway and will be completed within a reasonable certainty.

### **Response to Comment No. 69-5**

Refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding implementation of the proposed mitigation measures, as well as establishment of the Warner Center Plan Implementation Board which is tasked with overseeing implementation of the Warner Center Mitigation Program. See also Topical Response No. 4, The Village at Westfield Topanga, for a discussion of the mitigation measures associated with the Village project.

### **Comment No. 69-6**

**Affordability:** It should be noted that the Project calls for all housing involved to be priced at “market rate.” Since the adjacent area of Canoga Park and Winnetka provides for the overwhelming majority of affordable housing in the West San Fernando Valley, the increase in rents and resultant gentrification of the area will in all likelihood result in the

dislocation (eviction) of renters in the surrounding region, exacerbating the existing affordable housing crisis. This issue is not referenced in the report... not one word. While Councilmember Bob Blumenfield has expressed concerns about affordable housing in the Warner Center project, this proposal provides no assurance that this exodus will not occur. The current crisis in affordable housing is a very real and tangible issue and the failure to address all potential difficulties is to me a fatal flaw in this report. An appropriate study should be made to project the impact of this and other such construction on the availability [sic] and pricing of housing stock in the area. The failure to address this issue is incomprehensible.

### **Response to Comment No. 69-6**

The Project is consistent with the policies of the Warner Center Plan, as analyzed in Section IV.G, Land Use, of the Draft Supplemental EIR. With regards to the potential change in rent values, CEQA does not require review of a project's potential effects that are strictly economic or social in nature. CEQA is an environmental statute meant to address environmental impacts. The purpose of an EIR is to provide public agencies and the public with "detailed information about the effect which a proposed project is likely to have on the environment." (Pub. Resources Code, § 21061.) The CEQA Guidelines specifically state that "[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment." (CEQA Guidelines, §§ 15131(a); 15064(e).) When there is no evidence that potential economic or social impacts will result in some significant effect on the environment, "CEQA does not apply to such impacts." (Preserve Poway v. City of Poway (2016) 245 Cal.App.4th 560, 566.) In addition, when an indirect physical change "is speculative or unlikely to occur," that change is not "reasonably foreseeable," and should not be included in the EIR's analysis. (Citizens for a Sustainable Treasure Island v. City and County of San Francisco (2014) 227 Cal.App.4th 1036, 1061; see CEQA Guidelines, § 15145.)

This comment does not provide information on how those potential economic or social changes will lead to a direct or indirect physical impact on the environment, and such analysis of those potential impacts is speculative and not reasonably foreseeable. The comments regarding affordable housing are noted for the record and have been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 69-7**

**Conclusion:** While I believe that Westfield is acting in good faith, and has been a good neighbor in this community for many, many years. the size of this project calls for caution. The question is not whether development is necessary. That is clearly the case. However, I believe that the project should not proceed unless and until assurances are clear and

concrete that the required mitigating actions will be taken, and that the economic impact of the project on the lower income populace of the West San Fernando Valley will not cause significant pain and suffering.

**Response to Comment No. 69-7**

As discussed further in the Draft Supplemental EIR, all feasible mitigation measures would be incorporated into the Project to eliminate or reduce the potential significant impacts for the environmental issues outlined in Table I-3 in Section I, Executive Summary, of the Draft Supplemental EIR, and as enforced by the MMP, provided in Section IV, Mitigation Monitoring Program, of this Final Supplemental EIR. This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 70**

Teresa Comito  
22030 Calvert St., Apt. 1  
Woodland Hills, CA 91367-3558

**Comment No. 70-1**

Over the last 7 years, I have noticed a large increase in traffic congestion, especially on Topanga Blvd., Ventura Blvd., Victory Blvd, Sherman Way, Shoup Ave., Oxnard and Canoga Avenue. This is due to the fact that so many apartment complexes have been going up in our neighborhood, in particular on DeSoto and Oxnard. Now this plan is adding 1,432 multi-family units, along with the 350 units next to See's Candies, the units popping up on Variel Ave., and then the Rocketdyne property that will be housing probably another 1,000 units—that's at least another 7,000 people or more, and another 7,000 cars or more. There is nothing environmentally friendly about this. This is just a tax grab. This should be cut back. Parking is going to be an issue! Driving around here will be an issue!

**Response to Comment No. 70-1**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the potential traffic and parking impacts associated with the Project. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 70-2**

I strongly oppose the Entertainment and Sports Center. This is going to be a noise impact as well as a parking impact. I know that parking is not going to be FREE for those attending this sports center. Therefore, attendees will be looking for other spots to park in, like all the surrounding neighborhoods. Due to the fact that we have apartments already, the neighbors park on the street if they have more than one car. It should go to them first, because they live here, not to those coming for an event. (This impact is already verified by the fact that we have a 4th of July Event at the Park on Califa and Topanga Blvd. each year. What a noisy, trashy and overcrowded parking problem each time.)

**Response to Comment No. 70-2**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental traffic, noise and parking impacts of the Entertainment and Sports Center. This comment is noted for the record and has been

incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 70-3**

We have plenty of places to go to. There are new Entertainment and Sports Centers being built in the L.A. area as well as those already established, the Thousand Oaks Civic Arts Center, and our colleges and universities. When I go out, I want to get away to another location. I am not interested in having everything next to me. This is a bedroom community, and many people enjoy its peace and quiet. The things they want close to them is their Health Care and the things for our daily needs, markets, haircuts, clothing stores, laundromat, movies.

So, do you live in my neighborhood? I will be living literally across the street from this monstrosity. Would you allow this in your neighborhood? It would have been nice to see 150 houses go on that property instead of another Mall. We have enough of those. Please cut back on the apartments, and NO to the Entertainment and Sports Center.

**Response to Comment No. 70-3**

Refer to Topical Response No. 2, Entertainment and Sports Center, for a discussion of the Entertainment and Sport Center's consistency with the Warner Center Plan. With regard to the location of the Entertainment and Sports Center in the Downtown District, the intent of the Warner Center Plan is to locate dense development adjacent to transit that has a mix of uses designed to reduce vehicle trips and vehicle miles travelled. The location of the Entertainment and Sports Center within the Project Site is coupled with the other proposed uses adjacent to the Warner Center Transit Hub. Additionally, the Project does include residential uses through the provision of 1,432 residential units, along with other complimentary uses, including retail/restaurant, office, and hotel uses, as well as the Entertainment and Sports Center. This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 71**

William Conroy  
17434 Stare St.  
Northridge, CA 91325-1534

**Comment No. 71-1**

California Politics at its worst, .. [sic] is active in WOODLAND Hills, CA. Just after the latest additions to Warner Center, We [sic] have stopped even passing through that area, much less shopping there! It is a traffic mess already and parking is almost impossible and expensive! I feel sorry for the people who live there! As for the bus service (Orange Line) that is a joke! People in LA don't ride buses, unless they just got off the boat!

CA already has a Governor, [sic] who thinks that a "BULLET TRAIN" costing somewhere between \$64 and \$100+ Billion [sic] is going to solve anything in this STATE! At the same time the pols(D) [sic] are running around trying to figure out ways to raise taxes and fees! They can find \$Billions [sic] for a STUPID Train, [sic] but not one \$ DIME [sic] for new WATER sources for So. CA! OR any money (besides new fuel taxes) for our LA Streets [sic] and FREEWAYS upkeep! We already pay almost \$1.00 in taxes for every gal of fuel pumped in CA, BUT, SORRY, that sure isn't being used on repair!

BTW, are any of those THOUSANDS of housing units going to be affordable for the HOMELESS people, or the illegals? NOT a chance!

Please, HELP, .. [sic] stop this foolishness, right now! It is time to follow that MONEY trail (s), [sic] how is Westfeld, [sic] getting their plans so far down the road, they have to be buying OFF (Political Donations etc.) .. [sic] a lot of Pols, [sic] to pull this off! Passing laws in Sacramento, [sic] to allow this to go forward, etc. Bus service etc.!!

**Response to Comment No. 71-1**

This comment discusses policy issues and does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 71-2**

My address (Snail Mail) is 17434 Stare St. Northridge, Ca 91325



Thank you for your Quick Follow-up. [sic] I will be following up on how this project moves forward! I am sure that Westfeld [sic] has enough money to push this through, as they say.... "Money is the MOTHER's Milk of Politics!"

**Response to Comment No. 71-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 72**

Patricia Davis  
5314 Baza Ave.  
Woodland Hills, CA 91364-1805

**Comment No. 72-1**

I am writing to you about the Draft Supplemental Environmental Impact Report on the 15-years-of-construction Promenade 2035 Project. I have looked over the document and as a 27 year resident of Woodland Hills think the Project is a bad idea.

**Response to Comment No. 72-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 72-2**

Traffic has become a significant issue over the years as well as the bad air quality. Nothing about this Project will improve either of those and will no doubt make them worse. A version of the Studio Mixed Used Development Alternative (Alternative 4 pg. I-23) might be compatible for the area. Both the construction (B pg. I-42) and operational (B pg. I-48) phases will worsen air quality particularly of NO<sub>x</sub> and VOCs.

**Response to Comment No. 72-2**

The commenter's preference for Alternative 4 is noted for the record and has been incorporated into this Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed in detail in Section V, Alternatives, of the Draft Supplemental EIR, while Alternative 4 would eliminate some of the Project's significant and unavoidable impacts, Alternative 4 would not achieve the Project objectives to the same extent as the Project.

With regard to traffic, refer to Topical Response No. 3, Traffic, and Parking, above for a discussion of the Project's impacts to traffic during construction and operation of the Project.

As discussed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, with incorporation of Warner Center Plan Mitigation Measure AQ-1, regional VOC emissions associated with construction would be reduced below the

SCAQMD daily significance threshold and maximum regional NO<sub>x</sub> emissions would be substantially reduced by 49 percent in Year 2019, 43 percent in Year 2020, and to less than significant in Years 2021 and 2031. Nevertheless, regional NO<sub>x</sub> emissions would remain significant and unavoidable under the conservative Overlapping Construction Plan scenario. Refer to Table IV.B-5 on page IV.B-37 in Section IV.B, Air Quality, of the Draft Supplemental EIR, for specific increases of regional air pollutants generated by construction of the Project.

Emissions resulting from operation of the Project at its projected buildout year of 2033 are not expected to exceed the SCAQMD's daily regional operational thresholds for CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. However, the Project is expected to exceed the SCAQMD's daily regional operational thresholds for VOC and NO<sub>x</sub>. The VOC regional operational impact is primarily related to the use of consumer products (e.g., residential use of household cleaners and solvents that release VOC emissions). The NO<sub>x</sub> regional operational impact is from vehicular trips to and from the Project site. Thus, the Project would result in a significant and unavoidable regional operational air quality impact. Refer to Table IV.B-7 on page IV.B-45, in Section IV.B, Air Quality, of the Draft Supplemental EIR, for specific increases of regional air pollutants generated by operation of the Project.

### **Comment No. 72-3**

Los Angeles should be a trail blazer for clean air and quality of life issues. Trying to squeeze every dollar out of a piece of land by cramming as many people as possible into an area is not conducive to either.

### **Response to Comment No. 72-3**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. As a note, the Project would implement Project Design Feature D-1 in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR, which states that the design of the new buildings shall incorporate features of the LEED program to be capable of meeting the standards of LEED Silver or equivalent. Energy-related measures include exceeding the California's Building Energy Efficiency Standards by 25 percent for energy efficiency, the use of Energy Star-labeled products and appliances, and use of light-emitting diode (LED) lighting where appropriate. In addition, under Project Design Feature D-6, the Project would provide a minimum of 500 kilowatts of photovoltaic panels on the Project Site. Thus, the Project would include project design features that would promote clean air and sustainability.

**Comment Letter No. 73**

Kelly Del Valle  
23218 Hatteras St.  
Woodland Hills, CA 91367-3118

**Comment No. 73-1**

Please take note of my objection to the building of the project noted above.

**Response to Comment No. 73-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 73-2**

The amount of traffic and congestion exceeds what this small neighborhood has capacity for.

It is too large for that location.

**Response to Comment No. 73-2**

Refer to Topical Response No. 3, Traffic and Parking, regarding the traffic implications of the Project. As discussed therein, Warner Center Plan Mitigation Measure TR-101 and Mitigation Measures K-2 and K-3 include funding for neighborhood traffic protection measures and the implementation of a neighborhood traffic management plan.

**Comment No. 73-3**

Please do not allow this to be built.

**Response to Comment No. 73-3**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 73-4**

Thank you.

Here's my address:  
23218 Hatteras St  
Woodland Hills, CA 91367

**Response to Comment No. 73-4**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 74**

Lisa DeTournay  
21650 Burbank Blvd., Unit 210  
Woodland Hills, CA 91367-6472

**Comment No. 74-1**

Just my comment on the immense size of the Promenade 2035 project. I lived in Woodland Hills when the Promenade was built and it was a lovely, upscale store addition to our city. However, this new project will totally change the Warner Center area with incredible traffic and parking issues on adjacent streets.

**Response to Comment No. 74-1**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic and parking implications of the Project. In addition, refer to Topical Response No. 1, Warner Center 2035 Specific Plan, for a discussion regarding the Project's consistency with the Warner Center Plan. As discussed therein, the Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The Project is consistent with the Downtown District designation of the Warner Center Plan. In addition, with respect to the Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan, which is being requested for the Project. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center.

**Comment No. 74-2**

I am especially opposed to the 15000 seat stadium planned. I see absolutely NO need for this type of facility in our area. I currently live in Woodland Oaks (a condo association on Owensmouth and Burbank) and feel that the current level of traffic is enough already. Though I love living in a "suburban downtown" area, I believe that we are at capacity for the residential areas around the Promenade in regard to the traffic.

**Response to Comment No. 74-2**

Refer to Topical Response No. 3, Traffic and Parking, regarding the traffic impact analysis of the Project. As discussed in Section IV.K, Traffic, Access and Parking, of the Draft Supplemental EIR, intersections are projected to operate with less than significant

impacts, even during sold out event days at the Entertainment and Sports Center, with implementation of the Warner Center Mitigation Program and Project specific project design features. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking for further details regarding the Warner Center Plan Implementation Board.

#### **Comment No. 74-3**

Please count this as a vote AGAINST the stadium. Thank you!

#### **Response to Comment No. 74-3**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 74-4**

My address for "Interested Parties" is: 21650 Burbank Blvd Unit 210 Woodland Hills CA 91367-6472

#### **Response to Comment No. 74-4**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 75**

Alma Diaz  
20727 Vanowen St., Apt. A-10  
Winnetka, CA 91306-3726

**Comment No. 75-1**

*While I live in Winnetka, I do enjoy going to Woodland Hills to shop at the Topanga Mall and the Village. I'm looking forward to Westfield's Promenade project, so I have even more reason to stay in the valley for dining, shopping and other entertainment activities.*

*Overhauling the old Promenade mall is a great idea! I love that Westfield is being creative with the property and bringing in apartments, offices, shops and restaurants and a venue for entertainment and sports, along with public open space.*

*I'm pleased that the environmental impact report found no major reason why Promenade shouldn't move forward.*

*We desperately need more projects like Promenade in the valley—I hope you will approve it.*

**Response to Comment No. 75-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 76**

Karen DiBiase  
20525 Aetna St.  
Woodland Hills, CA 91367-5412

**Comment No. 76-1**

Attached are my personal comments related to the Draft Supplemental EIR for Westfield's Promenade 2035 Project, submitted during the Public Comment Period.

Thank you for uploading this to the Draft SEIR file in time for today's July 26, 2018 deadline.

I am the co-chair of the Environmental Committee of the Woodland Hills–Warner Center Neighborhood Council and a resident of Woodland Hills since 1988. The WHWCNC has submitted their comments separately. The statements listed below represent my personal comments concerning the Westfield Promenade 2035 Draft SEIR.

**Response to Comment No. 76-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 76-2**

To begin with, the Westfield Promenade 2035 project will be constructed in four phases, which is expected to be completed by 2035. The Draft Supplemental Environmental Impact Report was written as if this is a one phase project instead of the Multiple Phase Project (page I-21).

**Response to Comment No. 76-2**

As discussed on Page II-21 of the Project Description, of the Draft Supplemental EIR, the Project is anticipated to be constructed in multiple phases, over a period of 15 years (2019–2033), with buildout of the Project completed in 2033. A description of the phasing of the Project is summarized in Table II-2 on page II-22, of the Draft Supplemental EIR. The Project's phasing plan is intended to describe the geographic area covered by each phase of the Project, with the order of buildout of these geographic phases subject to change.

The Draft Supplemental EIR analyzed the environmental impacts of the Project as a phased development. For instance, throughout the Draft Supplemental EIR, the overlapping of phases are analyzed for those issue areas where such an occurrence would result in greater environmental impacts in order to provide a conservative analysis. For the purpose of providing a conservative analysis of potential construction impacts for the Draft Supplemental EIR, construction assumptions were developed for the maximum potential overlap of construction phases (the “Overlapping Construction Plan”), as provided in Appendix D, of the Draft Supplemental EIR. The Overlapping Construction Plan assumes that the Northeast, Northwest, and Southwest areas of the Project Site would be constructed as close in time as feasible, to provide a peak scenario of potential construction impacts. Additionally, for informational purposes, the Traffic Study analyzed the phased buildout of the Project. Refer to Topical Response No. 3, Traffic and Parking, for a summary of this phased analysis.

### **Comment No. 76-3**

It does not take into consideration other large projects in Warner Center that are currently under construction, currently approved but not begun yet and those projects that are pending approvals in Warner Center.

### **Response to Comment No. 76-3**

The Draft Supplemental EIR includes detailed analysis of potential cumulative impacts associated with the Project and related projects within the site vicinity. Specifically, as noted by the commenter, a total of 29 potential related development projects have been identified within the vicinity of the Project Site for inclusion in the cumulative impact analysis within the Draft Supplemental EIR. Additionally, the Project’s Traffic Study assumes full buildout under the Warner Center Plan in addition to Project generated traffic, as discussed in Topical Response No. 3, Traffic and Parking, above. Refer to Section III, Environmental Setting, of the Draft Supplemental EIR for a detailed discussion and list of the related projects. Also refer to each of the impact analysis sections within Chapter IV of the Draft Supplemental EIR for the cumulative analyses.

### **Comment No. 76-4**

The Draft SEIR references that there are “29 other nearby projects”, [sic] yet does not address that the scope of the “market conditions” in Woodland Hills will be vastly different throughout the term of construction of the Promenade 2035 project.

### **Response to Comment No. 76-4**

As discussed in Section III, Environmental Setting, of the Draft Supplemental EIR, the Draft Supplemental EIR evaluated cumulative growth surrounding the Project by

considering 29 related projects within the vicinity of the Project Site. This list of related projects includes all projects that had an application filed with the Department of City Planning or LADOT and was last updated in February 2017. That list of related projects comprises the best projections of projects that will be developed within the vicinity of the Project Site. With regard to market conditions affecting future development, CEQA does not require review of a project's impacts that are speculative or strictly economic or social in nature.

#### **Comment No. 76-5**

**I absolutely believe that the Draft SEIR for the Promenade 2035 should therefore be redone.** A separate SEIR for EACH phase of the project should be required. Warner Center is going through a unique period of growth and expansion, never before seen in the San Fernando Valley and updated and current data analysis needs to reflect this growth. It is impossible for the published Promenade 2035 Draft SEIR to forecast this changing environment, using data that is several years old.

#### **Response to Comment No. 76-5**

As discussed further in Topical Response No. 1, Warner Center 2035 Specific Plan, above, the Warner Center Plan was approved by the City in 2013 to plan for and regulate growth as analyzed in the Warner Center EIR. The City certified a programmatic EIR in 2013 evaluating the potential environmental impacts associated with full buildout under the Warner Center Plan. The Project's Draft Supplemental EIR analysis tiers off of the approved and certified Warner Center Plan EIR by analyzing Project-specific environmental impacts for the Project Site that may not have been covered under the Warner Center Plan EIR, for instance, impacts associated with the Entertainment and Sports Center.

The Project Traffic Study's growth assumptions related to background development in the Warner Center Model were the same ones used by the Warner Center Plan EIR. Those assumptions are based on socio-economic data including employment and household projections associated with the full development of the Warner Center Plan; additionally, the Warner Center EIR used a model (the Warner Center Model) that was developed from the Southern California Association of Governments' [SCAG] Regional Transportation Demand Model, which is based on the 2008 Regional Transportation Plan (RTP): Making Connections [SCAG, 2008]. Sub-regional growth outside of Warner Center is inherent to the Warner Center Model, to the extent that growth was projected for those areas. Thus, the future traffic conditions capture the traffic growth from adjacent areas of the Warner Center. In addition, actual traffic counts, included in Appendix FSEIR-2, of this Final Supplemental EIR, were conducted in 2016, the year of the Project's NOP, to compare to the Warner Center EIR's projected traffic growth for 2016, as discussed above in Topical Response No. 3, Traffic and Parking. These empirical counts were lower than

the Warner Center EIR's projected traffic volumes for 2016. Therefore, the area-wide growth used by the Warner Center Plan EIR, and the Project EIR, is conservative.

The Warner Center Plan requires that any project on a site greater than 217,800 square feet (5 acres) be master planned. The purpose of this requirement is "to ensure that pedestrian and walkability goals of the Warner Center Plan are preserved and/or enhanced. The Master Planned Project requirement is designed to protect large lots from incremental development that, over time, would prevent the larger development goals of the Plan from being realized." Therefore, the Applicant is required to submit a development application for the entire Project Site, to ensure that the design requirements of the Warner Center Plan are met, and the associated Draft Supplemental EIR must analyze environmental impacts from the entire Project.

Further, the Warner Center Plan also includes detailed requirements for the approval of Multiple Phase projects. Based on the information submitted, the Director may approve, conditionally approve, or disapprove all phases of the Project. Provided that the subsequent phases are in full compliance with the terms and conditions of the Multiple-Phase Project approval, no future compliance review is required, in accordance with the Warner Center Plan. However, if the future phases are not consistent with Project approvals, then the future phases of the Project would be subject to further review by the Director.

#### **Comment No. 76-6**

Secondly, to quote the Public Resource Code, Section 21061, "an environmental impact report is required to provide the public with detailed information about the effect which a proposed project is likely to have on the environment". [sic] And Section 15123(a) and 15362 of the CEQA Guidelines state the "an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives". [sic] As the Lead Agency, the City of Los Angeles is responsible to give a detailed report of potential significant issues and feasible mitigation measures as it relates to the Project. Throughout the entire Promenade 2035 Draft SEIR, Westfield and the City has failed to be specific about how to solve parking issues, security, traffic mitigation to/from the 101 freeway, availability of space at LAUSD schools for children living at the housing units, a source of work for those living at the housing units (Re: the office towers are proposed in phase IV, causing residents to travel outside Warner Center to find employment), the Entertainment/Sports Complex (ESC) about size/seating capacity/roof or no roof/types of "entertainment" planned/times the facility will be used/sound and light mitigation/traffic mitigation on adjacent streets and neighborhoods/etc and parking issues which rely on the assumption of "agreements with other business

owners to use their parking structures for overflow parking” (yet no written agreement was included in the Draft SEIR).

### **Response to Comment No. 76-6**

The Draft Supplemental EIR provides a comprehensive analysis of the Project in accordance with CEQA and includes mitigation measures and alternatives that address the potential impacts of the Project. Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the Project’s impacts to traffic and parking and to Topical Response No. 5, Public Services, for a discussion regarding the Project’s impacts to police protection. Also refer to Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, with regard to the Project’s impacts on schools and the school fees that will be paid to mitigate the Project’s impacts. With regard to the environmental implications of the Entertainment and Sports Center, refer to Topical Response No. 2, Entertainment and Sports Center, above.

Additionally, the commenter incorrectly implies that work opportunities would not be available until the last phase of the project. The Northeast Phase contains 85,000 square feet of non-residential area, which includes both work-live units and retail uses. Each of the remaining phases also include office uses: the Northwest Phase has 114,000 square feet of creative office uses, the Southwest Phase has 43,000 square feet of office uses, and the Southeast Phase has 472,000 square feet of office uses. Further, the Project’s phasing plan is intended to describe the geographic area covered by each phase of the Project, with the order of buildout of these geographic phases subject to change. As such, the Southeast Phase, or any other geographic phase, could be the first phase built.

### **Comment No. 76-7**

Warner Center is designed to be a LIVE-WORK-PLAY community. With the current proposal, if you live at the Promenade 2035 (Phase I for the residential units), you will be unable to work there until 2035 (Phase IV for the office towers). The Warner Center Specific Plan was designed to maintain a balance..... and there is no balance proposed by Westfield at this time (as Phase I and IV are separated by 15 years).

### **Response to Comment No. 76-7**

The Project’s phasing plan is intended to describe the geographic area covered by each phase of the Project, with the order of buildout of these geographic phases subject to change. As such, the Southeast Phase, or any other geographic phase, could be the first phase built. However, as explained in Response to Comment No. 76-6, above, the commenter is incorrect that there would no opportunity to work at the Project until the last phase. The Northeast Phase contains 85,000 square feet of non-residential area, which

includes both work-live units and retail uses. Each of the remaining phases also include office uses: the Northwest Phase has 114,000 square feet of creative office uses, the Southwest Phase has 43,000 square feet of office uses, and the Southeast Phase has 472,000 square feet of office uses.

In addition, the Project's mix of uses is consistent with the Warner Center Plan's requirement that projects within the Downtown District include a balance of non-residential to residential uses. Specifically, for an FAR of 2.3:1, the Plan limits residential uses to a maximum 48 percent of the allowable FAR and requires at least 52 percent of the required FAR be non-residential uses. In compliance with this requirement, the Project proposes 48 percent residential development and 52 percent non-residential development.<sup>63</sup> This ratio of non-residential to residential floor area would be achieved at buildout, consistent with the Warner Center Plan.<sup>64</sup>

### **Comment No. 76-8**

### **SPECIFIC ISSUES**

#### **Page I-24: Alternative 5**

The Draft SEIR lists Option 1 and Option 2 under Alternative 5. The public is asked to respond to "options" within the specific alternatives. This needs to be split into two separate alternatives so the public is able to make responsible comments. There is no stated proposed use for the stadium, only the reduction of the size of the Entertainment/Sports Center from 15,000 seats to *either* 10,000 seats or 7,500 seats. Without stating the proposed use of the facility, the public is unable to respond if either of these options would be a preferable option.

### **Response to Comment No. 76-8**

As discussed in Section V, Alternatives, of the Draft Supplemental EIR, Alternative 5 includes the same uses as the Project, with reduced seating within the Entertainment and Sports Center. Separate alternatives for the reduced seating options are not required and would result in repetition and unnecessary lengthening of the Section V, Alternatives, of the Draft Supplemental EIR.

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<sup>63</sup> *At buildout, the Project would provide 3,271,050 square feet of floor area, comprising 1,726,050 square feet of Non-Residential Floor Area (52 percent) and 1,545,000 square feet of Residential Floor Area (48 percent).*

<sup>64</sup> *Appendix B, Graduated FAR table, Note 6, of the Warner Center Plan provides that "[m]ulti-phased projects may reserve floor area for the required non-residential component in a future phase on-site."*

**Comment No. 76-9****Page I-16: Landscaping and Open Space.**

“The Project’s street frontages would meet all the requirements of the Warner Center Plan, both with regard to the types of new trees planted and the pedestrian connections.” Per **Appendix C** of the Draft SEIR, the Tree Report states that 292 private property trees will be removed. Of the 8 protected on-site trees, 6 are proposed to be relocated and 2 are unlikely to survive boxing and relocation. Westfield proposes to replace all protected trees at a ratio of 4:1. However, the math results in 6 protected trees + replacement of 8 trees (4:1 ratio) + 14 non-native Canary Island Pines = 28 trees.... vs the removal of 292 trees. There is no specific mention of other replacement trees on the site. This is unacceptable and contradicts multiple public presentations by Westfield of what the landscaping will look like. Also stated in Appendix C, the 90 existing street trees surrounding the Project site will also be removed. Westfield states that “all existing street trees would be replaced consistent with Urban Forestry’s requirements for street trees” but neglects to state what that requirement is.

*Again the purpose of an EIR report is to provide details and should not force the public to have to research “Urban Forestry requirements” to get data.*

On **Page I-28**, it states “the Project would provide at least 600 trees within the Project Site”, [sic] but fails to state where those trees will be located. Comments on Pages I-16 and I-28 contradiction [sic] each other in regard to trees. The existence of trees in Warner Center is crucial to the well-being of our community, environment, soil quality, esthetics, animal life and sun shading.

**Response to Comment No. 76-9**

Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, provides a detailed discussion of the number of existing and replacement trees proposed as part of the Project. With regard to on-site trees, of the 292 existing trees within the Project Site, eight trees are Western Sycamore trees and are considered protected per the City’s Protected Tree Ordinance. Six of the eight protected Western Sycamore trees are proposed to be relocated; however, based on the current health of the two remaining protected Western Sycamore trees, it was determined that the trees would require removal as the trees would be unlikely to survive boxing and relocation. While the City’s Protected Tree Ordinance (Ordinance No. 177404) requires protected trees to be replaced at a 2:1 ratio, the Board of Public Works routinely requires protected trees to be replaced at a minimum 4:1 ratio. Therefore, as set forth above in Project Design Feature A-1, the Project proposes to replace all protected trees at a ratio of 4:1. As replacements are considered removals by Urban Forestry, the Project proposes to plant at least

32 replacement Western Sycamore trees on-site (a 4:1 replacement for all eight protected trees).

With regard to the remaining 284 on-site trees that are not of a protected tree species, pursuant to Warner Center Plan Mitigation Measure BIO-2, all non-native trees greater than four inches in diameter at breast height would be replaced at a 2:1 ratio. Therefore, 568 replacement trees would be planted on-site to mitigate the removal of the 284 non-protected on-site trees. While many of these trees may be relocated on-site, relocation is considered removal by Urban Forestry, and therefore, would be required to be “replaced” at the 2:1 ratio. In total, 600 trees would be planted on-site by the Project, replacing 292 existing on-site trees, for an increase of 308 trees within the Project Site.

None of the 90 street trees proposed for removal are of a protected tree species. Of the 90 street trees proposed for removal, 73 trees are located within the jurisdiction of the City of Los Angeles (along Erwin Street, Owensmouth Avenue, and Oxnard Avenue), while the remaining 17 trees are located within the jurisdiction of the California Department of Transportation (Caltrans) along Topanga Canyon Boulevard. While many of these trees may be relocated on-site, relocation is considered removal by Urban Forestry, and therefore the analysis in the Draft Supplement EIR looked at the replacement requirements for all street trees. The Department of Public Works, Bureau of Street Services, Urban Forestry Division frequently requires street trees to be replaced on a 2:1 basis, which would result in 146 replacement trees (73 trees within the jurisdiction of the City of Los Angeles at a 2:1 ratio). However, based on the spacing requirements for street lights and utilities set forth by the Department of Public Works, 95 of a possible 146 replacement street trees could be planted within the Erwin Street, Owensmouth Avenue, and Oxnard Avenue right-of-ways. Therefore, Mitigation Measure A-1 is proposed, which would replace the 73 street trees within the jurisdiction of the City to the satisfaction of the City’s Department of Public Works, Bureau of Street Services, Urban Forestry Division through on-site replacement and a combination of other measures.

The street trees located on Topanga Canyon Boulevard would be replaced in accordance with Caltrans requirements as set forth in Mitigation Measure A-2, provided in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR. New street trees would be planted in accordance with the species listed in Figure 1 through Figure 11 of the Warner Center Plan. These tree species would be drought-tolerant and/or climate-adapted and would primarily require moist to dry soil conditions, as required by the Warner Center Plan.

The proposed locations of the trees are included in the landscape plan submitted as part of the Project’s applications, which is publicly available for review at the Department of City Planning.



**Comment No. 76-10****Continuation of Page I-16 comments (with references to Page I-136):**

Westfield proposes the use of “landscaped roof decks” within the Northwest, Northeast, and Southeast portion of the Project site as a mitigation to “open space”. [sic] The Northwest portion is in Phase II for the proposed hotel next to Topanga Canyon Blvd, and therefore is restricted to hotel guests. The Northeast is scheduled for the residential buildings of Phase I, and therefore is not readily accessible by the public. The Southeast portion of the site is the proposed hotel in Phase IV, which may/may not be built depending upon “market conditions” and therefore should not be considered as applicable “open space” on the Draft SEIR due to possible non-construction.

**Response to Comment No. 76-10**

Refer to Topical Response No. 7, Open Space, for a description of the Project’s 5.6 acres of ground level publicly available open space. As described in Section IV.J.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, 1 acre of Promenade Square would be built with the Northeast Phase of the Project.

**Comment No. 76-11**

The proposed 60,000 sq ft open space of Promenade Square makes up the bulk of the open space for the project. To access this park, the public must use Westfield’s planned underground/paid parking only. It is located within the Project site, and therefore not seen directly by the public from any existing street. The Draft SEIR also does not state what this space will be used for, or if any on-site handicap/other parking will be available adjacent to the park instead of underground. Public safety has not been discussed for the park. Questions: will there be separate security personnel specific to the Square? Will there be lighting and camera for safety concerns? If the park is open from 6am [sic] to 10pm, [sic] how will any homeless population encampment be handled after hours?

**Response to Comment No. 76-11**

Refer to Topical Response No. 7, Open Space, above, for information regarding accessibility, visibility, programming and security of Promenade Square. For those people who choose to park on-site, handicap parking will be available. While there will be drop-off areas around Promenade Square, consistent with the Warner Center Plan, the majority of the Project’s parking is proposed to be underground or screened from view in above-grade structures, with a limited number of surface parking spaces provided along Topanga Canyon Boulevard specifically for valet use.

**Comment No. 76-12****Page I-44: CO “Hot Spots” Analysis:**

At buildout of the Project, the average daily trips at the DeSoto Ave and Victory Blvd intersection would be “significantly below the daily traffic volumes that would be expected to generate CO”. [sic] However, as stated earlier, the projected building of the Project is phased over 15 years. The cumulative effect of all the other projects in Warner Center is not being considered in the Draft SEIR. Question: how will CO be mitigated in the underground parking? This is not discussed in the document.

**Response to Comment No. 76-12**

The CO hotspots analysis provided on Page IV.B-45 in Section IV.B, Air Quality, of the Draft Supplemental EIR appropriately analyzed daily traffic volumes at buildout of the Project (Year 2035) and included cumulative traffic. Therefore, the cumulative effect of other projects in Warner Center is considered in the Draft Supplemental EIR.

Underground parking structures would comply with Section 120.6(c), Mandatory Requirements for Enclosed Parking Garages, in which the ventilation rate would be at least 0.15 cubic feet per minute per square foot (cfm/sf) when the garage is scheduled to be occupied. This mandatory requirement ensures that the number of air exchanges within the parking structures would maintain CO concentrations below the CO national and state ambient air quality standards. In addition, CO sensors would be installed in the underground parking structures consistent with the applicable Building Energy Efficiency Standards at the time of the start of the building permitting process.

**Comment No. 76-13****Page I-57: Analysis of Historical Resources:**

“The Macy’s building appears to be eligible for the California Register and as a Los Angeles Historic-Cultural Monument (HCM) as an example of New Formalism architecture”. [sic] “Consequently, the demolition of the Macy’s building would result in a significant impact to an historical resource”. [sic] Therefore, additional analysis into the status of the Macy’s building must be done prior to any demolition. If the Macy’s building is deemed a HCM, then re-design of the site to respectfully and appropriately incorporate the building must be required of the Project.

**Response to Comment No. 76-13**

As discussed in Section IV.C, Cultural Resources, of the Draft Supplemental EIR, analysis of the Macy’s building was conducted by the *6100 N. Topanga Boulevard Historic*

*Resource Technical Report* (Historical Resource Assessment), prepared by Page & Turnbull and included as Appendix E, of the Draft Supplemental EIR. This Historical Resources Assessment was completed in compliance with, and satisfies, Warner Center Plan Mitigation Measure CUL-2. As discussed in the Historical Resources Assessment, the existing Macy's building is not currently listed in the National Register of Historic Places or the California Register of Historic Places. The Macy's building is not designated as a City of Los Angeles Historic Cultural Monument and is not within a City of Los Angeles HPOZ. The Macy's building was surveyed by SurveyLA as part of the Canoga Park–Winnetka–Woodland Hills–West Hills Community Plan Area, where it was determined that the Macy's building appears to be eligible for the California Register as an individual property through survey evaluation (Criteria C/3/3, Status Code 3CS) and individually eligible for local listing or designation through survey evaluation (Criteria C/3/3, Status Code 5S3). Therefore, the Macy's building was considered an historical resource for purposes of the Draft Supplemental EIR.

The Draft Supplemental EIR includes a seismic evaluation by structural engineer Nabih Youssef & Associates that examines what would be required to bring the Macy's building into compliance with the City of Los Angeles' mandatory standards for non-ductile concrete buildings pursuant to Ordinance 183893. The historic preservation consultants at Page & Turnbull reviewed the structural engineer's recommendations and concluded that the proposed seismic strengthening would involve substantial modifications to the building's exterior, including several character-defining features such as the projecting volumes, cylindrical columns, and decorative wall tiles. The modifications would alter the design of the building in such a way that its design integrity would be compromised, and it would no longer be an eligible historic resource.

Much of the building's architectural significance is in its massing, and the ways it breaks out of the utilitarian box-like forms associated with previous department stores. Retaining only a portion, or integrating the various masses into a new project, would not retain the building's design integrity nor convey the aspects that made it historic. Aside from the massing, the building does not have distinct architectural features or materials that are worth salvaging for re-use.

The Draft Supplemental EIR includes Mitigation Measure C-1, which requires documentation of the Macy's building to the standards of the Historic American Building Survey (HABS) program prior to issuance of a demolition permit. This documentation will be sent to City of Los Angeles Department of City Planning Office of Historic Resources and materials will be posted in digital format on HistoricPlacesLA, the City's Historic Resources Inventory and Management System. In addition, copies of the documentation materials will be offered and sent if requested to appropriate archives and repositories, including the Southern California Information Center at Cal State University, Fullerton; Los Angeles Public Library Central Library and/or local branch as appropriate; the University of

Southern California Library, Special Collections; California State University, Northridge; the Museum of the San Fernando Valley; and local preservation organizations and historical societies. As a note, a set of the bells were donated to the San Fernando Valley Relics Museum to be put on public display.

### **Comment No. 76-14**

#### **Page I-74: Hydrology, Surface Water Quality and Groundwater:**

The Draft SEIR states that the Project will “excavate down a maximum of 75 feet for basement levels, building structure, and hardscape and landscape around the structures”. [sic] Groundwater pollutants related to aerospace manufacturing were detected and noted in the Southeast corner of the site, which is under the proposed Stadium/parking. Environmental mitigation for any groundwater issues must be completed prior to construction of the underground parking and the mitigation process must be specified in the Draft SEIR. On **Page I-80**, it states that “impacts to surface water and groundwater hydrology and quality during construction and operation of the Project would be less than significant and no project-level mitigation measures would be necessary”. [sic] Detailed explanation of how the ground water pollutants will be removed is not listed in the Draft SEIR. Public safety during construction and afterwards during project operation is imperative. The Warner Center Plan Mitigation Measure HYDEO-1/“Best [sic] Management Practice (BPM) during construction” cannot be met without addressing these groundwater issues.

### **Response to Comment No. 76-14**

As discussed in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, the Project would include excavations at a maximum depth of 75 feet below ground surface. The Project would also result in a net export of existing soil material. While the Phase I Environmental Site Assessment did not identify any recognized environmental conditions at the Project Site, soil and groundwater sampling detected VOCs above screening levels in groundwater at one location along the southern perimeter of the Project Site. The results of the soils and groundwater sampling are provided in Appendix G, of the Draft Supplemental EIR. Based on the estimated regional groundwater gradient to the north or northeast, the concentration of VOCs at the location on the southern perimeter of the Project Site indicates that the VOCs are migrating from off-site. No VOCs were detected in the soil samples collected at the Project Site. If groundwater contamination is detected during construction, the appropriate testing, handling, treatment and disposal would be implemented in accordance with applicable regulatory requirements, such as the National Pollutant Discharge Elimination System (NPDES) requirements or industrial sewer discharge user permit requirements. As a note, the commenter incorrectly states that the Entertainment and Sports Center is located in the

Southeast corner of the Project Site. The Entertainment and sports Center is proposed in the Southwest corner of the Project Site.

### **Comment No. 76-15**

#### **Page I-94: Cumulative Impacts on Land Use:**

“There are three related projects in proximity to the Project Site. The balance of the related projects would not cause cumulative land use impacts”. [sic] Throughout the Draft SEIR, it references 29 other projects in Warner Center, not just the 3 projects listed on this page. The data used for the Promenade 2035 Draft SEIR report is not taking into consideration all of the multiple large projects within Warner Center. A new study using current projects under construction and those currently pending approval in 2018 must be used as the basis for “cumulative impacts on land use”. [sic] This new study must include the construction phase, the truck haul routes during construction and traffic studies on impacted intersections and freeway access on/off, as it relates to both the Promenade 2035 and the approved concurrent construction of other projects in Warner Center. In addition, as the Promenade 2035 is a phased project, *a new land use study must be required before each phase begins.*

### **Response to Comment No. 76-15**

The Draft Supplemental EIR fully accounts for cumulative growth. As discussed in Section III, Environmental Setting, of the Draft Supplemental EIR, there are 29 related projects within the vicinity of the Project Site. This list of related projects includes all projects that had an application filed with the Department of City Planning or LADOT and was last updated in February 2017. Cumulative study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area for each individual environmental impact issue may vary. For example, a cumulative land use impact generally may only affect the compatibility of uses within the vicinity of the Project Site, while a cumulative air quality impact may affect the entire South Coast Air Basin. The specific boundaries and the projected growth within those boundaries for the cumulative study area of each environmental issue are identified in the applicable environmental issue section in Section IV, Environmental Impact Analysis, of the Draft Supplemental EIR. With regard to land use, the Draft Supplemental EIR appropriately identifies three related projects in proximity to the Project Site and states that the balance of the related projects would not cause cumulative land use impacts due to their similar characteristics (i.e., mixed-use residential and commercial projects) and because of their distance from the Project Site buffered by existing intervening development.

With regard to traffic, as explained in Section III, Environmental Setting, of the Draft Supplemental EIR, the cumulative traffic analysis included in Section IV.K, Traffic, Access,

and Parking, of the Draft Supplemental EIR, assumes full buildout under the Warner Center Plan in addition to Project generated traffic, as discussed in Topical Response No. 3, Traffic and Parking, above.

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion of the Project's cumulative construction traffic impacts. Also refer to Response to Comment No. 76-5, above, for a discussion of the Warner Center Plan's approval process for a phased Project.

### **Comment No. 76-16**

#### **Page I-99: Entertainment and Sports Center:**

The Project includes a 15,000 seat Entertainment and Sports Center. There is no determination in the Draft SEIR if this stadium will be open-roof or closed. Also, there has been no determination for what events will take place at the stadium. If open-roofed, noise for concerts will include sustained amplification from sound systems that may be above allowable decibel levels. Noise for sporting events will include spontaneous loud bursts of sound from cheering crowds. Stadium lights will reflect up and outward toward the existing Marriott Hotel and be seen from nearby neighborhoods. Without the determination of open-roof or closed, it is impossible to state that noise impacts would be "less than significant". [sic] The Promenade 2035 Draft SEIR leaves these issues as un-determined, and therefore does not fulfil [sic] the "detailed information" requirement of an EIR.

### **Response to Comment No. 76-16**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a summary of the environmental impacts associated with operation of the Entertainment and Sports Center. Potential noise and lighting impacts associated with the Entertainment and Sports Center with a partial roof option were thoroughly evaluated in the Draft Supplemental EIR.

### **Comment No. 76-17**

#### **Page I-99: Parking Facilities:**

"The Project would include parking structures within each of the development areas". [sic] However, since the Project is phased and the stadium is currently scheduled for Phase III, there will be no available parking spaces at the proposed office/hotel structure, as that is currently scheduled for Phase IV construction, and will therefore will not exist yet. Therefore, there is NOT adequate parking available to support a 15,000 seat stadium, as proposed "shared parking" is [sic] not exist at the buildout of the stadium. The construction for the stadium must be moved to Phase IV, and the office/hotel tower must be built prior to

the stadium in order to support required on-site required parking. In addition, further study must be made on the estimated noise and CO levels that will be generated by vehicles cueing at the entrance/exit of the parking structure if a stadium is filled to capacity. This has NOT been addressed in the Draft SEIR. Possible shared parking agreements with non-Westfield owned property has also not been approved in writing at the time of the Draft SEIR, and therefore, can NOT be included as parking mitigation. The stadium must be greatly reduced in size or omitted entirely if separate on-site parking space requirements for the proposed ESC are not planned and available.

### **Response to Comment No. 76-17**

Based on the current proposed order of phasing, prior to buildout of the last phase within the Southeast Area, there would be 5,194 parking spaces available for the Project through the first three phases. These would be located within above-grade parking, two levels of subterranean parking beneath the Northwest and Southwest Areas (including below the Entertainment and Sports Center), and within the existing surface parking in the Southeast Area. This amount of parking would exceed the required number of parking spaces for the Project under the Warner Center parking requirements through the first three phases, which is 4,717 parking spaces including the Entertainment and Sports Center.

Refer to Topical Response No. 2, Entertainment and Sports Center for a discussion of the parking associated with the Entertainment and Sports Center. As discussed therein and within the Draft Supplemental EIR, Project Design Feature K-6 includes the development and implementation of an Event Management Plan, which requires that sufficient parking be provided for the Entertainment and Sports Center through a combination of on-site shared parking and available off-site parking to meet event demand. The Applicant would be required to provide annual evidence to LADOT of agreements that identify/secure the location and quantity of available off-site parking prior to the issuance of a temporary or permanent certificate of occupancy for the Entertainment and Sports Center, and annually thereafter.

With regard to vehicular noise from the Entertainment and Sports Center, refer to Topical Response No. 2, Entertainment and Sports Center. As discussed therein, the Draft Supplemental EIR analyzed the worst-case scenario, which assumes a sold-out event at the Entertainment and Sports Center.

As discussed in Response to Comment No. 76-12, above, a CO hotspots analysis was provided on Page IV.B-45 in Section IV.B, Air Quality, of the Draft Supplemental EIR appropriately analyzed daily traffic volumes at buildout of the Project (Year 2035) and included cumulative traffic, which as discussed in Topical Response No. 3, Traffic and Parking, assumes full buildout under the Warner Center Plan.

**Comment No. 76-18**

The Draft SEIR states there *may* be one to five levels of underground parking. Per the rules of an EIR, these decisions must already be determined in the EIR so the public can comment on actual parking plans and not what MAY be considered at the site. The conclusion is that The Promenade 2035 Draft SEIR must therefore be revised to include what is specifically going to be built in the parking structure(s) and not speculate on what open options MAY happen.

**Response to Comment No. 76-18**

As explained in Section I, Executive Summary, of the Draft Supplemental EIR, the CEQA Guidelines describe an EIR as an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. The Draft Supplemental EIR was prepared in accordance with CEQA and the CEQA Guidelines. With regard to subterranean parking, i.e., the parking garage option, the Draft Supplemental EIR conservatively analyzed the option with the potential for greater environmental impacts. As an example, Section IV.B, Air Quality, of the Draft Supplemental EIR analyzed two levels of subterranean parking in the Southwest Area since it resulted in approximately 117,000 cubic yards more soil import/export (i.e., more fugitive dust and pollutant emissions related to haul trucks) in comparison to the five levels of subterranean parking in the Southeast Area. The information provided regarding the Project in the Draft Supplemental EIR is consistent with the requirements of CEQA and sufficiently detailed for evaluation and review of the Project's potential environmental impacts. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 76-19****Page I-106: Mitigation Measures/Warner Center Plan Mitigation Measure NOI-3:**

Construction activities MUST (not shall) be restricted to the hours between 7am [sic] and 7pm [sic] Monday through Friday, and NOT extended up to 9pm. [sic] Construction activity at 9pm [sic] will be disruptive to the nearby neighborhoods and Marriott Hotel guests and once the Promenade 2035 residential building is completed, will be disruptive to those residents as well.

**Response to Comment No. 76-19**

The construction hour limits as provided in the Warner Center Plan Mitigation Measure NOI-3 are consistent with LAMC Section 41.40. As provided in Section IV.H,



Noise, of the Draft Supplemental EIR, a detailed noise impacts analysis was conducted to evaluate potential noise impacts associated with Project construction activities, as compared to the existing lowest daytime (7 A.M. to 10 P.M.) ambient noise levels. Specifically, noise impacts associated with the on-site construction activities for the various construction phases, including site grading and excavation were evaluated at the off-site noise sensitive receptors (including the Marriot Hotel). As concluded in the Draft Supplemental EIR, the noise impacts associated with the Project on-site construction would be significant before mitigation measures. However, implementation of the mitigation measures as specified in the Draft Supplemental EIR would reduce the on-site construction noise impacts to the off-site sensitive receptor locations to a less than significant level. With regard to on-site residents, as discussed in Section IV.H, Noise, of the Draft Supplemental EIR, CEQA does not generally require the analysis of Project impacts to future on-site Project receptors. However, for informational purposes, an analysis of potential construction-related impacts to future on-site residents was provided in the Draft Supplemental EIR. As discussed in the Draft Supplemental EIR, the 5-dBA significance threshold would be exceeded. Therefore, the construction noise impacts at the on-site noise-sensitive uses would be significant. Implementation of Warner Center Plan Mitigation Measure NOI-5 would reduce construction-related noise at these uses by 15 dBA. However, the Project's construction noise impacts to on-site receptors would remain significant and unavoidable.

### **Comment No. 76-20**

#### **Page I-114: Public Services-Police Protection, Construction:**

The Draft SEIR states “most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday commuter morning and afternoon periods”, [sic] which directly conflicts with the statement of the proposed hours of construction stated on **page I-106**. Community workers commuting on Topanga Canyon Blvd exists between 7am [sic] and 9am, [sic] and the reverse commuting traffic between 5pm [sic] and 7pm. [sic] Topanga Canyon Blvd is also a designated emergency route, and therefore daytime construction traffic from the Project, combined with the traffic from additional currently under construction projects, and combined with the daytime traffic of the two existing Westfield shopping malls, WOULD (not “could) impact the response times within the Topanga Area due to construction impacts on the surrounding roadways”. [sic] As the Promenade 2035 is a phased project, there will be on-going construction for 15 years.

### **Response to Comment No. 76-20**

While construction activities during Project construction would occur between the hours of 7:00 A.M. and 9:00 P.M., Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on Saturday, construction worker trips to and from the Project Site, as discussed on page IV.K-71, of Section IV.K, Traffic, Access, and Parking, of the Draft Supplement

EIR, are anticipated to occur outside of the peak hours (i.e., arrive at the site prior to 7:00 A.M. and depart before 4:00 P.M. or after 6:00 P.M.). In addition, the implementation of the Construction Management Plan, through Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1, as described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplement EIR, construction-related deliveries and haul trips would be scheduled outside the commuter peak hours to the extent feasible. As discussed further in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, implementation of the Construction Management Plan would ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the Construction Management Plan would be developed in consultation with the LADOT and may include limiting temporary traffic control during all construction activities adjacent to public right-of-ways to improve traffic flow on public roadways (e.g., flagmen), and scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible. Appropriate construction traffic control measures (e.g., signs, delineators, etc.) would also be implemented to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response times within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

### **Comment No. 76-21**

#### **Page I-115: Public Services—Police Protection, Operation:**

The Project Site is served by the Topanga Community Police Station. The Draft SEIR states “the Project would not cause a significant change to the officer-per-resident ratio for the Topanga area”. [sic] It states that it will reduce that ratio from 1.2 to 1.1, and on a cumulative level, further reduce that ratio from 1.2 to 0.8, along with an expected increase in crime. Westfield proposes hiring private, on-site security to “address crowd management and control for the stadium.” Questions not addressed in the Draft SEIR: will these private security employees take the place of trained police officers? Will Westfield be held *personally liable* for the actions of their security personnel? Will they be deputized and trained to be able to hold individuals or will the police still need to be called to handle disturbances at the stadium? The projected officer-per-resident ratio will need to be re-projected to also include a capacity 15,000 seat stadium, which is not included in the Draft SEIR’s calculation.

### **Response to Comment No. 76-21**

Refer to Topical Response No. 5, Public Services, for further discussion of the Project design features and mitigation measures that would be implemented under the Project to reduce impacts to police services. Refer to Topical Response No. 2,

Entertainment and Sports Center, above, for a discussion of the police protection impacts associated with the Entertainment and Sports Center. As discussed therein, the Draft Supplemental EIR's analysis assumes a service population of 15,000 people associated with the Entertainment and Sports Center. The Project's proposed private security will meet industry standards and State certification requirements required through the Bureau of Security and Investigative Services; comments regarding the Applicant's personal liability are outside of the purview of CEQA but are noted for the record and have been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 76-22**

#### **Page I-125 through I-127: Public Services—Fire Protection, Operation:**

The building of 1,432 residential units, plus the hotels, live-work units, office space and stadium will increase the demand for LAFD fire protection and emergency medical services compared to existing conditions. Response times for emergency vehicles (including police response) are expected to increase due to travel time delays caused by traffic.... primarily due to the stadium. CEQA requires that it is the responsibility of the City to mitigate this increased need. Therefore, this mitigation must to be detailed by the City and added as an Addendum to the Draft SEIR to show the public where these additional public services will come from.

### **Response to Comment No. 76-22**

Refer to Topical Response No. 5, Public Services, above for a discussion on the Project's impacts to fire services and the project design features and mitigation measures that will be implemented by the Project. Response times for emergency medical services were provided in Table IV.J.2-2 on page IV.J.2-12 of Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR. However, as there are no established thresholds, response times are not used to evaluate the ability of LAFD to provide fire services. As discussed further in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, while Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by traffic, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project's traffic study area. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, upon buildout of the Project (Future With Project Conditions) and with implementation of the Warner Center Mitigation Program and Project specific project design features, traffic generated by the Project would not result in significant impacts. In addition, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and

collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project's traffic study area. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, as further discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project is adding an additional lane on Topanga Canyon Boulevard, adjacent to the Project Site, to further improve the flow of vehicles (including emergency vehicles) along Topanga Canyon Boulevard. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 76-23**

#### **Page I-131 through I-132: Public Services—Schools:**

Per the Draft SEIR, "it is estimated that the Project would result in a total net increase of approximately 1,459 school age students". [sic] However, as reported in the Draft SEIR, there is zero capacity for both elementary and high school students in the local LAUSD schools, with only one middle school having capacity to accommodate only 178 new students. Westfield's mitigation is to "pay development fees for schools to LAUSD". [sic] It must be required for Westfield, Los Angeles City and LAUSD to work out a plan in which to accommodate these estimated new students *in advance of issuing the Project's building permit*. Simply "paying the required development fees for schools to LAUSD" without requiring LAUSD to specifically state how to spend those funds can NOT be tolerated. Without a plan in place by LAUSD *in advance* of new families moving in, there will be a detrimental effect to the community and places unrealistic constraints on the existing school student body. *If a new or expanded school plan cannot be completed, then residential construction must be suspended*. Furthermore, it must be required for all residential unit construction in Warner Center to meet with LAUSD in advance being issued building permits. The cumulative effect of all new residential unit construction (current, pending approval and forecasted) affects our existing local student's educational future.

### **Response to Comment No. 76-23**

As discussed in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, Senate Bill 50 (SB 50) allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, LAUSD collects development fees for new construction within its district boundaries. Currently, LAUSD collects the maximum new school construction facility fee at

a rate of \$3.79 per square foot of new residential construction, \$0.61 per square foot of commercial/industrial construction, \$0.28 per square foot of self-storage structure, and \$0.39 per square foot of parking structure.<sup>65</sup> Payment of these fees is required prior to issuance of building permits. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 76-24**

#### **Page I-144: Traffic, Access, and Parking. On-Street Parking Impacts:**

Per the Traffic Study, “parking is not allowed adjacent to the Project Site during construction”. [sic] Question: how will this be enforced? What precautions are in place to discourage parking on nearby residential streets in order to avoid paying for parking?

### **Response to Comment No. 76-24**

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the project would implement Mitigation Measure K-1, which would require the preparation of the Construction Management Plan that includes a prohibition of construction worker parking on adjacent residential streets and prohibition of construction-related vehicle parking on surrounding public streets. In addition, Mitigation Measure K-1 has been revised in Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR, to require that a contact name and phone number be provided by the Applicant during construction activities where the public can report any concerns regarding construction activities or implementation of the Construction Management Plan. The MMP included in this Final Supplemental EIR identifies the enforcement entity, the field verification, the lead agency oversight for this mitigation measure, as well as all of the mitigation measures that would be implemented by the Project. As discussed in the MMP, an independent construction monitor will document the Applicant’s compliance with the project design features and mitigation measures during construction in a form satisfactory to the Department of City Planning.

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<sup>65</sup> Los Angeles Department of Building and Safety, *Permit Fee Estimate*, <http://netinfo.ladbs.org/feecalculator/3950786566dd7fcc88258152007def26?OpenForm>, accessed September 8, 2017.

**Comment No. 76-25****Page I-145 through I-149: Traffic, Access, and Parking. Operational Impacts:**

“The addition of the non-stadium uses to existing conditions results in a total of 8 intersections with significant impacts” and when factoring in the stadium use, “results in a total of 12 intersections with significant impacts”. [sic] Question: how do you prevent drivers cutting through private neighborhoods to avoid traffic congestion? What is the mitigation on these intersections?

**Response to Comment No. 76-25**

Refer to Topical Response No. 3, Traffic and Parking, above, regarding the Project’s traffic impact analysis. The combined implementation of the Warner Center Mitigation Program together with the project design features is anticipated to reduce all Project impacts to a less than significant level. Further, Topical Response No. 3 provides a discussion about neighborhood street segments along with details about both Warner Center Plan Mitigation Measure TR-101 and Mitigation Measures K-2 and K-3. These measures describe the funding contribution toward and the implementation of a neighborhood traffic management plan, if required based on Mitigation Measure K-3. Event traffic conditions will be addressed by Project Design Feature K-6, which will require the development and implementation of an Event Management Plan (EMP). Refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding the neighborhood street segment impacts.

**Comment No. 76-26****Page I-154 through I-156: Caltrans Facilities Analysis, Intersections/Freeway Access:**

“21 of 26 of the freeway arterial/ramp intersections are projected to operate at LOS D or better. 5 intersections are projected to operate at LOS E or F during peak period, which is their current operating condition”. [sic] It is unacceptable for any of our freeway access ramps to be rated at LOS D or below. If the Caltrans and/or Department of Transportation (DOT) is responsible to improvements to the freeway ramps, and it is due to the Project’s proposed stadium of being the specific cause of additional intersection problems being identified, then *construction of the stadium must be suspended until DOT completes improvements to the on/off freeway ramps* on Topanga Canyon Blvd, Canoga Ave and DeSoto Ave. This is a public safety issue and was previously noted in this report that the stadium will cause delays for police, fire and medical emergency personnel responders.

**Response to Comment No. 76-26**

To identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an Entertainment and Sports Center (ESC) event in 2035; the corresponding proportionate share with a sold-out ESC event of 15,000 seats is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

Refer to Response to Comment No. 76-25 and Topical Response No. 2 regarding the EMP that will be implemented to address access from the Entertainment and Sports Center.

**Comment No. 76-27****Page I-183 through I-184: Utilities and Service Systems—Wastewater:**

“The Project would require construction of new on-site infrastructure to serve the new buildings and potential upgrade of existing infrastructure”. As the Promenade was previously a shopping mall, and is now projected to transition to housing/hotels/offices/stadium, the level of demand on utilities will have significantly increased. Therefore, utility connections need to be replaced and improved during Phase I (and not wait until 2023) so the residential units will be guaranteed continuous service. Rain water run-off needs to be captured and stored in wells, to be used to irrigate the parks. There is no communication in the Draft SEIR related to water storage conservation.

**Response to Comment No. 76-27**

Refer to Topical Response No. 6, Infrastructure, for a summary of the Project's utility connections to the surrounding water and wastewater infrastructure and an analysis of the Project's demand on utilities. As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft Supplemental EIR, the Project would implement Project Design Feature M.1-1, which includes implementation of additional water conservation measures beyond those required by the LAMC, as amended by Ordinance No. 184248. This project design feature was formulated through the Water Supply Assessment process with the LADWP. Project Design Feature M.1-1 includes measures to support water conservation including reuse of pool backwash water for irrigation as well as rainwater harvesting systems.

**Comment No. 76-28****Conclusion:**

- 1) The Westfield Promenade 2035 Project is made up of 4 phases, but the Draft SEIR was written as if there is only one phase for this project. Since construction will take place over 15 years, it is unrealistic to assume that the traffic studies that were used for this Draft SEIR will be applicable and unchanged in 5-10-15 years, considering the expected growth envisioned for Warner Center. Market trends adapt to change over time, and proposed future phased construction sometime doesn't happen. Therefore, the Draft SEIR is NOT applicable to the entire project and as such, it should only apply to Phase I of the project. EACH future phase must be required to have a separate SEIR report.



**Response to Comment No. 76-28**

Refer to Response to Comment No. 76-2, above, regarding the Draft Supplemental EIR's analysis of the Project as a phased development. Consistent with the Warner Center Specific Plan, the Project was analyzed as a multiple phase project.

**Comment No. 76-29**

- 2) The Warner Specific Plan strives for a balance of live and work. Therefore, construction of the office towers must be built at the same time as the residential units. When looking at the cumulative effect of constructing housing without also maintaining a balance of office/employment opportunities, then there will be no "walkability" as residents will be forced to drive to find employment elsewhere. The Draft SEIR does not address this necessary and required "balance". [sic] Therefore, the office tower must be moved to Phase II or built at the same time as Phase I.

**Response to Comment No. 76-29**

Refer to Response to Comment No. 76-7, above, regarding live and work balance on the Project Site.

**Comment No. 76-30**

- 3) The number of floors for underground parking needs to be determined. Current Draft SEIR is vague. Shared parking agreements do not exist in writing.

**Response to Comment No. 76-30**

Refer to Response to Comment No. 76-18, above, regarding the Draft Supplemental EIR's analysis of the Project's parking options.

**Comment No. 76-31**

- 4) Street and freeway access issues are not mitigated in the Draft SEIR. No specific proposals have been listed to correct these problems. No mitigation discussion with Caltrans, DOT and Westfield have been completed.

**Response to Comment No. 76-31**

Refer to Topical Response No. 3, Traffic and Parking, above for a discussion about the Project traffic impact analysis and mitigation measures. Relative to Caltrans, a supplemental analysis of potential impacts to state facilities (freeways) was prepared based on Caltrans guidelines and is provided in Appendix M, of the Draft Supplemental EIR. It is

important to note that Caltrans does not have or identify specific incremental criteria to measure the significance of Project effects on freeway mainline segments. Therefore, it is impossible to identify whether a specific facility would be significantly affected under Caltrans criteria. However, as identified in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Applicant would coordinate with Caltrans to contribute a proportionate share towards improvements that Caltrans identifies for the freeway mainline and off-ramps identified above to mitigate cumulative impacts to the state transportation network.

As discussed in Response to Comment No. 76-26, above, to identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an ESC event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

**Comment No. 76-32**

- 5) Access and accommodation to schools has not been mitigated in the Draft SEIR. No mitigation discussion with LAUSD and Westfield have been completed.

**Response to Comment No. 76-32**

Refer to Response to Comment No. 76-23, above, regarding mitigation for impacts to schools.

**Comment No. 76-33**

- 6) Safety issues in the Promenade Square Park were not addressed in the Draft SEIR.

**Response to Comment No. 76-33**

Refer to Topical Response No. 7, Open Space, regarding safety and security for Promenade Square.

**Comment No. 76-34**

- 7) Finally, the Entertainment/Sports Center is completely lacking in final decisions in the Draft SEIR: How many seats, what type of programs, concerts or sports, roof or no roof, several smaller community rooms or one large venue, no shared parking agreements and not enough on-site parking available, etc. There is no mitigation of how to easily get cars in/out of the stadium venue other than “security will be available to direct traffic”. [sic] There is no mitigation of freeway access. The public can NOT make determinations concerning the ESC as Westfield has failed to determine what the stadium will specifically include. Therefore, *the ESC must be removed from the project.*

**Response to Comment No. 76-34**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a summary of the conservative assumptions made in the Draft Supplemental EIR regarding the Entertainment and Sports Center, as well as detailed impact analysis related to traffic and parking.

**Comment No. 76-35**

With the Promenade 2035 Draft SEIR, Westfield has failed to be specific about many issues that are necessary for the public to comment on. Instead, Westfield has chosen to leave their options open and not address these specific questions. The City of Los Angeles

must allow the public to have the opportunity to make comments on any changes made to this Draft SEIR in order to avoid a bait-and-switch scenario. The Public Comment Period is important for due process of the project and a second Public Comment Period is required to address all changes.

The Promenade 2035 Draft SEIR is incomplete and lacks the specific details that we, the public, need in order to make a substantiated analysis and conclusion about the project. “An environmental impact report is required to provide the public with detailed information about the effect which a proposed project is likely to have on the environment”. [sic] This did not happen.

### **Response to Comment No. 76-35**

With regard to the commenter’s concern regarding the need for a second public comment period, the public will have a continued opportunity to comment on the Supplemental EIR during the public hearing process.

All options for the Project were presented in the Draft Supplemental EIR and satisfied CEQA’s requirements for the Draft Supplemental EIR as an informational document. The analysis provided in the Draft Supplemental EIR included the more conservative of these options. The Draft Supplemental EIR is comprehensive and fully complies with CEQA.

**Comment Letter No. 77**

Steven Dick  
steven3745@aol.com

**Comment No. 77-1**

i [sic] have lived in woodland hills [sic] for over 20 years and have seen what new construction does with traffic [sic] there is no way woodland hills [sic] could or should have to see this kind of expansion..not [sic] enough police public services etc with the population we have now [sic]

please [sic] stop this it is madness [sic]

please [sic] no more building [sic]

**Response to Comment No. 77-1**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the Project's traffic analysis. Also refer to Topical Response No. 5, Public Services, above, for a discussion regarding the Project's impacts on public services, including police protection. The comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 78**

Michel Doots  
22057 Oxnard St.  
Woodland Hills, CA 91367-3546

**Comment No. 78-1**

I am writing you as a concerned home owner. My son and I live in the Fountain Park Neighborhood which is within 1/2 block of the proposed 15,000 seat stadium being considered at the corner of Oxnard and Topanga Canyon. According to the submitted plans, it is not known whether it is to be a closed or open stadium. How can this possibly be considered if that has not yet been determined?

**Response to Comment No. 78-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for further details on the assumptions made in the Draft Supplemental EIR with regard to the Entertainment and Sports Center, and the conservative analysis included in the Draft Supplemental EIR. As noted above in Topical Response No. 2, Entertainment and Sports Center, the “no roof” or “open roof” option described in the Draft Supplemental EIR is more accurately described as a partial roof, as it includes an overhang extending over the seating areas of the Entertainment and Sports Center to provide shade, which would have additional benefits of providing some lighting and noise shielding.

**Comment No. 78-2**

The noise, the traffic, the added unknown environment are just a few of the items that need to be considered in not allowing this venue to happen.

Within my community are 220 homeowners, plus the residential homes to the south of Oxnard... we are all very much opposed to this stadium. Please think it through before going any further with the proposed plans.

**Response to Comment No. 78-2**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, regarding the environmental impacts of the Entertainment and Sports Center. This comment expressing opposition to the Entertainment and Sports Center is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 79**

Catherine Dunaj  
22925 Sylvan St.  
Woodland Hills, CA 91367-1627

**Comment No. 79-1**

The following comments are for the DSEIR for ENV-2016-3909-EIR.

I am opposed to this huge stadium being built in the Woodland Hills area as this area has been over-built in the past few years and traffic is terrible. Since the opening of the Village shopping center and Costco, traffic and parking have become a huge problem with [sic] bringing in large amounts of people to this area. The Westfield Topanga mall is just across the street and the Fallbrook shopping center, with a Walmart & etc., is just over a mile away, along with numerous new apartment complexes that have or are being built plus they have approved a large commercial Eldercare facility to be placed on a residential lot on Fallbrook and Erwin. The Woodland Hills area is already over-built and the addition of this massive stadium will add so many additional issues to an already problematic area. The traffic, parking and additional noise will make the beautiful area of Woodland Hills to [sic] further decline. Please do not go forth with this product.

**Response to Comment No. 79-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, regarding the environmental impacts of the Entertainment and Sports Center. This comment expressing opposition to the Entertainment and Sports Center is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 80**

Paul Edelman  
5065 Catalon Ave.  
Woodland Hills, CA 91364-3313

**Comment No. 80-1**

Hello Elva—attached is a personal letter on the Promenade DSEIR—please email acknowledge receipt [sic]

**Response to Comment No. 80-1**

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 80-2**

A major component of the proposed project, and most DSEIR alternatives, is the designation of publicly accessible open space areas on private property. The DSEIR concludes that because the proposed project provides slightly more than the 246,000 square feet of such required public open space that the project meets its public open space requirements. However, the details and qualities of the amenities in those areas are not adequately described in the DSEIR both for the public to know what it is getting and for decision makers to assess their general adequacy and long-term sustainability. Inadequately described project components with insufficiently defined long-term maintenance funding and enforcement teeth make for a deficient DSEIR.

With publicly accessible open space being the major public benefit to offset permanent unavoidable significant adverse, wide-spread surface street and freeway traffic impacts, those benefits must be commensurate with a hundred years of project-caused increased traffic gridlock within and around the project. As proposed, those publicly accessible open space benefits are insufficient both in total square footage, amenities, and a guaranteed level of maintenance and security. The DSEIR shall remain deficient until it irrevocably commits the project—via a revised project description and guaranteed permanent private funding source—to better-defined and better-maintained publicly accessible open space areas.

Given both the scale and budget of the project, coupled with its guaranteed significant adverse traffic impacts, the project should provide an exceptional public green space with exceptional levels of permanently-funded, [sic] private maintenance and user security. The



City Council would be failing the public to not require such a world class urban amenity within the signature project of Warner Center. The City has the power to require such an amenity and a significant amount of privately funded maintenance.

### **Response to Comment No. 80-2**

Refer to Topical Response No. 7, Open Space, for a detailed discussion of the quantities and types of Project open space proposed, the Applicant's private funding for maintenance of the Project open space, and security for the open space areas on the Project Site. As discussed in Topical Response No. 3, Traffic and Parking, traffic intersection impacts were determined to be less than significant with implementation of the project design features and the Warner Center Mitigation Program.

### **Comment No. 80-3**

The proposed project and all the DSEIR alternatives require a Parcel Map Exemption from the City—a major discretionary action. There most likely are other less obvious discretionary actions (not by-right). The City would also have to adopt a statement of overriding considerations for the unmitigable traffic impacts. Such required actions unequivocally give the City the exceptional power and latitude to demand the guaranteed provision of specific public benefits regardless their nexus with the proposed project. No exceptional benefits then no certified EIR is the equation. The proposed event stadium is not that world class signature green space free of concrete structures and dominated by shade trees; and it would cause its own permanent adverse impacts.

### **Response to Comment No. 80-3**

The Project's requested discretionary actions are listed in the Project Description, of the Draft Supplemental EIR, and include a Parcel Map Exemption in addition to Project Permit Compliance, Vesting Tentative Tract Maps, Master Conditional Use Permit, and a Director's Interpretation. The Parcel Map Exemption is being requested to adjust the lot lines of the existing parcels to match the geographic areas of the Project's proposed phases of development. None of these discretionary actions request any variances or exceptions from the City's regulations, and the Project is consistent with the Los Angeles Municipal Code and Warner Center Plan, as described in Section IV.G, Land Use, of the Draft Supplemental EIR, and Topical Response No. 1, Warner Center 2035 Specific Plan.

The CEQA Guidelines limit a lead agency's authority to require changes to a project or impose mitigation; specifically, there must be a nexus to the project's impacts, and the

required mitigation must be roughly proportional to the impacts related to a project.<sup>66</sup> The CEQA Guidelines also grant lead agencies the authority to approve projects even if the project would result in significant impacts, provided that the agency makes a fully informed and publicly disclosed decision and identifies benefits from the project that outweigh the identified significant impacts. In such a situation, the public agency is required to fully inform the public of the resulting impacts and approve overriding considerations.<sup>67</sup>

As discussed further in Topical Response No. 3, Traffic and Parking, the Project does not result in significant traffic impacts with respect to intersections with the implementation of the mitigation measures identified in the Warner Center Plan and project design features. The Draft Supplemental EIR also included the analysis of alternatives that would reduce traffic-related impacts; specifically Alternative 3, Alternative 4, and Alternative 5 would all have reduced impacts associated with traffic. Significant and unavoidable impacts have been identified with regard to regional air quality emissions, historical resources, noise/vibration, construction traffic and neighborhood street segments for which all feasible mitigation measures have been identified. Therefore the decision maker will be required to adopt a Statement of Overriding Considerations for these impacts in order to approve the Project, consistent with the CEQA Guidelines.

Refer to Topical Response No. 2, Entertainment and Sports Center, for more information regarding the Entertainment and Sports Center.

#### **Comment No. 80-4**

The SEIR [sic] project descriptions for the proposed project and all the development project alternatives are inadequate in that they do not include sufficient visual or written detail to show that an adequate number and distribution of shade trees will occur in proposed publicly accessible open spaces and other walkways. With both existing Woodland Hills temperatures, and those projected by conservative global warming scenarios, the daytime occupation of public spaces requires ample shade either from trees or permanent shade structures. The DSEIR touts the benefits of multiple privately-owned [sic] public spaces but fails to show the usability of those spaces visa via [sic] a required inclusion of shade and shade associated with seating. The DSEIR will remain inadequate until [sic] includes a detailed plan for public area shading.

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<sup>66</sup> 14 California Code of Regulations § 15041.

<sup>67</sup> 14 California Code of Regulations § 15043.

**Response to Comment No. 80-4**

The types of proposed Project trees and their locations are included in the landscape plan submitted as part of the Project's applications, which is publicly available for review at City Planning.

Refer to Topical Response No. 7, Open Space, above, for a discussion of the various open space areas provided on the Project Site. As discussed above, of the Project's approximately 10.6 acres of outdoor open space, approximately 5.6 acres are ground level and publicly accessible. These areas would support a wide range of active and passive recreational activities, as well as approximately 3 miles of walking paths. In total, approximately 600 trees would be provided on-site by the Project, for an increase of 308 trees over existing conditions.

**Comment No. 80-5**

The adequate maintenance of public spaces takes substantial funding particularly if there is a high density of large shade trees to maintain and the need to constantly address the occupation of said spaces by homeless and transient individuals. The proposed project is unique in its provision of publicly accessible areas on one hundred percent private property. That arrangement is not well tested in the San Fernando Valley. The DSEIR is deficient for not including permanent standards (and hours) and guaranteed levels of security patrol for the proposed publicly accessible open space areas. The DSEIR is deficient in how it fails to address how private property owners will be required to firmly but sensitively address the homeless and transient use of public spaces on private property. For the sake of both the private property owners and the public, this issue must be addressed upfront in the CEQA process.

At least one onsite public open space area should have public restrooms with an on duty, outside stationed security guard in the open space area during all public hours. A project this large can afford that level of service in perpetuity. The project must form one or more Community Facilities Districts (CFD) or Landscape Maintenance Districts (LMD) to provide a steady permanent funding source to maintain and patrol all the proposed publicly accessible open space areas. In contrast, a Dwelling Unit Construction Tax is a one-time fee that cannot fund the ongoing operation of a privately-owned, [sic] publicly accessible open space area. To repeat, the proposed project's public benefits must be sustainable and such sustainability annually requires hundreds of thousands of dollars of guaranteed privately generated landscape maintenance and security funding.

**Response to Comment No. 80-5**

Refer to Topical Response No. 7, Open Space, for a discussion of Applicant's maintenance obligations regarding Promenade Square, as well as public restrooms and security associated with Promenade Square.

**Comment No. 80-6**

The DSEIR is deficient because it concludes the project will not have an adverse impact on existing City park use. How can 3,000 new project residents in conjunction with 15,000 new Warner Center residents to be added between 2018 and 2028 not create a burden on existing Woodland Hills parks? The only way to offset that long-term public park degradation is for the project to generate significant, permanent private annual funding for the Department of Recreation and Parks that the Department would be obligated to spend on those specific Woodland Hills parks. The only apparent mechanisms for such in perpetuity funding are the above mentioned CFD and LMD options. Having hands on experience forming six public CFDs for park maintenance in the City of Los Angeles, I can attest that there is no barrier to formation of such districts. The City needs to break out of old molds and those individuals owning the properties in the proposed project need to fund the public amenities. The current model of sloughing off maintenance and security funding to the City's general fund is unsustainable and a bad deal for the public.

**Response to Comment No. 80-6**

Refer for Topical Response No. 7, Open Space, which provides a detailed discussion of the wide range of open space areas proposed on the Project Site. Due to the amount, variety, and availability of the proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similarly, the Project's commercial component could result in a demand for parks and recreational facilities. However, the Project also includes 14,000 square feet of creative office outdoor open spaces and 41,000 square feet of hotel outdoor open space. Thus, it is anticipated that Project employees, hotel guests, and visitors would also primarily utilize on-site open space during their time spent at the Project, resulting in a negligible demand for surrounding parks and recreational facilities. Therefore, as the Project would not substantially increase the demand for off-site public parks and recreational facilities, and would have less than significant impacts on parks, permanent private annual funding for the Department of Recreation and Parks would not be necessary.

**Comment No. 80-7**

Currently the DSEIR only addresses the increased provision of private security at the proposed Entertainment and Sports Center. It does so with zero specifics and broad claims. The DSEIR shall remain deficient until it commits the project at its various phases to specific permanent levels of security and maintenance funding (inflation adjusted) for all the proposed publicly accessible open space areas. Without such DSEIR detail, the publicly accessible open space components cannot provide the benefits espoused in the document. If maintenance and security in the publicly accessible open space areas is not top notch, their value will deteriorate, and their existence could eventually be put in jeopardy by a simple majority City Council vote down the road.

**Response to Comment No. 80-7**

The commenter incorrectly states that the Draft Supplemental EIR only addressed the increase provision of private security at the Entertainment and Sports Center. As discussed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, the Project includes project design features J.1- through J.1-9 that provide private, on-site security for the overall Project Site as well to reduce reliance on public police protection services. However, while these project design features are for the entire Project Site, including the open space areas, Project Design Features J.1-6 and IV.J.1-7 have been updated to specifically address security for the Project's open space areas, as described in Topical Response No. 7, Open Space, above; see also Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR.

**Comment No. 80-8**

The SDEIR [sic] is deficient in its analysis of heat island affects caused by the project. The proposed increase in total building mass and a mere ten percent permeable surface is not mitigated by required dense tree cover in all potential locations where trees can grow. For example, the proposed 2:1 tree replacement ratio for trees removed is not adequate to counteract global warming and the fact that the replacement trees will take 20 years to reach the sizes of the trees removed. The tree replacement ration [sic] must be increased to 5:1. The project landscaping must be designed to maximize the absorption CO<sub>2</sub>.

**Response to Comment No. 80-8**

With regard to additional heat, the Project includes a number of design features that are consistent with the strategies identified by the United States Environmental Protection Agency (EPA) to address heat island effects, such as: including trees and landscaping within development areas and implementing building standards that incorporate heat island reduction strategies. As discussed in Section IV.I.4, Public Services—Parks and

Recreation, of the Draft Supplemental EIR, the Project would provide a variety of open space and recreational amenities, including 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres. The EPA has also identified the enactment of green building ordinances by local jurisdictions as a means of addressing heat island effects. The Project would be consistent with the City of Los Angeles Green Building Code, as further discussed in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR. Based on these and other measures incorporated into the EIR, there is no evidence to suggest that the Project will result in an increase in temperature or a hot zone.

#### **Comment No. 80-9**

The SDEIR [sic] provides insufficient test data to prove that the project soils are not amenable to storm water infiltration. The project must provide more permeable surfaces and/or devote more areas to deeper infiltration basins such that no runoff leaves the site with the first inch of rainfall from any storm event.

#### **Response to Comment No. 80-9**

As discussed in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, the LID Manual prioritizes Best Management Practices (BMPs) with infiltration systems as the top tier priority BMP. The City of Los Angeles implements a screening requirement that the depth of bottom of infiltration facility to the observed groundwater should be greater than 10 feet below ground surface. As previously mentioned, the groundwater observed at the site was as shallow as 16 feet below ground surface, thus, leaving only 6 feet of infiltration depth available from the surface. Adding to consideration that infiltration structures will also require a certain amount of cover for structural stability, the amount of space remaining will be minimal. In addition, as discussed further in the Geologic and Soils Report, the perched water condition was created by underlying clay soils and bedrock, which are relatively impervious. On-site infiltration of stormwater would worsen the existing perched water condition. The native alluvial site soils are also prone to liquefaction when saturated and are in the moderate to high expansion range. Based on these conditions, on-site stormwater infiltration would not be feasible for the Project.

#### **Comment No. 80-10**

The DSEIR claims that the dewatering from excavating up to 75-foot-deep holes for building foundations will not have a significant adverse impact on groundwater resources. That conclusion is not supported by any evidence or studies. The amount of potential groundwater to be pumped is not even estimated. Nobody has a clue based on current data what the impacts will be, and which areas will be drained of groundwater that would flow into the holes. It is presumed that the water will be pumped into the storm drain

system and flow into the Los Angeles River. Over the course of the project, the pumping would account for the loss of millions of gallons of groundwater owned by the public (City of Los Angeles). All that groundwater should be infiltrated onsite during different project phases and/or put onto the fields at Pierce College or even Warner Center Park at night. Some trees located south of the proposed project area probably depend on groundwater to survive. The DSEIR fails to account for the potential loss of offsite trees from the proposed dewatering activities. To proactively offset such potential impacts to offsite trees on both public and private land, the DSEIR will remain deficient until it includes more precise groundwater studies or finds a way inject all the pumped water back into the ground within one mile of the excavated areas.

### **Response to Comment No. 80-10**

As discussed in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, the Project is expected to require dewatering during construction due to the depth to groundwater. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location to proceed with construction into the drainage system. Dewatering systems listed in the CASQA BMP Handbook that may be used at the Project Site include, but are not limited to, dewatering tanks, sand media particulate filters, pressurized bag filters, and cartridge filters, all of which are described in greater detail in the Water Resources Technical Report. The maximum anticipated dewatering inflows during construction are not anticipated to draw water across any substantial distance and, therefore, would not adversely impact the rate or direction of flow of groundwater supply. In addition, due to the distance from the Project Site to the nearest water supply wells and the temporary nature of construction dewatering, the construction dewatering is not anticipated to change potable water levels sufficiently to reduce the ability of water utilities to use the groundwater basin for public water supplies or to reduce yields of adjacent well fields. Therefore, as Project development would not adversely impact the rate or direction of flow of groundwater and no water supply wells would be affected, the Project would not result in a significant impact on groundwater hydrology during construction. As a note, discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements. During construction, temporary dewatering systems would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations.

### **Comment No. 80-11**

The DSEIR does not adequately address the adverse greenhouse gas impacts of exporting up to 1,400,000 cubic yards of soil offsite to unknown locations and importing up to 450,000 cubic yards of soil from unknown locations. If ten-cubic-yard dump trucks are

used to export and import that maximum amount of soil, that equates to over 180,000 truck trips. That is madness.

### **Response to Comment No. 80-11**

The information provided in this comment regarding the amount of import/export and related truck trips associated with construction of the Project is not accurate. As discussed on page IV.D-45 of the Draft Supplemental EIR, total grading on the Project Site would require approximately 1,086,000 cubic yards of export. This is equivalent to 77,571 hauls using 14 cubic yard trucks and roughly 43 percent of the number of trucks referenced in this comment. Please note that the GHG analysis provided an additional very conservative scenario in the event that soil on the Project Site is not suitable for recompaction or the Project is unable to stockpile and reuse the soil on site. Under this condition, 1,430,000 cubic yards of export and 344,000 cubic yards of import would be required. This is equivalent to 126,714 hauls using 14 cubic yard trucks or roughly 70 percent of the number of trucks referenced in this comment.

Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR, provided a thorough analysis of greenhouse gas emissions associated with above referenced export and import activities during construction. Appendix D.2, Construction Information, of the Draft Supplemental EIR, provides detailed modeling assumptions for the construction analysis. As discussed therein, the analysis conservatively assumed a haul distance of 80 miles to Simi Valley landfill. However, closer locations may be determined feasible (e.g., Scholl Canyon Landfill with a round trip of 56 miles and which currently accepts clean soil) at the time of import/export.

### **Comment No. 80-12**

The City is under zero obligation to certify an EIR with unmitigated significant impacts. The project has unavoidable significant adverse traffic impacts. CEQA calls for lead agencies to maximize the avoidance of significant impacts and to maximize the requirement of feasible mitigation measures to reduce the level of significant impacts. The proposed project and most of its development alternatives do not maximize traffic impact avoidance and the SDEIR [sic] mitigation measures do not go far to reduce such impacts. Thus, the SDEIR [sic] is deficient in the provision of a feasible project alternative that does not result in unavoidable significant adverse traffic impacts.

### **Response to Comment No. 80-12**

Refer to Response to Comment No. 80-3, above.



**Comment No. 80-13**

Attachment 2: Letter on Promenade 2035 DSEIR from Paul Edelman.pdf (4 pages)

**Response to Comment No. 80-13**

This attachment is a duplicate of the comments provided above. No further responses are necessary.

**Comment Letter No. 81**

Amir Erez  
53 Bell Canyon Rd.  
Bell Canyon, CA 91307-1103

**Comment No. 81-1**

I just wanted to let you know how much I'm looking forward to the Westfield Promenade project. I love everything about it, especially the new entertainment and sports venue. It will be great to enjoy concerts and other events without having to leave the neighborhood.

The sooner we can get the project approved and start construction, the better!

I can't wait for it to become a reality!

**Response to Comment No. 81-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 81-2**

Thank you Elva. That would be wonderful.

My home address is as follows:

Amir Erez  
53 Bell Canyon Rd  
Bell Canyon, CA 91307

**Response to Comment No. 81-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 82**

Sylvestine Etienne  
6300 Variel Ave., Apt. 258  
Woodland Hills, CA 91367-7770

**Comment No. 82-1**

Please accept the attached letter as my commitment and support to the Westfield Promenade Project 2035.

**Response to Comment No. 82-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the proposed Project.

**Comment No. 82-2**

Generally, I don't get involved in the planning process, but given the size and scope of this project, and its location, I felt it important to add my voice to this discussion.

I am truly passionate about green design and green amenities. Especially in Los Angeles County, if we wish to thrive in the future, we have to put our money where our mouth is and invest in the future now. That is why it was a relief to learn from the DEIR that Westfield is taking its commitment to green seriously.

In particular, I was pleased to see that when it comes to parking, 15% of all parking spaces will support EV charging and at least 40% of all parking spaces will be capable of supporting electronic vehicles in the future. In my mind, this isn't just green design for today, but by imagining a future less reliant of fossil fuels for transportation, it's green design for tomorrow, and the direction we **must** go.

Likewise, the project will limit the installation of natural gas fireplaces to no more than 150 throughout the entire project, again limiting fuel consumption.

It is our responsibility now to plan for the future. That doesn't mean we should limit growth, it means we grow more responsibly. Promenade 2035 is just such a project. I hope that ultimately this project moves forward, and it will do so with my sincere support.

**Response to Comment No. 82-2**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 83**

Donald Evans  
22345 Baltar St.  
Canoga Park, CA 91304-3842

**Comment No. 83-1**

As a citizen of Canoga Park for almost 40 years I have observed the ever growing traffic congestion. Despite the fact that the Orange bus system is one half mile from the Promenade Angelenos are tied to their cars.

It is imperative that the city take every possible action to ensure the free flow of traffic.

**Response to Comment No. 83-1**

As discussed in Topical Response No. 3, Traffic and Parking, impacts at all study intersections were determined to be less than significant with implementation of the project design features and the Warner Center Mitigation Program. Included in the Project Design Features is Project Design Feature K-7, which requires the implementation of a Transportation Demand Management Program to promote non-automobile travel and reduce the use of single-occupant vehicles. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking for further details regarding the Warner Center Plan Implementation Board.

**Comment No. 83-2**

The second issue is the lack of affordable housing in the Warner Center area. That lack of housing will result in lower income workers using their cars on the local freeways. The only people using the Orange bus system will be those living near that line.

**Response to Comment No. 83-2**

The mix of residential and commercial uses under the Project will help to create a jobs housing balance that will reduce overall vehicle trips in the Project vicinity. This comment discusses affordable housing as a policy issue and does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 83-3**

Thank you for the response [sic]

My address is 22345 Baltar Street, Canoga Park CA 91304-3842

**Response to Comment No. 83-3**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 84**

Margarita Fedorova  
ritafed@gmail.com

**Comment No. 84-1**

I am a West Hills resident who is very concerned with this project. We have enough infrastructure. Topanga Mall and Fallbrook malls are good enough for us! This expansion will create more traffic with already overcrowded 101 freeway and increase our commute. We don't need a stadium, we need to expand 101 freeway and develop suitable public transportation. We need to take care of an increasing crime rate(houses [sic] being burglarized left and right in Woodland Hills and West Hills areas) and take care of out of control homelessness. NO to Westfield Promenade 2035!

**Response to Comment No. 84-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Topical Response No. 3, Traffic and Parking, above, regarding traffic and to Topical Response No. 5, Public Services, regarding police protection.

**Comment Letter No. 85**

Angela Ferdig  
photos@angelaferdig.com

**Comment No. 85-1**

I am writing to comment on the Westfield Promenade Draft Environmental Impact Report and express my support for the project.

The draft EIR did a nice job of providing an extensive analysis of the project. Living only a few miles from the property, my biggest worries are traffic, congestion and parking. I'm relieved the draft EIR thoroughly analyzed these areas and the project identified mitigation measures to minimize any impacts.

In addition, I'm pleased that Westfield is making public open space a focal point with its Promenade Square. So many developers today are focused on using every inch of land to maximize profits. Westfield is to be commended for offering this large space for people to relax, picnic, play sports, etc. Like the Village, I have no doubt this green, open space will be a popular gathering area.

The draft EIR made a strong case for why Promenade should move forward. I am excited to see the proposed plans executed.

**Response to Comment No. 85-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 86**

Howard M. Fields  
21900 Marylee St., Unit 287  
Woodland Hills, CA 91367-4826

**Comment No. 86-1**

Please see attached correspondence of this date

I am one of the many residents to be affected by proposed Promenade 2035 project living within 2000 feet just south of Warner Park in the townhome community of Warner Village. I have lived in the area since 1983 and have seen the growth and development over the years. I've seen the Promenade Mall prosper and then deteriorate into the sad state of decline it is in today. I have taken the time to peruse the SEIR, and while I find most of the proposed development exciting, the negative effects of the proposed 15,000 seat Entertainment and Sports Complex (ESC) cannot be overstated. The plan should not be approved with any such ESC.

The proposed ESC is to have 15,000 seats. The Hollywood Bowl seats 17,500. The traffic and parking situation in, to and from the Hollywood Bowl for hours before and after a performance is a major headache for patrons and community residents. The Forum in Inglewood has 17,505 seats. The parking lot at the Forum is 21 acres in size. The entire Promenade project on 34 acres proposes 5,610 parking dedicated parking spaces. The Traffic study states that 2,023 weekday off-site spaces and 2,380 weekend off site spaces are needed and the developer will have to provide evidence of agreements to secure the location and quantity of such parking prior to a certificate of occupancy. Seriously? Where are the spaces? Nearby office buildings?

**Response to Comment No. 86-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the traffic and parking impacts of the Entertainment and Sports Center. As a note, the differences between the Hollywood Bowl and the proposed Entertainment and Sports Center are their locations relative to surrounding streets. The Hollywood Bowl is located in a predominately residential area surrounded by residential streets, whereas the Entertainment and Sports Center is bound by several commercial uses and a commercial boulevard (i.e., Topanga Canyon Boulevard) within the Downtown District of the Warner Center Plan. As required under Project Design Feature K-6, an Event Management Plan would be implemented that would include on-site measures specifically requiring circulation on the Project Site to be efficient, such as providing access along all four street frontages of the Project Site; the addition of a northbound lane on the

Topanga Canyon Boulevard across the site frontage (resulting in a total of four northbound lanes); a dedicated entry speed ramp into the subterranean Entertainment and Sports Center parking garage on Topanga Canyon Boulevard between Oxnard Street and Promenade Boulevard; multiple above-ground and subterranean parking facilities across the Project Site that will be managed by a single parking operator; subterranean parking that is designed to be connected and operated as a single facility; and centrally located pick-up/drop-off and bus zones, among others. These features will be used to support the approximately 5,610 parking spaces on-site as part of the Project. Furthermore, rather than building more parking on the Project Site to accommodate the entire Entertainment and Sports Center, the Project would capitalize on the Project Site's location in proximity to existing nearby office parking spaces that will be available during event times to supplement the on-site parking supply. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 86-2**

I read on page 3 of the City of Los Angeles Inter-Departmental Correspondence to Luciralia Ibarra, the Senior City Planner, *"According to the analysis, the proposed project would not result in significant traffic impacts on any of the evaluated freeway mainline segments."* The author cannot possibly be serious. With respect to traffic, currently at various times of the day and night it can take 8 minutes simply to exit the DeSoto, Canoga and Topanga Canyon/101 westbound exits with cars backed up on the freeway. It can take 10 minutes just to get through the intersection at Ventura and Topanga Canyon in the late afternoons, evenings and weekends.

### **Response to Comment No. 86-2**

A supplemental analysis prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR. Although the "City of Los Angeles Inter-Departmental Correspondence" referenced in the comment indicates that "the proposed project would not result in significant impacts on any evaluated freeway mainline segment", Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR states that Caltrans does not have or identify specific incremental criteria to measure the significance of Project effects on freeway mainline segments.

To identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note

that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an ESC event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

### **Comment No. 86-3**

In the words of Bob Dylan, "You don't need a weatherman to know which way the wind blows." I don't need to study all of the statistics in the SEIR to know that when you add 1,432 multi-family residential units (including 64,000 square feet of work-live space), 244,000 square feet of restaurant/retail space, 629,000 square feet of office space including a 28 story office tower, two hotels one with 300-rooms and another with 272-rooms, and a 320,050 square-feet [sic] 15,000 seat entertainment and sports center to a community that is already clogged with traffic that Warner Center and the surrounding areas will be one gridlocked horrible place to live or work.

Please DO NOT APPROVE of any Entertainment Sports Complex as part of the proposed development.

**Response to Comment No. 86-3**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 87**

Shawn Finnegan  
5202 Mecca Ave.  
Tarzana, CA 91356

**Comment No. 87-1**

Please see attached letter.

One of my favorite features of the Warner Center Plan was how specifically it analyzed different areas within the Warner Center. As I recall, it analyzed the Promenade area as a live/work style downtown.

I am pleased to see in the Promenade 2035 DEIR that Westfield is embracing that distinction, but I am also so grateful that the Promenade project is one million square feet less dense than analyzed and approved in WC2035.

It seems to me, we're getting everything we want in the Promenade Project, new ways to live and work and be entertained and all with less density. Couple that with the sincere outreach they've done, and the fact that everything they have said has been born [sic] out in the DEIR and this continues to look like a better and better project.

**Response to Comment No. 87-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 88**

Frances Fitzpatrick  
7936 Valley Flores Dr.  
West Hills, CA 91304-6118

**Comment No. 88-1**

As a home owner in West Hills, I used to go the promenade [sic] and Topanga all the time, but now it is so congested over there it is an area to stay away from.

All the proposed building in the Warner Center area and all the west end of the SFV is over whelming! [sic] There are hundreds of huge projects coming up and non [sic] of them provide for water, energy ,fire,police, [sic] new streets parking [sic] And most of all housing for people that already live here or are just starting out. All these housing projects are way too expensive to be considered affordable! If you think young couples are going to take rapid transit to go grocery shopping or the [sic] will all want to share their parks with the ever present transients and drug addicts that live in Warner Park and the surrounding area you are wrong. Why do you want to suck the life out of what is left of any quality of life in the valley. Every spot you politicians and developers can find you want to stick some high rise in [sic] What is wrong with you, did you forget we have earthquakes? Did you forget we have no water? Did you forget we don't have enough power? Is the new developer you pick for all of these going to pay for all this and import water and power, build new roads?

No, you want all of us to do it, well you are driving all the young people away,and [sic] all us older folks are dying off so who will pay for all this in the future, [sic] Oh, that's right you don't care about the future.

I guess you can tell, I am not in favor of any expansion that is anywhere near that, do something one story or two story and really green. We have so many empty buildings now, fix them up , [sic] reuse the spaces. Stop this! We do not need this. We just need to re asses [sic] the resources and our specific needs. Think out of the box.! [sic]

**Response to Comment No. 88-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Topical Response No. 3, Traffic and Parking, above, regarding traffic and to Topical Response No. 5, Public Services, regarding police and fire services. Also refer to Topical Response No. 6, Infrastructure, regarding impacts to infrastructure. In addition, refer to Topical Response

No. 7, Open Space, for a discussion regarding the proposed open space areas on the Project Site.

**Comment No. 88-2**

My address. Mrs.Frances [sic] Fitzpatrick. 7936 Valley Flores Drive. West Hills, California 91304.

**Response to Comment No. 88-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 89**

Armando Flores  
armando.i.flores7@gmail.com

**Comment No. 89-1**

I am writing in support of the Westfield Promenade project (ENV-2016-3909-EIR). Westfield's investment in the Warner Center throughout the years has created a hub for Valley residents to enjoy.

As a lifelong resident of the Valley, I can confidently say that Westfield Topanga and The Village have revitalized the area and the concept for Promenade 2035 will only create greater benefits for the Valley.

Westfield has become a part of our community. They are good neighbors and have ensured to create a plan that is consistent with the Warner Center 2035 plan while considering the concerns from members of the community. I strongly urge you to support this plan, which will bring numerous benefits for future generations to relish.

**Response to Comment No. 89-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 90**

Austin Fowler  
19010 Archwood St., Unit 5  
Reseda, CA 91335-5118

**Comment No. 90-1**

I'm pleased that Westfield has been making significant investments at the Village, Topanga Mall, and now with its Promenade project. All of these activities have increased Woodland Hills' reputation as a desirable place to live, work and play.

I hope you will allow Westfield to revamp the Promenade property—it will provide a tremendous boost to the neighborhood consistent with the vision for the Warner Center area.

Thank you for your time.

**Response to Comment No. 90-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 91**

Phillip Fox  
P.O. Box 802  
Woodland Hills, CA 91365-0802

**Comment No. 91-1**

Thanks for the opportunity to comment on the Westfield Promenade project. I like Westfield's plans to create a mini downtown district. Mixed-use developments with housing, offices, stores, restaurants, etc., are becoming more and more popular now and it's exciting to see this type of project coming to the Warner Center.

Longtime residents may be fearful that the neighborhood is changing, but in my mind, the change is positive. A sports and entertainment center, open space, more restaurants—all these will mean we won't have to drive far distances to enjoy our leisure activities. As a property owner south of the boulevard in Woodland Hills I support our local Warner Center and the exciting changes coming. I also purchased a condo in the KB Home Ascent project on Erwin so I can retire there soon and are able to walk and enjoy our slice of "Urban Area" in the West Valley.

Yes, the neighborhood is changing—all for the better!

**Response to Comment No. 91-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 92**

Devorh Frischer  
5302 Comercio Ln., Apt. 1  
Woodland Hills, CA 91364-2049

**Comment No. 92-1**

I wanted to let you know that I strongly support construction of Westfield Promenade.

The proposed project will break up and enliven several blocks with new businesses, residences, and new entertainment options.

I particularly like all the landscaping and public open space that the project will bring. The Draft Environmental Impact Report points out that more than five acres of open space will be accessible to the public through Promenade Square and small “pocket parks.” I think the community will really enjoy this important public benefit.

Overall, this is a terrific project for the community and one that is deserving of support.

**Response to Comment No. 92-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 93**

Barry Garfield  
7731 Atron Ave.  
West Hills, CA 91304-5370

**Comment No. 93-1**

I attended a meeting with Westfield representatives last summer and was impressed with their plans to replace the old Promenade mall with residential units, public open space, shops, offices and an entertainment and sports center.

I was very excited by what I saw and could tell that Westfield put a lot of thought into creating a space where people would want to live, work and spend their leisure time.

Now that the Draft Environmental Impact Report has been released and found minimal impacts, it's time to move forward and get this project approved. I hope you will give it your support.

**Response to Comment No. 93-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 94**

Kimaree and Yehuda Gilad  
23300 Erwin St.  
Woodland Hills, CA 91367-1412

**Comment No. 94-1**

This is a letter in regards to the environmental impact of the proposed new construction at the Westfield mall location at Topanga and Oxnard street in Woodland Hills.

**Response to Comment No. 94-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 94-2**

My husband and I are very much against such a large and dense project, as the traffic congestion and pollution will increase, noise from the proposed 15,000 seat stadium will disturb the neighborhood, greatly.

**Response to Comment No. 94-2**

Refer to Topical Response No. 3, Traffic and Parking, above, regarding the traffic impacts of the Project. Also refer to Topical Response No. 2, Entertainment and Sports Center, for further details on the environmental impacts of the Entertainment and Sports Center, including potential noise impacts.

**Comment No. 94-3**

What is being proposed will destroy our wonderful neighborhood and create a downtown which is what most of us are trying to avoid. We chose to live in this community for the quiet, rural feeling.

The environmental impact on our quality of life will become unbearable.

Please do NOT allow this project to be approved.

**Response to Comment No. 94-3**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 95**

Cheryl Ginolfi  
23101 Victory Blvd.  
West Hills, CA 91307-3516

**Comment No. 95-1**

I am attaching a letter regarding my support for the Promenade Project. Please feel free to reach out to me should you have any questions.

Dear Ms. Nuno-O'Donnell, I read with great interest Westfield Promenade's long-awaited draft environmental impact report and after reviewing it, I have more confidence that the project will be a great asset to the Valley.

As noted in the report, the project has few significant impacts even though it will transform and bring new excitement to the area. I like everything about the mixed-use project—from the shops and restaurants, residential units, offices and public open space to a new sports and entertainment center.

As someone who enjoys sports and live performances, I'm thrilled that Warner Center's downtown district will offer more entertainment options, like concerts. This is long overdue; a new venue will mean we can finally have world-class entertainment without having to drive great distances.

The Promenade project will be a great game-changer for our area.

Thank you for the opportunity to comment.

**Response to Comment No. 95-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 96**

Gary Gluck  
22307 Mobile St.  
Woodland Hills, CA 91303-2427

**Comment No. 96-1**

I wanted to share with you my comments regarding the subject report.

I live at 22307 Mobile St which puts me close to the proposed project.

I am thoroughly satisfied with the project as designed and I believe that the benefits from the construction will far outweigh any perceived negative impacts that would result.

**Response to Comment No. 96-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 97**

Anita Gogoshian  
7247 Ponce Ave.  
West Hills, CA 91307-1602

**Comment No. 97-1**

I am writing to comment on Westfield Promenade's draft Environmental Impact Report and express my support for the project. The DEIR did a nice job of providing an overview of the project and I'm pleased that it revealed no major impacts.

In fact, I was pleasantly surprised that the size of the Promenade project was smaller than what's allowed in the Warner Center Plan and that the proposed entertainment center not only complies with the plan, but shows no increase in noise beyond ambient urban levels.

After reviewing the DEIR, I'm even more convinced that the Promenade project will be good for the community, bringing much needed housing and more entertainment and leisure options to the San Fernando Valley.

Thank you for your hard work on the report.

**Response to Comment No. 97-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 98**

Luis R. Gomez  
5520 Owensmouth Ave., Apt. 318  
Woodland Hills, CA 91367-7021

**Comment No. 98-1**

I live in the Met Warner Condominiums, which is very close to the Westfield Promenade project. I had initial concerns about how this development would affect the quality of my neighborhood, but the more I heard about it, the more comfortable I became with Westfield's plans.

The old Promenade mall is in desperate need of an overhaul, and Westfield's proposal for a mixed-use development is a great idea. I'm looking forward to a new place to walk around, relax and enjoy some free time. The entertainment and sports center will also be a welcome addition to the neighborhood.

It's reassuring to know that the draft EIR studied the project thoroughly and found only minimal impacts with the project. Westfield has done a great job with the Village, so I have a lot of confidence that the Promenade will be done just as well.

**Response to Comment No. 98-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 99**

Edwin J. Gooze  
6250 Canoga Ave., Apt. 410  
Woodland Hills, CA 91367-2498

**Comment No. 99-1**

FYI —see attached

Hello, my name is Edwin Gooze, and I am a resident in the Valley. Over the past years, it has felt like there has been a real renaissance in our community. In particular, I noticed the new energy with the opening of Westfield Topanga and the Village. For once, it felt like my community wasn't just a stop through, or a place you worked and then left. No, it felt like a destination, like Century City.

I admire that as a community we devised a plan, (Warner Center 2035) to continue that trend.

After reviewing the Promenade 2035 DEIR, I've no doubt that this is exactly the type of project we hoped would come to fruition. It is not only consistent with WC2035 but it embraces its tenets. I personally am most looking forward to the future potential of walking to work, walking to the grocery store, and then walking home at the end of the day.

Let's enliven our community, and let's do it with projects like Westfield's Promenade 2035.

**Response to Comment No. 99-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 100**

Ellen Gordon  
5346 Hinton Ave.  
Woodland Hills, CA 91367-6026

**Comment No. 100-1**

I want to voice my concern over the “Proposed” Warner Center 20135 [sic] Projects. I am a long time resident and homeowner of Woodland Hills and I am very much opposed to the scale of these projects.

**Response to Comment No. 100-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 100-2**

An Indoor/Outdoor Arena seating 15,000 people, the [sic] proposed number of residential units, the proposed number of new shops will bring an unimaginable amount of traffic and gridlock gridlock [sic] to this area!

It is already a traffic nightmare getting off the 101 Freeway exits at Canoga or Topanga Canyon! Traffic barely moves currently driving up Topanga Canyon.

**Response to Comment No. 100-2**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion of the traffic impacts associated with the Entertainment and Sports Center and Topical Response No. 3, Traffic and Parking, for a discussion of the Project's impacts to traffic.

**Comment No. 100-3**

The plans must be scaled down! I feel like I live in “Westfield Hills” already instead of our beautiful Woodland Hills....

I hope someone will reconsider the negative effects Westfields [sic] plan will bring to this part of the valley.

**Response to Comment No. 100-3**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 100-4**

Thank you  
My address is  
5346 Hinton Avenue  
Woodland Hills Ca 91367

**Response to Comment No. 100-4**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 101**

James Grant  
jamiergrant@gmail.com

**Comment No. 101-1**

Draft Supplemental Environmental Impact Report for the Promenade 2035 Project is deficient in many ways but for me the most concerning omission is the cumulative effects of all the mega projects that are planned for the Warner Center. Evaluating each project in isolation as though they have no effect on each other or cumulatively is at the least dishonest but most probably fraudulent.

**Response to Comment No. 101-1**

The analysis of cumulative impacts throughout the Draft Supplemental EIR fully complies with Guidelines Section 15065 as well as CEQA Guidelines 15130. Refer to Section III, Environmental Setting, of the Draft Supplemental EIR, for the comprehensive list of related projects that was used to evaluate the potential cumulative impacts of the Project. As discussed in Topical Response No. 3, Traffic and Parking, full buildout of the entire Warner Center Plan is assumed in the Project's traffic analysis.

**Comment Letter No. 102**

Shirley Greene  
4569 Natoma Ave.  
Woodland Hills, CA 91364

**Comment No. 102-1**

As a resident of the West Valley, I am writing to comment on the Promenade 2035 project, which I have been carefully following since it was announced. Firstly, I want to say that is [sic] very important to note that the project complies with our community plan, and is respectful of how hard we have all worked to create it. Secondly, the Draft Environmental Report (DEIR) makes very clear that the project not only complies, but will have minimal impacts, while delivering the kind of project envisioned by the Warner Center 2035 Plan.

All of the different uses in the Promenade project will create a fully integrated neighbourhood, with all of the elements needed for a walkable, sustainable and interesting place to live and visit. I'm impressed with the inclusion of an entertainment and sports venue, a use already contemplated in the Warner Center plan, and one that will be very welcome here. What a relief it will be to have live shows and games come to us, rather than the other way round.

Finally, please remember that this is a Westfield project. Westfield is a proven community partner and creator of projects that the community has embraced. I remember all the objections to The Village on Topanga, and now it is an absolute hub of community life, with visitors coming from far and wide. We can depend on their ability to deliver what is promised, just as they have with their previous projects. I hope that the DEIR results and Westfield's successful track record, not only in California, but worldwide, will convince you to approve this project and let it get started quickly.

**Response to Comment No. 102-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 103**

Tiffany Gwyther  
22414 Miranda St.  
Woodland Hills, CA 91367-4453

**Comment No. 103-1**

I hope you will consider my brief comments re Westfield's Promenade project.

I've been a Woodland Hills resident for many years. During that time, I've seen changes in the Warner Center. The Promenade Mall was once an exciting place to be, but it has since fallen into hard times and is largely an empty building.

I'd love to see the property become a "mini" downtown with restaurants, shops, entertainment and public parks. Why would anyone not want to see this site redeveloped and transformed into something useful for the community?

I strongly support the Promenade project and urge you to approve it.

**Response to Comment No. 103-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 104**

Younna Haddad  
6041 Fountain Park Ln., Apt. 5  
Woodland Hills, CA 91367-3526

**Comment No. 104-1**

I hope you will give strong consideration to Westfield's proposed Promenade 2035 project. As someone who lives very close to the property, I can tell you that I'm looking forward to having more shopping, dining and entertainment options nearby.

The Village was well done and has provided a tremendous boost to the area. I'm confident Westfield will do a superb job with the Promenade and offer yet another great place to enjoy leisure activities.

**Response to Comment No. 104-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 105**

Michel and Gunilla Hamaoui  
4731 Abbeyville Ave.  
Woodland Hills, CA 91364-3702

**Comment No. 105-1**

We're not sure why it's taking so long to get the Westfield Promenade project through the review and approval process.

It's a great project that has been well-studied.

The Draft Environmental Impact Report also did a thorough analysis and provided strong evidence for allowing it to move forward.

Concerns about density, traffic, growth issues, etc. are overstated, in our opinion.

We know the city and Westfield will have measures in place to avoid any impacts in the neighborhood.

Westfield has done a superb job at The Village (and Century City Mall) and we're looking forward to continue spending time at the Promenade and enjoy Woodland Hills as we have been for the past 43 years.

**Response to Comment No. 105-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 106**

Bonnie Harris  
sundaysmom@gmail.com

**Comment No. 106-1**

Regarding proposed development of Promenade, my [sic] feelings are totally AGAINST any further ruining our area. It is obvious that this already is a problem area. Compared to what we all bought and worked so very hard to be able to enjoy a life of serenity and safety..... we obviously did not want the traffic, crime, and therefore we moved to be in [sic] this part, of the valley to have our life. Anyone [sic] who believes it will NOT be detrimental to every aspect of a semblance of civilized life is looking [sic] toward dollar signs only.

Traffic is a joke, an impossibility to navigate... dangerous, frustrating [sic] et al. [sic]

I know of NO ONE who approves this ridiculous, greed motivated, decision, because [sic] It [sic] is poorly thought out and in no way takes into consideration the impact on our lives.

I am one of many residents who bought homes here to have a lovely retirement. In [sic] the 40 years of my residency, I [sic] have seen the tragic and disastrous decline of a once safe and [sic] beautiful area in which I am AFRAID to go, [sic] out at night. I [sic] worked hard all my life to afford a serene neighborhood, but [sic] In [sic] The [sic] past few years on my street alone we have had to endure two drug labs, a porn house and what appears to be a few air b and bs [sic]

As there are constantly cars in and out and no one knows WHO is living there This [sic] all SOUTH of the [sic] boulevard area, once [sic] much desired.

We, who [sic] were hard working, decent law abiding citizens are being run out of our homes Now, and [sic] by WHAT?

congestion [sic], crime, [sic] and way too many cars and people with no principles. When we are all gone Woodland Hills will be just one slum and a great big disaster. Like [sic] the widening of the 405, which I drove daily for 40 years until the bad planning made [sic] it a joke. Thank God it was almost time to retire for me.

EXACTLY HOW will the residents benefit from more apartments, condos, [sic] and hotels? IF IT IS SUCH A GREAT PLAN AND.....

will [sic] make my life better,let [sic] me know so I can convince our police department,fire [sic] department(who [sic] by, then way are so stressed from all the crime, homelessness,and [sic] Traffic [sic] accidents) and all my friends and neighbors,who [sic] by the way are fed up or gone, and Those [sic] who are still hoping for a return to safety and sanity are waiting ,but [sic] without much hope.

Why not redeveloped [sic] VAN NUYS???? Now that is a once nice place that has been Ruined [sic] my [sic] many of the already mentioned issues. PLEASE!leave [sic] us alone...it is obvious to thinking minds what the outcome will be, And [sic] then it will be too late!

Thanks for the forum.

### **Response to Comment No. 106-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. In addition, refer to Topical Response No. 1, Warner Center 2035 Specific Plan, for a discussion on the Project's consistency with the Warner Center Plan. Also refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic implications of the Project and to Topical Response No. 5, Public Services, for a discussion regarding the Project's potential impacts to public services, including police and fire protection.

**Comment Letter No. 107**

Rena Harris  
5121 Penfield Ave.  
Woodland Hills, CA 91364-3533

**Comment No. 107-1**

Please see attached letter stating that I'm a huge proponent of your new Westfield Promenade 2035 project. I'm looking forward to this future development.

Thank you for this opportunity to submit my comments on the Promenade project. I live very close by and frequent The Village and The Topanga Mall on a daily basis so it's important to me that new projects respect the needs of the community. It's also great to hear the potential employment opportunities you will be offering to our fellow residents. I've lived in Woodland Hills for the past 15 years so it is nice to see Westfield making our community thrive.

The Promenade project has demonstrated sensitivity in several ways: there's publicly accessible open space—not just at the main park but smaller parks next to residential buildings; it is lower in height and density than what's permitted in the Warner Center 2035 Plan; and there are plans to employ sustainable practices, such as capturing and reusing rainwater for irrigation and landscaping.

I've seen Westfield representatives make presentations in the community and it's clear they are listening to neighbors' concerns about the project's potential noise, traffic, parking, etc. It's gratifying that the Draft Environmental Impact Report addresses these issues and have found few significant impacts with this project. A couple of years ago, I had the pleasure to attend the ground breaking event for The Village and listen [sic] the full support of our local assembly personnel and neighbors so I'm looking forward to seeing The Promenade 2035 evolve from a piece of land to a beautiful and functional entity.

Thanks for your efforts in putting together the report—now it's time to approve the project, it's been long overdue. Please don't hesitate to reach out to me if you have any questions or comments.

**Response to Comment No. 107-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 108**

Kurt Harrison  
5028 Clavel Ct.  
Woodland Hills, CA 91364-3016

**Comment No. 108-1**

I am writing to express my strong disapproval of the proposed Promenade Mall redevelopment project planned for the Warner Center area of Woodland Hills. My wife and I have been residents of the area for nearly 18 years. In that time, we have seen traffic problems increase, along with increasing incidents of crime, congestion, and other problems associated with over development, overcrowding, and lack of proper planning. The new proposal to build a large entertainment venue in the location now occupied by the Westfield Promenade Mall will undoubtedly exacerbate all of these problems. The primary impact of the development on local residents will be a decrease in the quality of living. While I understand Westfield's desire to maximize their profits to exclusion of all other considerations, I expect my elected and appointed officials to be taking steps to increase the quality of life and safety of their constituents, not to cow tow [sic] to wealthy developers whose interests lie exclusively in their own pocketbooks.

If this project is approved, I and others in my neighborhood with whom I have spoken about this will certainly be looking to hold responsible those, who, either by their actions or inaction, allowed this abomination of a project to go forward.

**Response to Comment No. 108-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Also refer to Topical Response No. 2, Entertainment and Sports Center, above, regarding the environmental implications of the Entertainment and Sports Center.

**Comment No. 108-2**

Thank you, Elva.

My mailing address is: 5028 Clavel Court, Woodland Hills, CA 91364

**Response to Comment No. 108-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 109**

Alyse Hart  
20516 Aetna St.  
Woodland Hills, CA 91367-5411

**Comment No. 109-1**

With all the growth in Warner Center and the additional cars and apartments. [sic] I am concerned about additional heat and the increased demands for water and power.

**Response to Comment No. 109-1**

With regard to additional heat, the Project includes a number of design features that are consistent with the strategies identified by the United States Environmental Protection Agency (EPA) to address heat island effects, such as: including trees and landscaping within development areas and implementing building standards that incorporate heat island reduction strategies. As discussed in Section IV.I.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, the Project would provide a variety of open space and recreational amenities, including 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres. The EPA has also identified the enactment of green building ordinances by local jurisdictions as a means of addressing heat island effects. The Project would be consistent with the City of Los Angeles Green Building Code, as further discussed in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR. Based on these and other measures incorporated into the EIR, there is no evidence to suggest that the Project will result in an increase in temperature or a hot zone.

Refer to Topical Response No. 6, Infrastructure, above, for a discussion regarding how LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand, as well as meet the water demands for the Project.

**Comment No. 109-2**

I suggest all parking structures must have coverage and produce solar power to prevent brown outs , [sic] power loss and more.

**Response to Comment No. 109-2**

As discussed in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR, the Project includes the provision of a minimum of 500 kilowatts of



photovoltaic panels on the Project Site, except where rooftop amenities preclude installation of photovoltaic panels, as required by Project Design Feature D-6.

**Comment No. 109-3**

What is DWP going to do to accommodate the overload ? [sic]

**Response to Comment No. 109-3**

As discussed in Topical Response No. 6, Infrastructure, above, LADWP can meet both the Project's estimated water demand as well as adequately support the Project's electricity demand.

**Comment Letter No. 110**

Felice Hartenstein  
felice.hartenstein@gmail.com

**Comment No. 110-1**

I am a shareholder at Fountain Park Co-Operative and am writing you in regards to the Westfield's Promenade 2035 Development. I'm very concerned about this particular development and the impact it will have in our community.

**Response to Comment No. 110-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 110-2**

This development promises to increase our population by the thousands. This will have a direct impact in the increase in noise, crime, traffic, and pollution. The increase of vehicles this development promises to attract will have a direct effect on our air quality.

**Response to Comment No. 110-2**

As discussed in the Draft Supplemental EIR and reiterated in Topical Response No. 1, Warner Center 2035 Specific Plan, above, the Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The Project is consistent with the Downtown District designation of the Warner Center Plan. In addition, with respect to the Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. The Project's potential impacts to noise, crime, traffic, and air quality were adequately analyzed and addressed in the Draft Supplemental EIR. With regard to noise, as discussed in Section IV.H, Noise, of the Draft Supplemental EIR, an evaluation of potential composite noise level increases (i.e., noise levels from all on-site Project noise sources combined) at the closest sensitive receptor locations was performed. As demonstrated therein, composite noise level impacts due to on-site Project operations would be less than

significant. Refer to Topical Response No. 2, Entertainment and Sports Center, for additional information regarding noise related to the Entertainment and Sports Center.

With regard to crime, as discussed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR and in Topical Response No. 5, Public Services, above, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site and potential impacts associated with police protection would be less than significant. In addition, as detailed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, the Project would implement several project design features that would provide private, on-site security for the Entertainment and Sports Center and overall Project Site to reduce reliance on public police protection services. These include Project Design Features J.1-1 through J.1-9 of the Draft Supplemental EIR.

With regard to traffic, refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding potential traffic impacts associated with the Project.

With regard to air quality, as discussed in Section IV.B, Air Quality, of the Draft Supplemental EIR, regional operational emissions associated with the Project would exceed the SCAQMD daily emission threshold for regional VOC and NO<sub>x</sub> and would be considered typical of any project similar in scale to the Project. The Project incorporates project design features that would help to decrease these regional emissions. Specifically, the Project represents an infill development within an existing urbanized area that would concentrate new residential, retail/restaurant, office, hotel and entertainment uses within an high quality transit area (HQTa) and serve to reduce vehicle miles travelled (VMT). The Project Site is adjacent to the Warner Center Transit Hub, which is directly serviced by five Metro local lines, one Metro Rapid line, one Antelope Valley Transit Authority line, one Santa Clarita Transit Line, and a new Warner Center circulator connecting to the Metro Orange Line, which will maintain comparable service frequency to the Metro Orange Line previously provided at the Project Site. "Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and the sustainability intent of the LEED program to meet the standards of LEED Silver or equivalent green building standards through the use of energy conservation, water conservation, and waste reduction features. As discussed on page IV.B-69 of the Draft Supplemental EIR, incorporation of project design features would decrease VOC emissions by 15 percent, NO<sub>x</sub> emissions by 49 percent, CO emissions by 53 percent, PM<sub>10</sub> emissions by 85 percent, PM<sub>2.5</sub> emissions by 84 percent, and similar amounts of SO<sub>x</sub> (<1 pound per day) would be emitted with incorporation of project design features. The Project would result in less than significant impacts related to localized operational emissions. The Project would also not result in any substantial toxic air contaminants (TAC) emissions sources. Specifically, the Project would not result in the exposure of sensitive receptors to carcinogenic or TACs that

exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.

**Comment No. 110-3**

Trying to transform our quiet community to a “lively downtown district,” as describe in The Warner Center 2035 Plan is only in the interest of those who stand to gain profit in doing so. I’m sure these developers wouldn’t want a stadium across the street from their homes.

**Response to Comment No. 110-3**

As discussed in Topical Response No. 1, Warner Center 2035 Specific Plan, above, the Warner Center Plan was approved in 2013 by the City with input from the community, and this regulatory document designates the Project Site as within the Downtown District. The Project is proposed to implement the Warner Center Plan and be consistent with its vision, which is to create a vital mixed-use, transit-oriented district for the Warner Center Plan area and surrounding communities. Refer to Topical Response No. 2, Entertainment and Sports Center, for a discussion regarding the Entertainment and Sports Center’s consistency with the Warner Center Plan.

**Comment No. 110-4**

I urge The [sic] Draft Environmental Impact Report to reconsider the impact having a stadium and dense population will have on our community.

**Response to Comment No. 110-4**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental impacts of the Entertainment and Sports Center. Also, as discussed in Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, the population associated with the Project would be consistent with population forecast for the Warner Center Plan and the SCAG subregion. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 111**

Alma Haykian  
20569 Haynes St.  
Canoga Park, CA 91306-4103

**Comment No. 111-1**

Let's face it—the Promenade Mall is an eyesore. It's time to bring the property back to life. Westfield's mixed-use proposal is a great idea and will create a new "center" in the Warner Center. I love the live/work/play concept and can't wait for the project to come to fruition!

**Response to Comment No. 111-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 112**

Gavin Heller  
22140 Victory Blvd.  
Woodland Hills, CA 91367-1947

**Comment No. 112-1**

As a concerned citizen, there is a lot to say about the Promenade 2035 Project.

**The Good**

This Project would be beneficial for the surrounding community in a variety of ways. First, it would bring a heavily underutilized space that has been falling to the waste [sic] side. It would allow for new commercial uses and being [sic] new employees and residents to the community. The sustainable features associated with the project would also bring a new standard to the area that other commercial uses should bring to future projects.

**Response to Comment No. 112-1**

These comments are noted for the record and have been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 112-2****The Bad**

Traffic. With the Village, Topanga Mall, and all the dozen [sic] of apartment buildings already in the area along with the 101 within a few miles, traffic impacts would be significant and unavoidable. This is stated in the EIR and no mitigation would help to lessen the impacts. Without much accessible transit available and the amount of parking, it would only serve to crowd the streets.

**Response to Comment No. 112-2**

Contrary to the comment above, as identified in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the impact associated with the addition of full Project traffic to each analyzed study intersection is anticipated to be less than significant with the full implementation of the Warner Center Mitigation Program and Project specific project design features. Also refer to Topical Response No. 3, Traffic and Parking, above. In addition, refer to Section IV.K, Traffic, Access, and Parking, with regard to the availability of transit within the Project vicinity and the parking analysis that demonstrates that

adequate parking will be provided on-site for the proposed uses on a typical day without an event and supplemented with off-site parking on days with an event.

### **Comment No. 112-3**

Housing and Population. There is no need for the area to have residential units, let alone units that do not offer any affordable housing for low to moderate household incomes. There is already surrounding communities that offer residential units to the community or for those that want to move into the area and of those a few have rent control policies associated with them. To include more residential units, would not serve the community, but rather inhibit growth and only create more problems (economically, circulation).

### **Response to Comment No. 112-3**

As discussed in Section IV.G, Land Use, of the Draft Supplemental EIR, the Housing Chapter of the City's General Plan Framework Element includes objectives to plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types. In addition, the Warner Center Plan envisioned the Project Site to include residential uses and the Warner Center Plan was approved with the objective of providing more housing. The Project would support the City's objective through the development of 1,432 multi-family residential units, consisting of studio, one-, two-, and three-bedroom units which will have a variety of price points. However, no below-market rate (affordable housing) residential units are proposed. The Project would further the Warner Center Plan's purpose to create a vital mixed-use, transit-oriented district for the Warner Center Plan area and surrounding communities by integrating new residential uses and related amenities with a variety of shopping, dining, and entertainment opportunities within an area well-served by public transit. Furthermore, as discussed above in Topical Response No. 1, Warner Center 2035 Specific Plan, the Project's mix of uses is also consistent with the Warner Center Plan's requirement that projects within the Downtown District include a balance of non-residential to residential uses. Specifically, for an FAR of 2.3:1, the Plan limits residential uses to a maximum 48 percent of the allowable FAR and requires at least 52 percent of the required FAR to be non-residential uses. In compliance with this requirement, the Project proposes approximately 48 percent residential development and approximately 52 percent non-residential development at buildout. This comment otherwise generally discusses policy issues with respect to apartment rental rates and does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 112-4****The Ugly**

After taking the time to read through other sections of the report, I wanted to offer some other issues associated with the Project.

**AQ issues:**

The LST analysis does not correctly choose the correct NOX thresholds. As noted here: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf\\_sfvsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf_sfvsn=2), the NOx threshold for a 5 acre site with a 50 meter receptor should be 212, not 114 for construction (which helps the Project).

**Response to Comment No. 112-4**

While the commenter provides the localized significance thresholds (LST) provided in Appendix C of SCAQMD's LST Methodology document, the SCAQMD's LST Methodology document does not account for the recently adopted 1-hour NO<sub>2</sub> NAAQS. Appendix D, of the Draft Supplemental EIR, provides the appropriate calculation to account for the updated 1-hour NO<sub>2</sub> NAAQS. As shown therein, the threshold was calculated to be 114 pounds per day, which is lower than the threshold of 212 pounds per day provided in Appendix C of SCAQMD's LST Methodology document. As such, the Draft Supplemental EIR provides a more conservative LST analysis.

**Comment No. 112-5**

CO Hot Spot analysis should detail the increase the hotspot analysis due to an increase in traffic at multiple traffic intersections. The SCAQMD suggests that localized CO impacts be evaluated at intersections due to increases in project-related off-site mobile sources. The SCAQMD recommends performing a localized CO impact analysis for intersections that change from level of service (LOS) C to D as a result of the project and for all intersections rated D or worse where the project increases the volume-to-capacity (V/C) ratio by 2 percent or more. As indicated in the traffic study, intersections 4, 5, 9, 10, 12, 27, 34, 39, 40, and 41 all would have potentially significant impacts for existing plus project scenarios in some form, while intersections 22, 24, and 27 would have potentially significant impacts for future with project scenarios. I would suggest a CO hot spot analysis analyze these significant roadway intersections using CALINE4 to better address this issue.



**Response to Comment No. 112-5**

On page IV.B-29 and IV.B-30 in Section IV.B, Air Quality, of the Draft Supplemental EIR, a discussion of the methodology for a CO “Hot Spot” Analysis is provided. As discussed therein, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. If the screening method does not rule out significant impacts for an intersection, then detailed analysis using CALINE4 is conducted. At buildout of the Project, the highest average daily trips at an intersection would be approximately 79,500 at the De Soto Avenue and Victory Boulevard intersection, which is significantly below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP. This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the De Soto Avenue and Victory Boulevard would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP. Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are appropriately determined to be less than significant.

**Comment No. 112-6****Noise issues:**

I would like to see further analysis with respect to operational noise. The sports arena, outdoor activities, and other recreational uses should be included in the analysis (numerically). There is a big discrepancy of the the [sic] existing uses vs the Project. These items should be addressed, notably in the cumulative operational noise sections.

**Response to Comment No. 112-6**

As provided in Section IV.H, Noise, of the Draft Supplemental EIR, a detailed noise impact analysis was performed for the Project’s operations related to on-site noise sources, including: outdoor mechanical equipment, use of outdoor spaces (i.e., the Promenade Square, outdoor courtyards, outdoor open space, and pool decks), the Entertainment and Sports Center, parking facilities; and loading and trash collection. The noise analysis was conducted for each of these individual noise sources.

A composite noise analysis that evaluated all Project-related noise sources operating at the same time was also conducted. To represent a worst-case scenario, this composite noise analysis was conservatively based on the following assumptions: the maximum number of occupants of the outdoor open spaces; a sold-out event at the Entertainment and Sports Center; an Entertainment and Sports Center with a partial roof; a live music/concert at the Entertainment and Sports Center, which would generate the

highest noise levels as compared to other potential events like sports; and concurrent operation of all these uses as well as other on-site operational noise sources. As such, the Project analysis already includes the highest noise generating events and additional noise analysis is not warranted. In addition, as discussed above in Topical Response No. 2, Entertainment and Sports Center, composite noise level impacts due to Project operations, including operation of the Entertainment and Sports Center, would be less than significant.

### **Comment No. 112-7**

#### **Decision**

Although this project would revitalize an under used site, there are too many impacts to the environment from the project that are Significant, unavoidable, and cannot be overlooked in the decision making process. There are already uses similar adjacent and nearby the Project Site, like the dozens of apartments and the Topanga Mall and the Village. As such, I would move to not move forward with the Project at hand.

### **Response to Comment No. 112-7**

This comment accurately states the Project would result in significant and unavoidable impacts. It should be noted, however, that some significant and unavoidable impacts were conservatively identified. Specifically, significant and unavoidable on-site construction noise impacts at on-site receptors were provided for informational purposes as CEQA does not generally require the analysis of Project impacts to future on-site Project receptors. In addition, impacts from Project and cumulative intersection impacts for operation of Phases 1-3 (interim) conditions are conservative as they assume that the Warner Center Mitigation Program is not implemented by operation of Phases 1-3. Also refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's consistency with the Warner Center 2035 Specific Plan's vision and regulatory requirements for the Project Site. This comment expressing opposition to the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

### **Comment No. 112-8**

#### **Advice**

The Project is a good start on the right direction for what should be located on the site. I would give the Project Applicant the following advice:

- 1) Have the Project not include residential units, or if it does, include affordable housing units.

2) Offer more open space/recreation areas. There does not seem like a sufficient amount of space for pedestrian activity or other activities to enjoy the scenery. It would also help to reduce traffic impacts.

3) The Project should include uses not associated with nearby properties or have more, i.e [sic] have more unique features.

### **Response to Comment No. 112-8**

As discussed in the Draft Supplemental EIR as well as in Topical Response No. 1, Warner Center 2035 Specific Plan, above, the Project's inclusion of residential uses is consistent with the uses envisioned in the Warner Center Plan and in furtherance of the Warner Center Plan's purpose to create a vital mixed-use, transit-oriented district for the Warner Center Plan area and surrounding communities. As discussed in Section IV.G, Land Use, of the Draft Supplemental EIR, the Project would develop 1,432 multi-family residential units consisting of studio, one-, two-, and three bedroom rental units. The various residential units would be rented at different price points providing options to meet the needs of the potential renters. However, no below-market rate (affordable) residential units are proposed. This comment otherwise generally discusses policy issues with respect to apartment rental rates and does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein.

With regard to open space, as discussed further in Topical Response No. 7, Open Space, of the Final Supplemental EIR, and Section IV.J.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, the Project would provide open space and recreational amenities which exceed the LAMC and Warner Center Plan requirements. The Project would provide a total of approximately 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres. This includes the approximately 60,000 square foot Promenade Square, approximately 48,000 square feet of required setbacks, the Gardens comprising approximately 22,000 square feet, approximately 32,000 square feet of additional large open space areas, and approximately 84,000 square feet of landscaped open space pathways through the Project Site. Additionally, the Project would provide approximately 5 acres of private rooftop open space for the Project's residential, office and hotel uses. This includes approximately 165,000 square feet of residential common outdoor open space, 14,000 square feet of creative office outdoor open space, and 41,000 square feet of hotel outdoor open space.

With regard to the commenter's advice to provide "more unique features," this comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 112-9**

Yes please! Thank you!

22140 Victory Blvd  
Woodland Hills, CA 91367

**Response to Comment No. 112-9**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 113**

Betty L. Hennigan  
22113 Oxnard St.  
Woodland Hills, CA 91367-3547

**Comment No. 113-1**

I am a shareholder at Fountain Park Co-Operative and am writing you in regards to the Westfield's Promenade 2035 Development. I'm very concerned about this particular development and the impact it will have in our community.

**Response to Comment No. 113-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 113-2**

This development promises to increase our population by the thousands. This will have a direct impact in the increase in noise, crime, traffic, and pollution. The increase of vehicles this development promises to attract will have a direct effect on our air quality.

**Response to Comment No. 113-2**

As discussed in the Draft Supplemental EIR and reiterated in Topical Response No. 1, Warner Center 2035 Specific Plan, above, the Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The Project is consistent with the Downtown District designation of the Warner Center Plan. In addition, with respect to the Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. The Project's potential impacts to noise, crime, traffic, and air quality were adequately analyzed and addressed in the Draft Supplemental EIR. With regard to noise, as discussed in Section IV.H, Noise, of the Draft Supplemental EIR, an evaluation of potential composite noise level increases (i.e., noise levels from all on-site Project noise sources combined) at the closest sensitive receptor locations was performed. As demonstrated therein, composite noise level impacts due to on-site Project operations would be less than significant.

With regard to crime, as discussed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR and in Topical Response No. 5, Public Services, above, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site and potential impacts associated with police protection would be less than significant. In addition, as detailed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, the Project would implement several project design features that would provide private, on-site security for the Entertainment and Sports Center and overall Project Site to reduce reliance on public police protection services. These include Project Design Features J.1-1 through J.1-9 of the Draft Supplemental EIR.

With regard to traffic, refer to Topical Response No. 3, Traffic and Parking, above for a discussion regarding potential traffic impacts associated with the Project.

With regard to air quality, as discussed in Section IV.B, Air Quality, of the Draft Supplemental EIR, while regional operational emissions associated with the Project would exceed the SCAQMD daily emission threshold for regional VOC and NO<sub>x</sub>, the Project does incorporate project design features that would help to decrease these regional emissions. In addition, the Project would result in less than significant impacts related to localized operational emissions. The Project would also not result in the any substantial TAC emissions sources. Specifically, the Project would not result in the exposure of sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.

### **Comment No. 113-3**

Trying to transform our quiet community to a “lively downtown district,” as described in The Warner Center 2035 Plan is only in the interest of those who stand to gain profit in doing so. I'm sure these developers wouldn't want a stadium across the street from their homes.

### **Response to Comment No. 113-3**

As discussed in Topical Response No. 1, Warner Center 2035 Specific Plan, above, the Warner Center Plan was approved in 2013 by the City with input from the community, and this regulatory document designates the Project Site as within the Downtown District. The Project is proposed to implement the Warner Center Plan and be consistent with its vision, which is to create a vital mixed-use, transit-oriented district for the Warner Center Plan area and surrounding communities.

**Comment No. 113-4**

I urge The [sic] Draft Environmental Impact Report to reconsider the impact having a stadium and dense population will have on our community.

**Response to Comment No. 113-4**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental impacts of the Entertainment and Sports Center. Also, as discussed in Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, the population associated with the Project would be consistent with the population forecast for the Warner Center Plan and the SCAG subregion. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 114**

Betty L. Hennigan  
22113 Oxnard St.  
Woodland Hills, CA 91367-3547

**Comment No. 114-1**

I am a resident of Fountain Park Co-op, a gated community located within walking distance to the Promenade. I moved into this area almost twenty years ago. One of the main reasons that I chose to live here was because of the green grass, trees and quality of life it provided. In my opinion, Westfield's Promenade 2035 is just another example of their corporate greed. Please prevent the further destruction of our community by NOT allowing a Sports Complex to be built here. We don't need it, we don't want it and we certainly don't deserve it. Enough is enough!

**Response to Comment No. 114-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 115**

Betty L. Hennigan  
22113 Oxnard St.  
Woodland Hills, CA 91367-3547

**Comment No. 115-1**

Please correct my address. It's 22113 Oxnard St., Woodland Hills 91367

Sorry about that, [sic]

**Response to Comment No. 115-1**

This address of the commenter will be used for future environmental and hearing notices for the Project.

**Comment Letter No. 116**

Jason Hines  
6100 Le Sage Ave.  
Woodland Hills, CA 91367-1322

**Comment No. 116-1**

I was very pleased to read in the Draft Environmental Impact Report that, when it comes to signage, we can expect it to be consistent with the architectural and landscape character of the Project. I was pleasantly surprised to learn that the project is paying great care to the scale and proportion of graphics so that it feels consistent with the site. I just don't want those ridiculously large signs, that don't make any sense in my neighborhood. And I have been more than assured, by the City's diligent work on this report, that isn't going to happen. I believe this project will help contribute to a vibrant pedestrian atmosphere, which is exactly what I'd like to see in my community. Promenade 2035 sounds exactly like the kind of place I want to spend my time. Can't wait to see what comes next.

Thank you for your time, [sic]

**Response to Comment No. 116-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. With regard to signage, as discussed further in Section IV.G, Land Use, of the Draft Supplemental EIR, the Project proposes a uniform sign program in compliance with the Warner Center 2035 Plan Sign District. The uniform sign program provides a cohesive, integrated approach to the variety of signs required for building identification, wayfinding and regulatory needs. The signage at the Project would be integrated with the design of the Project's architecture and landscaping.

**Comment Letter No. 117**

Jim Hoffman  
22163 Marylee St.  
Woodland Hills, CA 91367-4518

**Comment No. 117-1**

A pdf file of my concerns for the Promenade 2035 project are attached.

I am writing to express my concern about the Westfield Promenade 2035 project. The Woodland Hills site for the proposed project is located at the extreme northwest edge of Los Angeles County. There are only the local bus lines and the Orange Line that service the area. The 101 freeway offramp at Topanga Canyon Blvd. is currently impacted beyond its intended capacity.

As a community member, I am particularly concerned with the proposed stadium size, lack of parking and danger from flying cars (helicopters).

**Response to Comment No. 117-1**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic impacts of the Project. In addition, refer to Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, for a discussion regarding the transit access to the Project Site. Also refer to Topical Response No. 2, Entertainment and Sports Center, for a discussion regarding the environmental implications of the Entertainment and Sports Center.

**Comment No. 117-2****STADIUM SIZE:**

Only the Forum, Staples Center and Hollywood Bowl match the size and scope of the proposed 15,000-seat Entertainment Sports Complex (ESC) at the Promenade 2035 site. Notably, none of these major venues have attached apartments, office parks or hotels and none of them are near residences.

Westfield is no doubt looking for a professional team to make Woodland Hills their home. That's why Mr. Larry Green, Sr. VP of Westfield, is vague about the stadium plans. It would appear to be irresponsible for the City to approve development plans on a proposed ESC without final plans regarding "build to suit."

All the other big arenas also use their buildings for very large music concerts, which could exceed 15,000 seats with the addition of floor seating. Examples of other venues and their size:

The Greek Theater is only 5,900 seats. (Multiple on-site parking lots \$20–\$75 and off-site parking with shuttle buses).

All of the Downtown Music Center venues:

|                     |                     |
|---------------------|---------------------|
| Disney Hall         | 2,265 seats         |
| Dorothy Chandler    | 3,197               |
| Ahmanson            | 2,084               |
| Mark Taper          | 739                 |
| <b><u>TOTAL</u></b> | <b><u>8,285</u></b> |

The Music Center also includes four levels of parking (\$20) plus overflow to the courthouse and Metro Link.

**Examples of stadium/arenas that are close to 15,000 seats; none, except for the Hollywood Bowl, are near residences:**

**Forum—17,500** with on-site parking (\$25–\$40) off-site parking at parking structures and previously, at Hollywood Park.

**The Hollywood Bowl** is just under **18,000** seats with multiple on-site parking lots (\$22–\$60) plus shuttle buses and Metro Link. Major traffic controls are maintained throughout the adjoining neighborhoods.

**Staples Center—18,118** seats with 3,300 parking spaces at Staples-owned parking lot, 16,000 spaces within a 10-minute walk. Staples is serviced by the Metro Link blue and red lines and Amtrak.

### **Response to Comment No. 117-2**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 117-3**

**Promenade 2035 ESC—15,000** seats; on-site parking 3,323 (shared) off-site parking required at least 2,380.

1. The Promenade 2035 DSEIR appendix M called “Traffic” is 2,967 pages. There are maps of free neighborhood street parking. There is a map of the project with a half-mile circumference around which is the predicted distance people will walk to the project. Expect street parking from apartments and offices.
2. There are no shuttle buses to dedicated parking lots.
3. The Metro Orange Line is the only metro service (no one will take a local bus).
4. Most people will park for free along Oxnard west of Topanga and into the neighborhood up to and beyond Shoup. Expect restricted neighborhood parking requests.
5. Westfield proposes that ESC ticket prices will include parking. Does that count for per person or per car? Larry Green said ticket prices would include paid parking; it is a lie, no one else does it. Will Promenade parking be free? Not a chance.
6. The front door of the stadium is located at the corner of Topanga Canyon Blvd. and Oxnard St., directly across the street from single-family residences and the “free” neighborhood parking. Local neighborhood parking is closer than off site paid parking.
7. Uber and Lyft drivers will probably park within the free neighborhood areas waiting for the event fares.
8. Beer fueled audiences will be on the streets and in cars after the event where there is little public transportation. Uber?
9. The 101 freeway is already impacted. Off ramps and on ramps are insufficient.
10. Who pays for the extra traffic control, police outside of the complex?

**Response to Comment No. 117-3**

Pursuant to SB 743, the Project’s parking impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Therefore, impacts related to parking would be less than significant. Nonetheless, refer to Topical Response No. 3, Traffic and Parking, for a discussion of the Project’s proposed parking and consistency with LAMC and Warner Center Plan parking requirements, as well as parking associated with the Entertainment and Sports Center. The Project is requesting

approval of off-site and shared parking pursuant to the Warner Center Plan and the requirements of LAMC Section 12.24-X.20, which permits the approval of off-site parking within 750 feet. However, the Warner Center Plan allows utilization of a wider radius of off-street parking. Warner Center Plan Section 6.2.3.3(c) allows all parking spaces above the minimum requirement to be made available to meet off-street parking requirements of any project within the same District or adjacent District within the Plan, with a required covenant to the satisfaction of the Director. Therefore, parking for the Project's Entertainment Center could be located within the Downtown District or an adjacent District within the Warner Center Plan if off-site and shared parking is approved by the City. This is consistent with the goals of the Warner Center Plan not to construct unnecessary new parking. However, parking spaces are located within office buildings directly across from the Project Site which would be available on nights and weekend outside of standard office hours when events are occurring at the Entertainment and Sports Center. Parking at these locations would not require a shuttle for event attendees to travel to the Project Site. As described in Topical Response No. 2, the Entertainment and Sports Center, the Project will prepare an Event Management Plan (EMP) subject to approval by LADOT, which will identify off-site parking. The Applicant will be required to provide DOT annual evidence of agreements that identify/secure the location and quantity of available off-site parking, prior to the issuance of a temporary or permanent certificate of occupancy for the Entertainment and Sports Center.

With regard to Item No. 1 cited by the commenter, Appendix M, of the Draft Supplemental EIR, does not provide maps of free neighborhood street parking but rather Figure 22 identifies a 0.5 mile radius where people may potentially park and walk to the Project Site; in order to analyze potential impacts to adjacent neighborhoods. Therefore, to address potential impacts to neighborhoods, the Project would implement Mitigation Measures K-2 and K-3; these mitigation measures include the allocation of Mobility Fees toward the implementation of the Neighborhood Protection Program (Mitigation Measure K-2) and establishing a mechanism to identify Project-related impacts with the potential creation of a neighborhood traffic management plan consistent with LADOT requirements (Mitigation Measure K-3). The City could utilize the Project's Mobility Fees to address any parking intrusion that may occur during events, for instance by implementing a permit parking program for nearby neighborhoods, if approved. As discussed further in Topical Response No. 3, Traffic and Parking, above, the City Council approved the Warner Center Plan Implementation Board, which would include oversight and coordination of the Warner Center Mitigation Program. This would accelerate implementation of the mitigation measures in the Warner Center Mitigation Program, including those associated with the Project. Refer to Topical Response No. 3, Traffic and Parking, for more information. Public transportation into and out of Warner Center is not changed by the Project. The Project Site is directly adjacent to the Warner Center Transit Hub, which is directly serviced by five Metro local lines, one Metro Rapid line, one Antelope Valley Transit Authority line, one Santa Clarita Transit Line, as well as Metro Line 601 (also known as the Warner

Center circulator) which maintains a comparable service frequency to the previous Metro Orange Line service into Warner Center. Metro Line 601 began service in June 2018 and effectively replaced the Orange Line connection between the Canoga Station and the Warner Center Transit Hub with a route through Warner Center. In addition, Metro realigned the routes of those lines servicing the Warner Center Transit Hub to include additional connections to the Canoga Station.

The Entertainment and Sports Center event parking is anticipated to be a paid parking operation controlled by a single operator; event patrons will be charged a parking fee to utilize either the on-site or off-site parking facilities. While the EMP would ensure sufficient off-street parking is available, it is possible that patrons may seek to utilize on-street parking in the adjacent neighborhoods to avoid the parking fee. As a note, the closest potential off-site parking facilities would be located in office buildings directly across Oxnard Avenue from the Entertainment and Sports Center to the south of the Project Site.

Relative to the US-101, to identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an Entertainment and Sports Center (ESC)

event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

With regard to the commenter's concern on funding for the traffic control officers required under Project Design Feature K-6 for the EMP, the funding would be provided by the Applicant.

#### **Comment No. 117-4**

##### **OFF STREET PARKING:**

The Westfield Promenade 2035 project DSEIR specifies off-street parking that does not conform to the City of Los Angeles parking regulations. A footnote, however, in the regulations states, "Areas located within Specific Plans may have different parking requirements." (see *Summary of Parking Regulations*).

While the Promenade 2035 may be allowed to under build parking it ignores the fact that Woodland Hills does not support practical alternate transportation to replace the car. The under building of off-street parking will have a negative effect on the surrounding neighborhoods resulting in restricted parking in surrounding neighborhoods and police street barricades during stadium events in addition to the usual overflow of residential and office parking demands. The police barricades already exist for neighborhoods near the Hollywood Bowl.

The Draft specifies:

**Residential**—1,432 multi-family residential units and 1,432 parking spaces. That's one parking space per residential 1, 2 or 3-bedroom apartment. Usually code specifies one parking space per bedroom. Anyone renting a multi-bedroom apartment would naturally expect adequate assigned parking. There are no guest parking spaces in the design.

**Office**—629,000 sf and 629 parking spaces. That's one parking space per 1,000 sf of office space. Usually code specifies one space per 500 sf of office space.

**Hotel**—572 hotel rooms and 241 parking spaces. This does satisfy code but there is little public transportation and the nearest airports are Burbank and LAX. Yes, there is Uber but car rentals are also likely.

**Restaurant**—90,000 sf plus **Commercial/Retail**—154,000 sf totaling 244,000 sf with 488 parking spaces. Parking space code for restaurants varies from 1 per 100 sf for



restaurants, 1 per 200 sf for café and 1 per 250 sf for take-out. We don't know the ratio of restaurant sizes. At 1 per 250 sf for 90,000 sf is 360 parking spaces.

**Commercial/Retail** specifications are 1 per 500 sf. At 154,000 is 308 parking spaces. Code requirements for Restaurant and Commercial/Retail totals 360+308=668 parking spaces. That's 180 parking spaces short of the most optimistic code requirements.

**Stadium**—15,000 seats. This phase of the project anticipates off-site parking of 2,380 spaces. The DEIR says stadium patrons and labor would be willing to walk a one-half mile radius around Promenade 2035 to access free neighborhood parking. (Please see DEIR illustration).

#### **Response to Comment No. 117-4**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion of Project parking. With respect to the question above on restaurant parking, Warner Center Plan Section 6.2.3.2.2 identifies the parking requirements for non-residential, commercial uses as two parking spaces per 1,000 square feet, which is the ratio used for both the retail and restaurant components of the Project.

#### **Comment No. 117-5**

##### **FLYING CARS:**

To ease traffic congestion, Larry Green, Sr. V.P. of Development for Westfield, has on numerous occasions proposed the availability of “flying cars” to access the property.

Board members of the Woodland Hills/Warner Center Community Council have also referred to “flying cars.” It was initially considered a light-hearted remark yet it may have more validity. Uber is apparently planning drone taxis. Flying cars or drone taxis are also known as helicopters.

What's good about helicopters? A helicopter pad at the Promenade 2035 site would grant easier access for celebrities and to those who could afford it.

What's bad about helicopters?

1. **Noise.** Helicopters (flying cars) are loud. Anyone who has had a police helicopter fly overhead to attest to the volume.
2. **Traffic.** How much helicopter (flying car) traffic will there be? If there is a stadium built there many arrivals could be expected in a short time. After the

stadium/arena event is over at 10–11p.m. just as many flights out of the stadium could be expected. Freeway and street traffic and slow buses would encourage their use.

3. **Flight path.** Will the helicopters (flying cars) circle over the surrounding neighborhood waiting for a landing time?
4. **Control towers.** If there is a lot of helicopter (flying car) traffic, will a control tower be required? If so, where will the tower be located?
5. **Crashes.** Who is liable for helicopter (flying car) crashes or malfunctions causing personal injury or property harm? Every type of vehicle gets into an accident or breaks down at some point.

### **Response to Comment No. 117-5**

This comment makes statements and inquiries about the use of flying cars/helicopters to access the Project. Helicopters are expected to access the site for emergency purposes only pursuant to Ordinance 150,623. Other “flying car” technologies are not currently available and their inclusion and evaluation would be speculative.

### **Comment No. 117-6**

#### **Table of Contents for Evidence.**

Summary of Parking Regulations for the City of Los Angeles (2 pages)

Excerpt from Promenade 2035 Appendix M—Traffic Pages 209–210: Potential Neighborhood Parking from Promenade 2035 event patrons (4 pages)

Photographs of event parking to the west of the promenade. These were taken on July 4, 2018. This illustrates the potential neighborhood parking from Promenade 2035 event patrons. (2 pages)

### **Response to Comment No. 117-6**

These attachments pertain to the comments addressed above. Refer to Topical Response No. 2, Entertainment and Sports Center, above, regarding the parking associated with the Entertainment and Sports Center. In addition, refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding parking associated with the overall project.

**Comment Letter No. 118**

Hope Holm  
hopedale1@yahoo.com

**Comment No. 118-1**

I am extremely concerned about the plans for the Westfield Promenade site. That area has been bogged down by traffic for as long as I can remember. There are many times when driving either direction on the 101 (especially North), that the traffic from Topanga and Canoga doesn't allow for clear exit from the freeway and then traffic backs up onto the freeway at both of these off-ramps. To add a 15,000 seat arena, which would bring roughly another 7,500 cars into the area at one time, would create congestion that our current system just cannot handle. And since we are still waiting on the traffic study resolutions from the build of the Village—I would love to see traffic resolutions PRIOR to the build of a new extreme project.

**Response to Comment No. 118-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, and Topical Response No. 3, Traffic and Parking, above, which discusses the Project's traffic impact analysis and the Warner Center mitigation process. In addition, refer to Topical Response No. 4, The Village at Westfield Topanga, for a discussion of mitigation measures associated with the Village.

**Comment No. 118-2**

Additionally I have concern [sic] about the plan to add even MORE apartments in an area that is already saturated with apartments (many of which are VACANT). We are already told regularly to cut back on water usage, cut back on electric usage, etc., so where are we going to get the water & the electric [sic] to support all these additional occupants? The plan to recycle water that the village has works for watering, but is not considered potable water. More apartments are already being built and we are way beyond our limit to support those as it is.

**Response to Comment No. 118-2**

Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's consistency with the Warner Center Plan, which requires a certain percentage of residential development to non-residential development. Refer to Topical Response No. 6, Infrastructure, for a discussion of the Project's impacts to water

and electricity infrastructure and project design features and mitigation measures that would address these impacts and which are less than significant.

**Comment No. 118-3**

Further, I know in an ideal world parking won't be an issue because people will take public transportation, etc. But, this thought is simply not realistic. We already have public transportation that people do not use because of limited/inconvenient routes. Our community is just not used to or set up with a good public transportation system. Maybe fix that first before deciding to add a 15,000 seat arena, hotels, apartments, retail space, with parking for only a fraction of the apartment occupants.

**Response to Comment No. 118-3**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic and parking impacts of the Project and Project Design Feature K-7, in which the Project will prepare and implement a Transportation Demand Management Program to promote non-automobile travel and reduce the use of single-occupant vehicles. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 118-4**

I am really angry & frustrated that what is really best for the community is overlooked in an effort to compensate for bad planning on Westfield's part. The Promenade was once a beautiful, upscale shopping mall. Westfield came in, destroyed that, and now wants to hurt the surrounding neighbors for their poor decisions.

Please evaluate this plan carefully and recognize that it will not be an asset to the Woodland Hills area.

**Response to Comment No. 118-4**

As discussed in Topical Response No. 1, Warner Center 2035 Plan, the Project is consistent with the Warner Center Plan. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 119**

Steve H. Hornstein  
Hornstein Law Offices  
20335 Ventura Blvd., Ste. 203  
Woodland Hills, CA 91364-2456

**Comment No. 119-1**

Please find attached and below my letter in support of Westfield Promenade.

For all of my life, I have been a resident of Tarzana, and I have had my office in Woodland Hills for 16 years. The west valley is important to me. I take pride in being involved in my community, and doing what I can to help make my community a great place to live and work, not only by being a member of the West Valley–Warner Center Chamber of Commerce and the Rotary Club of Woodland Hills, but also by taking the time to write a letter such as this one.

Through my involvement with my community, I come across many companies and business leaders who take an active interest in the community. Westfield is one of them. They sponsor and host events, make charitable contributions to worthy causes and have created a sense of community in the West Valley with their Topanga and Village properties.

Westfield has made tremendous investments to build a better community and I am thrilled that these will continue with the revitalization of the Promenade property. It will be great to have another place to dine and shop, wander around a new public park and catch an evening performance at the entertainment and sports venue. We will finally have night life, arts and cultural events available here in the West Valley. Together with the Warner Center Plan, the Promenade project will transform the neighborhood.

We are so fortunate to have Westfield committed to the West Valley to make it a better place to live, work and enjoy life.

I hope the city will give Westfield Promenade strong consideration.

If you have any questions, please contact me at (818) 887-9401.

**Response to Comment No. 119-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 119-2**

Attachment: Hornstein Promenade Support Letter 7-19-2018 (2 pages)

**Response to Comment No. 119-2**

This attachment is a duplicate of the comments provided above. No further responses are necessary.

**Comment Letter No. 120**

Laurel Hubbard  
8901 Eton Ave., Spc. 83  
Canoga Park, CA 91304-6511

**Comment No. 120-1**

I live in Canoga Park and just became aware of the “Promenade 2035 project”. [sic] The impact of this project will be a disaster to the West Valley and should never happen!! It is too big for the area, which is part residential and part business. I use Canoga Ave all the time to go to Kaiser, and other streets in the area, and they are already busy. The traffic would be GRIDLOCK, the environmental impact would be TERRIBLE, and living in the area would be a NIGHTMARE.

This project is much to [sic] large for the area and should NEVER HAPPEN! Please keep me informed about this issue, it is VERY IMPORTANT to me.

**Response to Comment No. 120-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. In addition, refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project’s consistency with the Warner Center Plan. The Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The Project is consistent with the Downtown District designation of the Warner Center Plan. In addition, with respect to the Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director’s Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. Also refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic implications of the Project.

**Comment Letter No. 121**

Janel L. Huff  
20934 Bandera St.  
Woodland Hills, CA 91364-4503

**Comment No. 121-1**

Attached letter on the Promenade 2035 EIR COMMENTS.

Attachment 1: 180725 Promenade Project rebuttal.docx

I am in total support of the issues outlined the July 25th letter from the Woodland Hills Homeowners Association. To accept the above named project would be tragic for our community of Woodland Hills and the West San Fernando Valley, as a whole.

Additionally, my specific issues with the project referenced above are:

**Response to Comment No. 121-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 121-2**

1432 Multi-family residential units:

One of the largest issues with the proposed residential units is traffic. The traffic study, the basis for each unit is two-to [sic] three occupants, i.e. four to six car trips per day. With the ever increasing rental costs there are three and sometimes four individuals inhabiting a single two bedroom living unit. Developers and City suggest mass transit or working in the area will reduce traffic.

Tenants with local retail/restaurant jobs cannot pay the rental rates in newly constructed rental units; hence they double up in living units, due to having multiple part time jobs or college activities. This further extends the number of multiple drives and traffic issues on a daily basis, way beyond the studied four trips per day. These situations create more traffic than accounting for in any presented report or study.



**Response to Comment No. 121-2**

Refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding the traffic analysis including the trip generation assumptions which were reviewed and approved by LADOT.

**Comment No. 121-3**

244,000 sf of retail/restaurant uses:

Given the current retail tenant turnover at the new Westfield's Village, the only reason for more retail and restaurants is to support the proposed entertainment sports center and developer's profits. Brick and mortar stores are failing. The Village retailers have been very public about the lack of business and customers. Many of the original restaurants and small food venues have turned over or closed at Westfield's Village. I am at the Village quite frequently and my personal observation is majority of the restaurants are hurting. In order for a restaurant to be profitable you must fill the restaurant a minimum of three times at lunch and three to four times at dinner. This is called the table turnover rate. Are these establishments so busy with lunch and dinner that there is a demonstrated need?

**Response to Comment No. 121-3**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. In addition, refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's consistency with the Warner Center Plan. The Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The Project is consistent with the Downtown District designation of the Warner Center Plan. In addition, with respect to the Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. Refer to Topical Response No. 4, The Village at Westfield Topanga, for additional information on the Village.

**Comment No. 121-4****572 bed hotel:**

Why? Is there a current need, other than the developer wanting to make money? Has Pannell Kerr Forster\* or other hospitality expert studied the need for another local hotel? When the City subsidizes or waives certain taxes or fees for this kind of development, which is common in economic development negotiations, it puts all local existing like-use properties at a financial disadvantage. The eventual result will be the current existing properties usually must lower their average daily room night rates (ADRs) and the city gets less bed and sales tax revenue. The current or older properties will begin to suffer in occupancy, maintenance, number of employees and upkeep. Where is the proof that there is a need?

\*PKF (Pannell Kerr Forster) was the first organization offering specialized consulting and benchmarking services for the hospitality industry. P stands for William Henry Pannell. In 1869, he founded his own CPA firm in London, W. H. Pannell & Co. K stands for Errol Kerr. Together with his partner William Harris, he founded the New York CPA firm Harris, Allan & Co in 1911 which was later renamed into Harris, Kerr & Co. The first office was located in the Ritz-Carlton Hotel on Madison Avenue. F stands for William J. Forster who, in 1923, founded the company W. J. Forster & Co in New York. In 1933, it merged with Harris, Kerr & Co to Harris, Kerr, Forster & Co.

**Response to Comment No. 121-4**

Based on review of Project applications, the Applicant is not currently requesting any type of subsidy for the Project. This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. In addition, refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's consistency with the Warner Center Plan. The Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The Project is consistent with the Downtown District designation of the Warner Center Plan. In addition, with respect to the Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center.

**Comment No. 121-5****15,000 seat Entertainment Sports Center:**

The city has to look no further than the Hollywood Bowl. Yes, the Hollywood Bowl is slightly larger. However, the traffic and havoc issues an event center will bring to the Woodland Hills and surrounding community will be devastating. Like the “Bowl”, [sic] the City of Los Angeles must provide off duty and on duty police enforcement to deal with traffic and resulting accidents, traffic flow, plus blockaded residential feeder streets. These feeder streets will even affect South of Ventura Boulevard, as now seen with the WAZE app. The 101 freeway is already at a stand-still with traffic many times during the day, seven days a week. Topanga Canyon Blvd., a state highway, will be a parking lot. There is no permanent way to regulate entertainment event activities. The City may initially have an agreement with developer/user on venue activities. Then the developer/user will plead some sort of case that the agreement is not binding, or support there will be (paid) support from elected officials and surprise—open unconstrained activities at the “Sports Center” will eventually be allowed, permanently. If this developer were civic minded they would put the money in Pierce College for a sports center. Oh, but wait! There is no developer profit there.

**Response to Comment No. 121-5**

Refer to Topical Response No. 3, Traffic and Parking, above for a discussion regarding the traffic impact analysis and in particular Project Design Feature K-6, which is the development and implementation of an Event Management Plan (EMP). The purpose of the EMP is to respond to potential changes in traffic patterns and mobility/parking technologies that may alter the travel to and attendance of events at the Entertainment and Sports Center and is intended to be an evolving document that is subject to modification over time in coordination with both LADOT and Caltrans. To address potential traffic impacts to neighborhoods, the Project would implement Mitigation Measures K-2 and K-3; these mitigation measures include the allocation of Mobility Fees toward the implementation of the Neighborhood Protection Program (Mitigation Measure K-2) and establishing a mechanism to identify Project-related impacts with the potential creation of a neighborhood traffic management plan consistent with LADOT requirements (Mitigation Measure K-3).

**Comment No. 121-6**

I was once a Tourism Official in another state. We (the State) designed a destination traveler study asking the questions: who would use the facilities, where the guests would come from/go to and if they were staying overnight to visit this attraction. The results were surprising! In this particular instance, the study determined guests saved their money for the event/destination but DID NOT INTEND TO STAY OVER OR EAT OUTSIDE OF THE

EVENT SITE. This meant little or no anticipated increase bed tax or sales tax for the city. This outcome was a surprise to all, except the attraction ownership. Sadly, this study was done after the attraction was built.

#### **Response to Comment No. 121-6**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 121-7**

After all the issues with use, there are still the factors of deteriorating local infrastructure, to include but not limited to: water, sewer, communications, gas, fire and police. The City of Los Angeles has not maintained our water and sewer infrastructure. After waiting for decades for new streets, in some areas the City came in cut up the NEW streets to upgrade a few select areas on a street by street basis.

As an example, AT&T communications are so bad where I live with lack of lines, no fiber but poor twisted pairs (old copper lines) that repairman are out on a weekly basis passing bad twisted pairs between neighbors. Yes, this is a California Corporation Commission issue but they, AT&T, has a franchise agreement with the City.

#### **Response to Comment No. 121-7**

Refer to Topical Response No. 6, Infrastructure, for a discussion of the Project's impacts to water, wastewater, and energy infrastructure and project design features and mitigation measures that would address these impacts. Also refer to Topical Response No. 5, Public Services, for a discussion regarding the Project's impacts to police protection and project design features and mitigation measures that would address these impacts. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 121-8**

We are sadly in need of more Police to deal with the increasing crime, drugs, theft and homeless activities.

**Response to Comment No. 121-8**

Refer to Topical Response No. 5, Public Services, for a discussion of the Project's impacts to police services as well as the project design features and mitigation measures related to police protection that would be implemented under the Project.

**Comment No. 121-9**

**This project is a perfect example of why the Warner Center 2035 Specific Plan and the Los Angeles planning process needs to be changed.**

**Response to Comment No. 121-9**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 121-10**

Attachment 2: WHHO SDEIR [sic] Public Comment 7-25-18 - FINAL.PDF (15 pages)

**Response to Comment No. 121-10**

This attachment is a duplicate of Comment Letter No. 31, above. No further response is required.

**Comment Letter No. 122**

Eva Huffman  
23109 Canzonet St.  
Woodland Hills, CA 91367-6104

**Comment No. 122-1**

This project is way overscale for our neighborhood. The EIR speaks to the traffic as being highly impacted during peak traffic times. It is always peak traffic times. With all of the new apartments and condos going up in Warner Center, NOTHING should be approved to build until the streets have been widened and the freeway on and off ramps are improved. This is a negative impact on our neighborhood with the housing and then they want to build a stadium with 15,000 seats? This is not the neighborhood for this. Pick an industrial corridor like Van Nuys for a stadium. We are a RESIDENTIAL AREA!

**Response to Comment No. 122-1**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic impact analysis for the Project that assumes full buildout under the Warner Center Plan. Also refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for discussion about the Project's overall consistency with the Warner Center Plan. As discussed above, the Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The Project is consistent with the Downtown District designation of the Warner Center Plan. In addition, with respect to the Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center.

**Comment No. 122-2**

Parking must be provided so not to spill over into the residential neighborhoods. Anyone paying \$2500 a month in rent or mortgage is not taking the bus. These buildings must have enough parking. No 1 space for a 2 bedroom.

**Response to Comment No. 122-2**

Refer to Topical Response No. 3, Traffic and Parking, for a discussion about the Project's proposed parking supply. As noted, a total of 5,610 spaces are proposed for

the on-site parking supply; the parking requirements for all non-event related uses is 2,790 spaces; the on-site supply is able to meet the non-event parking requirements on days without an event at the Entertainment and Sports Center. On days with an Entertainment and Sports Center event, the additional parking demand from a sold-out event condition is anticipated to require the use of up to approximately 2,380 supplemental off-site parking spaces. Project Design Feature K-6 identifies the development and implementation of an Event Management Plan, which includes specific measures to address parking operations. The Project provides the required number of parking spaces for residential uses consistent with the requirements of the Warner Center Plan.

### **Comment No. 122-3**

Where is the water coming from? The heat that will be generated from this enormous and unneeded development is irresponsible and destructive. The trash that will be produced from the the [sic] stadium, offices and apartments. Where is all that going?

### **Response to Comment No. 122-3**

As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft Supplemental EIR, LADWP determined that the Project's net water demand was accounted for in the City's overall total demand projections set forth in LADWP's 2015 Urban Water Management Plan (UWMP). Specifically, the 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City through the year 2040. LADWP, therefore, concluded that the increase in water demand for the Project falls within the available and projected water supplies during an average year, single-dry year, and multiple-dry year through the year 2040, as well as the intervening years (i.e., 2033), as described in the 2015 UWMP. As outlined in the 2015 UWMP, LADWP is committed to providing a reliable water supply for the City. The 2015 UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling.

With regard to solid waste, as discussed in Section IV.M.3, Utilities and Service Systems—Solid Waste, of the Draft Supplemental EIR, Project-generated solid waste would be collected by a private solid waste hauler and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. As shown in Table IV.M.3-1 on page IV.M.3-15 of Section IV.M.3, Utilities and Service Systems—Solid Waste, of the Draft Supplemental EIR, the estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 78.71 million tons as of December 31, 2016. Thus, the Project's net increase of 2,461 tons of annual solid waste disposal would represent approximately 0.03 percent of the estimated remaining Class III landfill capacity

available to the City of Los Angeles. The County will continue to address landfill capacity through the preparation of Countywide Integrated Waste Management Plan annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2016 Annual Report. As such, Project impacts associated with solid waste would be less than significant.

#### **Comment No. 122-4**

The mixed use buildings that have been going up around the city DO NOT WORK! You can't work downstairs at Trader Joes and afford a \$2500 1 bedroom apartment upstairs. The vacancy rates in the mixed use buildings is over 10% all over the city.

Financial greed by the City of Los Angeles and Mayor Garcetti is not acceptable! The neighborhood does not want a project of this scale in our residential neighborhood.

No Stadium! No Westfield!

#### **Response to Comment No. 122-4**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. In addition, refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's consistency with the Warner Center Plan. The Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The Project is consistent with the Downtown District designation of the Warner Center Plan. In addition, with respect to the Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center.



**Comment Letter No. 123**

Frederick Johnson  
6020 Nevada Ave., Apt. 4  
Woodland Hills, CA 91367-3504

**Comment No. 123-1**

I hope this note finds you well. I am [sic] homeowner in Woodland Hills and my public comment letter regarding Westfield's Promenade 2035 Development! Environmental Case #: ENV-2016-3909-EIR, is attached.

I reside at the Fountain Park Cooperative located on Oxnard, just West of Topanga Canyon Blvd. I, like many of my neighbors in this area, am opposed to this project including the placement of a sports center at Oxnard Street and Topanga Canyon Blvd. The increased traffic, as we are close to the 101 freeway, noise pollution, and air pollution would be a great disturbance to this community. Our lives will be impacted in many negative ways. We do not want an attraction that is going to drive many many people in [sic] mass that do not live in this community to the area. Nor do we want to create additional traffic, noise and pollution, and possible crime.

**Response to Comment No. 123-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental impacts of the proposed Entertainment and Sports Center. The Project's potential impacts to traffic, noise, air quality, and police protection were adequately analyzed and addressed in the Draft Supplemental EIR. With regard to traffic, refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding potential traffic impacts associated with the Project.

With regard to noise, as discussed in Section IV.H, Noise, of the Draft Supplemental EIR, an evaluation of potential composite noise level increases (i.e., noise levels from all on-site Project noise sources combined) at the closest sensitive receptor locations was performed. As demonstrated therein, composite noise level impacts due to on-site Project operations would be less than significant. In addition, refer to Topical Response No. 2, Entertainment and Sports Center, for additional information regarding noise related to the Entertainment and Sports Center.

With regard to air quality, as discussed in Section IV.B, Air Quality, of the Draft Supplemental EIR, while regional operational emissions associated with the Project would exceed the SCAQMD daily emission threshold for regional VOC and NO<sub>x</sub>, the Project does incorporate project design features that would help to decrease these regional emissions,

including Project Design Feature D-1, which incorporates features of the LEED program to be capable of meeting the standards of LEED Silver or equivalent, and Project Design Feature D-2, which limits the installation of natural gas fireplaces. In addition, the Project would result in less than significant impacts related to localized operational emissions. The Project would also not result in the any substantial TAC emissions sources. Specifically, the Project would not result in the exposure of sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.

With regard to crime, as discussed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, and in Topical Response No. 5, Public Services, above, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site and potential impacts associated with police protection would be less than significant. In addition, as detailed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, the Project would implement several project design features that would provide private, on-site security for the Entertainment and Sports Center and overall Project Site to reduce reliance on public police protection services. These include Project Design Features J.1-1 through J.1-9 of the Draft Supplemental EIR.

#### **Comment No. 123-2**

We urge, for the well-being of the residents in this community, that this project be relocated to another area.

If you would like to speak about this, please do not hesitate to contact me via email or at (323) 810-6801.

#### **Response to Comment No. 123-2**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 123-3**

I am a homeowner at the Fountain Park Cooperative located on Oxnard, just West of Topanga Canyon Blvd. I, like many of my neighbors in this area, am opposed to this project including the placement of a sports center at Oxnard Street and Topanga Canyon Blvd. The increased traffic, as we are close to the 101 freeway, noise pollution, and air pollution would be a great disturbance to this community. Our lives will be impacted in many negative ways. We do not want an attraction that is going to drive many many

people in [sic] mass that do not live in this community to the area. Nor do we want to create additional traffic, noise and pollution, and possible crime.

We urge, for the well-being of the residents in this community, that this project be relocated to another area.

If you would like to speak about this, please do not hesitate to contact me at the above referenced phone number or email.

**Response to Comment No. 123-3**

This comment is duplicative of the comments provided above. See Response to Comment Nos. 123-1 and 123-2.

**Comment Letter No. 124**

Linda Johnson  
21550 Burbank Blvd., Apt. 206  
Woodland Hills, CA 91367-7067

**Comment No. 124-1**

As a close neighbor of the Promenade project, I have a strong interest in Westfield's plans to redevelop its Promenade property and any potential impacts on the community.

After reviewing the draft environment impact report, I've decided to fully support the project and urge the City's approval.

I was pleased that the DEIR raised no significant issues despite Promenade's size and scope and that the proposed entertainment and sports center complied with the Warner Center 2035 Plan. Good news, indeed.

The project is smart, well-designed and does a nice job of breaking up long blocks to improve walkability. What I love most about the project is its focus on walking—making things accessible without a car and easy to reach on foot. The pedestrian-friendly “activity nodes” and the project's proximity to transit will go a long way toward getting people out of their cars.

Promenade 2035 will be a welcome addition to the region. Like the Village, it will provide more exciting shopping, dining and leisure options to people who live and work in the valley. I look forward to its completion.

**Response to Comment No. 124-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 125**

Jacqueline Jones  
5800 Oso Ave.  
Woodland Hills, CA 91367-5424

**Comment No. 125-1**

I just wanted to drop this letter of support for the proposed Westfield Promenade 2035. I have been a resident of Woodland Hills for over 25 years and have seen the transformation of the Warner center, the Westfield Topanaga [sic] and the Village. I have a strong belief that the Promenade 2035 will take the Warner Center to next level. I look forward to see this project breaking ground and be part of the future Down Town [sic] Woodland Hills, I know how beneficiary this will be for young families moving into this wonderful environment and growing old enjoying all what Down Town [sic] LA and the Westside have to offer combined. Please see attached letter.

I could not be more proud to write you and share my support for the Promenade 2035 project that Westfield has proposed as part of the Warner Center Plan.

Besides the fact that the entire project is green and is committed to achieving LEED silver standards, I just appreciate that it feels like a community—like a place where you might know your neighbors, because they live in the same building and work around the corner.

I like that I can run to the grocery store and stop and relax in the park on the way home.

I think more than anything, what this project does, as guided by the Warner Center Plan (which I also supported), it changes the game when it comes not to WHERE we live, but in the WAY we do it. I like the idea of living in a place where you walk not drive, and instead of racing to work, you relax.

What I know for sure? What we're doing now, isn't working. The Warner Center Plan suggested we could do better. I believe Promenade 2035 will do that.

**Response to Comment No. 125-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 126**

Jordan Kajan  
3817 Coldstream Ter.  
Tarzana, CA 91356-5401

**Comment No. 126-1**

I was pleased to learn the planning department took a broad look at the potential environmental impacts of the Westfield Promenade project and found only a few areas of concern. And, it's reassuring to know these areas can be easily addressed and resolved.

As with any development project, I believe it's important to weigh the benefits and risks to the community. In my opinion, there are only benefits. These include:

- *Hundreds of people will be working* at the Promenade's new offices and businesses, not to mention the large number of workers who will be involved in its construction.
- *The development will generate millions of dollars.* This will give a big boost to the local economy and to the city tax revenues that support our public services.
- *The project will result in more residential units.* We need more homes/apartments to address the city's severe housing shortage.
- Promenade's focus on walkability and transit means *there will be fewer cars on the road.*
- *Quality of life in the West Valley will be improved* with new dining, shopping, entertainment options.

Let's not waste any time getting this project approved.

**Response to Comment No. 126-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 127**

Karo Karapetyan  
23206 Aetna St.  
Woodland Hills, CA 91367-3101

**Comment No. 127-1**

Westfield's Promenade 2035 project represents a major investment in this corner of the Valley. Westfield has already revitalized the mall and the Village and now they want to extend these improvements to the Promenade property.

The project itself sounds carefully designed to add residences, open space and new kinds of uses to the area, but it will also bring jobs and new revenues, which is important to the community.

Additionally, we need revenue for public services, as well as places to live, shop and eat. This project is a win-win for everyone.

**Response to Comment No. 127-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 127-2**

Westfield's Promenade 2035 project represents a major investment in this corner of the Valley. Westfield has already revitalized the mall and the Village and now they want to extend these improvements to the Promenade property.

The project itself sounds carefully designed to add residences, open space and new kinds of uses to the area, but it will also bring jobs and new revenues, which is important to the community.

Additionally, we need revenue for public services, as well as places to live, shop and eat. This project is a win-win for everyone.

**Response to Comment No. 127-2**

This comment is duplicative of the comment provided above. See Response to Comment No. 127-1.

**Comment Letter No. 128**

Ilene Karpman  
20316 Aetna St.  
Woodland Hills, CA 91367-5407

**Comment No. 128-1**

When will the quality of life to the citizens of The [sic] City of Los Angeles become more important than the profits to the big developers? I fear that will be never. Today is the last day for me to comment on the Westfield Promenade Project in the West San Fernando Valley. How many other people would have written had they known about the horror that is coming? While it is the city of Woodland Hills that will be most negatively affected because that is where Warner Center is and where all these buildings will be constructed other nearby cities will also be be [sic] in trouble.

**Response to Comment No. 128-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. The commenter incorrectly states that the last day to provide comments was on June 26, 2018. As discussed previously, the Department of City Planning extended the comment period by 45 days, until 4:00 P.M. on Thursday July 26, 2018, for a total comment period of 92 days, as shown in Appendix FSEIR-4. This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 128-2**

I have lived in my house since the early 1980's. [sic] Warner Center then and now is a pleasant place to work in and go to the movies, restaurants, and shopping. There are nice streets to walk on, go for a run, and take your dog for a walk. Now I hear The Warner Center Master Plan and the Westfield Promenade 2035 Project will turn this area into an overbuilt, unpleasant area to live near, work in, or go to for recreational pastimes. I wonder why is it necessary to build a 12,000 seat arena? Why is it necessary to keep building apartment building after apartment building? At this time at least 5 apartment buildings are being constructed. Why is it necessary to build at least 2 more large hotels and many more office buildings? Of course, I am not mentioning all the other surprises that are in store for the citizens.



**Response to Comment No. 128-2**

With regard to the development of residential uses, as discussed further in Section IV.G, Land Use, of the Draft Supplemental EIR, the Project would support the City's objective to plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types through the development of 1,432 multi-family residential units, consisting of studio, one-, two-, and three-bedroom units. Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's consistency with the Warner Center 2035 Specific Plan's vision and regulatory requirements for the Project Site. This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Note that the Project proposes 15,000 seats within the Entertainment and Sports Center, not 12,000 as stated by the commenter.

**Comment No. 128-3**

That brings me to traffic. I live across De Soto from Warner Center. In the 38 years I have lived in the area I have not seen any improvement in road construction or traffic lights. Quite the contrary. Oxnard Street between De Soto and Winnetka was reduced from 2 lanes going east and 2 lanes going west to one lane each direction so bike lanes could be added. I rarely see a bike. Instead I see lines of traffic from Warner Center east beginning at 7:30am and again at 5pm. I see traffic getting off Oxnard and using my street Aetna as a short cut that they speed on. I see vehicles backed up on Winnetka from the 101 freeway to Vanowen and visa [sic] versa in the morning and at 5pm. I have not see [sic] the city do anything about the traffic. The only thing that is going to happen in the future is the traffic is going to get worse. Yet how can that be? It seems impossible to me.

**Response to Comment No. 128-3**

This comment discusses observations of commute period cut-through traffic along Oxnard Street, between De Soto Avenue and Winnetka Avenue. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the community along Oxnard Street (north and south of Oxnard Street, between De Soto Avenue and Oso Avenue) is a potentially impacted street segment. To address the potential impacts, the Project would implement Mitigation Measures K-2 and K-3; these mitigation measures include the allocation of Mobility Fees toward the implementation of the Neighborhood Protection Program (Mitigation Measure K-2) and establishing a mechanism to identify Project-related impacts with the potential creation of a neighborhood traffic management plan consistent with LADOT requirements (Mitigation Measure K-3). Additionally, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the

Project would implement a variety of street improvements adjacent to the Project Site which would facilitate access to the Project Site.

As discussed in Topical Response No. 3, Traffic and Parking, above, the addition of full Project traffic to each analyzed intersection is anticipated to be less than significant with the full implementation of the Warner Center Mitigation Program. Impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with implementation of the Warner Center Mitigation Program. However, in the event that the Warner Center Mitigation Program and Project specific project design features are not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking for further details regarding the Warner Center Plan Implementation Board.

#### **Comment No. 128-4**

I could go on about the unpleasantness that is the future for this area and it's [sic] inhabitants, but I only have 30 minutes left to complete this and send it in, so I will ask a question. How many people who are planning this disgusting project and/or own Westfield live in the area now or plan to move here?

#### **Response to Comment No. 128-4**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 129**

Sheppard Kaufman  
22154 Alizondo Dr.  
Woodland Hills, CA 91364-6101

**Comment No. 129-1**

The attached PDF contains my comments regarding the Westfield Promenade 2035 DSEI: [sic] ENV-2016-3909-EIR. Thank you for your consideration.

**Response to Comment No. 129-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 129-2**

Sorry I didn't include earlier. here you go:

Sheppard Kaufman  
22154 Alizondo Dr.  
Woodland Hills, CA 91364

**Response to Comment No. 129-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment No. 129-3**

*(Note: I currently serve as the Board VP and Public Safety Chair of the Woodland Hills–Warner Center Neighborhood Council, but the comments below ONLY reflect my **personal** opinions)*

***General Comments:***

While there is no doubt that Westfield intends to build a quality project, and I personally support the idea of improvements to the Promenade site, there are serious concerns about

the impacts on traffic, noise and existing city services that do not seem fully addressed in the Draft SEIR.

Further, there are issues that required mitigation based on the EIR for the Westfield Village project and, to date, there are numerous cases in which the mitigation has not yet occurred—including those by public agencies where Westfield may have opted to make a mitigation payment in lieu of performing the work. These issues are especially true in relation to traffic. While I acknowledge that some mitigations have occurred or may be “in-progress”, [sic] I have serious concerns that major intersection/freeway improvements would not be completed in time, or in scope, to mitigate even existing impacts.

### **Response to Comment No. 129-3**

The Draft Supplemental EIR thoroughly analyzed impacts related to traffic, noise, and public services. Specific comments regarding the analysis of these topics in the Draft Supplemental EIR are provided and responded to below. Also refer to Topical Response No. 3, Traffic and Parking, above, for a summary regarding the Project’s impacts to traffic and parking, Section IV.H, Noise, of the Draft Supplemental EIR, for a discussion of the Project’s impacts to noise, and Topical Response No. 5, Public Services, for a summary regarding the Project’s impacts to police and fire protection. Refer to Topical Response No. 4, The Village at Westfield Topanga, above, for further detail regarding the implementation of mitigation measures for The Village project.

### **Comment No. 129-4**

Of particular concern is the proposed 15,000 seat “open roof” Entertainment & Sports Complex (ESC) and the noise, traffic, and public safety concerns potentially generated by music events, in particular. Since no concrete details have been provided on the form and intended programming for the final proposed ESC, it would seem difficult to create both a completely accurate EIR and opinion for this element of the project.

### **Response to Comment No. 129-4**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion of the impacts from the Entertainment and Sports Center as it relates to public safety, noise, and traffic as well as the assumptions for the Entertainment and Sports Center used in the Draft Supplemental EIR analysis. As noted above in Topical Response No. 2, Entertainment and Sports Center, the “no roof” or “open roof” option described in the Draft Supplemental EIR is more accurately described as a partial roof, as it includes an overhang extending over the seating areas of the Entertainment and Sports Center to provide shade, which would have additional benefits of providing some lighting and noise shielding.

**Comment No. 129-5**

I feel strong Consideration should be given to Alternative 4—the Studio/Mixed Use Alternative: Per the SEIR—this is the Most Environmentally Superior proposal. It seems more likely to provide a better jobs mix, compared to retail, in terms of jobs that pay well enough to support employees with a desire to live near their work—a key goal of the Warner Center 2035 Plan. Further, per the SEIR—this option creates less impact on City services, traffic, the environment, and surrounding neighborhoods.

Should Alternative 4 not be found acceptable, secondary consideration should be given to Alternatives 3 & 5. Both of which still create less impact on the environment and services than the project as proposed—though not as effectively as Alternative 4.

**Response to Comment No. 129-5**

The commenter's preference for Alternative 4 is noted for the record and has been incorporated into this Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed in detail in Section V, Alternatives, of the Draft Supplemental EIR, while Alternative 4 would eliminate some of the Project's significant and unavoidable impacts, Alternative 4 would not achieve the Project objectives to the same extent as the Project.

**Comment No. 129-6**

Environmental and traffic assumptions rely on a live-work balance which, when considering that project elements such as the office towers are scheduled for the project's final phase and "subject to market conditions", [sic] may mean that the intended balance and, therefore, mitigating effects are never achieved thereby creating a negative impact on the surrounding neighborhood.

I am concerned that without the creation of nearby jobs which provide a level of income commensurate with the ability to afford the proposed housing, the environmental and services impact will be far greater than anticipated within the Draft SEIR.

If the project is allowed to go forward in phases, I would suggest a mitigation requirement—monetary and/or other—in the event the project is not built as proposed by a specified time and does not achieve the live-work balance as anticipated in the Warner Center 2035 Plan.

**Response to Comment No. 129-6**

The Project's phasing plan is intended to describe the geographic area covered by each phase of the Project, with the order of buildout of these geographic phases subject to

change. As such, the Southeast Phase, or any other geographic phase, could be the first phase built. However, even under the current proposed phasing order, employment is available before the last phase. The Northeast Phase contains 85,000 square feet of non-residential area, which includes both work-live units and retail uses. Each of the remaining phases also include office uses: the Northwest Phase has 114,000 square feet of creative office uses, the Southwest Phase has 43,000 square feet of office uses, and the Southeast Phase has 472,000 square feet of office uses.

The environmental analysis contained in the Draft Supplemental EIR is based on the Project-specific proposed square footage of non-residential and residential uses and therefore is not dependent on a specific live-work balance. However, the Project's mix of uses is consistent with the Warner Center Plan's requirement that projects within the Downtown District include a balance of non-residential to residential uses. Specifically, for an FAR of 2.3:1, the Plan limits residential uses to a maximum 48 percent of the allowable FAR and requires at least 52 percent of the required FAR be non-residential uses. In compliance with this requirement, the Project proposes 48 percent residential development and 52 percent non-residential development.<sup>68</sup> This ratio of non-residential to residential floor area would be achieved at buildout, consistent with the Warner Center Plan.<sup>69</sup>

### **Comment No. 129-7**

#### ***Specific Comments regarding Promenade 2035 Draft SEIR***

Page I-14—Residential Parking: While the proposed one space per unit is within the WC 2035 plan, the reality of the number of cars per unit is subject to various factors including the final nature of the live-work environment envisioned, future transit option and the overflow parking accommodations available if the Entertainment Sports Complex is built and in use. How would additional parking be provided and the surrounding neighborhoods be protected in the event of more vehicles than available spaces? Would Westfield be required to fund residential permit parking zones adjacent to the project?

### **Response to Comment No. 129-7**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion about the Entertainment and Sports Center; in particular, it provides detail regarding Project Design Feature K-6, which is the development and implementation of an

<sup>68</sup> At buildout, the Project would provide 3,271,050 square feet of floor area, comprising 1,726,050 square feet of Non-Residential Floor Area (52 percent) and 1,545,000 square feet of Residential Floor Area (48 percent).

<sup>69</sup> Appendix B, Graduated FAR table, Note 6, of the Warner Center Plan provides that "[m]ulti-phased projects may reserve floor area for the required non-residential component in a future phase on-site."

Event Management Plan (EMP). The EMP requires that sufficient parking be provided through a combination of on-site shared parking and available off-site parking to meet event demand. The EMP requires that the operator provide evidence to LADOT that sufficient parking will be available. Further, Mitigation Measure K-2 includes payment of the Warner Center Mobility Fee which will be utilized consistent with Warner Center Mitigation TR-101 in contributing towards establishing the Warner Center Neighborhood Protection Program. As discussed further in Topical Response No. 3, Traffic and Parking, above, the City Council approved the Warner Center Plan Implementation Board, which would include oversight and coordination of the Warner Center Mitigation Program. This would accelerate implementation of the mitigation measures in the Warner Center Mitigation Program, including those associated with the Project.

### **Comment No. 129-8**

Page I-17—Sustainability: I support the sustainability options mentioned—especially in relation to cool roof and roof vegetation systems, as well as solar power and other environmentally friendly proposals. I hope the developer is able to increase the amount of hot water generated by non-carbon emitting sources beyond the 10% target noted in the project. As the GHG emissions conclusions for the project are all dependent on design features, I hope the developer will incorporate sustain ability features that exceed current guidelines.

### **Response to Comment No. 129-8**

As discussed on Page IV.D-43 of the Draft Supplemental EIR, Project Design Feature D-1 would include sustainability features that are integrated into the Project design to enable the Project to achieve LEED® Silver certification. Achieving LEED® Silver is based on a point system and can be achieved through different paths. Therefore, additional measures (e.g., increase beyond the 10 percent target in the amount of hot water generated by non-carbon sources) may be considered as part of the LEED® process. In addition, the Project does include sustainability features that exceed current guidelines (e.g., exceeding Title 24, Part 6, California Energy Code baseline standard requirements by 25 percent for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirements) including the installation of 40 percent of the total code-required parking spaces would be capable of supporting future electric vehicle supply equipment (EVSE) and 15 percent of the total code-required parking spaces would be equipped with electric vehicle (EV) charging stations.

### **Comment No. 129-9**

Page I-20—Construction Trucking Haul Route: The impact of the proposed haul routes seems to be understated in the supporting documents. In particular, the intersecting traffic pattern of the southbound Topanga Canyon Blvd. 101 Eastbound On-Ramp with the

101 WB Off-Ramp for Topanga Blvd. South. Depending on the arrival time and route for haul trucks, inbound traffic from the Ventura Blvd/Topanga Cyn EB 101 Off-Ramp would be greatly impacted at the Topanga/Ventura and adjacent intersections as this is already an impacted intersection as noted in the Village EIR. Finally, there is the potential for overlapping construction haul traffic patterns related to the Santa Susana Field Lab proposed cleanup and other proposed construction sites.

### **Response to Comment No. 129-9**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion of the construction traffic impact analysis. Although the Project is anticipated to be constructed in consecutive and non-overlapping phases, to provide a conservative analysis, the construction traffic impact analysis assumed maximum potential overlap of Project construction phases.

As set forth in Section III, Environmental Setting, of the Draft Supplemental EIR, there are 29 related projects within the Warner Center Plan area and vicinity. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, and described in Topical Response No. 3, Traffic and Parking, Mitigation Measure K-1 would implement a Construction Management Plan addressing construction traffic and would include measures to schedule construction-related deliveries and haul trips to arrive and depart the individual construction sites during off-peak hour to the extent feasible. The potential exists for the construction-related activities and/or haul routes of the Project and the related projects to overlap, particularly with respect to related projects that access US-101 near the Project Site. Specifically, there is a potential for these related projects and the Project to use the same haul routes at the same time. In addition, as with the Project, other nearby related projects could require temporary lane closures during construction. However, it is anticipated that like the Project, the related projects would be required to prepare a Construction Management Plan to ensure that potential construction-related impacts are minimized. The Construction Management Plans will be reviewed and approved by LADOT. To the extent that construction trips of related projects were to occur concurrently with the Project, it is anticipated that LADOT will require modification of the Construction Management Plan(s) to reduce effects of potential significant cumulative construction traffic impacts are anticipated.

### **Comment No. 129-10**

Page I-33—Digital Signage: While I acknowledge the current WC2035 Plan allows digital signage, I would like more details on the number of signs proposed, size, location, content & lumens. I do not feel an “LA Live” approach to digital signage is appropriate for an area surrounded by existing residential development.



**Response to Comment No. 129-10**

As discussed in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, signage on the Project Site would be consistent with the Warner Center Sign District, which further regulates signs within the Warner Center Plan area, and designed to be compatible with the existing and proposed architecture of the Project. In particular, digital signage is requested and would be consistent with the Project Site's location in the Downtown District of the Warner Center Plan.

The Lighting Report, provided in Appendix B, of the Draft Supplemental EIR, analyzed lighting from Project signage. Illuminated signage would include identification signs, digital signage, and tenant retail signs. All on-site lighting and signage would comply with the design guidelines set forth in the Warner Center Plan, the Warner Center Sign District, and applicable regulatory requirements, including the requirements set forth by CalGreen and Title 24 that stipulate the use of high performance lights with good color and good glare control. To provide a conservative analysis, the Lighting Report conservatively assumed the simultaneous use of all Project-related building and site lighting and assumed all signs would be operating at the maximum luminance level permitted by the Warner Center Sign District. Actual Project operations would likely generate lower illuminance and/or luminance than the lighting that has been modeled in the Lighting Report. In addition, existing off-site buildings and vegetation would block some of the light energy from reaching receptors. As discussed further in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, illuminated signage would generate a maximum of 0.3 foot-candle at the vertical planes at the property lines of the closest sensitive residential receptors. Thus, Project-related illuminance associated with illuminated signage would be below the 3.0-foot-candle significance threshold and would, therefore, be less than significant. In addition, as set forth below, the Project would comply with the applicable mitigation measures set forth in the Warner Center Plan EIR regarding lighting, including Warner Center Plan Mitigation Measure AES-10 and Warner Center Plan Mitigation Measure AES-11, Warner Center Plan Mitigation Measure AES-14, Warner Center Plan Mitigation Measure AES-16 through Warner Center Plan Mitigation Measure AES-20, Warner Center Plan Mitigation Measure AES-22 through Warner Center Plan Mitigation Measure AES-25, and Warner Center Plan Mitigation Measure AES-27. Implementation of these mitigation measures would further reduce the Project's less-than-significant lighting impacts.

**Comment No. 129-11**

Page I-54—Hot Spots analysis/Warner Center Mitigation Measures: AQ15, AQ16 should not be immediately struck as they may be relevant when the final route of construction traffic is plotted.

**Response to Comment No. 129-11**

Warner Center Plan Mitigation Measure AQ-15 pertains to localized offsite impacts to sensitive receptors as a result of proposed onsite construction activities. As discussed in Section IV.B, Air Quality, of the Draft Supplemental EIR, maximum construction emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds. The SCAQMD-recommended localized screening thresholds reflect consistency with the most stringent ambient air quality standards and would conservatively account for interior air pollutant impacts at applicable schools. Therefore, this mitigation measure is not applicable.

Warner Center Plan Mitigation Measure AQ-16, requires a project within 500 feet of the US-101 shall undertake a risk analysis to identify mitigation measures to reduce potential risks to such uses to acceptable levels (as identified by SCAQMD). Since the Project is located approximately 3,000 feet north of the US-101, this mitigation measure is not applicable.

**Comment No. 129-12**

Page I-57—Cultural Resources—the Macy’s building as a visual resource: While I do not personally oppose the loss of this structure, I would defer to architectural history experts on whether it is worthwhile to attempt to preserve any element of the existing architecture.

**Response to Comment No. 129-12**

As discussed in detail in Section V, Alternatives, of the Draft Supplemental EIR, and as further discussed in Appendix S, of the Draft Supplemental EIR, it is not feasible to retain the historical character-defining features of the Macy’s building while also meeting the City of Los Angeles Ordinance No. 183893, which provides the latest earthquake building requirements for concrete, non-ductile buildings. However, Mitigation Measure C-1, would require recordation of the Macy’s building prior to its removal with documentation to be reviewed by Department of City Planning’s Office of Historic Resources.

**Comment No. 129-13**

Page I-85—Land Use: In relation to Public Transport options, with no existing rail option for longer travel and limited, or only partial, bike-friendly routes to moderately close destinations—such as along Topanga Canyon Blvd, Ventura Blvd, etc.—the desired mitigation effects of existing transit may not materialize.

**Response to Comment No. 129-13**

Mobility Plan 2035 designates a combination of future bicycle facilities (Tiers 1, 2, and 3) as part of the Citywide bicycle network near the Project site and within Warner Center, and the Project Site includes both short-term and long-term bicycle parking. Additionally, the Warner Center Transit Hub adjacent to the Project Site provides access to several public transit options. Further, Section 7.8 of the Warner Center Plan describes the TDM requirements for all new development within Warner Center. Further, Appendix D, of the Warner Center Plan, identifies that a portion of the Warner Center Mobility Fee is designated for TDM implementation. Topical Response No. 3, Traffic and Parking describes Project Design Feature K-7, which is the development of a Project level TDM plan, and Mitigation Measure K-2, which is the payment of the Warner Center Mobility Fee.

**Comment No. 129-14**

Page I-99: Regarding noise generated by an open-roof Entertainment-Sports Complex (ESC). I have serious concerns about the potential for a significant noise impact generated by the proposed open-roof ESC. While I don't specifically disagree with the results of the pink-noise measurements, I am concerned about the following: I did not see measurements provided for residences located uphill from the ESC, nor did I see the impacts based on the type of noise generating the decibels. For example: Tonal, dynamic and constantly changing noise (ie: [sic] music) has more perceived impact than pink noise (the measurement source used). I strongly suggest a test at 115 dBA [sic] using music as the source. Additional testing should be performed in the hills surrounding the site as sound waves would tend to rise.

**Response to Comment No. 129-14**

As shown on Figure IV.H-2, in Section IV.H, Noise, of the Draft Supplemental EIR, sound propagation tests were conducted for six off-site receptor locations, including a receptor located uphill from the Entertainment and Sports Center (receptor location M6 located along Rolling Road). The site specific sound propagation test was conducted to identify any potential sound amplification due to the presence of the existing natural land topography and the intervening landscape in the existing hills southwest of the Project Site.

As discussed on page IV.H-22 of the Draft Supplemental EIR, pink noise<sup>70</sup> was used only for the site specific sound propagation test, whereas the actual measured sound spectrum from typical concerts (90 to 110 dBA) was used for the Entertainment and Sports

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<sup>70</sup> "Pink noise" is a random noise source, which has equal sound levels in the audio octave band frequencies (from 63 Hz to 8 kHz)."

Center noise analysis (as discussed on page IV.H-53 of the Draft Supplemental EIR). Furthermore, the use of pink noise as a sound source is a standard engineering method to measure the outdoor sound attenuations due to distance, topography, metrological and other existing natural components in the outdoor environment. Therefore, the additional sound test of using actual music is not warranted.

#### **Comment No. 129-15**

Page I-111—Direct Employment: While the project will generate new jobs. [sic] What will be the pay level of these jobs? If retail, and the ESC are the primary initial, or final, employers, it would seem most new jobs will be at, or near, minimum wage while the expected cost of living in the residences in and around the project twill [sic] require an income level that is much greater. If higher paying jobs are not a majority portion of the employment generated, then the live-work component, and its intended mitigations, cannot be achieved. This is the reason for the previously expressed concern about the phasing and the possibility that the office towers, and related higher paying “professional” jobs may be delayed or not built.

#### **Response to Comment No. 129-15**

The Project’s mix of uses is consistent with the Warner Center Plan’s requirement that projects within the Downtown District include a balance of non-residential to residential uses. Also, under the current proposed phasing order, the Northeast Phase contains 85,000 square feet of non-residential area, which includes both work-live units and retail. Each of the remaining phases also include office uses: the Northwest Phase has 114,000 square feet of creative office, the Southwest Phase has 43,000 square feet of office, and the Southeast Phase has 472,000 square feet of office.

#### **Comment No. 129-16**

Page I-112—Infrastructure: I acknowledge the generally newer DWP infrastructure in the project area; however, blackouts and brownouts have already been experienced during heat waves. With multiple projects in development in the area and the proposed ESC—does LADWP have the infrastructure available to provide reliable service in an environment where the climate is only expected to get warmer by the time the project is fully completed?

#### **Response to Comment No. 129-16**

Refer to Topical Response No. 6, Infrastructure, above, for a discussion of the Project’s impacts to electricity infrastructure.

**Comment No. 129-17**

Pages I-115 to I-123: Police: Operation—how is the impact considered “less than significant” when taken into account with other major developments built or planned in the area? While the mathematical calculation may be correct, the conversion from office to residential and shopping in the developments surrounding the project site could result in a higher net crime per capita.

**Response to Comment No. 129-17**

As discussed in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, a comprehensive cumulative analysis was conducted for the Project that includes all 29 of the related projects identified in Section III, Environmental Setting, of the Draft Supplemental EIR. As discussed therein, the police service population generated by the Project and related projects would increase the total police service population of the Topanga Area from 196,840 persons to 272,176 persons, which would decrease the officer-to-resident ratio for the Topanga Area from the current 1.2 officers per 1,000 residents to 0.8 officer per 1,000 residents. Assuming the same crimes per capita rate currently observed in the Topanga Area of 0.0006 crime per capita, the Project and related projects could generate an additional 42 crimes per year. The estimated 13 Project-generated crimes would represent approximately 31 percent of the cumulative growth in potential crimes. However, as previously discussed, the Project would implement Project Design Features J.1-1 through J.1-8 and Warner Center Plan Mitigation Measures PS-16, PS-17, and PS-19 to reduce reliance on LAPD services, and thus, is not anticipated to generate a demand for additional police protection services that could exceed the LAPD’s capacity to serve the Project Site. In addition, it is anticipated that the related projects would implement project design features similar to the Project, which would reduce cumulative impacts to police protection services. Additionally, a related project, depending on the project size, would be subject to the City’s routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Also refer to Topical Response No. 5, Public Services, above.

**Comment No. 129-18**

I only saw private security mentioned in the Draft SEIR relative to event security management. While I have no doubt that Westfield’s team, in conjunction with the LAPD, will produce a high quality security plan—based on other venues, and the current security environment, police resources are often on-site. Would the developer/operator pay for the provision of additional police resources so as not to impact the availability of already limited resources for the surrounding areas serviced by the Topanga Division?

**Response to Comment No. 129-18**

Refer to Topical Response No. 5, Public Services, above, for a discussion on the Project's impacts to police services and the proposed project design features and mitigation measures that will be implemented for the whole Project site, including those that address police protection associated with the Entertainment and Sports Center. As discussed therein, based on the *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, the need for or deficiency in adequate police protection services in and of itself is not a CEQA impact.<sup>71</sup> Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate. However, the Applicant would be responsible for paying for the Project's on-site private security. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 129-19**

It seems the LAPD Topanga Division is experiencing service impacts due to increased calls for service related to a significant expansion of businesses and residents—US Census data estimated 17,000 additional residents in the area from 2009–2015. [sic] In addition, police calls related to homelessness, substance abuse, and a general increase in crime above the 2014 levels already tax the system despite the hard work of the Topanga Division officers. While there is hope that some of these issues could be mitigated prior to the Project's in-service date, LAPD service expansion should be strongly considered prior to project completion.

**Response to Comment No. 129-19**

Refer to Topical Response No. 5, Public Services, above, for a discussion on the Project's impacts to police services and the proposed project design features and mitigation measures that will be implemented by the Project.

**Comment No. 129-20**

WC Plan Mitigation Measure PS-15 is struck—*the City shall ensure Police Protection levels are maintained*. While a strikethrough may be appropriate since it is a City responsibility—the question has not been answered as to whether the City can support this requirement—

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<sup>71</sup> *The City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833 found that "[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city." Thus, the need for additional police protection services is not an environmental impact that CEQA requires the Project to mitigate.*

especially in relation to the other projects that will add a police service population estimated to total 75,336 persons.

### **Response to Comment No. 129-20**

The commenter is correct that Mitigation Measure PS-15 was struck as it is the responsibility of the City and not the Applicant. Nonetheless, refer to Topical Response No. 5, Public Services, above, for an overview of the project design features and mitigation measures that would be implemented by the Project to address police protection. As discussed therein, based on the *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, the need for or deficiency in adequate police protection services in and of itself is not a CEQA impact.<sup>72</sup> Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate. Also refer to Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, for a discussion of the cumulative impacts of the Project and related projects on police protection.

### **Comment No. 129-21**

The Draft SEIR does not include any analysis of the LAPD Traffic Division impacts and resources. Currently, the Woodland Hills area is already allocated only minimal regular traffic enforcement and recently had multiple streets near the proposed development added to the Vision Zero High Injury Network (May 2018). Those streets included segments of: Ventura Blvd, DeSoto, Canoga, Fallbrook, Owensmouth—all near or directly adjacent to the project site.

### **Response to Comment No. 129-21**

Refer to Topical Response No. 3, Traffic and Parking, above for a discussion about the Project traffic impact analysis; in particular, a discussion about neighborhood street segments is provided along with detail about both Warner Center Plan Mitigation Measure TR-101 and Mitigation Measures K-2 and K-3 which describe the funding contribution towards and the implementation of a neighborhood traffic management plan.

This comment discusses portions of the Vision Zero High Injury Network located nearby the Project Site. As detailed in the Traffic Study, LADOT's Vision Zero initiative/policy promotes traffic safety strategies to eliminate collisions that result in severe injury or

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<sup>72</sup> *The City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833 found that "[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city." Thus, the need for additional police protection services is not an environmental impact that CEQA requires the Project to mitigate.*

death. The High Injury Network identified in Vision Zero is a network of streets based on a review of collision data from the most recent five year period, where strategic investments will have the biggest impact in reducing traffic collisions resulting in death and severe injury. The Project Site is not located immediately adjacent to a street identified in the High Injury Network.

All Project street improvements would be constructed in accordance with City requirements related to the safety of vehicles, pedestrians, and bicycles. Refer to Topical Response No. 7, Open Space, regarding the Project's landscaped setbacks bordering the entire perimeter of the Project Site, consistent with the Warner Center Plan. Refer to Topical Response No. 5, Public Services, above regarding how the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services; this provision would also apply to traffic enforcement. However, the analysis of traffic accidents is not required under CEQA.

The Warner Center Mitigation Program includes categories for roadway improvements, streetscape improvements, and neighborhood protection that may include safety elements consistent with Vision Zero. As described in Topical Response No. 3, Traffic and Parking, pursuant to Mitigation Measure K-2, the Project will be required to pay the Warner Center Mobility Fee, which will be used to implement the Warner Center Mitigation Program, including those improvements consistent with Vision Zero.

### **Comment No. 129-22**

Pages I-124–130—Fire & Emergency Medical Services: I have concerns that while future service delays may be considered “less than significant” the **current** EMS response times are already close to 5 min or more for each servicing station—which, per the American Heart Association, would result in likely serious injury or death in the event of a cardiac incident. Even minor further delays in medical resources could significantly impact live saving services.

In speaking with EMS and fire staff at surrounding stations—they are already feeling a “drain” on services related to increased medical calls for the homeless and other increases due to recent development in the area, yet the Level of Significance in the Draft SEIR is listed as “less than significant” for impacts on Emergency Services. This assumes that the City provides upgraded services by the time the project is completed. How is that to be ensured?



**Response to Comment No. 129-22**

Refer to Topical Response No. 5, Public Services, above for a discussion on the Project's impacts to fire services and the proposed project design features and mitigation measures that will be implemented by the Project. Response times for emergency medical services were provided in Table IV.J.2-2 on page IV.J.2-12 of Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR. However, as there are no established thresholds, response times are not used to evaluate the ability of LAFD to provide fire services. As discussed further in Section IV.J.2, Public Services—Fire Protection, of the Draft Supplemental EIR, while Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by traffic, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project's traffic study area. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, as further discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project is adding an additional lane on Topanga Canyon Boulevard, adjacent to the Project Site, to further improve the flow of vehicles (including emergency vehicles) along Topanga Canyon Boulevard.

**Comment No. 129-23**

Page I-131—LAUSD Schools: What is the LAUSD's plan for supporting the noted lack of spaces available for elementary school age children?

**Response to Comment No. 129-23**

As discussed in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, Senate Bill 50 (SB 50) allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, LAUSD collects development fees for new construction within its district boundaries. Currently, LAUSD collects the maximum new school construction facility fee at a rate of \$3.79 per square foot of new residential construction, \$0.61 per square foot of commercial/industrial construction, \$0.28 per square foot of self-storage structure, and

\$0.39 per square foot of parking structure.<sup>73</sup> Payment of these fees is required prior to issuance of building permits. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels. As such, with payment of the development fees set forth by LAUSD, potential impacts of the Project on school facilities would be less than significant. The comments regarding LAUSD's plan for supporting the lack of spaces for elementary school aged children are outside of the purview of CEQA but are noted for the record and have been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 129-24**

Page I-141—Library Impact: Summary Library demand in Woodland Hills is already strong. It is about services and events—child reading programs, senior events, authors/speakers, etc—not just a room with books. LAPL letter states that the size of WH branch is already too small for demand. Requests \$200 per capita in population for mitigation used toward books, staff other library resources (the request for funds not noted in Summary). The summary does not state how, exactly, the developer proposes to mitigate demand. It seems unrealistic that ALL new demand would be served by the project's on site check-out facilities UNLESS they were coupled with commensurate services.

#### **Response to Comment No. 129-24**

As discussed in Section IV.J.5, Public Services—Libraries, of the Draft Supplemental EIR, the Project would implement Warner Center Mitigation Measure PS-22, which requires that the Project offset the burden of existing libraries through: (1) payment of a fee based on an established nexus between the new development, demand and the need for additional personnel and facilities; (2) provision of on-site facilities commensurate with the demand generated; or (3) some combination of the above. The Project would implement Project Design Feature J.5-1, which states that the Project would incorporate a library room of approximately 800 square feet in each residential building for use by Project residents. The library room will include computers, free internet access, periodicals, books for loan, seating areas and tables. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

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<sup>73</sup> Los Angeles Department of Building and Safety, *Permit Fee Estimate*, <http://netinfo.ladbs.org/feecalculator/3950786566dd7fcc88258152007def26?OpenForm>, accessed September 8, 2017.

**Comment No. 129-25**

Pages I-145 thru I-168—Traffic and Access

While I agree on the nature of the project as a pedestrian friendly site and am not disputing the technical skill of the traffic engineers. I am concerned that the Draft SEIR analysis may not accurately represent daily commuting in the event that the live-work balance is not achieved.

**Response to Comment No. 129-25**

The environmental analysis contained in the Draft Supplemental EIR is based on the Project-specific proposed square footage of non-residential and residential uses. Additionally, the Project's mix of uses is consistent with the Warner Center Plan's requirement that projects within the Downtown District include a balance of non-residential to residential uses. Specifically, for an FAR of 2.3:1, the Plan limits residential uses in the Downtown District to a maximum 48 percent of the allowable FAR and requires at least 52 percent of the required FAR be non-residential uses. In compliance with this requirement, the Project proposes 48 percent residential development and 52 percent non-residential development.<sup>74</sup> This ratio of non-residential to residential floor area would be achieved at buildout, consistent with the Warner Center Plan.<sup>75</sup> The Draft Supplemental EIR's traffic analysis was reviewed and approved by LADOT for the Project-specific proposed square footage of non-residential and residential uses.

**Comment No. 129-26**

Does the use of 2008 Data with a growth rate factor of .56% accurately reflect the true growth in the area due to recent housing construction and an increase of approximately 17,000 residents since 2008?

**Response to Comment No. 129-26**

As discussed further in Topical Response No. 1, Warner Center 2035 Specific plan, above, the City certified a programmatic EIR in 2013 evaluating the potential environmental impacts associated with full buildout under the Warner Center Plan to the year 2035. The Project's Draft Supplemental EIR analysis tiers off of the approved and certified Warner

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<sup>74</sup> *At buildout, the Project would provide 3,271,050 square feet of floor area, comprising 1,726,050 square feet of Non-Residential Floor Area (52 percent) and 1,545,000 square feet of Residential Floor Area (48 percent).*

<sup>75</sup> *Appendix B, Graduated FAR table, Note 6, of the Warner Center Plan provides that "[m]ulti-phased projects may reserve floor area for the required non-residential component in a future phase on-site."*

Center Plan EIR by analyzing Project-specific environmental impacts for the Project Site that may not have been covered under the Warner Center Plan EIR, for instance, impacts associated with the Entertainment and Sports Center. As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project's Traffic Study assumed full buildout under the Warner Center Plan. Additionally, actual traffic counts were conducted in 2016, the year of the Project's NOP, to compare to the Warner Center EIR's projected traffic growth for 2016. These empirical counts were lower than the Warner Center EIR's projected traffic volumes for 2016. Therefore, the area-wide growth used by the Warner Center Plan EIR, and the Project EIR, is conservative. The population and housing impacts of the Project are analyzed in Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, and impacts were determined to be less than significant.

### **Comment No. 129-27**

*Traffic:* I have specific concerns regarding intersections that I did not see studied for the Draft SEIR—though some were studied in the EIR for the Westfield Village project. If I have inadvertently listed intersections that were, in fact, noted in the appendixes, I apologize in advance. This is a lot to read for lay person.

- Topanga Canyon Blvd /101—WB & EB on-ramps not discussed. Would be impacted by additional SB Topanga Canyon Blvd construction and SB and NB Topanga Boulevard operational traffic—regardless of whether or not the traffic was destined for the freeway ramps. These on-ramps, the EB 101 on-ramp from Topanga Blvd north are already severely backed up during many hours of the day.
- Canoga at 101 On-Ramps/Ventura Blvd not discussed.
- Canoga at Burbank Blvd not discussed [sic]

### **Response to Comment No. 129-27**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion about the Project traffic impact analysis relative to the 49 intersections selected for analysis. As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, three of the four locations identified by the comment were fully analyzed for Project traffic impacts. The fourth location, Topanga Canyon Boulevard and US-101 Eastbound on-ramp, is an uncontrolled ramp onto US-101. This location is not a signalized intersection, and as such, does not meet the LADOT analysis criteria and therefore, was not selected for analysis.

**Comment No. 129-28**

In addition, on page I-154, the Caltrans Analysis does not include impacts to On-Ramps queuing **OR** proposed mitigation efforts for existing LOS E/F segments of the freeway. It only measures a mitigation effort to be selected by Caltrans. How are we to be guaranteed any mitigation?

**Response to Comment No. 129-28**

A supplemental analysis of potential impacts to state facilities (freeways) was prepared based on Caltrans guidelines and is provided in Appendix M, of the Draft Supplemental EIR. As identified in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Caltrans facilities analysis evaluated the Project's potential impacts on 11 freeway mainline segments, 26 intersections along Topanga Canyon Boulevard and US-101 ramp terminal intersections, and five off-ramps along US-101. The Caltrans TIS Guidelines do not specify the analysis of freeway on-ramps.

To identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an ESC event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

### **Comment No. 129-29**

Page I-152—I believe traffic control officers would need to be expanded beyond the “Study” area in order to fully mitigate traffic impacts (ie: [sic] to the Topanga/Ventura Blvd intersection) .

### **Response to Comment No. 129-29**

It appears the commenter is referring to a discussion regarding the EMP on page I-152 in Section I, Executive Summary, of the Draft Supplemental EIR. Refer to Topical Response No. 2, Entertainment and Sports Center, for a discussion regarding the Entertainment and Sports Center, including Project Design Feature K-6, which includes the development and implementation of an EMP. The purpose of the EMP is to respond to potential changes in traffic patterns and mobility/parking technologies that may alter the travel to and attendance of events at the Entertainment and Sports Center. The EMP will include physical and operational elements such as changeable message signs on freeways, real-time monitoring of traffic conditions, and coordination with Metro to optimize transit operation. The EMP also includes the deployment of traffic control officers to selected locations for the purposes of directing traffic. The Applicant will coordinate with LADOT to identify the intersections where traffic control officers will be needed based on the size and time of the event and the time of year.

### **Comment No. 129-30**

Page I-164—Project Design Feature K-6. I feel the requirement for traffic control officers seems to be set at too high a threshold. Overall deployment appears not to be dispersed far enough from the ESC to mitigate impacts.

### **Response to Comment No. 129-30**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion of the Project’s impact analysis; based on a fully built Project with a sold-out Entertainment and Sports Center event and the Project’s Event Management Plan along with all the anticipated Warner Center Plan growth and full implementation of the Warner Center Mitigation Program, the Project is not projected to result in significant impacts. As referenced by this comment and summarized in Topical Response No. 3 Traffic and

Parking, Project Design Feature K-6 encompasses the development of the EMP; this includes the deployment of traffic control officers to selected locations for operational purposes for those events projected to exceed 10,000 attendees; detail about the traffic control officers is available in the Project's Transportation Study. The Project's EMP will require review and approval by LADOT prior to an event and may be subject to refinements from the description in Project Design Feature K-6.

### **Comment No. 129-31**

In addition, there had been discussion that rideshare services would help mitigate traffic impacts; however, a recent study entitled "Unsustainable?" by Bruce Schaller, a former NYC deputy commissioner for traffic and planning, notes that the impacts of certain types of rideshare services may actually make traffic worse.

### **Response to Comment No. 129-31**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the Project's traffic impact analysis. The methodology and analysis were reviewed and approved by LADOT. The effects of a rideshare trip may not be as impactful as perceived. Depending on the time of day, one end of the trip will be in the peak direction while the other trip end is in the opposite, off-peak direction. In many cases in the Warner Center, an off-peak direction trip will not affect the signal timing or the intersection traffic flows, and therefore, will have little to no effect on the operations of the key intersections in the Study Area. Further, one rideshare vehicle may be a combination of linked trips and/or passengers that potentially represent otherwise single passenger trips no longer traveling to the Project site. From an operational perspective, accommodations for rideshare services (i.e., designated drop off/pick up zones, waiting zones) have been integrated into the Project site design. These accommodations are anticipated to improve safety and address the localized effects of rideshare vehicles potentially blocking traffic/unnecessarily circulating on the street network. It should be noted that the increased use of rideshare trips to/from any venue will certainly reduce the parking demand at the venue which was also a concern of the adjacent neighbors.

The report cited in the comment ("Unsustainable?") provides a detailed account of the growth and operation of the Transportation Network Companies (TNCs) like Uber and Lyft as they operate in the densest areas of New York City. The report tracks the growth of TNCs in New York City from 2013–2016 and offers some recommendations for New York (and other cities) regarding the policies that could be considered to reduce the effects of additional vehicle miles of travel created by rideshare activity. The report admits that its findings and recommendations are specific to New York City particularly in the areas of street management, transit patronage loss, and road pricing. While transit policies and road/congestion pricing are beyond the scope of any single project, the issue of street

management is being addressed by the Project through the design of specific pick-up/drop off and waiting areas.

**Comment No. 129-32**

The traffic impact analysis in the Draft SEIR assumes a full implementation of all measures in the Mitigation plans. Based on the existing EIRs for the Westfield Village, many of those measures, especially Caltrans related, have not been implemented so the assumptions are probably overly optimistic in terms of mitigation. Further, I request that given the already impacted conditions on Topanga Canyon Blvd north and south of the Project Site, additional study and mitigations be required.

**Response to Comment No. 129-32**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the Project's traffic impact analysis and mitigation process in Warner Center. Refer to Topical Response No. 4, The Village at Westfield Topanga, above, for a discussion about development progress of The Village at Westfield Topanga and specifically about the implementation of transportation improvements. For informational purposes, the Traffic Study also analyzed the phased buildout of the Project. The Traffic Study analyzed buildout of the Northeast Area (Phase 1), Northwest Area (Phase 2), and Southwest Area (Phase 3, which includes the Entertainment and Sports Center). In the event that the associated mitigation measures have not been implemented by the operation of Phases 1–3, then the significantly impacted intersections would remain significantly impacted until implementation of the Warner Center Mitigation Program.



**Comment Letter No. 130**

Diana Kelley  
22055 Oxnard St.  
Woodland Hills, CA 91367-3546

**Comment No. 130-1**

We live in the Fountain Park neighborhood in Woodland Hills. We would like to voice our concern in regards to Environmental Case#: ENV-2016-3909-EIR. As residents on Oxnard St. for almost 12 years, do not think the mini sports arena would be a fit to this area.

Thank you for considering our concern to this matter.

**Response to Comment No. 130-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment expressing opposition to the Entertainment and Sports Center is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 131**

Maureen D. Kessie  
21790 Ybarra Rd.  
Woodland Hills, CA 91364-4327

**Comment No. 131-1**

As a local resident of Woodland Hills, I have reviewed the Executive Summary RE: the Promenade Project and see several problematic points that are not sufficiently addressed as related to the current status of the area in question.

It is apparent that the original 2013 Warner Center Plan on which the Promenade Project has based its compliance is significantly out of date with current conditions.

The Promenade Project does not sufficiently address:

**Response to Comment No. 131-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 131-2**

**1. Parking**—One parking spot each for 1432 multi-family units is unrealistic. Where will the occupants' other vehicles be parked?

**Response to Comment No. 131-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the parking analysis for the Project. The Project is consistent with the Warner Center Plan's requirement to provide a minimum of 1 parking space per residential unit.

**Comment No. 131-3**

**2. Water Infrastructure & Usage**—Southern California, and thus Woodland Hills, is currently undergoing a long term drought. The water table has dropped to levels that cannot even sustain current mature trees; everywhere you look trees are dying. Where will the water come from to irrigate the proposed green areas? And, at what cost? Will the cost be borne by the owners or the taxpayers? With no promise of a return to the past

patterns of wet winters in this region, it is likely not sustainable to service even the existing live/work infrastructure in the Woodland Hills area, not to mention the proposed amount of new commercial and residential construction, some of which is already underway. There is much verbiage in the report about harvesting rainwater—but, last winter there was insufficient rainfall to make harvesting of precipitation even viable! This is a serious matter that can't be ignored.

### **Response to Comment No. 131-3**

Refer to Topical Response No. 6, Infrastructure, for a summary of the Project's quantitative water supply impacts; estimated water consumption during operation of the Project; and project design features which go above and beyond City required water conservation measures. In addition, Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft Supplemental EIR, provides a comprehensive quantitative analysis of the Project's impacts to water supply and infrastructure during construction and operation of the Project. As discussed therein, LADWP concluded that the increase in water demand for the Project falls within the available and projected water supplies during an average year, single-dry year, and multiple-dry year through the year 2040, as well as the intervening years (i.e., 2033), as described in the 2015 Urban Water Management Plan. Thus, Project-level and cumulative impacts with regard to water supply and infrastructure would be less than significant with compliance with regulatory measures and implementation of Project Design Feature M.1-1, which includes implementation of additional water conservation measures beyond those required by the LAMC, as amended by Ordinance No. 184248.

### **Comment No. 131-4**

**3. Traffic flow is insufficiently addressed**—In particular, the addition of a 15,000 seat venue is simply not feasible. For example, has anyone working on the Executive Summary experienced the misery of summer traffic in the neighborhoods surrounding the Hollywood Bowl?

The results of the reports on the venue's impact on the various local intersections seem to have no basis in reality. Traffic in surrounding areas is already very bad at peak times, sometimes taking 2–3 lights to simply get through the Ventura/Topanga intersection. The future "improvements" to the infrastructure referenced are not detailed, just merely referred to, providing no confidence that further retail and residential development can be accommodated without serious problems—never mind a 15,000 seat stadium!

Again, at what cost and who will pay for these proposed infrastructure upgrades?

**Response to Comment No. 131-4**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the Entertainment and Sports Center and Topical Response No. 3, Traffic and Parking, for a discussion regarding the Project's traffic impact analysis and the mitigation process in Warner Center. The methodology and analysis were reviewed and approved by LADOT. The Project's mitigation measures (and project design features) would be implemented by phase. As stated in DOT's Traffic Assessment Letter, included as Appendix M.1, of the Draft Supplemental EIR, the Applicant is required to pay the required Mobility Fee for each project phase, prior to issuance of any building permits for that phase. This is also required by Mitigation Measure K-2, which requires the Project to pay Mobility Fees required by the Warner Center Plan by Project phase. Additionally, the mitigation measures in the Warner Center Mitigation Program directly adjacent to the Project Site would be implemented by Project phase, as required by Project Design Feature K-2, Project Design Feature K-8, and Section 7.7, Street Improvements and Dedications, of the Warner Center Plan.

**Comment No. 131-5**

Conceptually, it is admirable to work on making the Woodland Hills/Warner Center a viable live work area that is pedestrian friendly. But this proposal is based on an outdated plan that is not in sync with current reality, and MUST be revisited, updated, and brought into the realm of today's reality with serious consideration given to the limitations and current status of the area.

**Response to Comment No. 131-5**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed in Topical Response No. 1, Warner Center 2035 Specific Plan, above, the Warner Center Plan was approved in 2013 by the City with input from the community. Also refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a summary regarding the public's input into this process.

**Comment No. 131-6**

Here is what WHHO suggests you do:

1. Read the Executive Summary (SEE THE LINK ABOVE) or for the full Draft Supplemental Environmental Report (DSEIR) which you can find that above as well. (The Draft SEIR is also available online at the Department of City Planning's website at

<http://planning.lacity.org> (click on the “Environmental Review” tab on the left-hand side, then “Draft EIR,” and click on the Project title).

The complete 3,000+ page Draft Supplemental EIR—including the Executive Summary and Index can all be found at the link ABOVE. You will also find the email address for where your letter must be sent before 4 PM July 26, as well as the regular mail address. The DSEIR is filed under ENV-20 16-3909-EIR. [sic]

2. You will see a number of categories listed in the Executive Summary. Read the ones you are most interested in and then form your comments, suggestions, and criticism for each into a letter.

3. At the top of your Comments, please reference the Environmental Case No: ENV-20 16-3909-EIR. [sic]

4. Submit your written Comments by Thursday, July 26, 2018, [sic] no later than 4:00 P.M. to the following address: (either mail or email is acceptable).

Mail:

Elva Nuno-O'Donnell, City Planner  
City of Los Angeles, Department of City Planning  
6262 Van Nuys Boulevard, Room 351  
Van Nuys, CA 91401

E-mail:

[elva.nuno-odonnell@lacity.org](mailto:elva.nuno-odonnell@lacity.org)

Remember if you do not submit your comments they will not be part of the Administrative Records and any legal challenges may be limited to the comments submitted.

Thank you for your involvement and concerns for our community. It is through each of your efforts that our community will be a better place to live, work and play.

### **Response to Comment No. 131-6**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein.

### **Comment No. 131-7**

Thank you, Elva. My mailing address is:

21790 Ybarra Rd  
Woodland Hills, CA 91364

**Response to Comment No. 131-7**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 132**

Alan Keyfman  
mask0425@sbcglobal.net

**Comment No. 132-1**

As a resident of Woodland Hills, I would like to inquire about a chance of adding a freeway on-ramp (and possibly an off-ramp) on the west side of Canoga Avenue? Currently there are ramps only on the east side of Canoga which creates a huge “traffic dump” on Ventura Blvd for vehicles exiting 101 East needing to reach all points between west of Topanga Canyon Blvd and De Soto Ave almost two miles away.

<https://www.google.com/maps/@34.1687984,-118.5994651,16.92z>

The wait to make a left turn from Ventura onto Topanga can be as long as a few traffic light cycles during the peak times. The problem will only get worse with the development of the old USPS site on Clarendon St. west of Topanga, all Westfield developments as well as many others already approved and/or being planned. Having an exit off the 101 on Canoga Ave would provide a much needed relief now and in the future.

I understand that the freeway ramps are primarily a State issue but I believe that the City does have a say in this matter. Please advise.

**Response to Comment No. 132-1**

Improvements to State roadway facilities are made by Caltrans. The specific location on the west side of the existing Canoga Avenue ramp is a constrained location with private development located immediately adjacent to the freeway/overpass.

The Traffic Study included in Appendix M, of the Draft Supplemental EIR, includes a supplemental analysis of Caltrans facilities, including intersections, freeway mainline segments, and off-ramps. The Caltrans guidelines do not identify criteria relative to significant impacts related to the addition of Project traffic to state facilities; therefore, determination of impact significance cannot be made relative to the Caltrans guidelines. However, to identify the Project’s contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project’s proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the

significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an Entertainment and Sports Center (ESC) event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.



**Comment Letter No. 133**

Victoria Killian  
22120 Cantara St.  
Canoga Park, CA 91304-3826

**Comment No. 133-1**

I am a resident of Canoga Park and have just read through the Draft Supplemental EIR for Promenade 2035 Project and I have a lot of concerns regarding this project.

There will be significant environmental impacts to the community in which I live. As the report states this project is anticipated to cause "Project and cumulative off-site noise impacts during operation when there are sold-out events at the Entertainment and Sports Center..." I do not want an arena built anywhere in the Valley. The traffic will cause the Valley's already poor air quality to become worse because of vehicles driving here. The Valley does not flush out hazardous air like other parts of Los Angeles that get the sea breeze. It sits in the Valley and will make people, like my husband who has asthma, and myself who has [sic] many chronic health conditions, more sick.

**Response to Comment No. 133-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental impacts of the proposed Entertainment and Sports Center, including noise. Also refer to Topical Response No. 3, Traffic and Parking, above for an overview of the traffic impacts associated with the Project.

As shown in Table IV.B-2 on page IV.B-21 in Section IV.B, Air Quality, of the Draft Supplemental EIR, the ambient air quality data demonstrates that ambient air quality is improving in the area. In addition, as discussed on pages IV.B-45 and IV.B-46, localized impacts from on-site operational activities would fall below the LST thresholds. Furthermore, trips generated by the Project would generate less than significant impacts associated with localized mobile-source CO emissions.

**Comment No. 133-2**

Although integrations to public transit may be one way these developers are trying to tell us this project will be okay, I've lived in Los Angeles long enough to know that from the Valley there is not good public transit to other areas of Los Angeles. Everyone will still drive their cars to and from events and residences.

**Response to Comment No. 133-2**

As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplement EIR, there are public transit options in the Project vicinity. As described in Section IV.K, Traffic, Access, and Parking, of the Draft Supplement EIR and set forth under Project Design Feature K-6, the Project would include the development of an Event Management Plan (EMP). One component of the EMP is transit service coordination; this includes coordination with Metro to optimize transit service and frequency to the Entertainment and Sports Center during events. Further, Project Design Feature K-7 will develop and implement a Transportation Demand Management (TDM) Program which will include strategies to promote non-automobile travel and reduce the use of single-occupant vehicles; the TDM Program must be reviewed and approved by LADOT.

**Comment No. 133-3**

This project will change the intention of the Valley and its cultural landscape. The Valley is a suburban city within the City of Los Angeles; it allows for families to buy homes with yards and raise kids in a spread out community. This project will complete destroy that. It will cause a lot of harmful environmental impacts that I as a resident of Canoga Park I will be directly affected by this project.

Please make my comments known that I believe this project to be a harmful thing to happen to the Valley and that I do not want it to continue in its current state.

**Response to Comment No. 133-3**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Also refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's consistency with the Warner Center Plan.

**Comment Letter No. 134**

James W. Kinsey III  
21550 Oxnard St., Ste. 470  
Woodland Hills, CA 91367-7116

**Comment No. 134-1**

I have been following Westfield's Promenade project for some [sic] now. I've attended community meetings and have heard the Westfield team make presentations and answer questions.

As a longtime West Valley resident, I'm quite interested in seeing the Promenade mall redeveloped. Westfield's proposed project seems to be a very creative way to turn that massive block into a human-scale community. It's clear that a great deal of careful thought has gone into designing the project as it falls well within the parameters of the Warner Center 2035 Plan.

I'm pleased the Draft Environmental Impact Report builds on the thorough environmental analysis completed for the WC 2035 Plan in its own EIR. It's terrific that the EIR confirms the project furthers the WC 2035 Plan's goal to be one of the cleanest and greenest growth plans in all of Los Angeles by bringing together housing and jobs next to transit.

I look forward to the project's approval and completion.

**Response to Comment No. 134-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 135**

Andrea Koepke  
19716 Horseshoe Dr.  
Topanga, CA 90290-3235

**Comment No. 135-1**

The proposed Warner Center Promenade Development Project is not appropriate for the Woodland Hills neighborhood. The Project IS BIG and would specifically include approximately 1,432 multi-family residential units, approximately 244,000 square feet of retail/restaurant uses, approximately 629,000 square feet of office space, approximately 572 hotel rooms, and an approximately 320,000-square-foot, 15,000-seat Entertainment and Sports Center. We simply DO NOT have room for that amount of building and the amount of people that it will bring to our neighborhood. Residents don't want it. The business, traffic and congestion that such a project will bring will change our neighborhood drastically. We don't have the parking to make such a huge facility feasible. Our neighborhood side streets will become parking lots. We DON'T want it. Please help us by listening to the people who live in the area. The project is NOT WANTED. Please don't impose it on us. We want to keep what is left of the quiet neighborhood we moved to and have invested in. We don't want the character of our community changed to that of an urban area. This is a suburban area and we wish to keep it that way.

**Response to Comment No. 135-1**

Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for discussion about the Project's overall consistency with the Warner Center Plan. As discussed above, the Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The Project is consistent with the Downtown District designation of the Warner Center Plan. In addition, with respect to the Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. Also refer to Topical Response No. 2, Entertainment and Sports Center, for a discussion regarding the parking requirements of the Entertainment and Sports Center. As a note, the Entertainment and Sports Center is approximately 320,050 square-feet under the Project, and not 320,000 square feet as described by the commenter. This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 135-2**

Thank you. Of course, my address is: Andrea Koepke 19716 Horseshoe Drive Topanga, CA 90290.

**Response to Comment No. 135-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 136**

Brandon Kuipers  
21115 Dumetz Rd.  
Woodland Hills, CA 91364-4533

**Comment No. 136-1**

I just wanted to submit my comments on the proposed Promenade 2035 project. I'm a recent homebuyer residing at 21115 Dumetz Rd, Woodland Hills, CA 91364.

After reading through the proposal, I am mainly in favor of the development, but I do think there are some serious flaws in what needs to be required.

**Response to Comment No. 136-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 136-2**

1—With major power outages, additional traffic and greenhouse gases, and Woodland Hills being the hottest place in the valley, I believe that there should be a solar requirement added for the new development where solar panels should be required to all buildings and provide at least 10% of power consumption for the new development. This will help offset some of the added pressure to the power grid in a time where Los Angeles is struggling to keep up with power during major heatwaves.

**Response to Comment No. 136-2**

As discussed in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR, the Project would implement Project Design Feature D-6, which states that upon buildout of the Project, the Project shall provide a minimum of 500 kilowatts of photovoltaic panels on the Project Site, except where rooftop amenities preclude the installation of photovoltaic panels.

**Comment No. 136-3**

2—A major concern of residents in the area is lack of police, EMT's, [sic] and fire department funding. I think that upon completion, there should be a small increase in

funding to help cover the additional needs of the community that could be offset by additional property taxes paid from the development.

**Response to Comment No. 136-3**

Refer to Topical Response No. 5, Public Services, for a discussion of the Project's potential impacts to police and fire services and the Project design features and mitigation measures that would be implemented under the Project. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 137**

Praveen Kumar  
5535 Canoga Ave., Unit 120  
Woodland Hills, CA 91367-6690

**Comment No. 137-1**

Please see attached letter regarding Westfield Promenade 2035. Thank you for your consideration and interest in this matter.

I hope you and the City will give strong consideration to approving Westfield Promenade 2035. There are several reasons why this project needs to move forward:

- The draft environmental impact report shows the project will have few major impacts.
- Promenade complies with the Warner Center Plan requirements on parking, architecture and other guidelines.
- The project offers publicly accessible open space.
- The entertainment and sports center will be easily accessible to residents and bring arts, culture and live performances to the area.
- Promenade will bring more housing and jobs to the Valley.

I appreciate the time that the City has taken to look into this project. It's now time to get Westfield Promenade approved and permitted.

**Response to Comment No. 137-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 138**

Suzie Labowe  
4432 Conchita Way  
Tarzana, CA 91356-4902

**Comment No. 138-1**

Letting you know that I am completely against a Sports Area in Woodland Hills, CA [sic]

Thank you for letting us know [sic] who live in this area know.

**Response to Comment No. 138-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 138-2**

Thank you for getting back to me.

Home Address: Suzie Labowe, 4432 Conchita Way, Tarzana, CA 91356

**Response to Comment No. 138-2**

The commenter has been added to the mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 139**

Maria Sandoval  
ma\_sandoval17@yahoo.com

Avi Lerner  
TA Warner Investors, LLC

**Comment No. 139-1**

I own property at 21555 West Oxnard Street in Woodland Hills, CA and I wholeheartedly support Westfield's proposal to redevelop their outdated site into a mixed-use, downtown district with residences, offices, hotels, restaurants, shops, public parks and an entertainment and sports venue.

The Supplemental Draft Environmental Impact Report was a very thorough and complete analysis. As someone who could potentially be affected by the project, I was pleased to learn the report found "less than significant impacts" in areas of potential concern.

Westfield continues to invest in the Warner Center because they know these investments will enhance their business, as well as the communities in which they operate. We are all beneficiaries of Westfield's investments as property values increase, more jobs are created (during and after construction) and quality of life is improved with more entertainment and leisure activities.

For these reasons and more, I hope the City will approve Westfield's Promenade 2035.

**Response to Comment No. 139-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 140**

Wendy A. de Vries  
Legal Assistant  
Lerner & Weiss, APC  
21600 Oxnard St., Ste. 1130  
Woodland Hills, CA 91367-7838

Leonard D. Lerner  
Lerner & Weiss, APC  
21600 Oxnard St., Ste. 1130  
Woodland Hills, CA 91367-7838

**Comment No. 140-1**

Attached in PDF format is a copy of Mr. Lerner's letter to you dated June 11, 2018. The original correspondence has been placed in the U.S. Mail for delivery to you.

I have had an opportunity to review the proposed project for what used to be known as The Promenade in Woodland Hills.

As my letter will indicate, I am across the street from this proposed project.

**Response to Comment No. 140-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the proposed Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 140-2**

This area is already highly congested. Down the street on Oxnard, just east of Canoga, there is a huge residential complex that is nearing completion. That will bring tremendous additional vehicles into the area adding to an already congested scenario.

We all known that the property formerly known as the Rocketdyne–Boeing property will also be developed in some fashion, adding yet additional congestion.

This proposed project will make living and working in this area a nightmare. Some restraint must be exercised unless and until tremendous improvements to the traffic infrastructure are made.

### **Response to Comment No. 140-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for an overview of the traffic impacts associated with the Project. As discussed therein and in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, background traffic growth and traffic anticipated from the full buildout of the Warner Center Plan development assumptions were analyzed with the addition of full Project traffic to each analyzed intersection. The impact analysis concluded that Project impacts associated with the addition of full Project traffic to each analyzed intersection are anticipated to be less than significant with the full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking for further details regarding the Warner Center Plan Implementation Board.

### **Comment No. 140-3**

Should you have any questions or comments regarding the foregoing, please feel free to contact me.

### **Response to Comment No. 140-3**

This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 141**

Byron Levy  
P.O. Box 371683  
Reseda, CA 91337-1683

**Comment No. 141-1**

I live in Northridge, I'm a registered voter, and I fully oppose a 15,000 stadium in Woodland Hills.

**Response to Comment No. 141-1**

This comment expressing opposition to the Entertainment and Sports Center is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 141-2**

Thank you Elva.

PO Box 371683  
Reseda, CA 91337

**Response to Comment No. 141-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 142**

Melissa Lintinger  
4788 Burgundy Rd.  
Woodland Hills, CA 91364-4760

**Comment No. 142-1**

Let me add my voice to the many people who support the Westfield Promenade 2035 project. The project represents a tremendous investment in the valley and will make it a more desirable place to live and work.

This is important to me as someone who lives close to the Promenade property. I've been impressed by Westfield's plan to completely redo the old Promenade mall. The project strikes a great balance between public and private space, commercial and residential uses and updated architecture and landscaping.

I'm relieved the Draft Environmental Impact Report confirms the project will create a new downtown for the Valley with minimal impacts.

Westfield has done a great job reviving Topanga Plaza and creating the Village. I'm sure this next step will be equally done well.

**Response to Comment No. 142-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 143**

Dave Lowery  
23131 Collins St.  
Woodland Hills, CA 91367-4226

**Comment No. 143-1**

Letter regarding DSEIR for ENV-2016-3909-EIR:

I am a Walnut Acres resident with my wife & 2 kids for over 26 years. I beg of you to NOT allow the Westfield Development to go thru. It will devastate our paradisiacal little corner of Los Angeles. Year after year we fight over and over the development and greedy land grabs looking to re-zone us and spoil our community. This is the biggest, most crass and worse effort yet to destroy many lives in the Valley.

Thank you for your help [sic]

**Response to Comment No. 143-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 143-2**

Thank you!

David Lowery  
23131 Collins St  
Woodland Hills  
CA 91367-4226  
818.613.4328

**Response to Comment No. 143-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 144**

Karen Y. Lu  
P.O. Box 631  
Canoga Park, CA 91305-0631

**Comment No. 144-1**

I've been a West Valley resident for many years. I've seen the area become more lively and exciting, thanks to Westfield's investment in the community. There is no better place than Westfield Topanga and The Village to relax and unwind with family and friends, especially during the summer.

Now, we have something else to look forward to—Promenade. Westfield's proposal sounds amazing and I can't for this project to become a reality! I'm excited about the prospect of having an entertainment and sports complex for shows and concerts as well as new stores and restaurants.

Like The Village and Topanga mall, the Promenade will be a popular gathering spot. I'm anxiously awaiting the project's approval!

**Response to Comment No. 144-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 145**

Gregory Maier  
5727 Canoga Ave., Apt. 180  
Woodland Hills, CA 91367-6501

**Comment No. 145-1**

In response to the draft environmental impact report (ENV-2016-3909-EIR), I'd like to share my views on Westfield's Promenade development.

The project, with its focus on walkability, acknowledges the fact that auto-oriented malls with only retail stores need to change with the times. People no longer want to drive to a traditional mall and shop. Instead, they are more interested in being in a pedestrian-friendly environment where everything is conveniently located—restaurants, stores, parks, movie theaters, etc.

The attractively designed, forward-looking Promenade project will create a vibrant downtown for the West Valley. I urge the city to endorse it.

**Response to Comment No. 145-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 146**

Varant Majarian  
P.O. Box 17214  
Encino, CA 91416-7214

**Comment No. 146-1**

Regarding the Westfield Promenade 2035 project, I am supporting this project 100%. It is really important to give the Warner Center a “facelift.” Doing so will help the economy by giving it a boost and adding more jobs in the San Fernando Valley. I am supporting this project all the way.

I hope you will approve Westfield Promenade.

**Response to Comment No. 146-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 147**

Ronald and Dolores Marantz  
22647 Ventura Blvd., #216  
Woodland Hills, CA 91364-1416

**Comment No. 147-1**

DOESN'T ANYONE IN THE PLANNING DEPARTMENT CARE ANYTHING ABOUT THE TRAFFIC THIS WILL CAUSE, THE TIE UPS... ETC ETC ETC..... FOR THE 60 YEAR OR MORE RESIDENTS THAT LIVE IN WOODLAND HILLS,!!!

AS IT IS NOW AND GETTING WORSE, WE HAVE NO ROOM TO DRIVE DOWN THE STREETS HERE ESPCIALLY [sic] MORNING AND AFTERNOON.

WITH THE SANITARIUM GOING IN ON FALLBROOK AND ERWIN..... WESTFIELD CENTER EXPANDING..... AND NOW THIS STADIUM AND ALL THE WORKS GOING IN WITH IT.....

WHY DON'T YOU JUST BULLDOZE DOWN THE ENTIRE WOODLAND HILLS AND BUILD ALL THE BUILDINGS [sic] YOU WANT FOR THE "NEW" COMERS AND CONTRACTORS.....

THEY HAVE NO HISTORY HERE..... ESPECIALLY THE WESTFIELDS FROM AUSTRALIA.....

DR. RONALD AND DOLORES MARANTZ

WOODLAND HILLS, CA

NATIVE LOS ANGELES, CALIFORNIANS.....

NATIVE DAUGHTERS OF THE GOLDEN WEST SINCE 1825

**Response to Comment No. 147-1**

Refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding the Project's impacts related to traffic as well as the project design features and mitigation measures that the Project would implement to address traffic impacts. Also refer to Topical Response No. 2, Entertainment and Sports Center, for a discussion regarding the Entertainment and Sports Center and its potential impacts. The comment expressing

opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 147-2**

HOW ABOUT AN ANSWER TO OUR COMMENTS AGAINST ALL THIS TOOO [sic]  
MUCH BUILDING PLANNED FOR OUR "NICE" WOODLAND HILLS, CA CITY!

OUR MAILING ADDRESS IS :

22647 Ventura Blvd #216 Woodland Hills, Ca 91364

**Response to Comment No. 147-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project. In addition, refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's consistency with the Warner Center Plan.

**Comment Letter No. 148**

Gina Masequesmay  
22117 Oxnard St.  
Woodland Hills, CA 91367-3547

**Comment No. 148-1**

I am a resident and a voter in Woodland Hills, zip code 91367. I live 2 small blocks from the Village and I am concerned of the already increased traffic and nuisances that the Village had brought. Westfield proposed the Village to be pedestrian and biker friendly and it's really not so for the locals. I was actually excited when it was first proposed. Having experienced it since its opening, I am quite disappointed. I tried to walk to the Village but it's not made for pedestrians with the parking lot at Topanga and Erwin, making it unsafe to see pedestrians and bikers. The unwelcoming and unreliable parking fee has also led to more traffic and people parking elsewhere in the neighborhood during holidays and special events. While I understand that development has increased property value, it has also created more traffic congestion and noise pollution in my quiet neighborhood. It also provided no affordable housing and only increase the prices for renters. In the recent months, I have seen so many homeless people putting up tents in my neighborhood. This is not sustainable development. I am speaking as an owner concerned about her fellow citizens and renter-neighbors.

Now Westfield wants to build another gigantic structure that will create more traffic, noise and light pollution and block views in my neighborhood. For what I have seen of its failed promises with the Village, I can only imagine how more nuisances will be created by a sports stadium. No, I do not want drunk sports spectators creating more pollution in my neighborhood. We already have the racers on Topanga and Victory creating unsafe situations. Now drunken sports fan?... Please NO!

**Response to Comment No. 148-1**

Refer to Topical Response No. 4, The Village at Westfield Topanga, for further discussion regarding this project. Also refer to Topical Response No. 2 regarding the Entertainment and Sports Center and associated impacts to light and glare, noise, and security, and to Topical Response No. 3, Traffic and Parking regarding the potential traffic impacts of the Project. Note that in accordance with SB 743, potential impacts associated with aesthetics, including views, are concluded to be less than significant. Nonetheless, for informational purposes, Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, includes an analysis of potential view impacts and concludes that such impacts would be less than significant.

**Comment No. 148-2**

Please consider development with shops that are more affordable and with affordable housing and structures and landscapes that are actually green and pedestrian and biker friendly. I have seen the plans of the Village and this new stadium project, the Village plan promised more than it delivered. Of the new shops, I only attend 6 businesses in this mall and frequent 4 of the 6. I can only imagine this stadium will create a worse traffic jam in my neighborhood and more noise, light, material and air pollution. I am not sure what will be gained because the [sic] I really don't like a sports stadium in my relatively quiet neighborhood. We need more trees, not rowdiness.

**Response to Comment No. 148-2**

Refer to Topical Response No. 7, Open Space, above, for a discussion regarding the various open space areas provided by the Project. As discussed therein and in Section IV.J.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, of the Project's approximately 10.6 acres of outdoor open space, approximately 5.6 acres are ground level and publicly accessible. These areas would support a range of active and passive recreational activities, as well as approximately 3 miles of walking paths. In addition, refer to Topical Response No. 2, Entertainment and Sports Center, for a discussion regarding the Entertainment and Sport Center's impacts related to light, air quality, noise, and traffic.

This comment discusses affordable housing as a policy issue and does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. With regard to the potential change in rent values, CEQA does not require review of a project's potential effects that are strictly economic or social in nature. CEQA is an environmental statute intended to address environmental impacts. The purpose of an EIR is to provide public agencies and the public with "detailed information about the effect which a proposed project is likely to have on the environment." (Pub. Resources Code, § 21061.) The CEQA Guidelines specifically state that "[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment." (CEQA Guidelines, §§ 15131(a); 15064(e).) When there is no evidence that potential economic or social impacts will result in some significant effect on the environment, "CEQA does not apply to such impacts." (Preserve Poway v. City of Poway (2016) 245 Cal.App.4th 560, 566.) In addition, when an indirect physical change "is speculative or unlikely to occur," that change is not "reasonably foreseeable," and should not be included in the EIR's analysis. (Citizens for a Sustainable Treasure Island v. City and County of San Francisco (2014) 227 Cal.App.4th 1036, 1061; see CEQA Guidelines, § 15145.)

This comment does not provide information on how those potential economic or social changes will lead to a direct or indirect physical impact on the environment, and such

analysis of those potential impacts is speculative and not reasonably foreseeable. The comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 148-3**

I do not know how to send this message to Bob Blumenfield so please forward this message to my Councilman and anyone else relevant to this public hearing process.

Thank you for your attention,

**Response to Comment No. 148-3**

This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers, including the City Council, prior to any action on the Project. As a note, as requested by the commenter, the email comment was forwarded to Councilman Blumenfield and the commenter was also provided with the Councilman's email address to facilitate direct contact.

**Comment Letter No. 149**

Jacqui Matsumoto  
4851 Hazeltine Ave., Unit 102  
Sherman Oaks, CA 91423-2339

**Comment No. 149-1**

I have lived in Sherman Oaks for over 22 years and I'm excited about the changes that are coming to the West Valley.

With the over 48.5 Million visitors that come to LA, It's [sic] about time we have an entertainment and sports venue in our San Fernando Valley so that our local businesses can generate more revenue from these visitors and the community doesn't have to travel far to a sports and entertainment venue. In addition, more offices, shops and restaurants for the community is certainly a bonus. We also need a "central" park and more areas to walk so we can leave our cars at home.

I, for one, can't wait to see the Warner Center become a mixed-use, transit-friendly and urban district where people can work, live and play! Plus the Westfield team does an outstanding job of beautifying the area with their aesthetic designs.

Let's get Westfield Promenade approved!

**Response to Comment No. 149-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 150**

Susan McCall  
22431 Gilmore St.  
West Hills, CA 91307-3707

**Comment No. 150-1**

I'm a supporter of the Westfield Promenade project, so I was disappointed to learn the comment period for the Draft Environmental Impact Report was extended so long. I'm not sure why, but let's not add any more delays.

The Promenade project is important on so many levels. It supports the Warner Center 2035 Plan and moves the area toward a mixed-use, transit-oriented district; reinforces the area as the West Valley's employment and regional center; and provides more housing. Let's also not forget the economic benefits and job creation.

It is my sincere hope that the project is approved without further delay.

**Response to Comment No. 150-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 151**

Sean McCarthy  
5151 Balboa Blvd., Unit 204  
Encino, CA 91316-3467

**Comment No. 151-1**

Attached please find my comment on the DEIR for the Promenade 2035 project in Warner Center.

Please let me know if you have any questions about my comment or if there are any issues about opening the attachment.

Thank you for the opportunity to participate in the DEIR process.

I am writing to you as an interested resident of the San Fernando Valley to express my support for Westfield's Promenade 2035 project.

I looked at the Draft Environmental Impact Report and found no reason why this project should be delayed but plenty of reasons why it should be allowed to go forward.

As someone who worked on the Warner Center Specific Plan, I believe the Promenade 2035 project embodies many of the key elements, goals, and vision for Warner Center. From the economic benefits of construction to exciting new employment opportunities, the project has the potential to generate thousands of jobs and new revenues for the city.

Westfield's investment will bring major improvements to the area by creating a hub for creative offices, entertainment, and leisure activities.

In addition, the Westfield project will create 1,400 new residential units, helping to meet the city's growing demand for housing.

Promenade 2035 according to what I read, goes farther than anything I've seen proposed to date to meet the spirit as well as the intent of the Warner Center Specific Plan. For these reason and more I wholeheartedly support the Promenade 2035 Plan as contained in Westfield's DEIR.

**Response to Comment No. 151-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 152**

Kelly McClellan  
Michael McClellan  
Rory McClellan  
Connor McClellan  
mcclellans@sbcglobal.net

**Comment No. 152-1**

I am writing to express our family's opposition to the proposed development outlined in the Warner Center Specific plan 2035 for the following reasons:

**Response to Comment No. 152-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 152-2**

1.) **Warner Center is situated squarely in an extreme earthquake liquefaction zone:** according to the California Geological Survey report that can be found here: [http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/SHZR/SHZR\\_007\\_Canoga\\_Park.pdf](http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/SHZR/SHZR_007_Canoga_Park.pdf)

It is fool hardy to endanger thousands more lives by dense development in a dangerous earthquake zone. One cannot live in Los Angeles without realizing that a large Earthquake on the San Andreas is likely to occur in the not to [sic] distant future.

**Response to Comment No. 152-2**

Liquefaction was evaluated in the Initial Study and the Geological and Soils Report included as Appendix IS-2, of the Initial Study. These documents are provided in Appendix A, of the Draft Supplemental EIR. The Geologic and Soils Report performed several site-specific liquefaction analyses. Results from the liquefaction analyses indicate that some of the soil layers and/or lenses may liquefy in the event of an earthquake on a local or regional fault. Specifically, it was determined that the alluvial soil layers in the northeastern and northwestern portion of the Project Site were liquefiable. As such, the Geologic and Soils Report sets forth specific measures to address the potential for liquefaction within the Project Site. Specifically, Mitigation Measure GEO-13, states that the structures on the Project Site shall be supported on a mat foundation system or deep foundation system, such as friction pile, in order to tolerate the anticipated liquefaction. With implementation of

Mitigation Measure GEO-13, impacts regarding liquefaction would be reduced to a less-than-significant level. Therefore, seismic-related ground failure associated with the potential for liquefaction at the Project Site was found to be less than significant with incorporation of mitigation measures and regulatory requirements.

### **Comment No. 152-3**

**2.) Global warming, urban heat sinks, and scarce water resources.** This plan does not adequately address the urban heat island effect. The massive multi storied buildings and increased pavement will turn Warner Center and the surrounding neighborhoods in urban cauldrons.

We have seen nearly a decade of worsening drought in California, this summer Los Angeles has experienced records setting temperatures, often in excess of 105 for degrees for days on end. The Warner Center plan will only exacerbate this problem.

### **Response to Comment No. 152-3**

The comment appears to address the effects of urban heat island effect caused by development of the Warner Center Plan as a whole and not specifically the Project. However, the Project includes a number of design features that are consistent with the strategies identified by the United States Environmental Protection Agency (EPA) to address heat island effects, such as including trees and landscaping within development areas and implementing building standards that incorporate heat island reduction strategies. Specifically, as discussed in Section IV.I.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, the Project would provide a variety of open space and recreational amenities, including 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres. The EPA has also identified the enactment of green building ordinances by local jurisdictions as a means of addressing heat island effects. The Project would be consistent with the City of Los Angeles Green Building Code, as further discussed in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR. Based on these and other measures incorporated into the Draft Supplemental EIR, there is no evidence to suggest that the Project will result in an increase in temperature or a hot zone.

### **Comment No. 152-4**

Water resources are already scarce in California and residents in Warner Center and surrounding neighborhood have already seen their DWP bills skyrocket over the last five years because of this scarcity. The dense urban development proposed in the Warner Center Specific Plan will only exacerbate this problem and lead to increased bill's [sic] from DWP.

**Response to Comment No. 152-4**

The comment appears to address increased water demand caused by development of the Warner Center Plan as a whole and not specifically the Project. However, refer to Topical Response No. 6, Infrastructure, above, for a discussion regarding the Project's impacts to water infrastructure. As discussed therein, LADWP has demonstrated that sufficient water supplies will be available to accommodate the Project.

**Comment No. 152-5****3.) Traffic Congestion and gridlock will be exacerbated in Warner Center, Woodland Hills, Canoga Park and surrounding neighborhoods:**

Residents in these neighborhoods were repeatedly assured during the development and building of the Westfield Village in Warner Center that traffic congestion would not be a problem due to developers [sic] traffic mitigation planning. That assurance has turned out to be a complete falsehood. Warner Center, and the surrounding thoroughfares at Victory Blvd, Canoga Ave, Topanga Canyon Blvd, and [sic] Ventura Blvd have become practically gridlocked at peak travel times.

**Response to Comment No. 152-5**

Refer to Topical Response No. 4, The Village at Westfield Topanga, above, for further detail regarding the implementation of mitigation measures for The Village Project, and Topical Response No. 3, Traffic and Parking, for a discussion regarding traffic impacts of the Project and the Project's mitigation measures and phasing of mitigation measures. All mitigation measures for the Project will be implemented as set forth in the MMP included as Section IV, Mitigation Monitoring Program, of this Final Supplemental EIR.

**Comment No. 152-6**

The assumption is made in the Warner Center 2035 Plan, that new residents of these developments will rely heavily on public transit. In fact ridership on L.A.'s rapid transit has FALLEN by 20% since 2013 and they are losing 65,000 passengers a year. <https://la.curbed.com/2017/8/29/16219230/transit-metro-ridership-down-why> [sic]

Based on a new study by UCLA, L.A. Metro ridership is in freefall because L.A. residents cannot be convinced to give up their cars in this large metropolitan area.

<https://la.curbed.com/2018/1/31/16950224/metro-ridership-decline-stats-car-ownership-study>

Developers and the city council make the assumption that the residents of these new \$3500 per month luxury apartments will be using public transit. They are sadly mistaken, these new high end apartment dwellers will be using their automobiles not public transit, and the traffic congestion will become unbearable.

### **Response to Comment No. 152-6**

Transit connectivity is one element of the Warner Center Plan's Transit-Oriented Development approach; concentrating a mixture of uses within walking distance of each other is another element. As stated by the Warner Center Plan, the intent of the elements above is to reduce vehicle trips and vehicle miles traveled. As part of this intent, Section 7.8 of the Warner Center Plan describes the TDM requirements for all new development within Warner Center. Further, Appendix D of the Warner Center Plan identifies that a portion of the Warner Center Mobility Fee is designated for TDM implementation. Topical Response No. 3, Traffic and Parking, above, describes Project Design Feature K-7, which is the development of a Project level TDM plan, and Mitigation Measure K-2, which is the payment of the Warner Center Mobility Fee. TDM elements are incorporated into the Project analysis, consistent with the Warner Center Plan.

The referenced studies indicate an overall decline in Metro ridership from 2013 to 2017; however, the total ridership decrease was experienced by both the local (i.e. standard capacity/frequency with multiple stops) and premium (i.e., high capacity/frequency with limited stops and dedicated facilities, as represented by Metro Rail and Orange/Silver Lines) transit services. During this period, local transit service experienced a greater decline in ridership when compared to the decline in premium transit ridership. The continued buildout of the transit network and potential electrification of the Orange Line indicate a continued focus on premium transit service into Warner Center. In combination with the implementation of the Warner Center TDM requirement over the life of the Warner Center Plan, the effects of the Warner Center Plan transportation policies may put Warner Center in a position to not be as susceptible to the types of swings in local bus ridership that are discussed in these articles.

The commenter notes a rental rate for apartments which is not specific to the Project, as the specific rents for the Project's apartments have not yet been determined. In addition, comments regarding rental rates for apartments are outside of the purview of CEQA but is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 152-7**

**4.) Police and firefighters will be stretched to the breaking point:** Gang crime is on the rise in the West Valley <https://www.dailynews.com/2017/04/24/with-gang-crime-up-in-the-west-san-ferando-valley-la-leader-seeks-more-funding/>

Firefighters and police are stretched to the breaking point, the Warner Center Specific plan and city council have done nothing to address these infrastructure issues, problems that will only be exacerbated by the high density developments.

**Response to Comment No. 152-7**

Refer to Topical Response No. 5, Public Services, above, for a discussion regarding the Project's impacts to police and fire services. As discussed therein, the Project would implement several project design features and mitigation measures that would address potential impacts to police and fire services.

**Comment No. 152-8**

Theses [sic] are some of the few issues that has led our family to vigorously oppose this massive development.

Thank-you for your consideration n [sic] this matter,

**Response to Comment No. 152-8**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 153**

Ryan McGinn  
7106 McLaren Ave.  
West Hills, CA 91307-2219

**Comment No. 153-1**

As a West San Fernando Valley resident for over 40 years I have never seen such a lack of concern for existing residents in a proposed construction project. The developers want to not just double the size of the Promenade mall, they are proposing a project 5 times larger and a stadium! Traffic on surrounding streets is already an F rating and the 101 Freeway between Topanga and the 405 was recently found to be the most congested IN THE NATION and now with this project and others in Warner Center, there will be another 30,000 residents, plus all the workers that come with them. I understand there is a shortage of housing in LA, but to place that massive of a burden on one quiet neighborhood is unfair and will be disastrous. Also, these new residents will be no different than the rest of LA. They will NOT all magically have jobs a block away that they bike or skateboard to. They will also have errands to run and kids to take to school and NO they will not take the kids on a bicycle or on the bus! 80–90 percent will drive cars like the rest of us! They aren't taking the slow Orange Line either. Still no upgrade to the 101 Freeway? Right now, If [sic] a person in Woodland Hills has to go to any other part of LA to get to work, they must first sit in 45 minutes of traffic just to get to the 405! Then add on another 45 minutes to get downtown or to the Westside! That's 3 hours per day of driving before we add these massive projects! Also, the Orange Line is NOT a viable option. It would actually take people 90 minutes just to get to a job near Ventura and Sepulveda with transfers and walking. All this and they want to add a massive amount of new traffic to the 101 with absolutely no improvement.

**Response to Comment No. 153-1**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the Project's impacts to traffic, project design features, and the mitigation measures related to traffic.

A supplemental analysis of potential impacts to state facilities (freeways) was prepared based on Caltrans guidelines and is provided in Appendix M, of the Draft Supplemental EIR. As identified in Section IV.K Traffic, Access, and Parking, of the Draft Supplemental EIR, the Caltrans facilities analysis evaluated the Project's potential impacts on 11 freeway mainline segments.

To identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an ESC event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

### **Comment No. 153-2**

Also, the proposal for a stadium DOES NOT fit into character and design of the West Valley. Residents overwhelmingly do not want it. Anytime there is an event, we would become prisoners trapped at home. We pay a huge amount of taxes that have helped pay for many of the city's improvements such as subways to everywhere, LAX expansion, museums etc yet we won't be able to actually use these due to the traffic caused by this project. We are also very concerned with infrastructure for this many new people. Police, which are already understaffed as measured by slow response times, hospitals, water and power, schools. Will the developers be paying for all of these upgrades and when will they be upgraded? Also, stadiums are notorious for behavior that requires massive law

enforcement and emergency room response. Will the developers pay for a new police station, officers and hospitals?

### **Response to Comment No. 153-2**

Refer to Topical Response No. 2, Entertainment and Sports Center, for a discussion regarding the Entertainment and Sport Center's compatibility with the surrounding uses as well as the Entertainment and Sport Center's impacts related to police and fire services as well as traffic, among others. Refer to Topical Response No. 6, Infrastructure, for a discussion regarding the Project's impacts to water, wastewater, electricity, and natural gas infrastructure.

With regard to schools, as discussed in Section IV.J.3, Public Services – Schools, of the Draft Supplemental EIR, SB 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, LAUSD collects development fees for new construction within its district boundaries. Currently, LAUSD collects the maximum new school construction facility fee at a rate of \$3.79 per square foot of new residential construction, \$0.61 per square foot of commercial/industrial construction, \$0.28 per square foot of self-storage structure, and \$0.39 per square foot of parking structure. Payment of these fees is required prior to issuance of building permits. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels.

### **Comment No. 153-3**

I understand there is an Option 4 that would still include a massive increase in the mall and number of residents, but would scale that number down and NOT include the stadium. Every Single family member and person I know that has also lived here for years would prefer this option(or no project of course). Option 4 would still be a massive project, but would at least keep some sense of community and quality of life that has been built in the West Valley.

### **Response to Comment No. 153-3**

The commenter's preference for Alternative 4 is noted for the record and has been incorporated into this Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed in detail in Section V, Alternatives, of the Draft Supplemental EIR, Alternative 4 includes the construction of 552 residential units (which include work-live units, similar to the Project), approximately 205,000 square feet of retail/restaurant, and approximately 1,619,000 of office uses, which include 587,000 square feet of studio uses. While Alternative 4 would eliminate some of the

Project's significant and unavoidable impacts, Alternative 4 would not achieve the Project objectives to the same extent as the Project.

**Comment No. 153-4**

7106 McLaren Ave  
West Hills, Ca 91307

**Response to Comment No. 153-4**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 154**

Gerda McKeehan  
pgmac@att.net

**Comment No. 154-1**

I feel the Westfield “Warner Center 2035 Plan” borders on insanity. The residents of our community should be the ones determining our future. Not L.A. City Hall who has a track record of treating the Valley as 2nd class citizens, at best. Much has changed since the Plan was adopted in 2013. There has been an outrageous amount of oversized apartment complexes now jammed into the east side of the Plan. We already have their Westfield Shopping Village, that has made a mess of traffic. What we don’t need is more stores upon stores. This is clearly demonstrated by the failure of the Promenade Mall etc.

Don’t shove this down our throats. Rather, let our local inhabitants determine whether we need 17,000 more apartments. [sic] I know I am dreaming, but what a wonderful legacy it would be for Westfield to develop the property into a beautiful Park [sic] with a variety of activities which would truly be of benefit to our citizens.

**Response to Comment No. 154-1**

These comments do not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above for a discussion regarding the Project’s consistency with the Warner Center Plan. In addition, refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding the traffic impacts of the Project. Furthermore, refer to Topical Response No. 7, Open Space, for a discussion regarding the various public open space areas that would be provided by the Project. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 155**

Paul McKeehan  
pgmac@att.net

**Comment No. 155-1**

Please DO NOT allow the Promenade 2035 project to proceed. It should be abandoned. The Draft Supplemental Impact Report should not [sic] be ignored or not considered. It is ridiculous to think that a project of that magnitude would not severely impact the quality of live [sic] of our current residents. The admired and cherished residential community-character of Woodland Hills would be altered for the worst. And just for the obscene profit of the Westfield Corporation.

Please do not destroy our beloved City, let it keep its wonderful nature. The current "Westfield Village" is already more than enough.

**Response to Comment No. 155-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment indicating opposition is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 156**

Mike Merina  
mike.merina@yahoo.com

**Comment No. 156-1**

I love the ideas [sic] of putting something cool that will help our local economy in the place of a broken down unused part of town. Please push for the arena. That's the best part in my opinion. Let the one million residents of the sfv [sic] get a world class concert arena and venue.

Thanks [sic]

**Response to Comment No. 156-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 157**

Marlene D. Moore  
6219 Balcom Ave.  
Encino, CA 91316-7209

**Comment No. 157-1**

I am very concerned that a 17,000 seat sports/concert arena is proposed in Woodland Hills next to the village.

**Response to Comment No. 157-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental impacts of the Entertainment and Sports Center. Note that the Project proposes 15,000 seats within the Entertainment and Sports Center, not 17,000 as stated by the commenter.

**Comment No. 157-2**

The traffic is already problematic and this would exacerbate that issue—I strongly urge you to reconsider other locations where increased traffic flow won't create gridlock—it's already gridlock in the Valley during peak and off-peak hours. In the past 10 years, my commute drive time from Granada Hills to Encino has doubled! And it doesn't much matter what time of day I go...

Please! No 17,000 seat arena!

**Response to Comment No. 157-2**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Also refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic impacts of the Project.

**Comment No. 157-3**

Please use my work address:

6219 Balcom Ave.  
Encino, CA 91316



**Response to Comment No. 157-3**

The commenter has been added to the mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 158**

Tom Morehouse  
23533 Oxnard St.  
Woodland Hills, CA 91367-3039

**Comment No. 158-1**

A great many thanks to the entire City Planning Department and the hours of work that went into the execution and release of the Draft Environmental Impact Report on the proposed Westfield Promenade 2035 Project.

I know that there is an Entertainment/ Sports [sic] Center proposed as part of the project, and as exciting as that sounds, I was truly concerned about the lighting.

Not any longer. I was so pleased to discover in the DEIR that impacts from Project lighting are less than significant with either an open roof Entertainment and Sports Center or a roofed Entertainment and Sports Center.

That type of information is reassuring to community members just like me, and it makes supporting this exciting project, [sic] all the easier.

Let's get Promenade approved as soon as possible.

**Response to Comment No. 158-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 159**

Marylou Morelock  
1187 Aztec  
Topanga, CA 90290-4407

**Comment No. 159-1**

I write to provide my support to the letter submitted to you by the Topanga Association for a Scenic Community. Additionally, most of my shopping and appointments occur in the Woodland Hills area. I am concerned about the increased density of people and traffic that this project will bring to the area. I no longer use Topanga Canyon North of Dumetz as the traffic is unbearable. I fear that this development will gridlock all northern routes through the area.

Living at the Top of Topanga, I can tell you that the traffic traveling south to Pacific Coast Highway during the day has increased Significantly since I first moved here in 1990.

I hope that these factors will be given great weight in the deliberations about this proposed project.

**Response to Comment No. 159-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the Project's impacts related to traffic. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 160**

Pati Moser  
23547 Burbank Blvd.  
Woodland Hills, CA 91367-3009

**Comment No. 160-1**

I just can't believe we are here again discussing yet another over sized inappropriate commercial development in Woodland Hills brought to us by the same good ole boys group. I have listened to this "crew" who are behind all this intrusive development as they talk about it being like "Times Square" or "Manhattan" or "Rockefeller Plaza". [sic] As someone who has just gotten back from those areas, we are nothing close to becoming New York. So before we allow this "crew" of money makers to destroy our beautiful Woodland Hills, let me say, if they want to be New York, then they have a lot of work to do before they start breaking ground.

**Response to Comment No. 160-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 160-2**

The first thing needed is funding by THEM for a larger police force. New York has 34,000 uniformed officers. I can assure you it's hard to turn your head in ANY direction and NOT see a patrol car or officer. We have 9,000 officers of which many are performing civilian duties and not on the streets. So our friends with the money can immediately pay to increase our force to a minimum of 20,000 officers in the streets. This will assuredly help in combating the crime and other activities when they bring in hundreds of thousands of more people into our community. And the funding will NOT come from raising taxes. We, the people who live here, are not making money on this monstrous inappropriate sham.

**Response to Comment No. 160-2**

Refer to Topical Response No. 5, Public Services, for a discussion regarding the Project's impacts related to police services and the project design features and mitigation measures that the Project would implement to reduce the Project's impacts to police services.

**Comment No. 160-3**

The second thing that must be done is a REAL assessment of roads, streets, traffic flow. We are taking our cars to stores, to concerts, to this 15000 seat stadium. What are they doing to ensure the off ramps on the 101 can handle this flow of traffic? Prove to us that they have allowed ample parking for not only the concert venue but for all the newly developed housing, hotel, restaurants, retail, and office workers and visitors. And don't play the nonsense that we won't be in our cars because we will. They MUST provide the parking to ensure save [sic] flow of traffic. If they start impacting us from getting to work, doctor appointments, schools, meetings, because they have not taken into consideration the necessary day to day flow of traffic, our lives will be changed forever. It will no longer be a community that we live in and support and love, but a commercial nightmare.

**Response to Comment No. 160-3**

As identified in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the impact associated with the addition of full Project traffic to each analyzed study intersection is anticipated to be less than significant with the full implementation of the Warner Center Mitigation Program and Project specific project design features. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking for further details regarding the Warner Center Plan Implementation Board.

Also refer to Topical Response No. 3, Traffic and Parking, above. Estimates of the number of trips generated and the methodologies and assumptions for the arrival of the project trips are summarized in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. The scope of analysis of the Traffic Study was developed in

consultation with LADOT staff, which reviewed and approved the Traffic Study. A copy of the Traffic Study and LADOT's assessment letter is provided in Appendix M, of the Draft Supplemental EIR.

**Comment No. 160-4**

And finally, WATER. Where is the water for this huge commercial development? Have they thoroughly researched water use, prices, and source? As a DWP employee, I question their research. And again, don't put the burden on the residential homeowners who gain NOTHING with this obscene structure.

**Response to Comment No. 160-4**

Refer to Topical Response No. 6, Infrastructure, above, for a discussion regarding the Project's impacts to water infrastructure and the determination by LADWP that sufficient water supplies are expected to be available to accommodate the Project.

**Comment No. 160-5**

So to recap: THEY must provide funding for an additional 11,000 police officers. THEY must provide evidence of adequate equal parking spaces to all the venue sizes. THEY must provide evidence of street flow of traffic. THEY must provide evidence of obtaining water.

**Response to Comment No. 160-5**

This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 161**

Gilian Neiditch  
1118 Mohawk  
Topanga, CA 90290-4445

**Comment No. 161-1**

I am begging you not to approve this new project. This area is already so glutted with traffic, I was astounded to find out they were planning on building MORE in an area already overrun with malls and condos. It's a fallacy that a person could "Live and work" at any of these locations because anyone who works there could never AFFORD to live there. Everyone will be driving in.

I live in Topanga Canyon, and I'm a native Angelino, and I've been so depressed at how these big corporations can come in and develop property that, to anyone using logic, shouldn't [sic] be allowed. There's THREE malls right next to each other! And everywhere in the country, all I read are that malls are shutting down because of e-commerce. The last thing we need is for the whole area to become defunct and depressed.

PLEASE do not clear this project for development. Everyone in the area is so unhappy about this.

If you have any questions please call my cell at: [REDACTED].

Thank you for your time.

**Response to Comment No. 161-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 161-2**

Yes, thank you. My address is below:

Gilian Neiditch  
1118 Mohawk  
Topanga, CA 90290

**Response to Comment No. 161-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.



**Comment Letter No. 162**

Jo Ann Nickerson  
outlook\_6168B12DBFC28B01@outlook.com

**Comment No. 162-1**

I live within 3 miles of the proposed Project and greatly OPPOSE it due to 'added [sic] congestion to an area that is already:

- Overly congested
- Need no more retail (the second largest in the continent)
- An over abundance of apartments/hotels/ [sic]
- Active 'homeless' population
- Law enforcement unable to control increasing crime
- Etc., etc .....

**Response to Comment No. 162-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Also refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding the Project's impacts related to traffic, and Topical Response No. 5, Public Services, for a discussion regarding the Project's impacts related to police services.

**Comment Letter No. 163**

Shannon Padgett  
20921 Community St., Apt. 22  
Canoga Park, CA 91304-2767

**Comment No. 163-1**

As a 40-year resident, I've seen a lot of changes in the San Fernando Valley. I remember when the Promenade Mall was brimming with shoppers, but today, it's a near empty building that no one cares about.

Westfield's plans to turn this property into an exciting place to live, work, shop, dine and enjoy entertainment is exactly what's needed. We've seen how the Topanga Mall and the Village have brought new excitement to the area, and I'm confident the Promenade project will be just as successful.

As I understand it, the Supplemental Draft Environmental Impact Report makes a strong case for Westfield Promenade to move forward and any issues regarding traffic, construction and noise can be addressed.

I support this project and hope you will approve it.

**Response to Comment No. 163-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 164**

Lorna Paisley  
6952 Balboa Blvd.  
Lake Balboa, CA 91406-4557

**Comment No. 164-1**

Nero fiddled and Rome burned [sic]

The cow kicked over the lantern and Chicago burned.

LA Council members bow to developers who pour concrete and cut down trees and LA is burning.

Yes LA is burning. On July 6 we had record breaking temperatures. Tree leaves burned, flowers burned, garden food burned and our air conditioners ran all day producing more air pollution. It was July and temperatures could be worse in August and September.

There is one way to cool LA. The city needs to plant more trees which cool the air and get rid of concrete which holds in heat.

Do not allow Promenade 2035 which will take down trees, pour millions of pounds of concrete, cause traffic problems, and cause more air pollution.

I live in Lake Balboa and it impacts me and my life also.

**Response to Comment No. 164-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Topical Response No. 7, Open Space, above, for a discussion regarding the various open space areas provided by the Project. As discussed therein and in Section IV.J.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, of the Project's approximately 10.6 acres of outdoor open space, approximately 5.6 acres are ground level and publicly accessible. These areas would support a range of active and passive recreational activities, as well as approximately 3 miles of walking paths. In total, approximately 600 trees would be provided on-site by the Project, for an increase of 308 trees over existing conditions. Also refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic impacts of the Project. In addition, refer to Section IV.B, Air Quality, of the Draft

Supplemental EIR, for an analysis of the air quality impacts associated with the Project. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 165**

Lorna Paisley  
6952 Balboa Blvd.  
Lake Balboa, CA 91406-4557

**Comment No. 165-1**

I have been an environmentalist for decades and know the importance of trees to the earth and to cities and the danger of pouring concrete. The earth is in danger from heat and lack of rain and plant growth and LA needs to be a leader in planning to help heal the earth not burn it up.

Nero fiddled and Rome burned. The cow kicked over the lantern and Chicago burned. Los Angeles city council bows to developers who pour concrete and cut down trees and LA burns.

Yes, LA is burning. On July 6, 2018 we had record breaking temperatures. Tree leaves burned, flowers burned, native California plants burned, garden food burned and air conditioners ran all day using energy and producing carbon dioxide adding to the blanket of carbon dioxide that holds heat on the earth. And temperatures may be higher in August and September. Concrete was so hot it could not be touched with hand or foot. Two years ago the same thing happened.

There is a way to cool Los Angeles. The city needs to plant and water more trees. They cool the air by providing shade and by evapotranspiration. And the city should be looking for ways to get rid of concrete or at least limit it.

Do not allow Promenade 2035 in the form it is in. It will take down over 200 trees, pour millions of pounds of concrete, cause traffic problem and more air pollution making the city heat up more. This is not how to make the city livable. And people die from the heat.

My understanding is that the people who live in the immediate area could live with Alternative 4. I say it is all a bad idea.

and [sic] I am impacted by your decision.

**Response to Comment No. 165-1**

Refer to Topical Response No. 7, Open Space above, for a discussion regarding the various open space areas provided by the Project. As discussed above and in Section

IV.J.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, of the Project's approximately 10.6 acres of outdoor open space, approximately 5.6 acres are ground level and publicly accessible. These areas would support a range of active and passive recreational activities, as well as approximately 3 miles of walking paths. In total, approximately 600 trees would be provided on-site by the Project, for an increase of 308 trees over existing conditions. The comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 166**

Frank Pajonk  
22950 Mariano St.  
Woodland Hills, CA 91367-6132

**Comment No. 166-1**

After reading through the above DSEIR I would like to raise my serious concerns regarding the environmental consequences of this project during construction and later operation. A project of this scope will not only negatively impact the quality of life of nearby neighbors but also significantly decrease the air quality in a suburban community with long lasting health consequences for children and the elderly, the most vulnerable members of our community.

Therefore, I urge the City of Los Angeles to object to the planned project based on its negative environmental impact.

**Response to Comment No. 166-1**

As discussed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, the localized effects from Project emissions to sensitive land uses in close proximity to the Project Site (i.e., adjacent residences) were evaluated according to the SCAQMD's localized significance threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. These ambient air quality standards provide public health protection, including protecting the health of "sensitive" populations, such as asthmatics, children, and the elderly. As shown in Table IV.B-6 on page IV.B-41 and Table IV.B-8 on page IV.B-46 of the Draft Supplemental EIR, maximum construction and operational emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds with implementation of mitigation measures. The comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

On December 24, 2018, the California Supreme Court (Court) issued the *Sierra Club v. County of Fresno* (Friant Ranch) decision that concluded the EIR for Friant Ranch Project was deficient in its informational discussion of the human health impacts associated with the Project's significant and unavoidable impacts related to air quality. A supplemental discussion of the potential health effects related to the Project's significant and unavoidable

criteria pollutant emissions is added as Appendix U, Public Health Impacts, to the Draft Supplemental EIR and is appended to this Final Supplemental EIR. Appendix U provides additional details regarding the potential health effects from the Project's significant and unavoidable criteria pollutant emissions, relating the effects in the context of relevant science, and explains why it is not scientifically feasible at the time of drafting of the Supplemental EIR to quantitatively and reliably connect this individual Project's air quality impacts to likely health consequences.



**Comment Letter No. 167**

Tony Palermo  
21428 Mulholland Dr.  
Woodland Hills, CA 91364-5343

**Comment No. 167-1**

While I applaud most of the new development planned for the Promenade Development Project, I'm appalled at the inclusion of a sports stadium where one could not exist in harmony with the surrounding neighborhood. With access from only one freeway, and an already overtaxed one at that, the proposed stadium is a mess waiting to happen.

**Response to Comment No. 167-1**

As discussed in Section IV.G, Land Use, of the Draft Supplemental EIR, the Project Site is located within the Downtown District of the Warner Center Plan area. Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for further detail on the Project's consistency with the Warner Center Plan. In addition, as discussed in Topical Response No. 2, Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. Refer to Topical Response No. 2, Entertainment and Sports Center, above, for further discussion of the Entertainment Uses proposed on the Project Site as a permitted use in the Downtown District of the Warner Center Plan.

**Comment No. 167-2**

The other caveat I have for the whole project, is that none of it should be approved until the orange line is turned into the light rail it was meant to be and there is a stop at the new project. This just seems [sic] like common sense to me. The light rail also needs to tie into the existing red line so there could be a seamless ride from the west valley to downtown. The proposed light rail line down Van Nuys Boulevard should be connected at well.

**Response to Comment No. 167-2**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment indicating opposition is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

Note that the Project Site is directly adjacent to the Warner Center Transit Hub, which is directly serviced by five Metro local lines, one Metro Rapid line, one Antelope Valley Transit Authority line, one Santa Clarita Transit Line, as well as Metro Line 601 (also known as the Warner Center circulator) which maintains a comparable service frequency to the previous Metro Orange Line service into Warner Center.

**Comment No. 167-3**

The Valley is going to grow whether anyone wants it to or not, let's just make sure that it is done in a smart and logical way.

**Response to Comment No. 167-3**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 167-4**

Our home address is:

21428 Mulholland Dr.  
Woodland Hills, CA 91364

Thank you for adding us this to the Interested Parties list.

**Response to Comment No. 167-4**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 168**

Leegie Parker  
5131 Geyser Ave.  
Tarzana, CA 91356

**Comment No. 168-1**

I am a HUGE FAN of the proposed Westfield Promenade Project! I have lived in Tarzana for over 23 years, and I have desired a venue like this for all those years. Living in the West Valley, I have long felt isolated from the cultural activities that are over the hill, in the westside. So, I'm delighted we may be getting a venue for concerts right here in our neighborhood if Westfield's Promenade project is approved. The entertainment complex will be a great addition to the Warner Center. I support Westfield's project and hope that you will too!!!!

**Response to Comment No. 168-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 169**

Ghanouni Parvin  
21500 Califa St., #121  
Woodland Hills, CA 91367-4955

**Comment No. 169-1**

I received a mailer regarding the makeover of the former Promenade Mall, and I have to say I'm very impressed with Westfield's plans.

It will be a welcome addition in the community and I hope you will give it your approval.

**Response to Comment No. 169-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 170**

Kristina Payton  
kristinapayton@gmail.com

**Comment No. 170-1**

I am emailing to let you know my disapproval of the 17,000 seat sports/concert arena being proposed in Woodland Hills. This is going to cause a huge amount of traffic as well as overpopulation in the area.

Thank you for your consideration.

**Response to Comment No. 170-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental impacts of the proposed Entertainment and Sports Center and to Topical Response No. 3, Traffic and Parking, for a discussion regarding the traffic impacts of the Project. With regard to the comment regarding overpopulation, Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, provides an analysis of the Project's potential population effects in relation to growth forecasts adopted by SCAG. As discussed therein, the population of 3,714 persons generated by the Project would represent approximately 0.16 percent of the projected growth in the SCAG region between 2016 and 2033 (i.e., the Project's baseline and buildout years), and 0.8 percent of the projected growth in the City of Los Angeles during the same period. As such, the 3,714 new residents constitute a small percentage of City and regional growth and would be consistent with contemplated growth under the Warner Center Plan as described in the Warner Center Plan EIR. Note that the Entertainment and Sports Center includes 15,000 seats not 17,000 seats as stated by the commenter. The comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 171**

Terry Ann Perry  
23648 Balmoral Ln.  
West Hills, CA 91307-1307

**Comment No. 171-1**

I will try to make this short and to the point.

First and foremost, I need to address the true facts about the area that you're planning this project, where Rocketdyne at Victory and Canoga had experiments with nuclear waste gone bad, causing cancer and disease to the lives of every family that lived nearby, as told by the lone survivor, still suffering of lupus. This project will dig up the contaminated earth, and the gale force winds that come through the canyons quite frequently, are going to blow the dust of this contaminated ground all over the San Fernando Valley! The residents of our area have never seen the real soils reports that seem to be kept under wraps.

**Response to Comment No. 171-1**

As discussed in Section IV.E, Hazards and Hazardous Materials, of the Draft Supplemental EIR, the Rocketdyne site at Victory Boulevard and Canoga Avenue is located approximately 0.6 mile northeast of the Project Site. Numerous environmental investigations and remediation activities for contaminated soil have been conducted across the site since 1984. Elevated levels of chemicals of potential concern include chlorinated solvents from historic manufacturing activities at the site. The LARWQCB (Los Angeles Regional Water Quality Control Board) issued a mitigated negative declaration (MND) in July 2016 for a soil management plan for demolition of the facility buildings and removal of impacted materials, which is ongoing (based on documents from GeoTracker). Based on the down gradient location and distance from the Project Site, this listing is not considered to represent a significant environmental concern for the Project. In addition, as discussed on page IV.E-28 in Section IV.E, Hazards and Hazardous Materials, of the Draft Supplemental EIR, as well as in Appendix G, of the Draft Supplemental EIR, the Phase I Environmental Site Assessment did not identify any Recognized Environmental Conditions (RECs) at the Project Site and no volatile organic compounds (VOCs) were detected in the soil samples collected at the Project Site.

**Comment No. 171-2**

Next, can you tell me where these 1400 new families are going to send their children to school? I don't see any mention of building schools in your Promenade/housing/hotel/sports arena project. No doubt you've seen the congestion of the Canoga Park High

School at the corner of Topanga and Victory. It's hard to miss. Our schools are very overcrowded. Although my son now has his masters degree, he did go to El Camino High School and told me of the many times that he and other students were sitting on the floor because there was no room for any more desks in the already full classrooms. CPHS also has this problem.. or will the new students be bussed to other areas?

### **Response to Comment No. 171-2**

As discussed in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, the Project's residential and non-residential components would generate a total of approximately 1,785 new students. The number of Project-generated students who would attend LAUSD schools serving the Project Site would likely be less than this estimate because the analysis provided in the Draft Supplemental EIR does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools (i.e., Magnet Schools and Pilot Schools) located away from their home attendance area, or students who may enroll in charter or private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site.

Nonetheless, as discussed further in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, pursuant to SB 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts.

### **Comment No. 171-3**

Were you here during the Northridge quake? Buildings that were 3 stories high, crumbled to the ground. Remember Robinsons May? Maybe they didn't use Simpson bolt down, or enough rebar, which helps earthquake-proof a building, and maybe they did. The fact is, that we're on a faultline [sic] and if you think the Northridge quake was big, then look out! There is a good reason that we don't have 28 story buildings in this area! They have no business being in this part of the valley.

### **Response to Comment No. 171-3**

As discussed in the Initial Study, provided in Appendix A, of the Draft Supplemental EIR, based on the Geologic and Soils Report, a review of the City of Los Angeles General Plan Safety Element and the City's Zoning Information and Map Access System, the Project Site is not located within a currently established Alquist-Priolo Earthquake Fault

Zone for surface fault rupture hazards.<sup>76,77,78</sup> In addition, based on the information provided by the City's Zoning Information and Map Access System, the nearest fault to the Project Site is the Santa Susana Fault, located approximately 8.84 miles north of the Project Site.<sup>79</sup> Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault. In addition, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Project would also continue to implement Warner Center Plan Mitigation Measures GEO-1 through GEO-7, which enforce the State and local requirements addressing seismic ground shaking. However, as a note, if more stringent requirements related to seismic hazards are adopted prior to the Project pulling building permits, the Project would be subject to those more stringent standards.

#### **Comment No. 171-4**

Topanga and Victory. Probably the busiest corner of the West Valley. It looks as though construction of this project would go on for over a decade, so let's talk about the traffic during and especially after construction. It has already become a nightmare because of the recent Costco and mall. It's no wonder that more people are shopping online!

#### **Response to Comment No. 171-4**

The Project is proposed as a phased development, therefore construction is anticipated to occur in phases through the Project's 2033 buildout date. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project worker trips to and from the Project Site are anticipated to occur outside of the peak hours (i.e., arrive at the site prior to 7:00 A.M. and depart before 4:00 P.M. or after 6:00 P.M.). Therefore, most, if not all, construction worker trips would occur outside of the typical weekday commuter peak periods. However, even if all construction worker trips were conservatively assumed to occur during the morning and afternoon peak periods, they would still be fewer than the trips allocated for TAZ 9 under the Warner Center Plan. Full implementation of the Warner Center Mitigation Program and Project specific project

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<sup>76</sup> *Geotechnologies, Inc. Soils and Geology Issues Report, October 6, 2016.*

<sup>77</sup> *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan, Safety Element, November 26, 1996, Exhibit A.*

<sup>78</sup> *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed August 2, 2016.*

<sup>79</sup> *Geotechnologies, Inc. Preliminary Geotechnical Engineering Investigation, August 31, 2016.*



design features is projected to result in less than significant impacts to the street network including the intersection of Topanga Canyon Boulevard & Victory Boulevard. However, to the extent that Project construction begins prior to the implementation of the Warner Center Mitigation Program, peak-hour construction transportation impacts may occur during the Overlapping Construction Plan period. The Construction Management Plan, as required by Warner Center Plan Mitigation Measure TR-100 and Mitigation Measure K-1, will identify specific actions to reduce the effects of the construction impacts.

**Comment No. 171-5**

One thing for sure: WE DON'T NEED ANY MORE RETAIL STORES IN THIS AREA! When I helped my friend open a retail space at The Promenade mall a few years back, I was shocked at how empty this beautiful mall was. She had almost no business and had to close.

It just got worse over the years. Lots of stores have opened and closed here since then.. [sic] we have more than enough already. There are plenty of new restaurants that have opened too.

**Response to Comment No. 171-5**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 171-6**

Are you going to be widening the roads throughout this area? It has already become bottle necked from 'The Village' [sic]

**Response to Comment No. 171-6**

As discussed above under Topical Response No. 3, Traffic and Parking, and as discussed further in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project would implement a variety of street improvements in the vicinity of the Project Site which would facilitate access to the Project Site. Project design features that will facilitate access to the Project Site include: Project Design Feature K-1, which introduces a fourth northbound through lane across the Topanga Canyon Boulevard frontage and Project Design Features K-2 through K-5 and K-8, which individually apply improvements to the main Project driveways. LADOT has determined that the Warner Center mitigation measures adjacent to the Project Site shall be implemented as part of the

Project's construction. These include construction of a dedicated eastbound right-turn lane at Owensmouth Avenue and Erwin Street (Warner Center Mitigation Measure TR-8), a new traffic signal at Topanga Canyon Boulevard and Calvert Street/Promenade Boulevard (Project Design Feature K-2), and dedication of right-of-way around the Project Site frontages, which will be used as part of other Warner Center mitigation measure improvements as required by Section 7.7, Street Improvements and Dedications, of the Warner Center Plan. Collectively, these project design features would help to address traffic issues during operation of the Project.

#### **Comment No. 171-7**

A 15,000 seat Sport Center should then cause total gridlock. The congestion in traffic at a stadium here, is just more than our eroded, poorly maintained and overcrowded streets can handle.

#### **Response to Comment No. 171-7**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental impacts of the Entertainment and Sports Center, including traffic. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 171-8**

Your 5,610 parking spaces are just a drop of what would be needed for this crazy bucket of parking problems.

#### **Response to Comment No. 171-8**

As discussed above, in accordance with SB 743, impacts associated with parking are not considered significant impacts under CEQA. However, an analysis of parking is provided in the Draft Supplemental EIR. As discussed further in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project's provision of 5,610 parking spaces would satisfy the non-event parking requirements of 2,790 parking spaces. The Entertainment and Sports Center would require 3,000 parking spaces for sold-out events under the LAMC (1 space per 5 seats). Therefore, the remaining 2,820 parking spaces provided on the Project Site would be utilized to fulfill the required parking spaces for the Entertainment and Sports Center. In order to make up the remainder of the LAMC required parking (i.e., 180 parking spaces) and to provide for peak demand parking of a maximum of 2,380 parking spaces, a combination of on-site shared parking (shared with the office and retail uses only) and off-site parking located at adjacent office buildings is proposed, and would require approval through the Project's requested entitlements. In

addition, as set forth under Project Design Feature K-6, the Project would include the development of an Event Management Plan (EMP). The EMP would identify the number of on-site shared use parking spaces available for the Entertainment and Sports Center and identify the number of off-site parking spaces that would be required to meet demand, depending on the time of year and number of event attendees. The EMP would require that sufficient parking be provided through a combination of on-site shared parking and available off-site parking to meet event demand. The Applicant would be required to provide annual evidence to LADOT of agreements that identify/secure the location and quantity of available off-site parking. LADOT must approve the location and quantity of off-site parking.

**Comment No. 171-9**

This project is just too enormous for this already overcrowded area. Our aging infrastructure of sewer lines, electrical grids and water shortage make a project like this one undesirable. Go ahead and build it where there is room for it and where it's needed. In the desert or in the mountains out of the city. We don't want it. We don't need it. It doesn't belong here!

Stop this project now, before going any further. Why not ask the people who live in this community what they want?

**Response to Comment No. 171-9**

This comment expressing opposition to the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. Refer to Topical Response No. 6, Infrastructure, above, for a discussion regarding the ability of the infrastructure system to accommodate the wastewater generation and electrical demand associated with the Project. Also refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's consistency with the Warner Center 2035 Specific Plan's vision and regulatory requirements for the Project Site.

**Comment No. 171-10**

Thank you, Elva. Yes, my address is:

Terry Ann Perry 23648 Balmoral Lane West Hills, CA 91307

Please note that the high school is at Topanga and Van Owen.

**Response to Comment No. 171-10**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 172**

Vlad Pesin  
5500 Owensmouth Ave.  
Woodland Hills, CA 91367-7004

**Comment No. 172-1**

Please find my letter attached.

**Response to Comment No. 172-1**

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the proposed Project.

**Comment No. 172-2**

I am writing to let you know that I think the Draft EIR for the Promenade 2035 project confirms that this is going to be a great addition to Warner Center. It is very reassuring to see that such a thorough evaluation of the project has been conducted and that all of its elements follow the rules set out in the City's Warner Center 2035 Plan—a plan that the City and local stakeholders worked so hard to craft and review.

To me, the most important aspect of the Promenade 2035 project is that it has been so carefully designed to include everything needed to live life without the daily use of a car. This is a major step toward reducing traffic and the stress that goes along with it. I'm particularly glad to see that the project includes an entertainment venue, so that residents and neighbors will be able to enjoy events locally, and will not need to drive endless miles to see a show or game.

The Promenade 2035 project responds to community needs, complies with local planning regulations, and will bring excellent resources to the area. I hope it will be approved without delay.

Thank you for your consideration.

**Response to Comment No. 172-2**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 173**

Christine Peterson  
5900 Jumilla Ave.  
Woodland Hills, CA 91367-5606

**Comment No. 173-1**

I hope that one more voice who is totally opposed to this humongous project for the year 2035 will help to put a stop to this insanity. Traffic as it is has become impossible on any given day. It seems “rush hour” from early morning to late at night and beyond.

Other than the developers I predict that Uber and Lyft will make a bundle since no one will be able to find parking anywhere.

Thank you for listening. Please put a stop to this development.

**Response to Comment No. 173-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Topical Response No. 3 with regard to the traffic impacts of the Project.

**Comment No. 173-2**

Here is my mailing address:

Christine Peterson  
5900 Jumilla Avenue  
Woodland Hills, CA 91367

**Response to Comment No. 173-2**

The commenter has been added to the Project’s mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 174**

Gwyn Petrick  
6355 Topanga Canyon Blvd., #428  
Woodland Hills, CA 91367-2140

**Comment No. 174-1**

Please see my attached letter of support for the Promenade 2035 project.

My office is across the street from the Village and it is an amazing place.

I know they will do the same with the Promenade

I live across the street from the Village, so I'm well aware of the difference Westfield has made in the quality of development we enjoy. It's great that they want to extend the revitalization to the Promenade property and I especially love that they want to make it pedestrian friendly and sustainable.

It's reassuring that the recently released Draft Environmental Impact Report evaluated several areas, including traffic, noise and air quality, and found that impacts can be addressed.

Westfield has done an amazing job of enhancing our community and I look forward to the Promenade's completion!

**Response to Comment No. 174-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 175**

David Price  
Ellen Brown  
21007 Topochico Dr.  
Woodland Hills, CA 91364-6030

**Comment No. 175-1**

My wife and I are residents of the [sic]

Girard Tract section of Woodland Hills, in the hills south of Ventura Blvd and just east of Canoga Ave. We have lived in our current home for 23 years. As longtime residents of this end of the valley, we have some serious concerns about the proposed 2035 plan for Warner Center. The following are our principal concerns:

**Response to Comment No. 175-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 175-2**

1. As currently configured, the establishment of the Westfield Village has created traffic flow and congestion issues, particularly on Topanga Canyon Blvd. The intersection of Topanga Canyon Blvd and Ventura Blvd has always been problematic, but the development of the Village has exacerbated this problem and traffic has now been impacted from the Topanga/Ventura intersection all the way north to Vanowen. Given the disruption of traffic flow caused by the Village development, we are very concerned about what traffic will be like with the addition of millions of square feet of commercial and residential development and approximately 135,000 new residents in a very limited space.

**Response to Comment No. 175-2**

Refer to Topical Response No. 3, Traffic and Parking, and Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, for a discussion of the Project traffic impact analysis which found the addition of full Project traffic to each analyzed study intersection is anticipated to be less than significant with the full implementation of the Warner Center Mitigation Program and Project specific project design features. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for



operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking for further details regarding the Warner Center Plan Implementation Board.

The scope of analysis of the Traffic Study was developed in consultation with LADOT staff, which reviewed and approved the Traffic Study. A copy of the Traffic Study and LADOT's assessment letter is provided in Appendix M, of the Draft Supplemental EIR.

### **Comment No. 175-3**

2. Air quality at this end of the valley has always been at least a little better than the air quality further east in the valley. The 2035 plan raises the prospect of significantly compromised air quality for Woodland Hills and surrounding areas.

### **Response to Comment No. 175-3**

This comment is related to the Warner Center Plan and does not specifically address the Project. Nonetheless, as discussed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, the localized effects from Project emissions to sensitive land uses in close proximity to the Project Site were evaluated according to the SCAQMD's localized significance threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. These ambient air quality standards provide public health protection, including protecting the health of "sensitive" populations, such as asthmatics, children, and the elderly. As shown in Table IV.B-6 on page IV.B-41 and Table IV.B-8 on page IV.B-46 of the Draft Supplemental EIR, maximum

construction and operational emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds with implementation of mitigation measures.

**Comment No. 175-4**

3. Adding to the traffic and air quality impacts of the 2035 plan, is the commercial vehicle traffic needed to supply and support this massive new influx of commercial establishments and residential properties.

**Response to Comment No. 175-4**

This comment is related to the Warner Center Plan and does not specifically address the Project. Nonetheless, refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the Project traffic impact analysis which was reviewed and approved by LADOT. To the extent that commercial vehicles are on the street network during the peak periods, the traffic generated by commercial vehicles is inherent in those trip generation rates utilized for the commercial and residential uses. Therefore, commercial vehicles during the peak periods are included in the Project's traffic analysis. Relative to air quality, the analysis was conducted using SCAQMD's recommended CalEEMod model. The model calculates the emissions associated with on-road mobile sources. These are associated with residents, workers, customers, and delivery vehicles visiting the land uses types in the project. The CalEEMod Los Angeles fleet mix includes commercial vehicles/trucks in the overall vehicle fleet.

**Comment No. 175-5**

My wife and I are not fundamentally against all new development. We do, however, see the 2035 plan for Warner Center as being oversized for the space being considered, and a major negative impact on our neighborhood.

**Response to Comment No. 175-5**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for further detail regarding the Warner Center Plan.

**Comment No. 175-6**

Thank you Elva.

Our address is:

21007 Topochico Drive, Woodland Hills, CA 91364

**Response to Comment No. 175-6**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 176**

Curtis B. Quillin  
21030 Kenwyn Ct.  
Topanga, CA 90290-4436

**Comment No. 176-1**

Please see my attached letter of support for the proposed re development of the Westfield Promenade property.

I believe the Draft Environmental Impact Report for the Promenade 2035 project represents a comprehensive study of all aspects of the plan and clearly demonstrates that the area will receive numerous long-term benefits and few short-term impacts as a result of its implementation.

The community worked very hard to create the Warner Center 2035 Plan as a guide for future development, and the Promenade project complies with its regulations. I think the project will be a welcome replacement for the aging and nearly abandoned mall. It has been designed to create a neighborhood that welcomes the public to open spaces, shopping and restaurants with walkable streets and sustainable landscaping. I also want to voice my support for the entertainment venue that will allow us to attend shows and sports events without the need to leave our community. The popularity of summer concerts in Warner Center Park should prove that area residents will support local concerts and events whenever they are staged here.

So much work and analysis has gone into the creation of both the Warner Center 2035 and Promenade 2035 plans that we are all sufficiently knowledgeable about them. I hope we can agree that enough studying has been done, and it's now time to start building.

Thank you for considering my comments.

**Response to Comment No. 176-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 177**

Mark R. Rachman  
22104 Victory Blvd., B209  
Woodland Hills, CA 91364

**Comment No. 177-1**

I am a local resident and assistant undergraduate biologist at California State University Northridge and field technician with the DOI. I am writing this comment to express my concern for this project.

I am a low income person, and any new project should be made to address the growing number of low income people that can live in Woodland Hills. We as a community do not need more high cost housing. This area is in a housing crisis and affordable housing needs to be made a primary focus of any new development.

**Response to Comment No. 177-1**

As discussed in Section IV.G, Land Use, of the Draft Supplemental EIR, the Housing Chapter of the City's General Plan Framework Element includes objectives to plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types. The Project would support the City's objective through the development of 1,432 multi-family residential units, consisting of studio, one-, two-, and three-bedroom units, which would be priced at various points. However, the Project does not propose below-market rate (affordable) housing. This comment otherwise generally discusses policy issues with respect to apartment rental rates and does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 177-2**

Next, I would like to address the issue of climate change. Medium and high income earners, by in large, do not use public transportation. They drive cars. Increased traffic and a decrease in green spaces means increased carbon dioxide emissions and an increase in to the human impact on climate change. This could be mediated by incorporating public transportation in to the project, and decreasing available parking to not allow an increase in traffic, our environment can not [sic] handle more cars. We need to decrease the amount of cars in our community to save our earth.

**Response to Comment No. 177-2**

As discussed in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR, the Project would support numerous goals related to the reduction of greenhouse gas emissions and potential impacts associated with greenhouse gas emissions would be less than significant. In particular, the Project is proposing to provide the minimum number of parking spaces permitted under the Warner Center Plan, to further incentivize the use of transit, bicycles, and, and walking. In addition, the Project Site is directly adjacent to the Warner Center Transit Hub, which is directly serviced by five Metro local lines, one Metro Rapid line, one Antelope Valley Transit Authority line, one Santa Clarita Transit Line, and a new Warner Center circulator connecting to the Metro Orange Line, which will maintain comparable service frequency to the Metro Orange Line currently provided at the Project Site. Furthermore, in accordance with Project Design Feature K-7 presented in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Applicant shall develop and implement a TDM Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. Additionally, the Project would provide bicycle parking spaces and facilities throughout the Project Site in accordance with City requirements, which currently require 361 short-term and 1,726 long-term bicycle parking spaces, in addition to bicycle-serving amenities, that would further encourage biking. Further, the Project Site was designed to encourage walkability. Consistent with the Warner Center Plan, the Project breaks up the current single, large block with a number of pedestrian paths traversing the Project Site, creating a pedestrian environment. New landscaped pedestrian paths would be installed along all four street frontages of the Project Site (i.e., Topanga Canyon Boulevard, Erwin Street, Owensmouth Avenue, and Oxnard Street), and more than 2 miles of landscaped pedestrian paths would be installed throughout the Project Site. In addition, the Project would remove the existing surface parking lot and mall, which currently provides no outdoor open space, and would provide a variety of open space and recreational amenities, including 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres.

**Comment No. 177-3**

Finally, I would like to address the flora being planned for the development. Native and endemic plants play a critical role in the ecosystem of the San Fernando Valley, and care should be taken when selecting plants for landscaping. Palm trees and eucalyptus are, by in large, not native, and require too much water. Native plants require less water, and they help sustain native wildlife that has evolved along side [sic] the native flora for millions of years. Our community does not need more exotic plants. Increased green spaces decreases public health issues like asthma and lung cancer. Green spaces are critical for urban ecosystems and human communities.

**Response to Comment No. 177-3**

As discussed further in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, Project landscaping would incorporate drought-tolerant and native plants. In addition, the Project would provide a variety of open space and recreational amenities to comply with the LAMC and Warner Center Plan requirements. As discussed above in Topical Response No. 7, Open Space, the Project would provide a total of approximately 466,000 square feet (approximately 10.6 acres) of total open space areas, including approximately 246,000 square feet of publicly accessible open space at grade and approximately 220,000 square feet private open space for residential, office, and hotel uses, which would consist of a variety of open space features and recreational amenities. The Project's proposed open space would exceed the open space requirements under the LAMC and Warner Center Plan.

**Comment No. 177-4**

I would like this statement to be on the public record. If you have any questions or concerns for me, feel free to contact me.

**Response to Comment No. 177-4**

These comments are noted for the record and have been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 177-5**

Mark Richard Rachman

22104 Victory Blvd, B209  
Woodland Hills, CA  
91364

**Response to Comment No. 177-5**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 178**

Ralph and Susan  
sp54@socal.rr.com

**Comment No. 178-1**

The continued increase in population density and gridlocked traffic in our neighborhood is completely destroying any quality of life for those of us who call Woodland Hills our home. This project is excessive, and it should not be approved!!!

I was trying to send my comment in reference to the EIR for the Promenade 2035 Project. I used the link that the city planning website listed for comments. If that link was incorrect, I apologize for the error. Thank you.

**Response to Comment No. 178-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. The link listed in the Department of City Planning website was correct.

As discussed in Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, the Project would be consistent with the population projections for the Warner Center Plan and SCAG subregion. Also refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the potential traffic impacts of the Project.



**Comment Letter No. 179**

Sinesh Ramamurti  
4949 Hood Dr.  
Woodland Hills, CA 91364-4711

**Comment No. 179-1**

I live near the Promenade property, so I would be directly affected by Westfield's plans to redevelop the former Promenade Mall.

While I was initially concerned about the increased density and the effects of having more residents/businesses in the area (i.e. traffic), it's encouraging to know that in addition to the Warner Center Plan mitigation measures, the project calls for improvements to ease traffic, access and parking.

When the Village was being built, neighbors had similar concerns about traffic/parking, and those issues didn't materialize. I trust they won't with the Promenade project.

I'm happy to support Westfield Promenade.

**Response to Comment No. 179-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 180**

Bonnie Ramos  
20767 Ingomar St.  
Winnetka, CA 91306-2020

**Comment No. 180-1**

I'd like to thank the City Planning Department for allowing me to add my voice to this important conversation. I believe in the process and that this will ultimately result in a richer community.

Initially, when I first learned of Westfield's intentions to redevelop their Promenade site, I was a bit skeptical. Although the project sounded very exciting and rewarding, the scope seemed large. I found myself concerned with construction impacts, as well as the height of some of the proposed buildings.

After serious review of the Draft Environmental Impact Report, I am pleased to find most of my fears have been addressed in thoughtful ways. In particular, I was pleased to see that even with a conservative analysis, it was determined that after mitigations, there would be less than significant impacts to off-site sound sensitive receptors, including those at Canoga High School. I also was sincerely pleased to see that the taller of the buildings would be placed in areas that were sensitive to the community and adjacent to other taller buildings.

Knowing the steps that Westfield is committed to taking to mitigate any impacts during construction, as well as their thoughtful placement of height, I feel confident in adding my voice in support to this project.

**Response to Comment No. 180-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 181**

Sandra Ramsey  
22726 Collins St.  
Woodland Hills, CA 91367-4434

**Comment No. 181-1**

I am concerned what promenade 2035 will do for our Warner Center!

It's already crowded & so much traffic!

I live less than five minutes away but we have enough traffic on our side streets plus excess speeds!!

Why can't they redo the Promenade Mall like it used to be?

There are some of us that still enjoy old fashion [sic] shopping.

So Topanga Mall is there.

Everytime [sic] I go to the Woodland Hills post office I see the old mall and get so sad.

We have enough high rises.

Can anything stay old fashion [sic] and not for big business?

Thank you for your time.

**Response to Comment No. 181-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Also refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the Project's impacts related to traffic during construction and operation of the Project.

**Comment Letter No. 182**

Nancy Reims  
ncyrei2@icloud.com

**Comment No. 182-1**

How can this area accommodate parking for [sic] 15,000 seat auditorium?

Furthermore, what kind of traffic jams will it bring?

Won't it affect the businesses in the area, by deterring people from the area when events there create massive traffic problems?

**Response to Comment No. 182-1**

Refer to Topical Response No. 3, Traffic and Parking, and Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, for a discussion of the Project traffic impact analysis. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 183**

Juergen S. Rinnert  
6220 Owensmouth Ave., Apt. 271  
Woodland Hills, CA 91367-2255

**Comment No. 183-1**

I am writing with comments to the DRAFT SEIR for the Promenade 2035 Project. We live at 6220 Owensmouth Ave Apt 271 so will be heavily impacted by the changes in traffic that this project anticipates. The construction traffic first and then the regular residential and business traffic that will follow will be heavy. That construction, at the same time as we anticipate the construction at the old Rockeddyne [sic] Plant location in the area surrounded by Victory, Canoga Ave and Owensmouth could overwhelm the area. I understand that nothing can stop progress so I offer these comments only to try to mitigate the impact on the area.

**Response to Comment No. 183-1**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic impacts of the Project. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 183-2**

1) One Way Streets. Please have traffic planners consider making Erwin St. and Oxnard St and possibly Owensmouth One Way streets, at least for the duration of the construction. a) That would allow for easy turning lanes without congestion at the stop lights. Today a person trying to turn from Erwin eastbound onto Owensmouth has to wait for oncoming traffic which often means only two cars make it. b) With One Way traffic, the turning side would not be impacted by oncoming traffic. This will also make the egress out of the Condominiums on Erwin and the apartment traffic out of Warner Pines less risky as it can then only turn one way. Today there are risks of collision from left or right or Anthem parking lot. c) The entrance into the Warner Pines lot as well as the apartments next door from the Southbound Owensmouth, across from the Farmers insurance building is very risky from the center lane. At the same time as cars try to turn left, others are coming out of the Farmer's property into the center lane often leading to close calls. This could be eliminated with one way traffic. d) Finally, the traffic into the village Parking Area or the Cosco [sic] Gas station adds to the congestion with turning traffic and would be well served if they could only turn one way. e) You gain a lane on each street that is converted to one way traffic without the center lane.

**Response to Comment No. 183-2**

This comment suggests Erwin Street, Oxnard Street, and potentially Owensmouth Avenue operating as one-way streets. The introduction of one way operation is not identified as an improvement measure in the approved Warner Center Mitigation Program. While the suggested one-way circulation may be perceived as safety enhancing, such operation is contrary to the street network circulation that was contemplated as part of the approved Warner Center Plan. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 183-3**

2) Eliminate On Street Parking Eliminate all on-street parking on Erwin, Oxnard and Owensmouth between Victory, Burbank, Canoga and Topanga Blvd. That would allow for the creation of an extra lane which can be the turning lanes and can be guided by turning arrows. If necessary, consider asking the owners of the vacant Bank Property on the corner of Erwin and Owensmouth to give permission for off street parking on their unused lot.

**Response to Comment No. 183-3**

This comment suggests the removal of on-street parking along Erwin Street, Oxnard Avenue, and Owensmouth Avenue between Victory Boulevard, Burbank Boulevard, Canoga Avenue, and Topanga Canyon Boulevard. Although the removal of on-street parking may increase the number of travel lanes on the identified streets, this has not been identified as an improvement measure in the approved Warner Center Mitigation Program and the removal of on-street parking may result in additional impacts that were not previously analyzed by the Warner Center Plan EIR. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 183-4**

3) Petition Anthom [sic] Blue Cross to remove or block the entrances to their parking lots from Owensmouth and or Erwin St and limit parking entrance to Canoga Ave and Oxnard St. That would free up that traffic during rush hours.

**Response to Comment No. 183-4**

The comment suggests an operational street condition that affects private property not part of the Project and is not specific to the environmental impacts addressed in the Draft Supplemental EIR. The comment is noted for the record and has been incorporated

into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 183-5**

4) Traffic Lights There seems to be an opportunity to improve traffic flow. Some of the lights should be set so that when there has been no car across the sensors, the light changes. Today we often wait excruciating time while there is no traffic, waiting for the color to change. That should be changed to smooth out the traffic.

**Response to Comment No. 183-5**

This comment suggests improvements to traffic flow, but does not specify locations for the improvements. Note that all signalized intersections in the City of Los Angeles are equipped with Automated Traffic Surveillance and Control (ATSAC) system and Adaptive Traffic Control System (ATCS). ATSAC is a system that can provide real-time adjustment of signal timing plans to reflect changing traffic conditions, identification of unusual traffic conditions caused by incidents, the ability to implement special purpose short-term signal timing changes in response to incidents, and the ability to identify signal equipment malfunctions quickly. ATSC is a traffic signal control program that provides fully responsive traffic signal control based on real-time traffic conditions. It automatically adjusts and optimizes traffic signal timing in response to current traffic demands on the entire signal network such that the number of stops and the amount of delay is minimized along with improved traffic signal coordination throughout the network. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 183-6**

5) Enforce Traffic laws The intersection of Erwin and Owensmouth has a traffic light and separate pedestrian crossing light where you can cross in all directions. There are also signs [sic] for no turn on Red. I could stand on that corner and generate a hundred tickets a day from people who ignore this warning. I suggest a vigorous enforcement of traffic laws to force people to comply. Hire extra police that will pay for themselves.

**Response to Comment No. 183-6**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 183-7**

6) Remove Bus Terminal The bus terminal on either side of Owensmouth might have to be relocated, at least during the construction. a) Perhaps the city could acquire a portion of the Anthem Blue Cross parking lot or grounds, perhaps through eminent domain, and make that a Bus Terminal to get the busses out of the traffic lanes. Today, when busses are parked there, we are limited to one lane. That won't work when this is all built out. Much of the Anthem lot is in vegetation and losing [sic] that would have no impact on their parking lot. b) Another option is to use a portion of the current Promenade parking area as Bus Terminal until the final phase of construction, allowing busses to park off the street. All it would take is to build entrances and exits into the lot. d) Another option is to give up a portion of the Warner Park, just enough to have a bus terminal.

**Response to Comment No. 183-7**

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, while not anticipated, temporary displacement of bus stops adjacent to the Project may occur. Coordination with public transit agencies to provide advance notification of bus stop relocations and durations would be required as part of the Construction Management Plan pursuant to Warner Center Mitigation Measure TR-100 and Mitigation Measure K-1. Thus, with implementation of Warner Center Mitigation Measure TR-100 and Mitigation Measure K-1, Project construction would not result in changes to bus and/or transit service such that a substantial inconvenience to riders would occur, and temporary impacts to bus and/or transit service were found to be less than significant.

With regard to operation, the comment suggests an operational condition that affects transit operations and private property not part of the Project, which is not specific to the environmental impacts addressed in the Draft Supplemental EIR. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 183-8**

7) Farmer's Insurance Parking Garage Encourage the landlord of the Farmer's Insurance Center garage to make the garage a Public Parking facility with long term rates. People who now park on street on Erwin or Owensmouth could park there. Also, consider asking the cars that exit the Farmer's Center to exit the center from a different drive way than they use to enter thus reducing the congestions on Owensmouth.

**Response to Comment No. 183-8**

The comment suggests an operational condition that affects private property owner not part of the Project and is not specific to the environmental impacts addressed in the



Draft Supplemental EIR. However, the Applicant will be in contact with the owner of the private property to discuss off-site parking agreements related to the Entertainment and Sports Center. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 183-9**

8) Warner Pines Visitor Parking Force Warner Pines owners to create some visitor parking spots inside their perimeter. Today, there are no spaces for visitors and they have to park outside. This would eliminate street parked vehicles.

**Response to Comment No. 183-9**

The comment suggests an operational condition that affects private property not part of the Project and is not specific to the environmental impacts addressed in the Draft Supplemental EIR. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 183-10**

9) Limit Hours of Construction Traffic Limit it to non-rush hour traffic or nights [sic]

**Response to Comment No. 183-10**

This comment suggests limiting hours of construction to non-rush hour traffic times. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplement EIR, and set forth under Mitigation Measure K-1, the Project would prepare a detailed Construction Management Plan. As part of the Construction Management Plan, construction-related deliveries, haul trips, and construction worker trips would be scheduled to occur outside of typical commuter peak hours to the extent feasible. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 184**

Michael and Maria L. Rissi  
mike.a.rissi@gmail.com

**Comment No. 184-1**

My wife and I completely oppose this Stadium proposal.

Terrible for quality of life for people in our area.

NO!

**Response to Comment No. 184-1**

This comment expressing opposition to the Entertainment and Sports Center is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 185**

Bruce Roberts  
18034 Ventura Blvd., #318  
Encino, CA 91316-3516

**Comment No. 185-1**

The following is sent with regard to the Draft Supplemental Environmental Impact Report ("DSEIR") on the project referenced above, and to express my comments and concerns regarding that draft Report. Unfortunately, due to a lack of sufficient actual notice, these comments are brief.

**Response to Comment No. 185-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below. With regard to the commenter's concern regarding the lack of sufficient notice, in response to requests for extension of the Draft Supplemental EIR comment period for the Project, the Department of City Planning extended the comment period by 45 days, until 4:00 P.M. on Thursday July 26, 2018, for a total comment period of 92 days, as shown in Appendix FSEIR-4.

**Comment No. 185-2**

The proposed development is out of character for the area, and it is too big, unnecessary, invasive, and overly demanding of limited resources. There are not enough specifics to determine the true affect [sic] of the project but the traffic impact and noise issues appear to be excessive and unnecessary, it appears that the construction proposed would continue for far too long for residents in the area to have to tolerate, and a project which includes a 15,000 seat stadium for the area is out of proportion to any needs of the community.

**Response to Comment No. 185-2**

As discussed in the Draft Supplemental EIR and Topical Response No. 1, Warner Center 2035 Specific Plan, above, the Project is consistent with the Warner Center Plan. The Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. As further discussed in Topical Response No. 2, Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval

from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. Also refer to Topical Response No. 2, for the Entertainment and Sports Center's impacts to noise and traffic.

**Comment No. 185-3**

In light of the failure to adequately address the issues raised by the proposed project, and its serious negative impact, the DSEIR should be revised to address and include alternatives for development which are not so radical, and which would be more consistent with the community and the needs of the residents.

**Response to Comment No. 185-3**

Consistent with CEQA Guidelines Section 15126.6(a), the Draft Supplemental EIR includes an analysis of five alternatives that were selected based in part on their ability to reduce the significant impacts of the Project. Therefore, the Draft Supplemental EIR does not need to be revised to include alternatives for development as this was already adequately addressed in compliance with the CEQA Guidelines.

**Comment No. 185-4**

Thank you for your email. Future notifications can be sent to me at the following address. This is not my residence address (which is in Woodland Hills, CA) but is the address where I prefer to receive mail.

Bruce Roberts  
18034 Ventura Boulevard, No. 318  
Encino, CA 91316

Thank you again for your email correspondence, and thank you for adding me to the Project's "Interested Parties" list so that I may receive future notifications.

**Response to Comment No. 185-4**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 186**

Burton and Marsha Roseman  
13432 Tiara St.  
Van Nuys, CA 91401-4047

**Comment No. 186-1**

This project should be abandoned. There simply is too much traffic and not enough Room [sic] for all the extra added cars and people in the west valley.

It is not in the interest of the residents that already live in the valley to subject them to The [sic] construction and the reality of so much dust, dirt, trucks..... and eventually All [sic] the extra people. We travel the length of Victory Blvd on a regular basis, and already There [sic] is too much traffic west of Tampa through Fallbrook.

**Response to Comment No. 186-1**

Refer to Topical Response No. 3, Traffic and Parking, and Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, for a discussion of the Project's traffic impact and construction impact analyses. The Project traffic impact analysis found that the addition of full Project traffic to each analyzed study intersection is anticipated to be less than significant with the full implementation of the Warner Center Mitigation Program and Project specific project design features. The scope of analysis of the Traffic Study was developed in consultation with LADOT staff, which reviewed and approved the Traffic Study. A copy of the Traffic Study and LADOT's assessment letter is provided in Appendix M, of the Draft Supplemental EIR. Relative to Victory Boulevard, the Project analyzed intersections between De Soto Avenue and Shoup Avenue; with the addition of Project traffic and full implementation of the Warner Center Mitigation Measures, the intersections are projected to operate at a better level of service than identified by the full buildout and implementation Warner Center Mitigation Program condition of the Warner Center Plan EIR. Also included in Topical Response No. 3, Traffic and Parking, is a discussion of Mitigation Measure K-1, which is the preparation of a Construction Management Plan. The Construction Management Plan identifies measures anticipated to minimize the effects of construction related traffic impacts.

**Comment No. 186-2**

Burton Roseman M.D. And Marsha Roseman  
13432 Tiara Street  
Van Nuys California 91401

**Response to Comment No. 186-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 187**

Judith Rosenblatt  
judimr@sbcglobal.net

**Comment No. 187-1**

To whom it may concern: I am mostly concerned with the traffic on the streets and on the Ventura Freeway. The freeway has become almost intolerable now. What would be the consequencel [sic] of the additional cars?? Please reconsider.

**Response to Comment No. 187-1**

Refer to Topical Response No. 3 Traffic and Parking, above and to Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, for a discussion regarding the Project traffic impact analysis, which found that the addition of full Project traffic to each analyzed study intersection is anticipated to be less than significant with the full implementation of the Warner Center Mitigation Program and Project specific project design features. The scope of analysis of the Traffic Study was developed in consultation with LADOT staff, which reviewed and approved the Traffic Study. A copy of the Traffic Study and LADOT's assessment letter is provided in Appendix M, of the Draft Supplemental EIR.

A supplemental analysis of potential impacts to state facilities (freeways) was prepared based on Caltrans guidelines and is provided in Appendix M, of the Draft Supplemental EIR. As identified in Section IV.K Traffic, Access, and Parking, of the Draft Supplemental EIR, the Caltrans facilities analysis evaluated the Project's potential impacts on 11 freeway mainline segments.

To identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation

of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an ESC event in 2035; the corresponding proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.



**Comment Letter No. 188**

Christine L. Rowe  
6732 Faust Ave.  
West Hills, CA 91307-3627

**Comment No. 188-1**

Please see my attached comments on the Promenade 2035 Draft Supplemental Environmental Impact Report and the Warner Center 2035 Plan which I am attaching with a Google drive.

📎 Promenade 2035 DSEIR Comments Christine L Rowe...

I also support the attached comments by the WHHO as stated in my letter.

**Response to Comment No. 188-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 188-2**

I would like to begin with my apologies that I was unable due to a number of reasons to read very much of the Promenade 2035 Draft Supplemental Environmental Impact Report (DSEIR).

I have attended a number of meetings with the Woodland Hills Warner Center Neighborhood Council (WHWCNC) on the Promenade 2035.

I am also a member of the Woodland Hills Homeowners Organization (WHHO) which represents residents which include my area of West Hills which falls in the Warner Center Neighborhood Protection Plan area.

I have read and I agree with the attached letter signed by John M. Walker the President of the WHHO.

I would like to point out to you and to Councilmember Blumenfield's office one of the constraints that I see related to being able to read and write informed comments on a document of this scale.

On July 11th, I attended the WHWCNC Board meeting. The first part of that meeting was spent on Board business. Then Tom Glick and his team came to discuss the Woodland Hills portion of the Southwest Valley Community Plan. This went on to about 8:30 p.m.

Other projects were discussed, and I do not believe that it was until close to 9:30 p.m. that WHWCNC President Joyce Fletcher started to read their Board's letter—about 15 pages? to the Board and stakeholders who were present regarding their comments on the Promenade 2035 DSEIR. I recall that Larry Green who represents Westfield stated that it was about 10:10 p.m. when he was called up for his comments. When I left this meeting—after 11:00 p.m., discussion of that letter was still ongoing.

This week I was supposed to attend a Zoning Administrator hearing on a preschool which directly impacts my home residence. I was unable to write detailed comments related to that project due to other commitments.

Last night, the 25th, there was a meeting on the LA River Revitalization at Canoga Park which I would have liked to have attended. However, at the same time, the West Hills Neighborhood Council's Environment Committee was meeting to discuss a meeting earlier today at the Santa Susana Field Laboratory.

Last week, at another meeting I could not attend, a committee of the WHWCNC addressed another project which is to go in place of an existing industrial/commercial business—I believe that is Thermo Fisher Scientific. Why is this business purchasing property in West Hills at Corporate Pointe and leaving the Warner Center area?

My point in these comments is that there are too many projects for one stakeholder to attend meetings for, and to analyze in a meaningful manner at one time. I really request that the Council office consider this and help to guide City Planning and other City departments so that all of these extremely important environmental reviews are not occurring in one community at the same time.

### **Response to Comment No. 188-2**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 188-3**

In addition to the statements in the letter attached, I have my own concerns.

I have attended another meeting on another project in Canoga Park at 21515 Vanowen which is also in Warner Center. The developer's representative stated that State laws do not require a CEQA review of projects within a Specific Plan. If this is the case, it is my opinion that the Warner Center Specific [sic] Plan 2035 aka: WC 2035 should never have been approved.

Yes, I was aware that there were meetings on the Plan. However, I was a member of the West Hills Neighborhood Council at the time, and I was also very heavily engaged in the Santa Susana Field Laboratory cleanup which required reading technical documents and attending numerous technical meetings.

My one visit to a WC 2035 Plan meeting was, in my opinion, a waste of time since no one cared about my concerns regarding the contamination of the groundwater beneath the various industrial sites and the potential impacts of the remediation on the community.

Yes, the original Warner Center Specific Plan envisioned a second downtown. But just like all of our other community plans, there was no recent update. The information within that document is based on old assumptions regarding the growth of the surrounding communities.

More importantly, I believe we have new State laws that mandate our considerations of the cumulative impacts of all of these projects on the surrounding communities.

**Response to Comment No. 188-3**

Both the Warner Center Plan EIR and the Project's Draft Supplemental EIR provided an analysis of cumulative impacts that fully complies with CEQA Guidelines Section 15065 as well as CEQA Guidelines 15130. For instance, the traffic studies prepared for both the Warner Center Plan EIR and the Project's Draft Supplemental EIR assumed and analyzed full buildout of the Warner Center Plan through 2035.

In addition, actual traffic counts were conducted in 2016, the year of the Project's NOP, to compare to the Warner Center EIR's projected traffic growth for 2016. These empirical counts were lower than the Warner Center EIR's projected traffic volumes for 2016. Therefore, the area-wide growth used by the Warner Center Plan EIR, and the Project EIR, is conservative.

Refer to Section III, Environmental Setting, of the Draft Supplemental EIR, for the comprehensive list of related projects that was used to evaluate the potential cumulative impacts of the Project. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 188-4**

In 2013 when I believe WC 2035 was approved, we did not have the tools in the tool box we have today from OEHHA—the State Office of Environmental Health Hazard Assessment.

Since I have not read the Health Risk documents for Promenade 2035, I need to ask this question. When you remediate a contaminated site such as the UTC Rocketdyne property for future use, what remediation standards does the City of Los Angeles require?

To the best of my understanding, the UTC Rocketdyne site is being cleaned up based on the groundwater contamination guidelines according to the Los Angeles Regional Water Quality Control Board (LARWQCB) guidelines. So does the WC 2035 Plan require a specific level of cleanup to build there? Why do I ask this? What will the cleanup standards be at the Promenade 2035 site? [https://www.waterboards.ca.gov/losangeles/board\\_decisions/adopted\\_orders/query.php?id=7453](https://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/query.php?id=7453)

I remember at times in the past seeing stock piled soil at the UTC Rocketdyne site. I tried to comment to the LARWQCB to prevent stockpiling soil for which we did not know the level of contamination on that site when their structure was demolished.

**Response to Comment No. 188-4**

The commenter refers to the UTC Rocketdyne site, located approximately 0.6 mile northeast of the Project Site, which is not part of the Project nor is it under the control of the Applicant. Thus, the details of the clean up on the UTC Rocketdyne site is beyond the scope of the EIR. With respect to the Project, as discussed in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, construction activities for the Project would include excavating down a maximum of 75 feet for basement levels, buildings structures, and hardscape and landscape around structures. If groundwater contamination is detected during construction, the appropriate testing, handling, treatment and disposal would be implemented in accordance with applicable regulatory requirements, such as NPDES requirements or industrial sewer discharge user permit requirements. The estimated rate and duration of groundwater dewatering during construction is not anticipated to draw groundwater across any substantial distance. Therefore, impacts relative to the rate or direction of movement of existing contaminants,

the level of groundwater contamination, and regulatory water quality standards would be less than significant. In addition, related projects, such as the UTC Rocketdyne project, would be unlikely to cause or increase groundwater contamination because compliance with existing statutes and regulations would prevent the related projects from affecting or expanding any potential areas affected by contamination, or increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. In addition, as discussed in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplement EIR, based on its downgradient location and distance from the Project Site, the UTC Rocketdyne site, in particular, is not considered to represent a significant environmental concern.

#### **Comment No. 188-5**

I recall like yesterday seeing soil at The Village site stockpiled on the site. I remember seeing the dust from grading blowing widely. Adequate dust measures were not used to create The Village property in my opinion. And that needs to be considered when we consider the Promenade 2035.

#### **Response to Comment No. 188-5**

As discussed on Page IV.B-12 of the Draft Supplemental EIR, the Project would be required to incorporate SCAQMD Rule 403 fugitive dust control measures at least as effectively as the following measures:

- Use watering to control dust generation during the demolition of structures;
- Clean-up mud and dirt carried onto paved streets from the site;
- Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site;
- All haul trucks would be covered or would maintain at least 6 inches of freeboard;
- All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of spillage or dust;
- Suspend earthmoving operations or additional watering would be implemented to meet Rule 403 criteria if wind gusts exceed 25 mph; and
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind. All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions.

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 188-6**

I tried to briefly look at the traffic analysis which is based on 2016 data. Since this plan extends to 2035, it does not consider future proposed Santa Susana Field Laboratory traffic impacts on Topanga Canyon Blvd and its potential impacts on the 101 freeway.

**Response to Comment No. 188-6**

The Santa Susana Field Laboratory is located approximately four miles northwest of the Project Site. The related projects list includes related projects that have an application filed with the Department of City Planning and LADOT within a two mile radius of the Project Site. As the Santa Susana Field Laboratory is outside of this radius, it was not included in the related projects list for the Draft Supplemental EIR. As described in Topical Response No. 3 Traffic and Parking, above, the Project's Construction Management Plan, as required by Mitigation Measure K-1, will be reviewed and approved by LADOT. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the potential exists for the construction-related activities and/or haul routes of the Project and the related projects to overlap particularly with respect to related projects that access the US-101 near the Project Site. As with other related projects, the Santa Susana Field Laboratory remediation projects would be required to prepare a Construction Management Plan to ensure that potential construction-related impacts are reduced. Nonetheless, to the extent that construction trips of related projects were to occur concurrently with the Project, cumulative construction traffic impacts would occur.

**Comment No. 188-7**

Pierce College—just outside of the Warner Center Plan. I believe that Pierce College implemented a 2014 Master Plan without noticing the community, and without advising DOT that they are finally planning to put in their "Mall" which will block through traffic from Mason or DeSoto to Winnetka. Back in 2010, when I commented on their Master Plan then, I told DOT that they had failed to analyze that impact or even tell DOT of that plan. When I was on the Pierce campus about a week ago, construction rerouted me to prevent me from exiting the Mason gate. So please be aware that there are going to be additional impacts on traffic at the DeSoto / Victory intersection that were not considered. <http://www.laccd.edu/Board/StandingCommittees/Documents/2013-2014StandingCommitteeAgendas/LAPC%20Strategic%20Master%20Plan%20Final.pdf>

**Response to Comment No. 188-7**

As identified in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Pierce College Master Plan is identified as a cumulative project to the overall background conditions of the Project's impact analysis. As indicated in Section IV.K, Traffic, Access, And Parking, of the Draft Supplemental EIR, the intersection of De Soto Avenue & Victory Boulevard is projected to operate at LOS C at full buildout of the Project (without or with a sold out event) along with all anticipated growth of the Warner Center Plan and the full implementation of the Warner Center Mitigation Program and Project specific project design features. The addition of Project traffic to the De Soto Avenue & Victory Boulevard intersection would not result in a significant impact at full buildout of the Project (without or with a sold out event) during the PM peak hour. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review by the decision makers.

**Comment No. 188-8**

Even the Pierce College 2014 Master Plan is using old student enrollment data. And they did not do a Supplemental EIR to analyze the traffic data to the best of my understanding.

So we have old traffic studies on multiple projects.

Here we have the DTSC Santa Susana Field Laboratory Traffic Study from their Draft Environmental Impact Statement last fall 2017: [https://www.dtsc.ca.gov/SiteCleanup/Santa Susana Field Lab/upload/App H Traffic Study.pdf](https://www.dtsc.ca.gov/SiteCleanup/Santa_Susana_Field_Lab/upload/App_H_Traffic_Study.pdf)

DTSC also used old data as in the Promenade 2035 document. And they also failed to analyze the routes proposed by the Department of Energy in their Draft Environmental Impact Statement earlier in 2017: <http://www.ssflareaiveis.com/documentation.aspx> as well as the NASA SSFL Draft Environmental Impact Statement Traffic Studies: [https://www.nasa.gov/agency/nepa/news/SSFL\\_DEIS.html](https://www.nasa.gov/agency/nepa/news/SSFL_DEIS.html). Three different traffic studies on SSFL planned routes from DTSC, DOE, and NASA -three different potential impacts on our communities including routes on Roscoe, Topanga Canyon Blvd, and the 101 freeway.

**Response to Comment No. 188-8**

The comments regarding the Santa Susana Laboratory Project is outside the scope of the Project's Draft Supplemental EIR. Refer to Response to Comment No. 188-6 regarding the Project's Construction Management Plan and coordination of construction activities with other projects.

**Comment No. 188-9**

Back to OEHHA. <https://oehha.ca.gov/>

Since I was not able to read all of the Promenade 2035 appendices, I cannot know if they used the CalEnviroScreen tools to consider the current impacts of air, groundwater, traffic, and noise on the community. And as in the WHHO letter, we must consider the cumulative impacts.

**Response to Comment No. 188-9**

CalEnviroScreen is a mapping tool that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects. The methodology for analysis of cumulative impacts suggested in this comment is not consistent with SCAQMD recommended methodology. The SCAQMD recommended air quality cumulative impact methodology is explained below. The SCAQMD shares responsibility with CARB for ensuring that all federal and state ambient air quality standards are achieved and maintained throughout all of Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. SCAQMD has developed methodologies and thresholds of significance that are widely used by lead agencies throughout the air basin. As set forth in the *LA CEQA Thresholds Guide*, the City adopted the SCAQMD thresholds to assess the significance of a project's project-specific and cumulative air quality impacts. SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution prepared in August 2003 specifically states:

*As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR.... Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.*<sup>80</sup>

The cumulative analysis of air quality impacts within the Draft Supplemental EIR appropriately follows SCAQMD's specified methodology. According to the SCAQMD, individual projects that exceed the SCAQMD's recommended daily thresholds for project-

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<sup>80</sup> *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, South Coast Air Quality Management District, August 2003.*



specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. Project construction-related daily maximum regional construction emissions with mitigation would exceed the SCAQMD daily thresholds and consequently have a significant cumulative impact due to construction-related regional NO<sub>x</sub> emissions. Maximum localized construction emissions with mitigation would not exceed any of the SCAQMD-recommended localized screening thresholds and thus would have a less-than-significant cumulative impact. In addition, operational emissions from the Project would exceed SCAQMD's regional VOC and NO<sub>x</sub> significance thresholds at Project buildout. Therefore, the emissions of non-attainment pollutants and precursors (i.e., related to VOC and NO<sub>x</sub> emissions) generated by Project operation would be cumulatively considerable. Maximum localized operational emissions would not exceed any of the SCAQMD-recommended localized screening thresholds and thus would have a less-than-significant cumulative impact.

Air quality impacts are basin-wide, and air quality is affected by all pollutant sources in the basin. Therefore, the ambient air quality measurements provide a summary of basin-wide cumulative air quality impacts. As the individual project thresholds are designed to help achieve attainment with cumulative basin-wide standards, they are also appropriate for assessing the Project's contribution to cumulative impacts.

#### **Comment No. 188-10**

Yes—Warner Center was meant to be sustainable. But you have two potential major projects going in Warner Center at this time—the Adler project—another project for which I saw a recent presentation, and the Promenade 2035 project.

At the Adler project meeting, we were told that the Orange Line stops across from the Promenade site had been removed. That means that anyone that wanted to use public transportation outside of Warner Center new bus service area would have to change buses. Can you imagine if you are an employee at one of their stores or restaurants—are you going to want to take public transportation late at night to go home? This is a project not only within the Promenade 2035 plan but within the WC 2035 Plan—no requirements within each district for housing for the service employee sector, the first responders, or even for our teachers. There is no provision in the plan for teachers let alone Pierce College students.

#### **Response to Comment No. 188-10**

Public transportation into and out of Warner Center is not proposed to be changed by the Project. The Project Site is directly adjacent to the Warner Center Transit Hub, which is directly serviced by five Metro local lines, one Metro Rapid line, one Antelope Valley Transit Authority line, one Santa Clarita Transit Line, as well as Metro Line 601 (also

known as the Warner Center circulator) which maintains a comparable service frequency to the previous Metro Orange Line service into Warner Center. Metro Line 601 began service in June 2018 and effectively replaced the Orange Line connection between the Canoga Station and the Warner Center Transit Hub with a route through Warner Center, including service to the Adler site. In addition Metro realigned the routes of those lines servicing the Warner Center Transit Hub to include additional connections to the Canoga Station. Metro's replacement of the Orange Line connection with Metro Line 601 was intended to improve access and service from the Orange Line station through Warner Center. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 188-11**

So what is Calenviroscreen? <https://oehha.ca.gov/calenviroscreen>

“What are cumulative impacts?”

- “Cumulative impacts” means exposures and public health or environmental effects from all sources of pollution in a geographic area.
- Cumulative impacts also take into account groups of people that are especially sensitive to pollution's effects, such as young children and people with asthma, and socioeconomic factors, such as poverty, race and ethnicity, and education.
- For CalEPA's definition of cumulative impacts, see the [CalEnviroScreen 3.0 report](#).

**Response to Comment No. 188-11**

As discussed in Response to Comment No. 188-9, CalEnviroScreen is a mapping tool that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects. As also discussed in Response to Comment No. 188-9, this tool is not used for the evaluation of cumulative impacts for private development projects located within the SCAQMD and within the City of Los Angeles. As a note, on page IV.B-22 of Section IV.B, Air Quality, of the Draft Supplemental EIR, according to CalEnviroScreen, the Project site is located in the 41 to 45 percentiles, which means that the Project site is slightly better than average in comparison to other communities within California.

**Comment No. 188-12**

What is Environmental Justice?

- State law defines environmental justice to mean “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation and enforcement of environmental laws, regulations, and policies.”
- Environmental justice principles are an important part of CalEPA’s goal to restore, protect and improve the environment, and to ensure the health of people, the environment and the economy.
- CalEPA asked OEHHA to develop CalEnviroScreen to identify communities suffering from cumulative impacts of multiple pollutants and people who are vulnerable to pollution’s effects.
- Visit [CalEPA’s Environmental Justice Program page here.](#)”

Environmental Justice—Canoga Park and other local communities have been identified as Environmental Justice Communities. <https://oehha.ca.gov/environmental-justice>

Therefore, the impacts of all of these projects in Warner Center must consider the impacts on these sensitive census tracts.

SB 535 Disadvantaged Communities: <https://oehha.ca.gov/calenviroscreen/sb535>

Some of the census tracts within Warner Center are identified as SB 535 Communities or adjacent to them.

“Disadvantaged Community Designation (Updated June 2017)

Disadvantaged communities in California are specifically targeted for investment of proceeds from the State’s cap-and-trade program. These investments are aimed at improving public health, quality of life and economic opportunity in California’s most burdened communities at the same time reducing pollution that causes climate change.

Authorized by the California Global Warming Solutions Act of 2006 (AB 32), the cap-and-trade program is one of several strategies that California uses to reduce greenhouse gas emissions that cause climate change. The funds must be used for programs that further reduce emissions of greenhouse gases.

In 2012, the Legislature passed Senate Bill 535 (de Leon), directing that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The legislation gave CalEPA responsibility for identifying those communities. In 2016, the Legislature passed AB 1550 (Gomez), which now

requires that 25 percent of proceeds from the fund be spent on projects located in disadvantaged communities.

Following a series of public workshops in February 2011, CalEPA released its list of disadvantaged communities for the purpose of SB 535 in April 2011. To inform its decision, CalEPA used the CalEnviroScreen 3.0 results. In June 2018, OEHHA issued an update of CalEnviroScreen 3.0 results to address a minor flaw in the software program algorithm used to calculate overall census tract scores. Because of this update, CalEPA has added two census tracts to its Disadvantaged Communities List for Climate Investments in accordance with CalEPA's designation report(link is external). [sic] These are census tract numbers 6067000800 (Sacramento) and 6075012301 (San Francisco). No other changes have been made to the list of disadvantaged communities. The maps and results available below reflect this June 2018 update.

For more information on SB 535 and AB1550 implementation, go to the Cal EPA page on Greenhouse Gas Reduction Investments to Benefit Disadvantaged Communities(link [sic] is external) and ARB's page on Disadvantaged and Low-income Communities Investments."

### **Disadvantaged and Low-income**

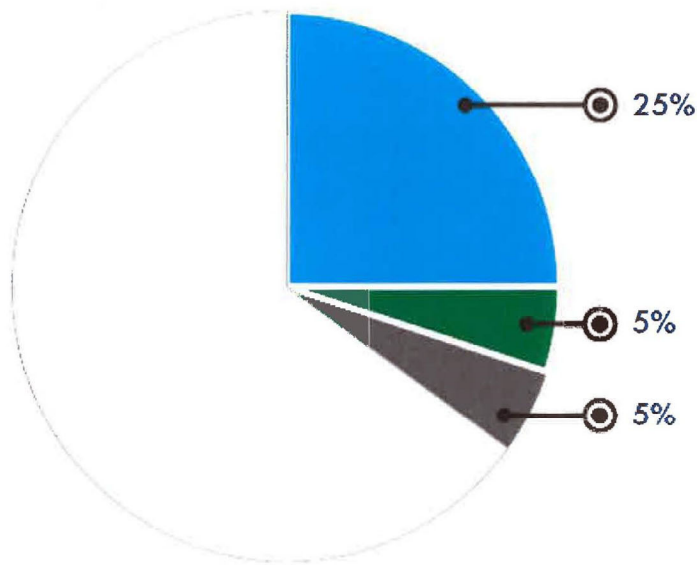
<https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/communityinvestments.htm>

### **"Communities Investments**

### **Senate Bill 535 and Assembly Bill 1550 Implementation**

Senate Bill (SB) 535 (De León, Chapter 830, Statutes of 2012) directs State and local agencies to make investments that benefit California's disadvantaged communities. It also directs the California Environmental Protection Agency (CalEPA) to identify disadvantaged communities for the purposes of these investments based on geographic, socio-economic, public health, and environmental hazard criteria.

Assembly Bill (AB) 1550 (Gomez, Chapter 369, Statutes of 2016), increased the percent of funds for projects located in disadvantaged communities from 10 to 25 percent and added a focus on investments in low-income communities and households.



A minimum of 25 percent of the projects invested in projects that are located benefiting individuals living in disadvantaged communities;

An additional minimum of 5 percent in projects that are located within individuals living in low-income or benefiting low-income households

An additional minimum of 5 percent located within and benefiting individuals living in low-income communities, or benefiting low-income households, that are within a 1/2 mile radius of a disadvantaged community.

The California Air Resources Board (CARB) and the administering agencies are in the process of transitioning to full implementation of AB 1550 as part of Fiscal Year 2017-18, and CARB is in the process of updating its Funding Guidelines for Agencies that Administer California Climate Investments to incorporate the legislative requirements of AB 1550.

California Climate Investments projects selected after the release of the [2017 Draft Funding Guidelines](#) will use AB 1550 definitions for disadvantaged communities, low-income communities, and low-income households. Information on SB 535 implementation is available [here](#) for projects selected under prior Funding Guidelines.

#### Disadvantaged and Low-income Community Maps

The map below identifies disadvantaged communities and low-income communities for the purposes of California Climate Investments.

1. Disadvantaged Communities - Census tracts in the top 25 percent of [CalEnviroScreen 3.0](#) scores, plus those census tracts that score in the highest 5 percent of CalEnviroScreen's Pollution Burden without an overall CalEnviroScreen score.

2. Low-income Communities - Census tracts that are either at or below 80 percent of the statewide median income, or at or below the threshold designated as low-income by the California Department of Housing and Community Development's (HCD) [2016 State Income Limits](#).
3. Low-income Buffer Regions - Low-income communities as identified in (2) that are also within 1/2 mile of a disadvantaged community as identified in (1).

To see if a particular community is within a disadvantaged community or low-income community, either navigate to the desired location on the map, or search for the location in the search bar.

For full screen click: [here](#).

Download data: [Geodatabase](#), [Kmz](#), or [Excel \(1.3mb\)](#).

Methodology for identifying low income community census tracts under AB 1550 is available [here](#).

### Low-income Households

AB 1550 defines low-income households as those with: 1) a household income at or below 80 percent of the statewide median income, or 2) a household income at or below the threshold designated as low-income by HCD's list of 2016 State Income Limits. To determine the low-income threshold by county and household size, use the tool below. The list of income thresholds designated as low-income by HCD is available [here](#).

Select Low-income

Definition:

Select County:

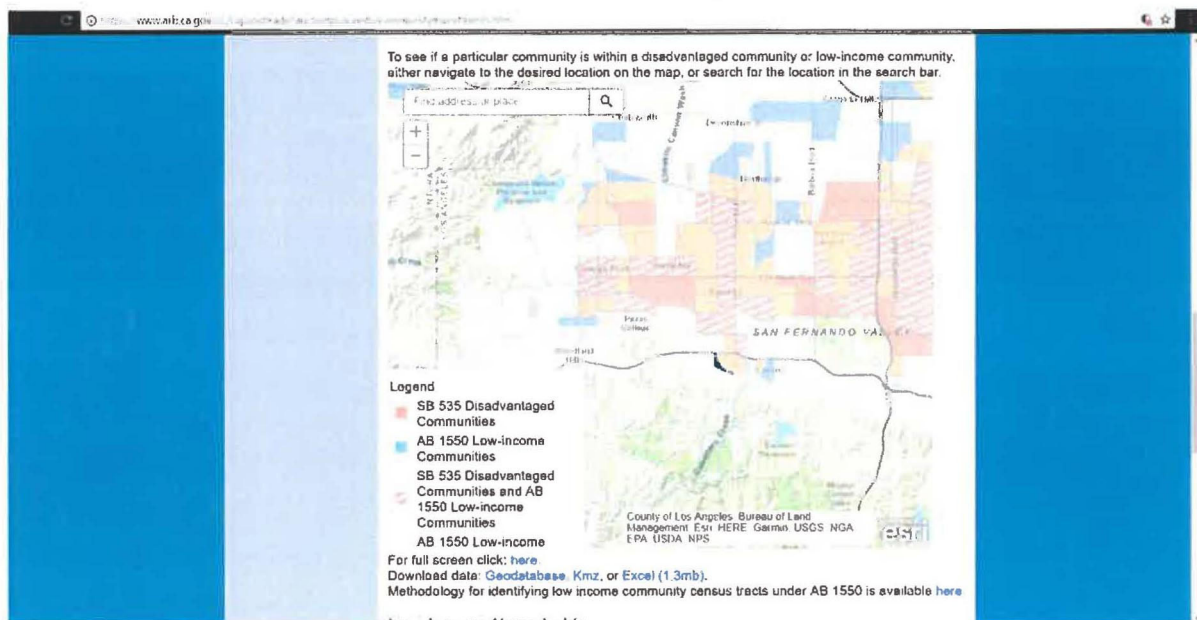
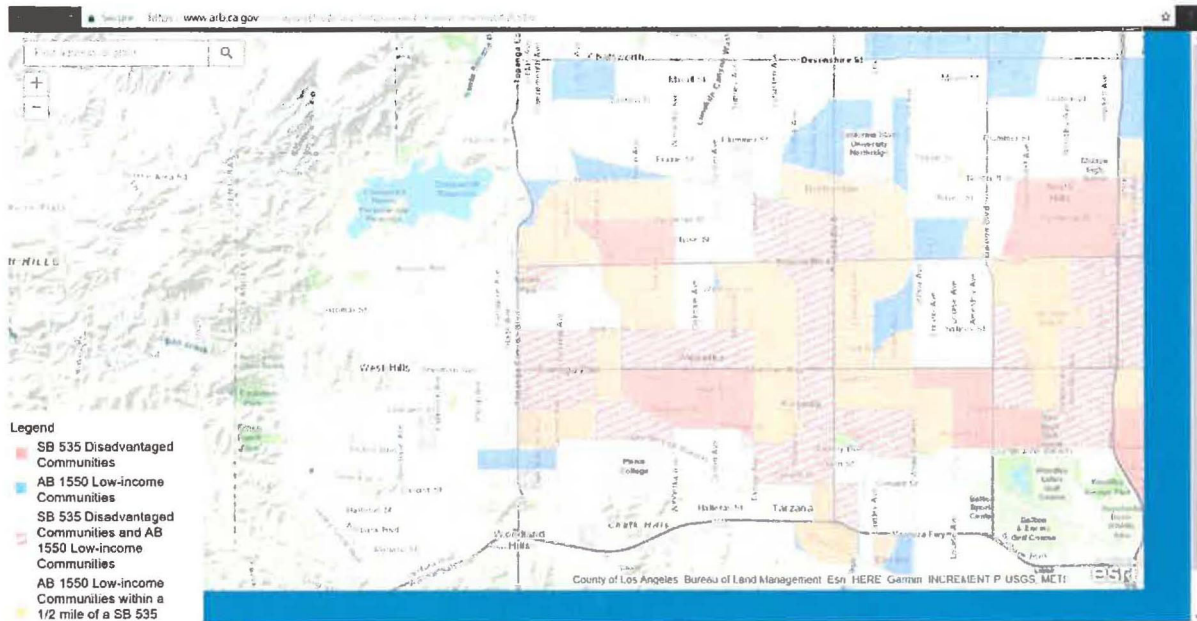
Select Household Size:

Calculate

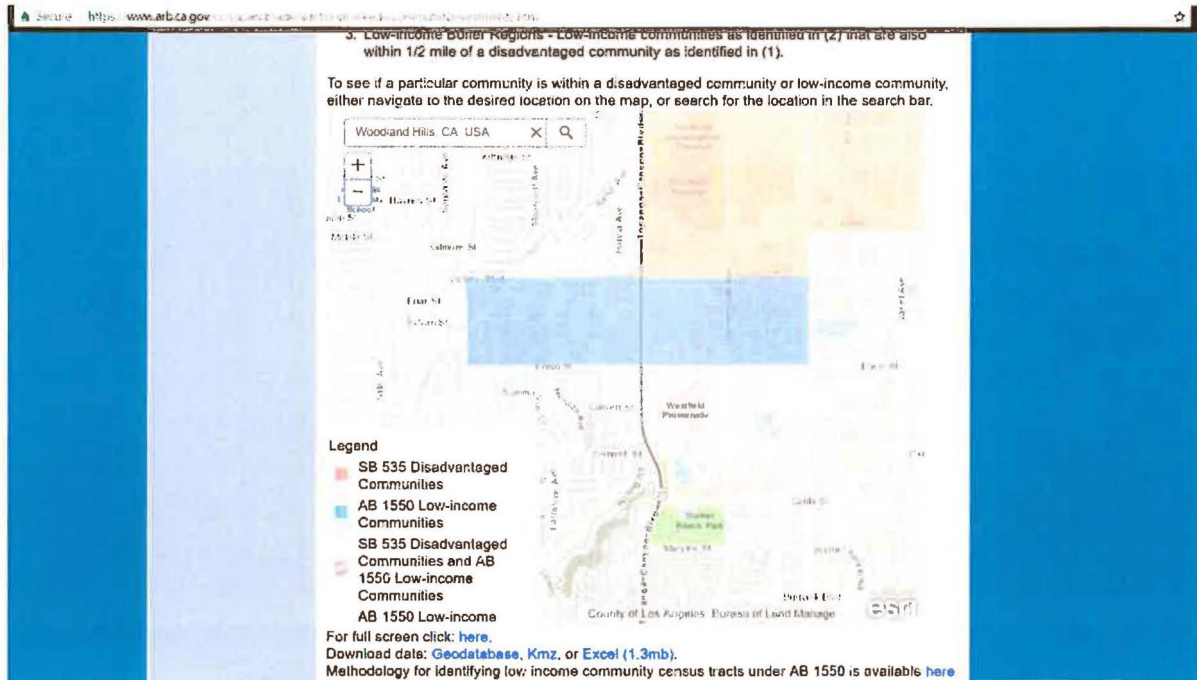
### Additional Resources

- [CARB SB 535 investment information](#)
- [CalEPA SB 535 implementation website](#)
- [OEHHA CalEnviroScreen website](#)
- [CalEPA Environmental Justice website"](#)

So here are two screen shots showing the ARB cap and trade communities in the Warner Center and CD 3 area:







So according to this screen shot, the Promenade is immediately adjacent to an AB 1550 community. So how is Westfield going to protect that community from the impacts of that project?

### **Response to Comment No. 188-12**

The Project is not within a disadvantaged or environmental justice community per SB 535 and AB 1550, as described further by the commenter. This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment No. 188-13**

My very favorite maps are the individual tabs on the Pollution Burden maps:

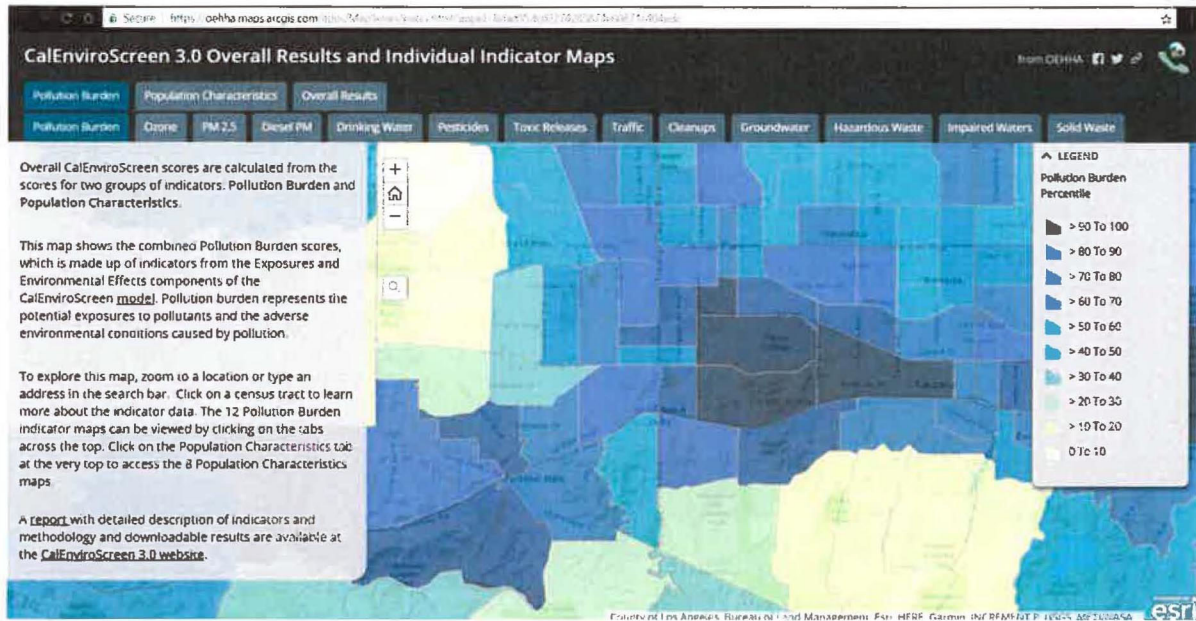
<https://oehha.maps.arcgis.com/apps/MapSeries/index.html?appid=8dad35dcd2274285874e60871c404edc>

"Overall CalEnviroScreen scores are calculated from the scores for two groups of indicators: **Pollution Burden and Population Characteristics**.

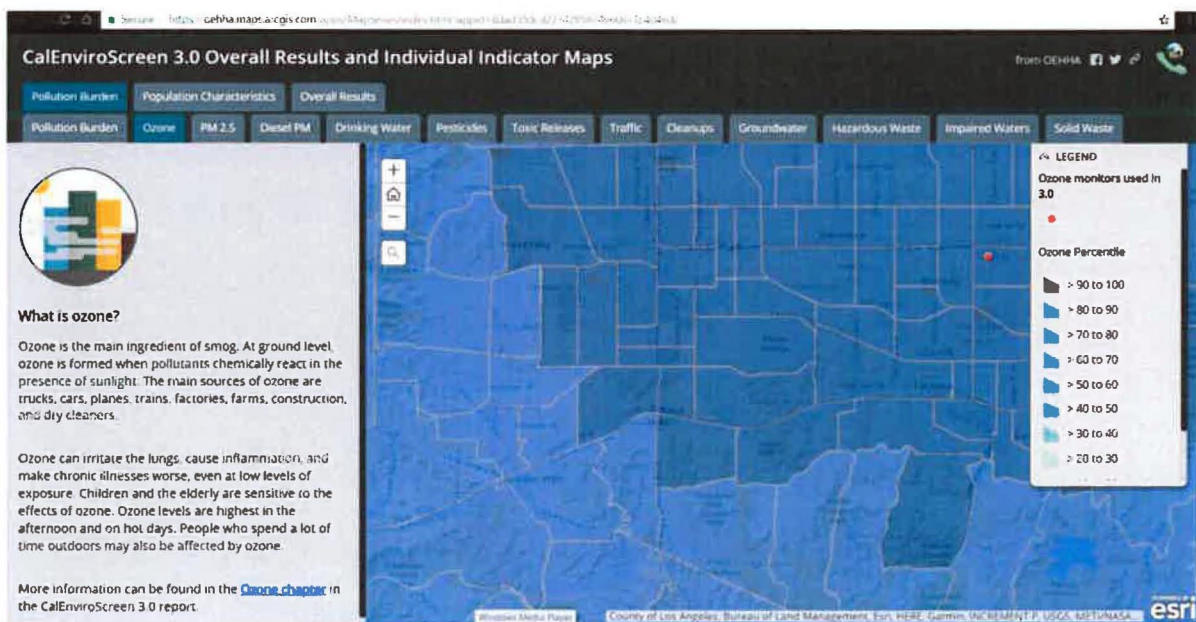
This map shows the combined Pollution Burden scores, which is made up of indicators from the Exposures and Environmental Effects components of the CalEnviroScreen model. Pollution burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution.

To explore this map, zoom to a location or type an address in the search bar. Click on a census tract to learn more about the indicator data. The 12 Pollution Burden indicator maps can be viewed by clicking on the tabs across the top. Click on the Population Characteristics tab at the very top to access the 8 Population Characteristics maps.

A report with detailed description of indicators and methodology and downloadable results are available at the CalEnviroScreen 3.0 website."

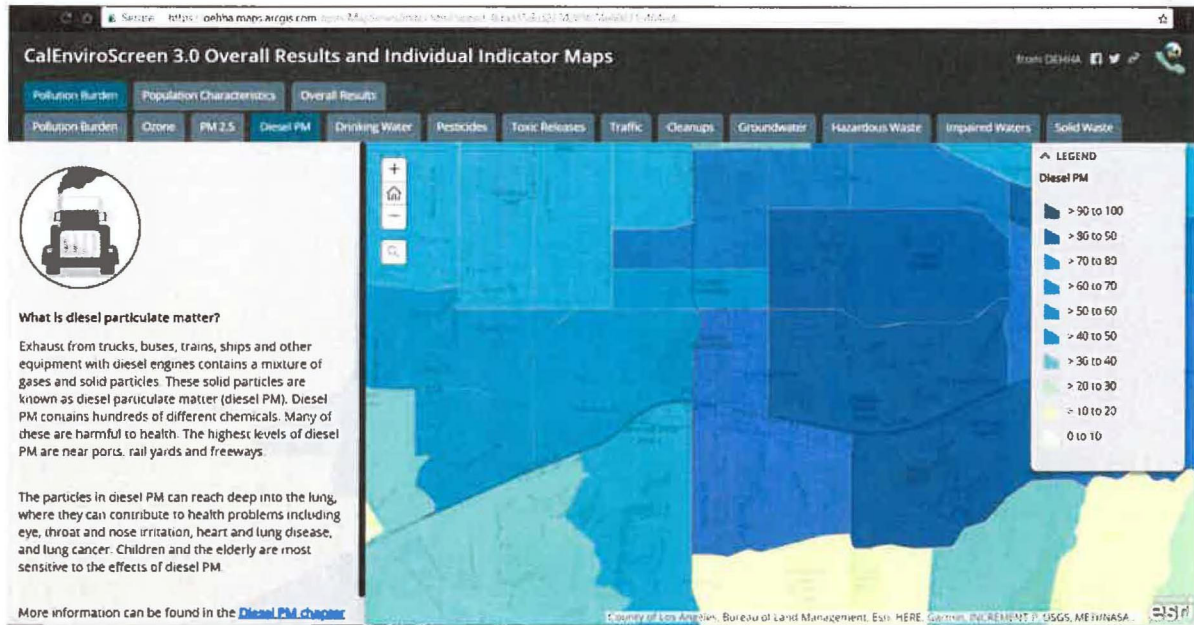


So this screen shot is the Pollution Burden overall score today for this part of the West San Fernando Valley.

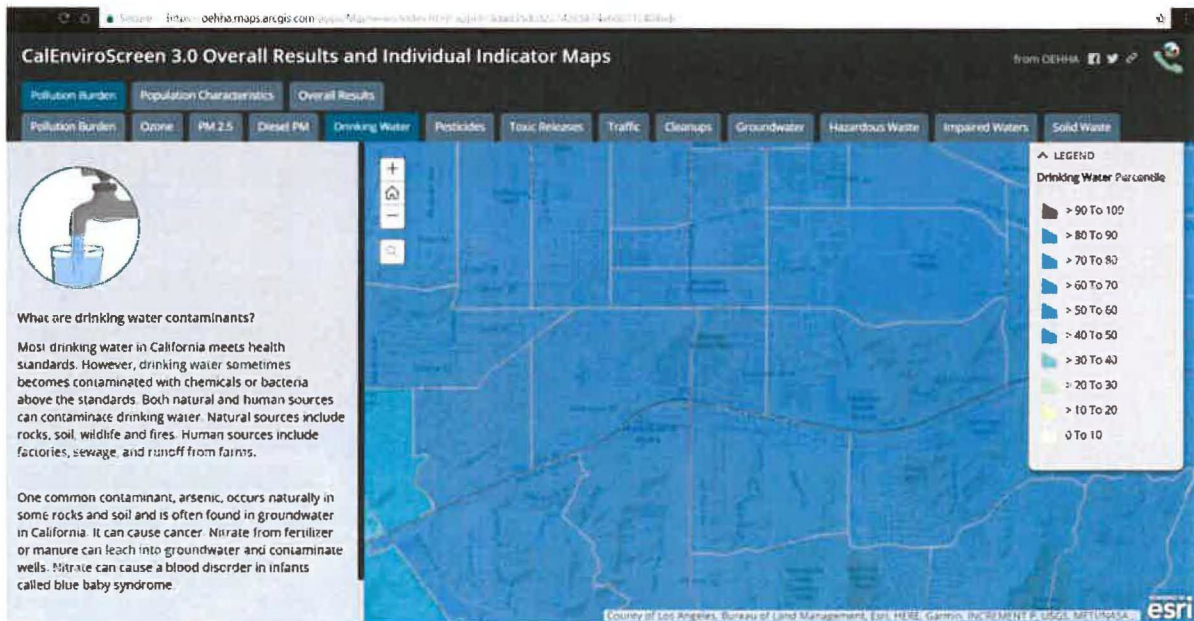


This map is for ozone in the West San Fernando Valley – this is what we are breathing now.

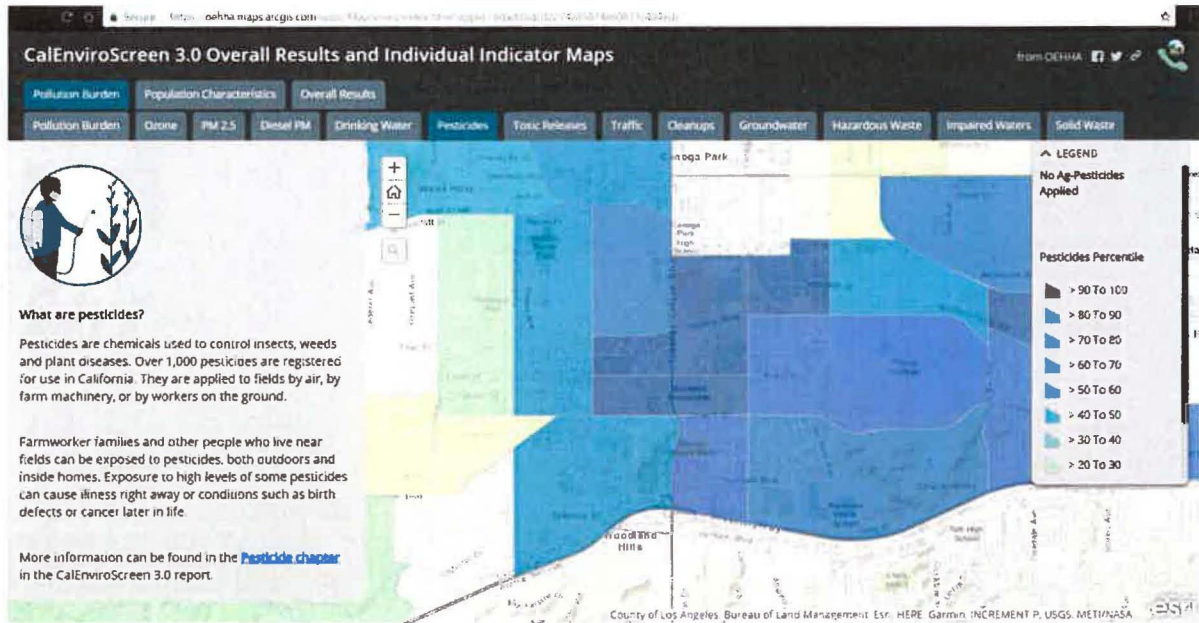




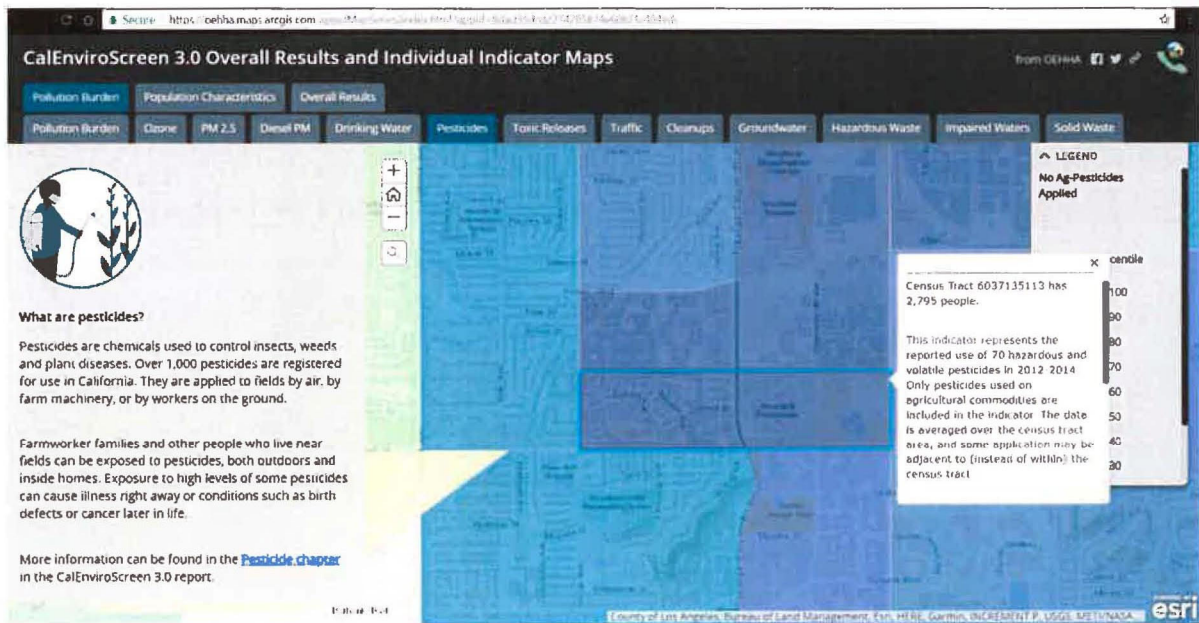
This map shows the existing impacts of Diesel emissions in the surrounding community – think future trucks for all of these projects.



This screen shot shows the drinking water contamination in the Woodland Hills Warner Center area which includes the Promenade property.

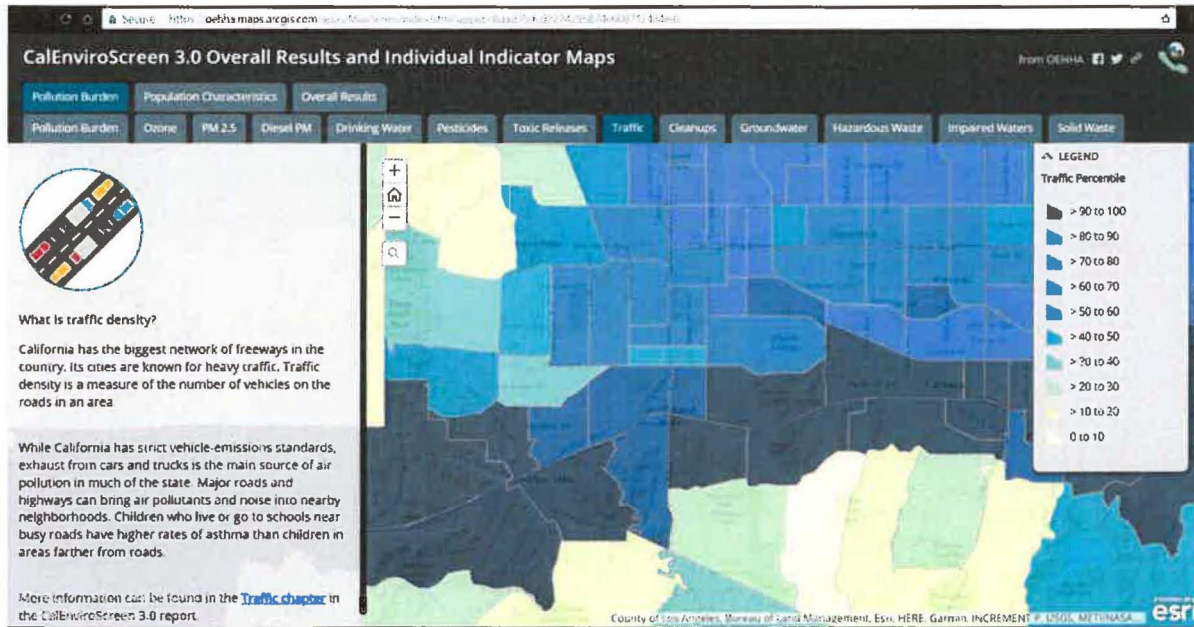


Very interesting to see the pesticide levels on the Promenade property.



So with this lovely view of the pesticides within the Promenade census tract, is this what the future residents and the future users of the proposed stadium and the open space will be breathing?





So this lovely map shows the existing traffic impacts along the 101 freeway and into our project area. How can we plan unsustainable project let alone a stadium with the current impact on our air quality from traffic?

### **Response to Comment No. 188-13**

CalEnviroScreen was developed by the Office of Environmental Health Hazard Assessment (OEHHHA) as a screening tool to identify the burden of pollution from multiple sources in communities while accounting for potential vulnerability to the adverse effects of pollution. This comment provides a series of maps from CalEnviroScreen depicting various existing conditions within the West San Fernando Valley. Much of the information provided in the screenshots is already incorporated into the discussion of existing conditions within the Draft Supplemental EIR.

The first and second screen shots show the pollution burden overall score and ozone on a specific day within West San Fernando Valley. Instead of focusing on a specific day to characterize existing conditions, the Draft Supplemental EIR provides relevant ambient air quality data for all criteria pollutants over the last three years from the most representative monitoring station (Reseda Station within West San Fernando Valley area), approximately four miles from the Project site. Use of this data provides a better indicator of exceedances of ambient air quality standards and pollution trends within the Project area. In addition, this data forms the basis for SCAQMD's localized significance thresholds and was used for purposes of determining potential Project-related localized air quality impacts. As concluded in the Draft Supplemental EIR, the Project would not result in any significant localized air quality impacts. Please refer to Table IV.B-2 on page IV.B-21 of the Draft Supplemental EIR for a summary of the national and state ambient air

quality standards for relevant air pollutants along with the ambient pollutant concentrations that have been measured through the last three years of available data.

The third screenshot map shows the existing impacts of diesel emissions in the surrounding community and cites that “the highest levels of diesel PM are near ports, rail yards and freeways.” This information is similarly provided in the Draft Supplemental EIR under existing conditions based on data provided by both OEHHA and SCAQMD. Page IV.B-18 of the Draft Supplemental EIR cites the SCAQMD’s MATES-IV Study (a series of maps that shows regional trends in estimated outdoor inhalation cancer risk primarily related to diesel PM) that shows the average carcinogenic risk within the Air Basin is approximately 420 in a million and, generally, “the risk from air toxics is lower near the coastline and higher risks concentrated near large diesel sources (e.g., freeways, airports, and ports).” Figure IV.B-2 on page IV.B-23 of the Draft Supplemental EIR provides an area map based on the MATES-IV model showing the calculated cancer risk in the Project area is approximately 675 in a million.<sup>81</sup> The cancer risk in this area is predominately related to nearby sources of diesel particulate (e.g., the Ventura Freeway [US-101]).

The fourth screen shot shows the drinking water contamination ranking in the Woodland Hills Warner Center area. As discussed on page IV.F-42 in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, there are no groundwater production wells or public water supply wells within one mile of the Project Site. Refer to Response to Comment No. 188-14, below, for a discussion regarding the ground water below the Project Site.

The fifth screenshot shows CalEnviroScreen pesticide level ranking for the Project census tract. Page IV.E-16 of the Draft Supplemental EIR, and as discussed further in the Environmental Assessment Technical Reports, provided in Appendix G, of the Draft Supplemental EIR, acknowledges that based on a review of historic documents and photographs, the Project Site was agricultural land as early as 1928 until 1971, when the Shopping Center and surface parking lot were developed.

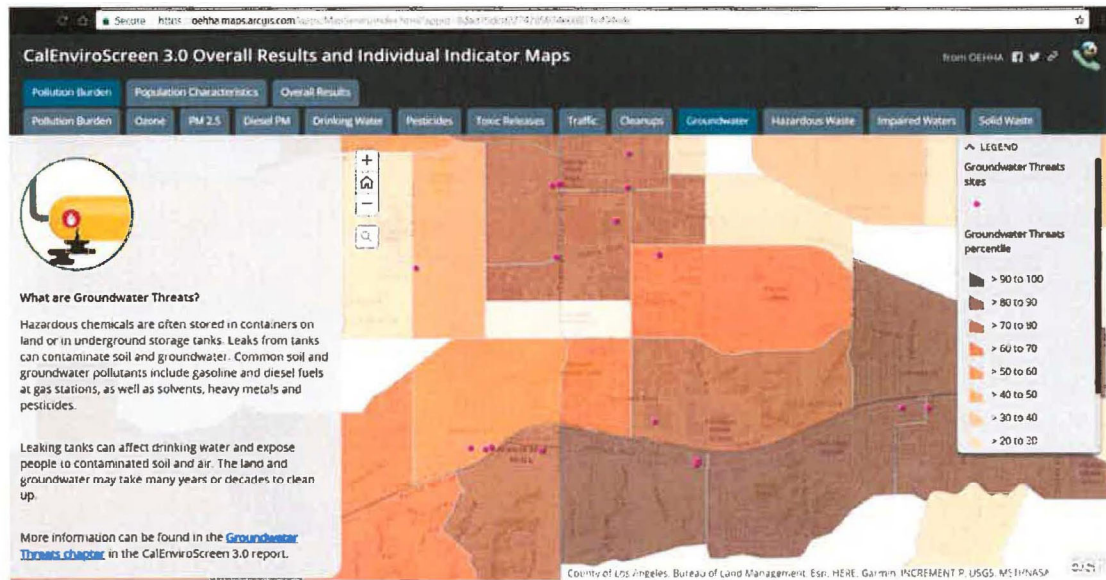
Finally, the sixth screenshot shows existing traffic impacts along the US-101. CalEnviroScreen shows that the census tract for the Project area ranks in at 44 percent, meaning that the Project area has slightly better traffic density than other census tracts in the vicinity of the Project Site.

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<sup>81</sup> SCAQMD, *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-IV), MATES IV Interactive Carcinogenicity Map*, 2015.

The information provided in the screenshots of the various CalEnviroScreen rankings do not change the significance conclusions in the Draft Supplemental EIR.

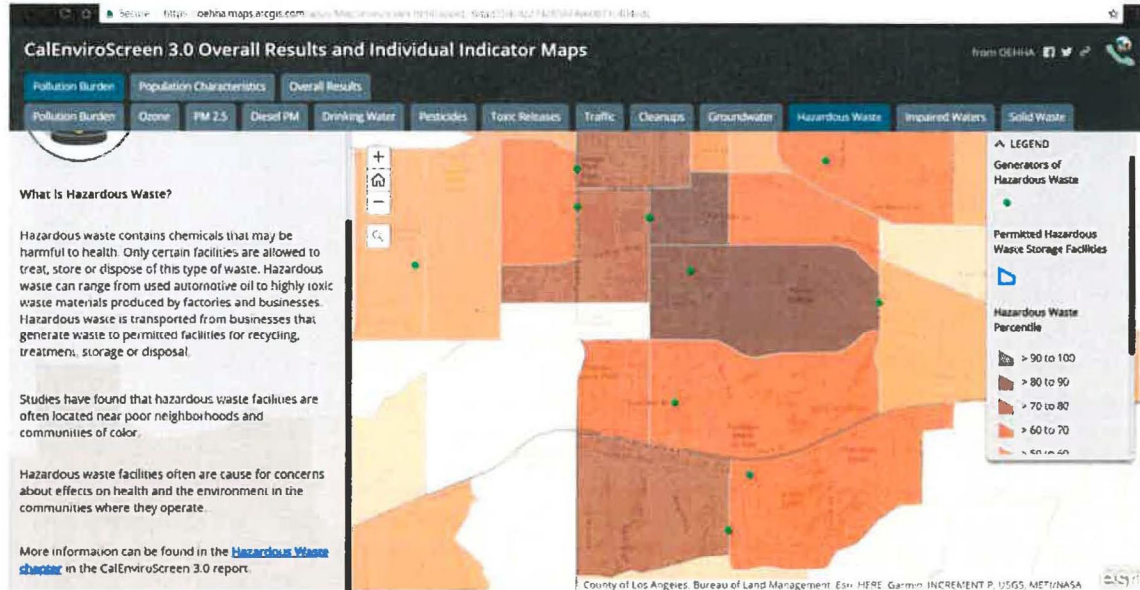
### **Comment No. 188-14**



This is a map to show the Groundwater threats around the project site. So while the Promenade site does not appear to have any known sites, let's look at all of the groundwater contamination at Westfield's other two properties, the UTC Rocketdyne property, as well as the Adler property area.

Groundwater is shallow in some areas of Warner Center. I believe it is 15 to 20 feet below surface at UTC Rocketdyne. So how are any parking structures going to be built below grade with those ground water levels?

How are you going to prevent vapor intrusion into your residences and into your open space areas?



### **Response to Comment No. 188-14**

As discussed above in Response to Comment No. 188-13, CalEnviroScreen was developed by OEHHA as a screening tool to identify the burden of pollution from multiple sources in communities while accounting for potential vulnerability to the adverse effects of pollution. This comment provides two maps from CalEnviroScreen depicting various existing conditions within the West San Fernando Valley. Much of the information provided in the screenshots is already incorporated into the discussion of existing conditions within the Draft Supplemental EIR.

The first screenshot depicted in this comment shows CalEnviroScreen groundwater threat ranking, which is calculated by considering the number of groundwater cleanup sites, the weight of each site, and the distance to the census tract. The Project Site is located in an area where the number and type of groundwater threats is higher than 15 percent of census tracts in California. As discussed in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, during on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements, concerning the handling, storage and



disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect the rate or change direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells on-site or within one mile of the Project Site, construction activities would not be anticipated to affect existing wells. Therefore, the Project would not result in any substantial increase in groundwater contamination through hazardous materials releases that could affect the rate or direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells.

The second screenshot depicted in this comment shows CalEnviroScreen hazardous waste ranking, which is calculated by considering the number of permitted Treatment, Storage and Disposal Facilities or generators of hazardous waste, the weight of each generator or site, and the distance to the census tract. As described in the CalEnviroScreen website, the Project Site is located in an area where the number and type of hazardous waste generators is lower than all of the census tracts in California. As discussed in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, the Project is expected to require dewatering during construction as the Project's maximum depth of excavation of 75 feet below ground surface exceeds the estimated groundwater depths of 16 and 30 feet below ground surface. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location to proceed with construction, into the drainage system. Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements. During construction, temporary dewatering systems such as dewatering tanks, sand media particulate, pressurized bag filters, and cartridge filters would be utilized in compliance with the NPDES permit. These temporary systems would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With regard to vapor intrusion, as discussed further in the Environmental Assessment Technical Reports, provided in Appendix G, of the Draft Supplemental EIR, vapor encroachment from off-site sources were not considered a concern as the off-site properties that could have potentially affected the Project Site closed their case with the Los Angeles Regional Water Quality Control Board in 2004.<sup>82</sup> However, as discussed

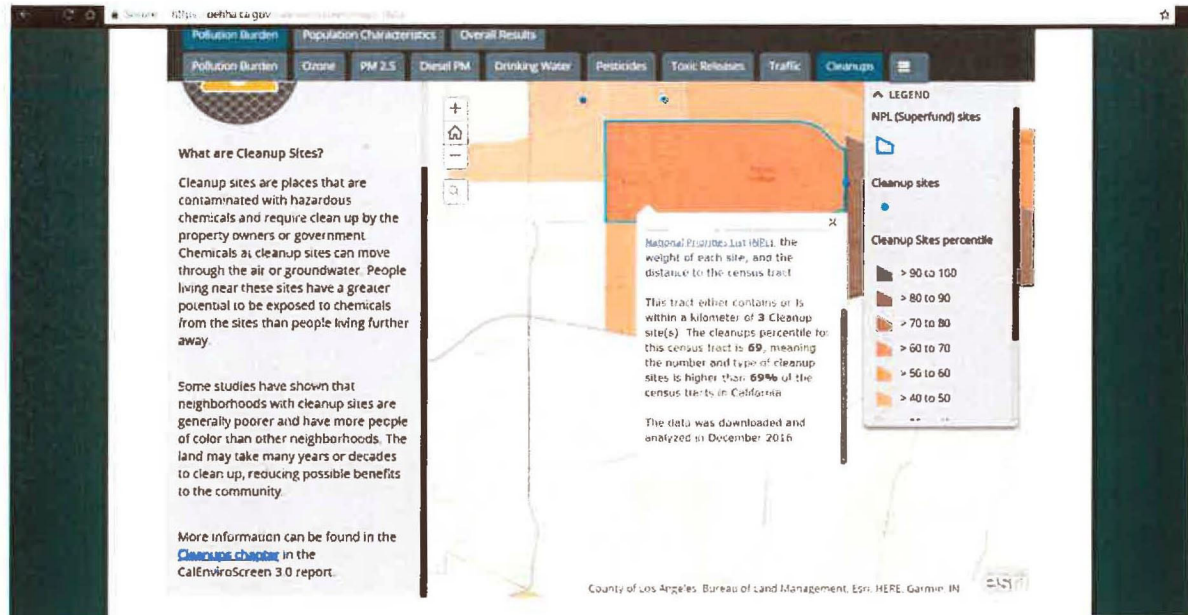
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<sup>82</sup> *Environmental Database Resources, Inc. (EDR). EDR Vapor Encroachment Screen for 6100 Topanga Canyon Boulevard, Los Angeles, CA 91367, July 20, 2016. Inquiry 4667994.9s.*

further in Section IV.E, Hazards and Hazardous Materials, of the Draft Supplemental EIR, groundwater samples were collected from three locations at the Project Site: the northwest corner, the northeast corner and the southern perimeter. Samples were analyzed for VOCs. No VOCs were detected in the soil samples. VOCs were not detected above screening levels in groundwater in the northern portion of the Project Site, but were detected above screening levels at one location in the southern perimeter. It is anticipated that the detected VOCs are migrating from off-site. However, the groundwater data was evaluated using Project Site specific geotechnical information and standard modeling tools, and it was concluded that the estimated potential for such contaminants to migrate into indoor air at the Project Site are below risk-based thresholds for both commercial and potential future residential scenarios. As discussed previously, construction activities for the Project would include excavating down a maximum of 75 feet for basement levels, buildings structures, and hardscape and landscape around structures. Therefore, there is the potential to encounter contamination in the subsurface during excavation activities for the subterranean parking garages at depths at or below the groundwater level. Construction activities would occur in accordance with applicable federal, state, and local regulations and requirements, including specific OSHA requirements regarding worker safety. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. In the event that contaminated soils are encountered during excavation, based on visual, olfactory, or vapor reading detection, the nature and extent of the contamination shall be determined and appropriate handling, disposal and/or treatment shall be implemented in accordance with applicable regulatory requirements, such as SCAQMD Rule 1166, which provides requirements to control the emissions of VOCs. In the event contaminated soils are encountered, no contaminated soils would be stockpiled on the Project Site. Therefore, impacts related to the potential to encounter contamination in the subsurface during construction at the Project Site were found to be less than significant.

The information provided in the screenshots of the various CalEnviroScreen rankings do not change the significance conclusions in the Draft Supplemental EIR.

## Comment No. 188-15



So while the Promenade may not have any cleanup sites on it, please see the adjacent census tract and its score as 69 – which means it is worse than 69% of the other census tracts in the State of California. How will the remediation of these sites impact the Promenade projects?

Will the future residents of Westfield’s high end residences at “Market Rate” be sitting on their rooftop patios and breathing the contamination as these other properties are dug up?

## Response to Comment No. 188-15

As discussed above in Response to Comment No. 188-13, CalEnviroScreen was developed by OEHHA as a screening tool to identify the burden of pollution from multiple sources in communities while accounting for potential vulnerability to the adverse effects of pollution. This comment provides a map from CalEnviroScreen depicting existing conditions within the West San Fernando Valley. Much of the information provided in the screenshots is already incorporated into the discussion of existing conditions within the Draft Supplemental EIR.

The screenshot depicted in this comment shows CalEnviroScreen cleanup sites percentile, which takes into account the type of cleanup site and how close it is to where people may live. As described in the CalEnviroScreen website, the Project Site is located in an area where the number and type of cleanup sites is higher than 2 percent of the census tracts in California. As discussed in Section IV.E, Hazards and Hazardous Materials, of the Draft Supplemental EIR, each of the related projects would be required to comply with all applicable laws and regulations related to hazardous materials, including without limitation those associated with the use, storage, and/or disposal of hazardous

materials and hazardous waste, storage tanks, asbestos-containing materials, LBP, PCBs, and emergency response. Additionally, any related project within the Warner Center Plan area would be required to implement any applicable mitigation measures included in the Warner Center Plan EIR.

### **Comment No. 188-16**

Please know that I love the existing Westfield and The Village properties. But now we are looking at residences, no jobs to employ those people in those residences, at least two cars per residence, and proposed hotels which will also bring more traffic.

I could not agree more with the WHHO and the WHWCNC – please do not even consider a stadium until the Warner Center Plan is revisited, and until these other project sites have been remediated and built.

### **Response to Comment No. 188-16**

The commenter incorrectly states no jobs would be provided on the Project Site. The Project includes the development of approximately 244,000 square feet of retail/restaurant uses, approximately 629,000 square feet of office space, up to 572 hotel rooms, and an Entertainment and Sports Center approximately 320,050 square-feet and 15,000 seats in size, which provide for a variety of employment opportunities. As discussed further in Section II, Project Description, of the Draft Supplemental EIR, one of the objectives of the Project, in accordance with the objectives in the General Plan Framework Land Use Chapter, is to accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors, and encourage the development of new Regional Centers that accommodate a broad range of uses and provide job opportunities. The Project would redevelop an existing underutilized shopping center with a high-density integrated, mixed-use and transit- and pedestrian-oriented development with residential, retail/restaurant, office, hotel, and entertainment uses consistent with this objective and the Warner Center Plan. With regard to the Entertainment and Sports Center, as discussed further in Topical Response No. 2, Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 188-17**

Attachment: WHHO SDEIR [sic] Public Comment 7-25-18 - FINAL.pdf (15 pages)

**Response to Comment No. 188-17**

This attachment is a duplicate of Comment Letter No. 31, above. No further response is required.

**Comment Letter No. 189**

Shain Sabeti  
6431 Valley Circle Ter.  
Canoga Park, CA 91307-2747

**Comment No. 189-1**

First, thank you for your outstanding work on the Draft Environmental Impact Report for Westfield's Promenade 2035 project. I appreciate your team's careful and thoughtful review of this important project.

Second, I want to say that I am in full support of Westfield's project, and I'm excited about the proposed Entertainment and perhaps even the Sports Center but with the exception of it being utilized as a soccer stadium. I do not support such a venue at all. I believe that type of venue could bring the wrong type of crowds into our beautiful community. The west valley has long been deficient in sports, arts, music and cultural events and I'm beyond excited that we will finally have a venue nearby. But, I wish it could be more like the Universal Amphitheatre.

I know that noise level is a concern among some neighbors, so I was happy to learn that the draft EIR thoroughly examined this and found that noise levels from the center wouldn't be any different from what you would normally find on an urban public street.

I am looking forward to enjoying live performances without having to drive to Los Angeles, Hollywood or elsewhere.

**Response to Comment No. 189-1**

This comment indicating support, with the exception of the Entertainment and Sports Center's use as a soccer stadium, is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 190**

Adam Salcido  
P.O. Box 79222  
Corona, CA 92877

**Comment No. 190-1**

Please provide any updates to the above mentioned project.

I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project.

jbourg2271@aol.com  
jbourgeois029@gmail.com  
asalcido.07@gmail.com

Mailing Address:  
P.O. Box 79222  
Corona, CA 92877

Please confirm receipt of this email.

**Response to Comment No. 190-1**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project. As requested, a confirmation email was sent to the commenter.

**Comment Letter No. 191**

Jason Schlieske  
6041 Fountain Park Ln., Apt. 5  
Woodland Hills, CA 91367-3526

**Comment No. 191-1**

I live about a half mile away from Westfield's Promenade property, so any plans to build residences, hotels, offices, restaurants and an entertainment/sports center would directly affect me. After learning more details about the project, I'm pleased to say that I fully support it.

The Promenade project will bring welcome changes to the area, including more places to dine and shop, public open space, additional housing, employment opportunities and a new entertainment and sports center for concerts and other events.

Guided by the Warner Center 2035 Plan, this new urban center is exactly what the West Valley needs. The Draft Environmental Impact Report reinforces what many of us already know—the project is smart, innovative and forward-thinking and deserves to move forward.

**Response to Comment No. 191-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 192**

Kim Seiniger  
19807 Gilmore St.  
Woodland Hills, CA 91367-2811

**Comment No. 192-1**

Please accept my brief comments on Westfield Promenade's (ENV-2016-3909-EIR) Supplemental Draft Environmental Impact Report. From the DEIR, it appears the project has few environmental impacts so why not approve it now? Also, it's great that the project is environmentally friendly to minimize its footprint.

Promenade is a win-win for the community and neighbors.

**Response to Comment No. 192-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 193**

Carmella Sheeler  
22332 Dolorosa St.  
Woodland Hills, CA 91367-4438

**Comment No. 193-1**

As a longtime resident of Woodland Hills, I wish to make a comment regarding the Promenade project.

**Response to Comment No. 193-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 193-2**

I believe the community deserves more specifics on how the project is being handled. I especially feel that There [sic] is a real need for hearings with the community regarding the Stadium portion of the project before You [sic] start building it.

**Response to Comment No. 193-2**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the Entertainment and Sports Center. Prior to any approval and subsequent development of the Project, the Project, including the Entertainment and Sports Center, will be presented at several public hearings. The Project is subject to public input and public hearings and the commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project. The Director's Interpretation and Project Permit Compliance required for the Entertainment and Sports Center will be part of the Project's public hearings, which will be noticed and open to public comment.

**Comment No. 193-3**

This project affects many aspects of life in Woodland Hills. I am also concerned how You [sic] will be handling the need for schools which will be definitely affected by the increase of families after The [sic] project is completed.

**Response to Comment No. 193-3**

As discussed in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, the Project's residential and non-residential components would generate a total of approximately 1,785 new students. The number of Project-generated students who would attend LAUSD schools serving the Project Site would likely be less than this estimate because the analysis provided in the Draft Supplemental EIR does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools (i.e., Magnet Schools and Pilot Schools) located away from their home attendance area, or students who may enroll in charter or private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site.

Nonetheless, as discussed further in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, pursuant to SB 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts.

**Comment No. 193-4**

I appreciate the opportunity to air my opinions and would be happy to learn of any meetings you can hold to enable the community to get a complete picture of your plans and the opportunity for input.

**Response to Comment No. 193-4**

This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 194**

Judy and Bert Sherman  
22071 Oxnard St.  
Woodland Hills, CA 91367-3546

**Comment No. 194-1**

Ms. O'Donnell please see the attached letter regarding our opposition to the entertainment and sports center proposed to be built at the corner of Oxnard Street and Topanga Canyon Blvd.

Please be advised that as residents of the Fountain Park Cooperative located on Oxnard Street, just west of Topanga Canyon and the proposed Promenade 2035 project, we are totally opposed to the placement of a 15,000 seat Entertainment and Sports Center on the corner of Oxnard Street and Topanga Canyon Blvd.

**Response to Comment No. 194-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 194-2**

Currently the traffic on Topanga Canyon Blvd., as well as the entrances and exits of the 101 Freeway, are extremely busy in this area already. The addition of this center will greatly affect the traffic detrimentally. There is no way that the traffic coming to this center will not impact those living in this immediate area.

We therefore request the relocation of this arena to another area. As it is, the addition of all the various new residences, hotels and businesses, will in itself add a tremendous amount of new traffic to this area.

Thanking you in advance for your consideration of this request,

**Response to Comment No. 194-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic impacts of the Project. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 195**

Remus Sicolvan  
20761 Archwood St.  
Winnetka, CA 91306-4010

**Comment No. 195-1**

I've been a supporter of Westfield Promenade 2035 for quite some time. I've attended community meetings and have voiced the many reasons why this project is good for the community. With the release of the Supplemental Draft Environmental Impact Report, I'm even more convinced that this project needs to move forward.

The DEIR cited a few environmental impacts, but these are minor (and can be mitigated), while the community benefits are significant—job creation, new revenues to the city, much needed housing, transit- and pedestrian friendly neighborhood, new entertainment options, etc.

With any large development, there will be naysayers who cite concerns about density, traffic and parking. I hope you will consider also the voices of those of us in the community who support the project and see the many benefits of Westfield Promenade.

Thanks for your time and consideration.

**Response to Comment No. 195-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 196**

Michael Siegfried  
21900 Marylee St., #260  
Woodland Hills, CA 91367-4803

**Comment No. 196-1**

I appreciate the opportunity to submit my comments on the Draft Environmental Impact Report for the proposed Westfield Promenade project.

I have lived in the heart of Warner Center in Woodland Hills for the past 29 years and have seen many exciting improvements. The concert stage at Warner Park, the Orange Line terminus on Owensmouth and , [sic] more recently, the incredible Village at Topanga. Over all these years, the one dinosaur in our midst has been the Promenade Mall. Many years ago when it had the May Company, Robinsons [sic] and Saks Fifth Avenue, it was a nice place to shop. However, those stores are long gone for good and all that's left are the AMC theater [sic] and a few restaurants. With the expanded Topanga Plaza a block away, the Promenade can never be a viable mall again.

I have studied the Westfield Promenade project and I believe it will transform the area by bringing new apartments, stores and restaurants not to mention the acres of public open space and the new entertainment and sports center ! [sic] It is precisely the kind of development that Warner Center needs.

I see the Warner Center 2035 Plan and the Westfield Promenade Plan in particular to be the future of development in Los Angeles. The ability to live, work and play within the same neighborhood is a wonderful opportunity and one which will enhance the lives of Warner Center residents. This project will reduce the daily freeway drudgery and allow people to walk or bike to work & shop. I am excited to offer my complete support for the Promenade Project because it is just the kind of development that Los Angeles needs.

**Response to Comment No. 196-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 197**

Antranik Sinanian  
4236 Tarzana Estates Dr.  
Tarzana, CA 91356-5447

**Comment No. 197-1**

I live a few miles from Westfield Promenade and have been a strong supporter of the project. I like the idea of density being focused in the Warner Center, [sic] Being an engineer myself and specialized [sic] in Urban Traffic and City Planning the concept of high density housing and mixing it with retail, office, sports and entertainment actually reduces the traffic and increases pedestrian traffic.

With release of the Supplemental Draft Environmental Impact Report, I feel even better about the project. My understanding is the DEIR fully analyzed the potential impact of the traffic, and traffic being a [sic] an empirical science it can be easily mitigated if this project will create any negative impact on traffic of the area.

I look forward to hearing about the project's approval.

**Response to Comment No. 197-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 198**

Katherine Sison  
23962 Eagle Mountain St.  
West Hills, CA 91304-2100

**Comment No. 198-1**

The approval of the Warner Center Plan was a highpoint for the City of Los Angeles and in particular the Valley. It was a green plan for growth in a way that no one had considered. Upon review of the Promenade 2035 I see that they will be required to follow certain construction mitigations that were designated as part of the Warner Center Plan. Such as:

- Washing trucks leaving construction sites to minimize dirt and dust
- Incentivizing transit and providing ride share options for construction personnel
- Scheduling construction activities that could affect roadways for off-peak periods.

These steps will help minimize impacts to area visitors and residents during construction and I'm glad to see those steps being taken. Knowing that all these mitigations have been planned, it makes the Promenade 2035 plan all the more exciting. Thank you for your consideration and review of the project. I hope it is approved by the City once all additional review is completed. Sincerely,

P.S.—I did also want to mention something else. Since Westfield announced this project, they've really made an effort to tell us about it, and answer our questions. I've received quite a bit in the mail, and I know they've set up meetings and such. I think that should c [sic]

**Response to Comment No. 198-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 199**

David Slonaker  
24529 Calvert St.  
Woodland Hills, CA 91367-1015

**Comment No. 199-1**

I am writing to voice my concerns with the proposed Promenade 2035 Project, Case Number ENV-2016-3909-EIR

As a 25 year homeowner in Woodland Hills, I have attended meetings and read and reviewed the Draft Supplemental Environmental Report and want to express my concern with this project.

Not once through the many years that I have lived, worked, and participated in youth sports, have my friends and I ever expressed a need for a stadium. What we have expressed, through the years, is the need for more recreational areas, for more soccer and baseball fields, for more police and safer streets. And, for better and more logical development.

I'm all for economic development but the Promenade 2035 Project will make our lives worse and negatively alter this area for future generations.

There are already times when we have traffic gridlock on local streets and the 101 freeway. I read of no specific solutions to this current problem, let alone how this will be addressed in the future.

The Promenade 2035 Project is flawed. The Warner Center Specific plan is flawed. It makes the assumption that there will be better jobs in this immediate area. That people will be able to live and work here without getting in their car. That is not practical in today's economy. That critical problem is not addressed with the Promenade Project.

**Response to Comment No. 199-1**

Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, and Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the entertainment uses encouraged in the Downtown District of the Warner Center Plan, where the Project Site is located. In addition, refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding the Project's impacts related to traffic during construction and operation of the Project. As discussed in Section II, Project Description of

the Draft Supplemental EIR, the Project includes office, retail, and hotel uses which provide jobs in the area, as well as a variety of housing types. As such, the Project will provide an opportunity for persons to live and work at the Project Site. With regard to the commenter's concern for a need for more recreational areas, refer to Topical Response No. 7, Open Space, which provides a summary of the publicly available open space areas that would be provided by the Project. In addition, refer to Topical Response No. 5, Public Services, for a discussion of the project design features and mitigation measures implemented by the Project associated with police protection. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 199-2**

Please consider Alternative 4: Studio Mixed-Use Development Alternative on page I-23 of the Draft Supplemental Environmental Impact Report as a more practical project for the future of the Woodland Hills community.

#### **Response to Comment No. 199-2**

The commenter's preference for Alternative 4 is noted for the record and has been incorporated into this Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. As discussed in detail in Section V, Alternatives, of the Draft Supplemental EIR, while Alternative 4 would eliminate some of the Project's significant and unavoidable impacts, Alternative 4 would not achieve the Project objectives to the same extent as the Project.

**Comment Letter No. 200**

Patti Smith  
6219 Balcom Ave.  
Encino, CA 91316-7209

**Comment No. 200-1**

PLEASE help us overrule the plan to build a 17,000 seat arena in our already terribly overcrowded San Fernando Valley.

**Response to Comment No. 200-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental impacts of the Entertainment and Sports Center. Note that the Project proposes a 15,000 seat Entertainment and Sports Center not a 17,000 seat Entertainment and Sports Center. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 200-2**

Our infrastructure is already overwhelmed, traffic is a nightmare, our environment is suffering, and so are all the people who already reside here.

With out-of-control development and housing projects in Warner Center, developers are choking us out of our own neighborhoods and diminishing our quality of life.

It used to take me 12 minutes to drive to my doctor's office. It now takes 45 if I'm lucky.

PLEASE, PLEASE, PLEASE help us defeat this proposal for an arena in Warner Center.

**Response to Comment No. 200-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic impacts of the Project. Also refer to Topical Response No. 6, Infrastructure, for a discussion regarding the ability of the infrastructure system to accommodate the Project. In addition, as discussed in the Draft Supplemental EIR and reiterated in Topical Response No. 1, Warner Center 2035 Specific Plan, above, the Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The Project is consistent with the

Downtown District designation of the Warner Center Plan. In addition, with respect to the Entertainment and Sports Center, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director's Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 200-3**

Thank you for your response. Here's my mailing address:

Patti Smith  
6219 Balcom Ave.  
Encino, CA 91316

I appreciate you advising me to include my address so I can be kept apprised.

**Response to Comment No. 200-3**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 201**

Travis Smith  
CEO  
Reflex Sales Group  
6219 Balcom Ave., Ste. 101  
Encino, CA 91316-7209

**Comment No. 201-1**

I'm sure you are getting bombarded with emails for this so I apologize in advance.

In regards to the sports arena, as a home owner in Woodland Hills, I fully support modernization and development. The Village was a great add.

The suggested park will be great.

But on top of the hotels and new apartments being added, the area simply cannot sustain adding a sports complex of that size. It's like putting the Forum in the middle of a residential area.

The traffic is already a problem the city is struggling to solve, and this blatantly goes against that mission. The amount of daily stress it will cause the average citizen of the area should dramatically outweigh the joy of a sports/concert arena will bring.

Thanks for reviewing this.

**Response to Comment No. 201-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental impacts of the proposed Entertainment and Sports Center. Also refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding the traffic impacts of the Project. This comment expressing opposition for the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 202**

Jan Sobel  
5177 Alhama Dr.  
Woodland Hills, CA 91364-3238

**Comment No. 202-1**

In an effort to keep my remarks brief, I appreciate how much work has gone into making this Environmental report available to the public.

I am a long time Valley resident. I support the Warner Center Plan that was put together by the community including: residents, stakeholders and City officials. Upon reviewing this Draft Environmental Impact Report, I believe that this project falls well within the envelope of the Warner Center Plan.

I believe the community put the Warner Center Plan together for a purpose, and projects like Promenade 2035 fit that purpose. I personally am very glad to see the Warner Center Plan coming to life.

**Response to Comment No. 202-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 203**

Brenda Sosoban  
6421 Neddy Ave.  
West Hills, CA 91307-2831

**Comment No. 203-1**

Please see attachment.

I've seen what Westfield has done with The Village, so I'm confident the Promenade project will be a great asset to the community as well.

I'm looking forward to enjoying concerts at the new entertainment venue, walking/relaxing in the public park, dining at new restaurants and perhaps even working in the new office space.

Here's hoping Westfield Promenade receives the city's support and approval.

**Response to Comment No. 203-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 204**

John Spaulding  
jrspaulding@yahoo.com

**Comment No. 204-1**

I have been a homeowner in Woodland Hills for over 40 years. I have been dismayed to see the transformation over the last 5 years. We have traded good paying professional jobs in manufacturing and engineering for high density apartment developement. [sic] At least if there was condominium construction there would be some pride of ownership. I've been around long enough to know once the developers make their money these apartments devolve into what we once called "projects".

Most of my neighbors are not very familiar with the 2035 plan. But they are decidedly unhappy with the apartment construction and the terrible traffic it is bringing.

I finally attended a Woodland Hills neighborhood council meeting at the fire station on Burbank Blvd a couple weeks back to gauge the tenor of the crowd. I now better understand how corrupted this process is. I watched the Westfield execs, the unions and Rep Blumenfields [sic] people steamroll the agenda. These special interests berated the council members for not giving earlier notice of this meetng [sic] so they could pack in even more of their people. There was standing room only as it was.

Neither my wife and I, or my neighbors ever recall being able to vote on this project, or the 2035 plan. We also were not able to vote on giving 40 million dollars in tax relief to Westfield to build on what was already the most desireable [sic] property in the valley. Is there no way some kind of referendum can be put to the citizens of the west valley regarging [sic] this quality of life issue?

I'm soon to retire, so I guess I can vote with my feet.

**Response to Comment No. 204-1**

Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's consistency with the Warner Center Plan as well as community participation in development of the Warner Center Plan. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. The Project is subject to public input and public hearings and the commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 205**

Andrea Spencer  
6670 Glade Ave., Apt. 334  
Woodland Hills, CA 91303-2500

**Comment No. 205-1**

Westfield Promenade 2035 is a terrific project! The recently released draft environmental impact report provides further evidence that this project must move forward.

A new urban and pedestrian-friendly district with housing, offices, restaurants and the like are appealing to a longtime resident like me, but I'm especially excited about Westfield's plans to build an entertainment and sports center. While I love living here, I have long hoped for more entertainment options in the valley. I'm ecstatic that with the new center, this may soon be a reality. I'm looking forward to attending concerts, cultural and sporting events without having to make the awful drive downtown.

Westfield has done a spectacular job with Promenade so far and I know they will find the right tenant for the new entertainment and sports venue.

Thank you.

**Response to Comment No. 205-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 206**

Alok Srivastava  
5192 Knollwood Way  
Woodland Hills, CA 91364-1356

**Comment No. 206-1**

I appreciate the opportunity to submit my comments on the Draft Environmental Impact Report (DEIR) for the Promenade 2035 project. This will be an important investment in my community and it deserves the careful attention the City is giving it. Fortunately, the DEIR confirms that a great many people who live here already know. it's [sic] the right project in the right location, and it will be an asset to Warner Center.

Promenade 2035 will expand the upgraded and revitalized properties from Topanga Plaza through the Village to create a great new neighborhood with balanced uses and public space. Westfield has proposed a thoughtfully designed project that complies with local zoning and will have opportunities for living, working, shopping and just walking through landscaped public spaces. I particularly appreciate the sustainable aspects of its construction and operation, and I hope the City will encourage all projects to take similar actions to make conservation of limited resources a central feature of development.

The Promenade 2035 project is thoughtful and forward-thinking. The DEIR has shown that it has only a few short-term impacts and many long-term benefits. I hope it will be approved.

**Response to Comment No. 206-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 207**

Patrick J. Statham  
stuntsonly@gmail.com

**Comment No. 207-1**

How about a beautiful park with a huge fountain and coffee shops and a dog run?

Thank you.

Also with vendors and small coffee and sandwich shop. A place to really hang out. Like the Grove but more park than shops.

**Response to Comment No. 207-1**

Refer to Topical Response No. 7, Open Space, above, for a discussion regarding the various open space areas provided on the Project Site. As discussed above, of the Project's approximately 10.6 acres of outdoor open space, approximately 5.6 acres are ground level and publicly accessible. These areas would support a range of active and passive recreational activities, as well as approximately 3 miles of walking paths. In total, approximately 600 trees would be provided on-site by the Project, for an increase of 308 trees over existing conditions. This comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 208**

Kriss Stauber  
20559 Aetna St.  
Woodland Hills, CA 91367-5412

**Comment No. 208-1**

Some of my concerns with the Westfield Promenade Development include the fact that the proposed 12,000-seat arena at the corner of Oxnard and Topanga may draw rowdy crowds from all over Los Angeles and Ventura counties. We don't even know whether the arena will be open or roofed. Could mean a lot of noise, traffic, air pollution, great demand on the already limited number of police officers in our area. Can our city count on a budget to meet all the additional stress?

**Response to Comment No. 208-1**

The commenter incorrectly states that the Project includes a 12,000-seat arena. The Project proposed a 15,000-seat Entertainment and Sports Center. However, Alternative 5 of the Draft Supplemental EIR analyzed both a 10,000-seat and 7,500-seat Entertainment and Sports Center. Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the Entertainment and Sports Center and its environmental impacts, including an analysis of police protection services, noise, traffic, and air quality.

**Comment No. 208-2**

Also, many are concerned about possible brown-outs, water rationing, that we may face because of the huge number of new residents that will reside in all the new condos, apartments, and hotels that are to be built. We currently don't have the infrastructure to adequately provide for current resident needs—particularly through the hot months of summer and fall. Can the DWP really be counted on to handle all the overload?

Thank you for your consideration

**Response to Comment No. 208-2**

Refer to Topical Response No. 6, Infrastructure, above, for a discussion regarding how LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand, as well as meet the water demands for the Project.

**Comment Letter No. 209**

Susan Stearns  
Berkshire Hathaway California Properties  
23925 Park Sorrento  
Calabasas, CA 91302-4010

**Comment No. 209-1**

I am writing you to express my opposition to this proposed plan.. [sic] specifically, the 15,000 seat stadium. This 15000 [sic] seat stadium is terribly out of place for this residential area. To the west of this proposed 15,000 seat stadium is a community of 220 homeowners with the Fountain Park community, and hundreds more single family homes just to the south. These communities are residential, not hotels or apartment buildings. these [sic] are homeowners within the community and established neighborhoods, not transients.

**Response to Comment No. 209-1**

Refer to Topical Response 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the consistency of the Project with the Warner Center Plan's vision for the Project Site. Also refer to Topical Response No. 2, Entertainment and Sports Center, for a discussion regarding the Entertainment and Sports Center and its environmental impacts.

**Comment No. 209-2**

Not only is this a disruption of the Woodland Hills community, but the increased traffic of all the cars that would be coming and going on the streets, the air pollution, the transient population, etc. Traffic on the streets is unbearable. Street racing is increasing each day and night.

**Response to Comment No. 209-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic impacts of the Project. Also refer to Section IV.B, Air Quality, of the Draft Supplemental EIR, regarding the less than significant localized air quality impacts that would result from the Project. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 209-3**

Westfield has stated they have done a sound test. I would really like to see this. To my knowledge, no one at Fountain Park has been contacted. We get enough noise from the Marriott Hotel in the summer time from the music they play around the pool. We have all complained to them about this.

Please take the above into consideration and plan to move this stadium elsewhere.

**Response to Comment No. 209-3**

As provided in Section IV.H, Noise, of the Draft Supplemental EIR, a site specific sound propagation test was conducted to establish the site specific sound propagation (sound attenuation as a function of distance) from the Project Site to the residential community to the southwest. The sound propagation test was conducted to identify any potential sound amplification associated with the existing intervening landscape and natural topography in the existing hills southwest of the Project Site. The results of the site specific sound propagation test are provided in Figure IV.H-3 and Table IV.H-10 of the Draft Supplemental EIR. As discussed on page IV.H-22 of the Draft Supplemental EIR, the empirical measured noise levels from the sound propagation test are actually lower than the results from the site-specific 3-dimensional computer noise model. Therefore, the Project noise analysis is conservative (i.e., noise levels should be even lower than the estimated levels). As presented in Section IV.H, Noise, of the Draft Supplemental EIR, a detailed noise impact analysis was performed for the Entertainment and Sports Center operation. As presented in Table IV.H-22 and Table IV.H-23 of the Draft Supplemental EIR, the estimated noise levels from the Entertainment and Sports Center with a partial roof would be below the significance thresholds and noise impacts would be less than significant.

**Comment Letter No. 210**

Mickie Stern  
4637 Park Mirasol  
Calabasas, CA 91302-1732

**Comment No. 210-1**

Today, the Promenade site sits largely empty. It always makes me a little sad when I drive by during the course of my day. I remember decades ago when it was thriving, but it feels like it never really kept up with the times and all that's left is that old Macy's building.

Maybe that's why I'm so excited about Promenade 2035, and its potential to reinvigorate a once vibrant landscape and bring people back to the space.

One of the things that I was most interested to learn about in the Draft Environmental Impact Report on the Promenade project was that they conducted a thorough cultural review. It was interesting to learn that the actual Macy's Building is not listed on the National Register of Historic Places or the California Register and that it has not been designated as a City of Los Angeles Historic Cultural Monument.

I appreciate that SurveyLA sees some significance in its design, but really, it feels very tired. I think the Promenade 2035 project stands the opportunity to improve the overall cultural significance of the space and so I support Promenade 2035. And I applaud them for taking steps to ensure that the Macy's building is well documented if future students wish to study it.

It's a fair and thoughtful way to move forward.

**Response to Comment No. 210-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 211**

Stefan Storace  
stefanstorace@yahoo.com

**Comment No. 211-1**

Robberies / crime [sic] is up in the Woodland Hills area since the Village opened up. Crime also goes up when subways come to the neighborhood.

**Response to Comment No. 211-1**

Refer to Topical Response No. 5, Public Services, for a discussion regarding the Project's impacts related to police services and the project design features and mitigation measures that the Project would implement to reduce the Project's impacts to police services.

**Comment No. 211-2**

We don't care about the housing shortage. Get your priorities straight, fix the freeway traffic problems first.

Don't allow Westfield or any other developers to do any more development. Cancel the Warner Ctr 2035 plans. We don't need anymore [sic] traffic and we certainly don't need one more car on the 101 and 405 freeways.

**Response to Comment No. 211-2**

Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, for a discussion regarding the Warner Center Plan. In addition, refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the traffic analysis for the Project that was prepared in coordination with LADOT and Caltrans. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 211-3**

15,000 seat arena, totally crazy. Don't add downtown to Woodland Hills.

We don't need 2 hotels, Apts, [sic] Restaurants [sic] and Art Galleries. [sic] We have enough. The only thing we need is a department store.

**Response to Comment No. 211-3**

Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project's overall consistency with the Warner Center Plan. As discussed above, the Project Site is located in the Downtown District of the Warner Center Plan, which is designated for high-density and mixed-use development including residential, retail, restaurant, office, hotel, and entertainment uses. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 211-4**

So..... right now we are in the midst of a heat wave... and DWP has announced a FLEX alert...

Is the electrical and water infrastructure there, or planned for all the massive building of apartments, condos, office, retail and entertainment projects in progress and being planned? Or will this further drain our resources?

**Response to Comment No. 211-4**

Refer to Topical Response No. 6, Infrastructure, above, for a discussion regarding how LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand, as well as meet the water demands for the Project.

**Comment Letter No. 212**

Patricia Streeter  
18331 Tarzana Dr.  
Tarzana, CA 91356-4215

**Comment No. 212-1**

The older I get, the more I believe how you say something matters. Doing what you say you will, matters. And, telling the truth, matters. Perhaps it doesn't seem like it in our political climate today, but partnerships rely on honest brokering.

I wish to applaud City Planning on their tireless work on the Environmental Review as well as Westfield for being an honest broker and partner with my community. From the moment they announced this project, they told us their plans, and met with us to make sure that we understood in great detail, and listened to our concerns.

What I find so reassuring is that everything that Westfield told us they were planning for the site has been reviewed in great detail by the City. This is the type of relationship you want with your community partners.

In particular, I am thrilled about Promenade Square, Westfield has described this new green space as a community asset and I am excited about what this space will mean to the local community.

I support this project. I thank Westfield for their outreach and I appreciate the City for all of their hard work.

**Response to Comment No. 212-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 213**

Diane Sukiennik  
23371 Mulholland Dr., #124  
Woodland Hills, CA 91364

**Comment No. 213-1**

I write to you in regard to the proposed Westfield project, called Promenade 2035 (ENV-2016-3909-EIR), and share my personal support.

I was able to review the Environmental Report that was put together by the City and couldn't be more excited about what this project will mean for my community, particularly the open space designed as part of the project.

I love that Promenade 2035 will be so walkable, but more than that, I love that there are places to just enjoy being outside. Promenade Square seems like a win for the community. I like the idea of an activated outdoor space, and this is well over an acre of space that will be open to the public, almost like a small-town square. That sounds exciting to me.

I can see this becoming a real gathering place, not just within the Warner Center, but for all the Valley.

**Response to Comment No. 213-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 214**

John L. Sundahl  
22843 Erwin St.  
Woodland Hills, CA 91367-3214

**Comment No. 214-1**

The plan to increase the total floor space over 5 fold is bad enough. When the additional units come on line to the north on the old Aero-jet [sic] site, living in this area will be untenable. When there are events at the Stadium, the entire area will be gridlocked. Who in their right mind who lives in this area would agree to this and want it. Travel will be impossible. We have enough event stadiums in Los Angeles without this. And no one said anything about the Homeless. This is all about money and taxes [sic]

Build a freeway and monorail in the Los Angeles Riverbed. You say no MONEY.

**Response to Comment No. 214-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the Entertainment and Sports Center and its environmental impact. In addition, refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above. As discussed therein, the Warner Center Plan permits up to 5:1 and 6:1 FAR. However, the Project proposes a 2.3:1 FAR on the Project Site. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 214-2**

Sup [sic] address 22843 Erwin St, Woodland Hills, 91367 Ca

**Response to Comment No. 214-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 215**

John L. Sundahl  
22843 Erwin St.  
Woodland Hills, CA 91367-3214

**Comment No. 215-1**

The Warner Center Entertainment Center will completely change the character of the Woodland Hills area. We are already unable to handle the increased traffic and crime that has increased in this area due to “Budgetary Problems” [sic] The police are overtaxed and we are told there will be no more officers available. The roads and streets are badly in need of serious repairs. The additional traffic will only make these matters worse. There is no need for this facility in the area with the acception [sic] of our politicians who want more tax revenue.

Do not build this project as it is designed. If it must be built, put it on vacant and under-used commercial property to the north [sic]

**Response to Comment No. 215-1**

Refer to Topical Response No. 2, the Entertainment and Sports Center, for a discussion regarding the Entertainment and Sports Center. As discussed therein, Entertainment Uses are encouraged in the Downtown District and permitted with a discretionary Project Permit Compliance approval from the Director of City Planning per Section 6.2.9 of the Warner Center Plan. A Director’s Interpretation is also being requested to approve the number of seats for the Entertainment and Sports Center. In addition, refer to Topical Response No. 5, Public Services, for a discussion regarding the Project’s impacts related to police services and the project design features and mitigation measures that the Project would implement to reduce the Project’s impacts to police services. Furthermore, refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding the Project’s impacts related to traffic during construction and operation of the Project. The comment suggesting the Project be moved to an unspecified location to the north is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 216**

Maureen Tamuri  
Glenn Michitsch  
22112 Califa St.  
Woodland Hills, CA 91367-4502

**Comment No. 216-1**

Thank you for the opportunity to provide my comments to the Draft EIR for the proposed Promenade 2035 project. We are residents on Califa Street and reside within 900 feet of the proposed development. As such, the impacts to us will be significant on a number of areas as identified within the draft document. Our overall assessment is that the SEIR [sic] fails to identify and analyse [sic] the impact of noise, pedestrian movement, safety and necessary improvements associated with the over 15,000 residential units located with a 1/2 mile radius of the site, and the identified need and use of 2,390 remote parking locations identified in the traffic analysis.

As an affected party in an identified [sic] sensitive neighborhood, we offer the following comments:

**Response to Comment No. 216-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR and the topics mentioned in this comment are provided and responded to below.

**Comment No. 216-2****Draft SEIR [sic] IV.J.1 Police Protection**

The analysis of the project does not include any consideration of pedestrian movement within a 1/4 mile of the [reject [sic] to and from the 2,390 remote parking locations identified in the LAC traffic study.

**The project should be conditioned to implement design safety measures, such as adequate pedestrian lighting, landscaping and adequate walkway widths, coupled with the provision of private security patrols and shuttle services for employees and project patrons to nd [sic] from remote parking sites relied upon in the traffic analysis.**

**Response to Comment No. 216-2**

Regarding the commenter's concern on safety for pedestrians walking to and from the off-site parking areas in the vicinity of the Project Site, refer to Topical Response No. 5, Public Services, for a discussion regarding the project design features and mitigation measures that the Project would implement to address public safety. As discussed therein, and as discussed further in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, Project Design Feature J.1-2 would require the Project to develop a Security Plan, which would outline the security services and features to be provided in conjunction with the proposed Entertainment and Sports Center. In addition, Project Design Feature J.1-6 would require on-site security consisting of personnel and equipment. Furthermore, Project Design Feature J.1-8, would require the Project Applicant to consult with the LAPD regarding crime prevention features appropriate to the design of the Project. Features that would be implemented include, but are not limited to: (1) landscaping to be planted in a manner that does not provide obvious cover for persons tampering with doors or windows of commercial facilities, or for persons lying in wait for pedestrians or parking garage users; (2) lighting of parking structures, elevators, and lobbies to reduce areas of concealment; (3) lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings; (4) design of public spaces to be easily patrolled and accessed by safety personnel; (5) parking facilities easily patrolled and accessed by safety personnel; implementing public safety measures in parking facilities; and (6) graffiti deterrent measures, where possible. In addition, visitors to the Project Site who park within the off-site parking locations would be traveling from existing parking locations along existing sidewalks, which already include adequate existing street lighting. Furthermore, LADOT will be reviewing and approving the off-site parking locations, which are required under the Warner Center Plan to be within the Downtown District or adjacent District.

**Comment No. 216-3****Appendix B. Lighting technical report**

The lighting analysis is flawed in that it does not consider additional off-site lighting requirements, such as new pedestrian lighting improvements [sic] associated with pedestrian pathways to and from the development.

**A revised study addressing off-site pedestrian lighting associated with safe travel to and from remote shuttle and parking locations should be conducted.**

**Response to Comment No. 216-3**

As discussed in Response to Comment No. 216-2, above, visitors to the Project Site who park within the off-site parking locations would be traveling from existing parking



locations along existing sidewalks, which already include existing street lighting. Thus, no changes are needed or proposed with respect to these existing lighting conditions. With respect to on-site lighting, as discussed in Response to Comment No. 216-2, above, the Project will provide lighting for security purposes, including lighting along pedestrian pathways. Lighting will also meet the illumination requirements specified by the LAMC, including the requirements specified on page IV.A-8 of Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR.

#### **Comment No. 216-4**

##### **Appendix I Noise**

**The noise analysis looked at only two variables; traffic and construction noise. It did not consider any impacts from pedestrian travel to and from the proposed development to the 2,380 off-site parking locations discussed but not identified in Appendix M, Traffic. Arguably, hundreds if not thousands of persons walking to and from remote parking locations will generate noise, a noise generating component which was not considered as highly impactful to the residential neighborhoods surrounding the site. The study should be conducted once a plan identifying remote parking areas and shuttle stop locations is prepared.**

#### **Response to Comment No. 216-4**

As presented in Appendix M, of the Draft Supplemental EIR, the Project would require off-site parking during sold-out events at the Entertainment and Sports Center, particularly during the peak month of December. Locations will be approved by LADOT in connection with the Event Management Plan, required by Project Design Feature K-6. Potential off-site parking may be located directly across the Project Site to the north (parking at The Village and Farmer Insurance parking structure), south (Warner Center Towers parking structures) and east (Anthem Blue Cross surface parking lot). Pedestrians may walk to/from the Entertainment and Sports Center via the crosswalks at Topanga Canyon Boulevard/Erwin Street, Warner Drive North/Erwin Street, and Owensmouth Avenue/Erwin Street (to the north parking); via the crosswalks at Topanga Canyon Boulevard/Oxnard Street and Warner Drive South/Oxnard Street (to the south parking); or via the crosswalks at Owensmouth Avenue/Oxnard Street and Owensmouth Avenue/Promenade Boulevard (to the east parking). All of the pedestrian walk-paths are adjacent to existing commercial/office areas with the exception of along Owensmouth Avenue (north of Erwin Street), where there are residential uses along the east side of Owensmouth Avenue (represented by receptor R1). Therefore, the pedestrians would not be walking through the residential neighborhood when commuting to/from the off-site parking locations. The nearest noise sensitive uses to the aforementioned pedestrian walking paths would be the residential use located along the east side of Owensmouth Avenue (represented by receptor R1), the existing Warner Center Marriott Woodland Hills hotel on

the south side of Oxnard Street (represented by receptor R2) and the residential use located at the southwest corner of Oxnard Street and Rolling Road (represented by receptor R3). Noise levels associated with pedestrians along walking paths from the Entertainment and Sports Center to the off-site parking (i.e., people talking) are estimated to be approximately 43.7 dBA, 52.9 dBA and 42.0 dBA at the off-site sensitive receptors R1, R2 and R3, respectively. The calculations are provided in Revised Appendix I.1, of the Draft Supplemental EIR, which have been appended to this Final Supplemental EIR. Thus, the estimated noise levels associated with people walking to/from the Project designated off-site parking locations would be well below the Project's significance threshold of 64.1 dBA, 61.0 dBA and 59.9 dBA for receptors R1, R2 and R3, respectively.

### **Comment No. 216-5**

#### **Appendix M Traffic:**

Page 4, A1. Specific Project requirements, TDM program: The analysis properly identified the need for the TDM program to address pedestrian and bicycle travel to and from the complex, but offers no analysis of the demand or area to be studied, nor any quantifiable estimates of the number of users to be accommodated.

**The Project analysis is grossly flawed in that no analysis of pedestrian and bicyclist travel to and from the site is available, and should be required in order to generate a master plan of improvements comparable to that of the traffic improvements.**

### **Response to Comment No. 216-5**

As discussed in Section II, Project Description, of the Draft Supplemental EIR, with regard to bicycle parking, the Project would meet the City's bicycle code requirements. Based on the City's current requirements, the Project would provide 361 short-term and 1,726 long-term bicycle parking spaces. In addition, the Project includes sidewalk and streetscape improvements on the boundaries of the Project Site, consistent with the Warner Center Plan requirements. In particular, landscaping and other streetscape improvements would be provided along the perimeter of the Project Site connecting to publicly accessible landscaped open spaces internal to the Project Site. Section 7.8 of the Warner Center Plan describes the TDM requirements for all new development within Warner Center. Further, Appendix D, of the Warner Center Plan, identifies that a portion of the Warner Center Mobility Fee is designated for TDM implementation. Project Design Feature K-7, which is the development of a Project level TDM plan, and Mitigation Measure K-2, which is the payment of the Warner Center Mobility Fee, are described in Topical Response No. 3, Traffic and Parking, above. The Project TDM plan will require the review and approval by LADOT prior to implementation. TDM elements, which promote non-automobile travel and reduce the use of single-occupant vehicles, are incorporated into the Project analysis, consistent with the Warner Center Plan.

**Comment No. 216-6**

PAGE 5, A.2 mobility fees

**Mobility plan fees are inadequate to cover off site pedestrian and bike way improvements, and should also be tied to a regional CIP inflation factor in order to adequately cover the 20 year building cycle for this project. The mobility fees should also cover future review efforts indicated under 5.B Event Management Plan [sic]**

**Response to Comment No. 216-6**

All of the pedestrian improvements and bicycle facilities on-site will be paid for by the Project Applicant, and will not be paid for through Mobility Fees. As described in Section 7.4 of the Warner Center Plan, all fees in Warner Center are subject to annual indexing using the City Building Cost index. The implementation of the Event Management Plan (EMP) under Project Design Feature K-6 would be funded by the Applicant.

**Comment No. 216-7**

Page 7, 4.C: The analysis cites the need for up to 2,380 off site [sic] parking spaces to support the proposed development. However, there are no associated improvements to pedestrian pathways to and from those sites. Currently, sidewalks throughout the area are narrow, uneven, overgrown and lacking in safety features such as pedestrian lighting or trash receptacles. Section 5. B indicates that off site [sic] parking may require remote parking locations up to 1/4 mile from the development.

**In order to accommodate safe pedestrian movement to and from remote sites, we request that the project be conditioned to identify all 2,380 off-site parking spaces and improved sidewalks from those locations to include pedestrian lighting, trash receptacles, shuttle stop locations and appropriate landscaping. Shuttle stop locations should also be identified [sic] to determine if adequate right of way exists to house both the shuttle stop, and queuing area.**

**Response to Comment No. 216-7**

As stated in Project Design Feature K-6, describing the EMP, the Applicant would be required to provide annual evidence to LADOT of agreements that identify/secure the location and quantity of available off-site parking prior to the issuance of a temporary or permanent certificate of occupancy for the Entertainment and Sports Center, and annually thereafter. The EMP will also include and require DOT approval of the locations of any shuttle stops that are necessary.

No changes are proposed by the Project to the off-site parking locations, as the off-site parking areas would be located in parking facilities within existing commercial/office areas with the requisite infrastructure already in place (i.e., lighting). Relative to the movement between the Entertainment and Sports Center and the off-site parking, traffic control officers at adjacent intersections will coordinate vehicular traffic and direct pedestrians to the designated crossings.

#### **Comment No. 216-8**

Page 9, 5 H. Neighborhood impact analysis.

**Bullet #4 should be corrected to read “Oxnard to the north, Burbank blvd. To [sic] the south, Shoup Blvd. to the West and Topanga Canyon to the east. [sic] This correction is necessary to describe the (our) “Rolling Road” single family residential community closest to the project site.**

#### **Response to Comment No. 216-8**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding neighborhood street segment analysis. As described, the boundaries of the neighborhoods were identified as potential cut through routes with connections to other streets. Rolling Road, referenced in the comment for inclusion into an identified neighborhood, is a designated local street that terminates into a cul-de-sac/private gate. As such, Rolling Road does not provide a direct connection to a cut-through traffic route and is not included within the boundaries of the identified neighborhood.

#### **Comment No. 216-9**

Thank you for your consideration of the recommended additional studies and project conditions.

#### **Response to Comment No. 216-9**

This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 217**

Joy Tangarone  
4201 Esteban Rd.  
Woodland Hills, CA 91364-6011

**Comment No. 217-1**

I am responding to the draft of the EIR report for the Promenade 2035 Project in Woodland Hills.

Please note that I do not believe there is enough parking being planned for this development. Traffic congestion is already an issue in our city and 5,610 spots are not enough for this size planned development.

**Response to Comment No. 217-1**

As discussed above, in accordance with SB 743, impacts associated with parking are not considered significant impacts under CEQA. However, an analysis of parking is provided in the Draft Supplemental EIR. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Project's provision of 5,610 parking spaces would satisfy the non-event parking requirements of 2,790 parking spaces. The Entertainment and Sports Center would require 3,000 parking spaces for sold-out events under the LAMC (1 space per 5 seats). Therefore, the remaining 2,820 parking spaces provided on the Project Site would be utilized to fulfill the required parking spaces for the Entertainment and Sports Center. In order to make up the remainder of the LAMC required parking (i.e., 180 parking spaces) and to provide for peak demand parking of a maximum of 2,380 parking spaces, a combination of on-site shared parking (shared with the office and retail uses only) and off-site parking located at adjacent office buildings is proposed, and would require approval through the Project's requested entitlements. The required parking provided for the residential and hotel uses would not be shared, in accordance with the Warner Center Plan. In addition, as set forth under Project Design Feature K-6, the Project would include the development of an Event Management Plan (EMP). Relative to parking, the EMP would identify the number of on-site shared use parking spaces available for the Entertainment and Sports Center and identify the number of off-site parking spaces that would be required to meet demand, depending on the time of year and number of event attendees. The EMP would require that sufficient parking be provided through a combination of on-site shared parking and available off-site parking to meet event demand. The Applicant would be required to provide annual evidence to LADOT of agreements that identify/secure the location and quantity of available off-site parking. LADOT would have to approve the location of off-site parking.

**Comment No. 217-2**

My view regarding the development of an 15,000 seat entertainment and sports complex is that this is not good for our community. The area of topanga [sic] and oxnard [sic] is not well suited for something of this size. The environmental impact would be devastating to our area as traffic and crime issues would escalate.

The sound travels already when open air concerts are held on the lawn near the Marriot and this is nothing of the size in which the city plans for the promenade are being proposed.

**Response to Comment No. 217-2**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the Entertainment and Sports Center and its environmental impacts, including an analysis of impacts related to traffic, police protection services, and noise.

**Comment No. 217-3**

It gets well over 100 degrees for weeks at a time during August and September so an open air stadium I am opposed to altogether.

**Response to Comment No. 217-3**

This comment does not raise an environmental issue specific to the Draft Supplemental EIR. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As a note, the partial roof option for the Entertainment and Sports Center would include an overhanging roof located over the Entertainment and Sports Center's seating areas to provide shade for visitors. The partial roof/overhang would be approximately 86 feet long.

**Comment No. 217-4**

Any type of sports or entertainment complex should be limited in size and with a closed roof facility. My suggestion for the city to consider is to plan two separate smaller venues. One venue could be similar to the LALive [sic] Microsoft Theater in size and which could also provide their own security for events. The other type of sports complex would be a professional ice skating rink and all purpose sports facility where the floor could be changed out for college basketball tournaments and other events. This sporting facility could host mixed sporting events like ice skating, boxing, martial arts, dance, gymnastics and other family events. Traffic concerns are a huge issue as well as crime and noise pollution.

**Response to Comment No. 217-4**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the environmental impacts of the proposed Entertainment and Sports Center. As discussed in Section V, Alternatives, of the Draft Supplemental EIR, Alternative 5 analyzed an Entertainment and Sports Center with smaller venues within the Entertainment and Sports Center that would be either 10,000-seats or 7,500-seats. However, this alternative would not achieve all of the Project objectives to the same extent as the Project. In addition, see Appendix FSEIR-6 for additional information regarding the demand for a 15,000 seat Entertainment and Sports Center as proposed by the Project. As a note, all of the alternatives analyzed by the Draft Supplemental EIR would be considered by the decision-makers in their review of the Project.

**Comment No. 217-5**

The homeless issue also needs to be addressed as well as the drug trafficking around the mall. It has gotten to the point that al [sic] the freeway ramps in this area are having encampments and families are discouraged from enjoying the community with their children. People have had issues with public indecent exposure in the parks, on the streets. The hygiene and cleanliness of our community needs to be addressed in the planning of the Promenade. Bathroom facilities and fountains are a concern, [sic]

**Response to Comment No. 217-5**

Refer to Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR, which provides an analysis of the Project's impacts to police protection services. As discussed therein, the Project would implement several project design features that would provide private, on-site security for the Entertainment and Sports Center and overall Project Site to reduce reliance on public police protection services. These include Project Design Features J.1-1 through J.1-9 of the Draft Supplemental EIR. This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts of the Project. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. In addition, refer to Topical Response No. 7, Open Space, above, for a discussion regarding the security for open space areas on the Project Site, including the public restroom proposed in the Promenade Square.

**Comment No. 217-6**

I do have empathy for the police officers and fire department whom [sic] serve the community as they are limited by laws that were put in place to protect the few rather than the whole of our San fernando [sic] Valley. The Promenade 2035 plan needs to include private security and additional LAPD enforcement. Officers on foot or bicycle can be

warnings to those thinking it is ok to peddle drugs and publicly relieve themselves in our parks, streets and community. It is not good that marijuana is being smoked in our parks and so many think they can drive under the influence as the authorities are limited in fighting this problem.

The Promenade 2035 also needs to be wise to protect our community from terrorist threats. Large scale sculptures, rocks and trees to keep any idiots whom might try and plow down people with vehicles needs to be planned. We live in a different world now and public safety must be a top priority when planning large developments.

**Response to Comment No. 217-6**

Refer to Topical Response No. 5, Public Services, above, for a discussion regarding the potential impacts to police and fire protection as well as the various security measures that will be implemented as part of the Project.

**Comment No. 217-7**

Thank you for your review of my concerns as a resident of this community.

**Response to Comment No. 217-7**

This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the proposed Project.

**Comment No. 217-8**

Thank you for your response.

My information to stay informed about the Promenade 2035 project is as follows:

Joy Tangarone  
4201 Esteban Road  
Woodland Hills, CA 91364

**Response to Comment No. 217-8**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.



**Comment Letter No. 218**

Vivian Teasdale  
7014 Middlesbury Ridge Cir.  
West Hills, CA 91307-1813

**Comment No. 218-1**

In Los Angeles, it is so tempting to want to stop all growth. Our roads are crowded, our air polluted, and we need to be better when it comes to conservation of our natural resources. I understand why it's tempting to just want to say no to every new development that comes along. I imagine that you have received letters suggesting just that in regard to many projects you review.

But to think that stopping growth and development will somehow help our current situation is counterintuitive. What would help would be to think about growth differently—to think about growth in the way that cities similar in size do. We must change our patterns. We must build homes in proximity to the things people wish to be in proximity too. [sic] We must give commuters new ways to get to and from places and all of this is possible if the public works with private investment.

I believe from all that I have read in the Promenade 2035 Draft Environmental Impact Report, this is such a project for Los Angeles. I'm excited about the addition of new apartments connected to amenities and near transit. With Promenade 2035, residents would have direct access to the Warner Center Transit hub, which allows for easy connection to downtown Los Angeles, Santa Clarita, Antelope Valley and half a dozen local Metro lines. Additionally, the project has more than 1500 bicycle parking spaces, both short-term and long-term and bicycle amenities. And, even better, this project co-locates residential, commercial and office all on the project site.

Can you imagine a Los Angeles where you can actually walk to work? It's a new model pursuing. Let's start by approving Promenade 2035.

**Response to Comment No. 218-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 219**

Jane Terjung  
1639 Oak Dr.  
Topanga, CA 90290-4023

**Comment No. 219-1**

I am sending this email as an official comment for the record regarding the newly proposed Westfield Development in Woodland Hills (Promenade 2015—case number ENV-2016-3909-EIR).

I live in Topanga canyon and believe that the proposed changes in this project will have a wry negative impact on traffic in Topanga canyon, [sic] causing gridlock and safety problems.

**Response to Comment No. 219-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 219-2**

Topanga canyon [sic] only has one way in from the Westside at Pacific Coast Hwy (Topanga Cyn Blvd) and 2 ways out on the Valley side (Topanga Cyn Blvd & Old Topanga Cyn) and they are already over loaded during rush hour. The added occupants who may very well have jobs on the Westside will only make this worse. On weekends, the newly proposed Stadium would most certainly attract drivers from the Westside, once again clogging our roads.

**Response to Comment No. 219-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for a summary of the Project's traffic analysis and impacts. The Traffic Study analyzed a Study Area which included 49 intersections with the greatest potential to experience significant traffic impacts due to the Project. This Study Area was developed in consultation with both LADOT and Caltrans. Intersections at the periphery of the Project's Study Area were determined not to have significant impacts as a result of the addition of Project traffic and the full implementation of the Warner Center Mitigation Program and Project specific project design features. Therefore, the intersections beyond the Study Area would not experience

significant impacts, given that Project traffic dissipates farther from the Project Site, and as such, the intersections within the community of Topanga would not be significantly impacted by the Project. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking, for further details regarding the Warner Center Plan Implementation Board.

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a summary of the traffic analysis associated with the Entertainment and Sports Center and a discussion about Project Design Feature K-6, which is the preparation of an Event Management Plan to address the potential effects of event traffic.

### **Comment No. 219-3**

In addition to the traffic congestion issues, Topanga Cyn [sic] is at high risk for brushfire and it is already in current danger with drivers throwing cigarette butts and idling cars stuck in traffic igniting roadside brush.

### **Response to Comment No. 219-3**

With regard to fire risks, as discussed in the Initial Study, provided in Appendix A, of the Draft Supplemental EIR, there are no wildlands located in the vicinity of the Project Site. Furthermore, the Project Site is not located within a City-designated Very High Fire

Hazard Severity Zone.<sup>83</sup> Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires.

**Comment No. 219-4**

PLEASE take this into consideration and reduce the size of this project.

**Response to Comment No. 219-4**

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

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<sup>83</sup> *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed August 2, 2016. The VHFHSZ was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

**Comment Letter No. 220**

Gina K. Thornburg  
5146 Comercio Ave.  
Woodland Hills, CA 91364-3245

**Comment No. 220-1**

Attached herewith are my comments. I have also copied them into the email in both Word and PDF formats. Thank you!

As a longtime resident (nearly 28 years) of the western San Fernando Valley, as a geographer, concerned citizen, mother, and scholar-activist, I respectfully submit the following comments pertaining to several areas of concern in the Draft SEIR (DSEIR) of Unibail-Rodamco-Westfield's (U-R-W) proposed Promenade 2035 Project (the Project). Thank you in advance for your consideration of these comments.

**Response to Comment No. 220-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 220-2****1. False Scale Relations, Population, and Environmental Justice**

This DSEIR employs a few deceptive tactics to render invisible the actual environmental setting of the proposed Project. It fails to relate environmental impacts to the local geography, climate, and population demographics and instead relates the estimated environmental impacts of the Project to the region of Southern California. This false scale relation, i.e., relating the activities on 34 acres in Woodland Hills, California, in the southwest corner of the mountain-rimmed San Fernando Valley, to the 6,345-square-mile South Coast Air Basin is misleading, illogical, and deceptive (see page IV.B-2 in Chapter IV, Environmental Impact Analysis, B. Air Quality). Indeed, the DSEIR defines the "environmental setting" of the Project as this regional 6,345-square-mile area. This is nonsensical. The actual environmental setting is the southwest San Fernando Valley. The Valley does not enjoy off-shore air flows that push polluting air contaminants out to the Pacific Ocean. The Valley is also much sunnier than coastal areas, which regularly enjoy the moderating effects of low fog, or the marine layer. Significantly for the quality of air that area residents breathe is the location of US Highway 101, which not only cuts through the

middle of Woodland Hills but has also been deemed to feature the second-worst congested stretch of freeway in the United States, with drivers losing 51 hours per year in traffic delays; this stretch is the approximately 25-mile distance from Topanga Canyon Blvd. to the exit for Vignes Street in downtown LA's Chinatown (see the INRIX Global Traffic Scorecard at <http://inrix.com/scorecard/>). A recent study by a UCLA professor of atmospheric chemistry found that pollution from mobile sources, namely automotive traffic, travels farther from freeways than previously believed.[1] Given that the southern boundary of Warner Center is US 101, the cumulative effects of pollutants from the freeway must be considered along with the pollutants produced by the all of the projects in the construction boom in Warner Center. Not only cumulative construction-related impacts in conjunction with pollutants from US 101 but also cumulative operational air-quality impacts in conjunction with pollutants from US 101, and all major arteries and streets in and adjacent to Warner Center, must be considered in calculating the health impacts of airborne pollutants to the local residential and regular-occupying (such as employees and schoolchildren) populations. Sensitive receptors include residents and area schools, particularly Woodland Hills Academy, which is nearly adjacent to US 101. As well, current and updated measurements must be used to calculate the cumulative impacts of air pollution, not the outdated data from the 2003 Air Quality Management Plan, as cited in Chapter IV, Environmental Impact Analysis of the DSEIR.

[1] See Barboza, T. (2017). Freeway pollution travels farther than we thought. Here's how to protect yourself. Retrieved July 25, 2018, from <http://www.latimes.com/local/california/la-me-freeway-pollution-what-you-can-do-20171230-htmstory.html>.

### **Response to Comment No. 220-2**

The commenter inaccurately states that the Draft Supplemental EIR failed to relate environmental impacts to the local geography, climate, and population demographics and instead related the estimated environmental impacts of the Project to the region of Southern California. The environmental setting is specific to each topic (e.g., air quality, public services, traffic, water, etc.) and is defined further in the beginning of each impact analysis. Section IV.B.2.d, Air Quality, of the Draft Supplemental EIR, provided information regarding the "environmental setting" consistent with guidance provided in SCAQMD's *CEQA Air Quality Handbook* (Handbook). Page 7-1 of the Handbook states that

*The background, or baseline air quality information, should include a discussion of the following points: (1) Project setting and description; (2) Climate and meteorological conditions; (3) Existing regional and local air quality; (4) Existing sensitive receptors; (5) Existing toxics emissions sources; and (6) Extent of air basin affected, and AQMP.*

As further described in Section IV.B, Air Quality, of the Draft Supplemental EIR, the Project Site is located within Source Receptor Area 6, which covers the West San

Fernando Valley area. The monitoring station most representative of the Project Site is the Reseda Station, located at 18330 Gault Street in Reseda, approximately four miles east of the Project Site. This monitoring station captured all of the air pollutants, including those that result from the US-101. Figure IV.B-2 on page IV.B-23 of the Draft Supplemental EIR identified the national and state ambient air quality standards for relevant air pollutants along with the ambient pollutant concentrations that have been measured at the Reseda Station through the period of 2014–2016.

As discussed in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, the localized effects from Project emissions (e.g., on-site construction traffic and heavy-duty construction equipment) to sensitive land uses in close proximity to the Project Site (i.e., adjacent residences) were evaluated according to the SCAQMD's localized significance threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area (West San Fernando Valley) and distance to the nearest sensitive receptor. These ambient air quality standards provide public health protection, including protecting the health of "sensitive" populations, such as asthmatics, children, and the elderly. As evaluated in Section IV.B, Air Quality, of the Draft Supplemental EIR, maximum localized construction emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds with implementation of mitigation measures.

The methodology for analysis of cumulative impacts suggested in this comment, contradicts SCAQMD recommended methodology. The SCAQMD recommended air quality cumulative impact methodology is explained below. The SCAQMD shares responsibility with CARB for ensuring that all federal and state ambient air quality standards are achieved and maintained throughout all of Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. SCAQMD has developed methodologies and thresholds of significance that are widely used by lead agencies throughout the air basin. As set forth in the *LA CEQA Thresholds Guide*, the City adopted the SCAQMD thresholds to assess the significance of a project's project-specific and cumulative air quality impacts. SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution prepared in August 2003 specifically states:

*As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR.... Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative*

*significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.*<sup>84</sup>

The cumulative analysis of air quality impacts within the Draft Supplemental EIR appropriately follows SCAQMD's specified methodology. Furthermore, air quality impacts are basin-wide, and air quality is affected by all pollutant sources in the basin. Therefore, the ambient air quality measurements provide a summary of basin-wide cumulative air quality impacts. As the individual project thresholds are designed to help achieve attainment with cumulative basin-wide standards, they are also appropriate for assessing the Project's contribution to cumulative impacts.

### **Comment No. 220-3**

Moreover, Woodland Hills is the hottest geographic location in the City of Los Angeles, with summertime temperatures regularly exceeding 100 degrees. The maximum temperature in July 2017 was 112°F, and thus far in July 2018, temperatures measured at the Pierce College Weather Station were at or exceeded 100°F on 13 days between and including July 6 and July 26. On July 7, the maximum temperature was 117°F.[2] The excessive heat that characterizes Woodland Hills has been omitted in the DSEIR. This is a fundamental and devastating flaw in the calculations for air-quality impacts to the local community and area. Heat and sunlight are drivers in the formation of ozone, or smog.<sup>3</sup> According to the Environmental Protection Agency, nitrogen oxides, or NO<sub>x</sub>, are highly reactive gases formed from the burning of fuel. "The primary sources of NO<sub>x</sub> are motor vehicles, electric utilities, and other industrial, commercial, and residential sources that burn fuels".[3] "Ground-level Ozone... is formed when NO<sub>x</sub> and volatile organic compounds (VOCs) react in the presence of heat and sunlight".<sup>3</sup> Significantly, "[c]hildren, the elderly, people with lung diseases such as asthma, and people who work or exercise outside are susceptible to adverse effects such as damage to lung tissue and reduction in lung function. Ozone can be transported by wind currents and cause health impacts far from the original sources." Woodland Hills is characterized demographically by an average older population than the rest of the City of Los Angeles, which is significant when considering the environmental impacts of the Project.

According to the US Census Bureau, 23.2% of the population of the City of Los Angeles in 2016 was age 55 years or older. The median age for Los Angeles city is 35.6 years (see US Census Bureau, American FactFinder, 2016 American Community Survey 1-Year Estimates). In contrast, both of the ZIP codes in Woodland Hills are residence to older

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<sup>84</sup> *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, South Coast Air Quality Management District, August 2003.*



populations on average. In ZIP code 91364, 32.4% of the population is age 55 or older, while in ZIP codes 91367, 30.4% are. The median age for 91364 is 43.2, while the median age for 91367 is 40.9. The aging and already elderly population of Woodland Hills constitutes a class of people protected from discrimination.

According to the State of California Department of Justice,[4] Government Code section 11135, subdivision (a) states:

*No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state....*

[2] Data are available at [data.piercecollege.edu](http://data.piercecollege.edu).

[3] See *NOx: How nitrogen oxides affect the way we live and breathe*. United States Environmental Protection Agency, Office of Air Quality Planning and Standards, EPA-456/F-98-005, September 1998.

<sup>3</sup> [Not included in comment letter.]

<sup>3</sup> [Not included in comment letter.]

[4] See Harris, K. D. (2012). *Environmental Justice at the Local and Regional Level: Legal Background*. State of California, Department of Justice. Retrieved on July 25, 2018, from <https://oag.ca.gov/environment/ceqa/planning>

### **Response to Comment No. 220-3**

With regard to additional heat, the Project includes a number of design features that are consistent with the strategies identified by the United States Environmental Protection Agency (EPA) to address heat island effects, such as: including trees and landscaping within development areas and implementing building standards that incorporate heat island reduction strategies. As discussed in Section IV.I.4, Public Services—Parks and Recreation, of the Draft Supplemental EIR, the Project would provide a variety of open space and recreational amenities, including 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres. The EPA has also identified the enactment of green building ordinances by local jurisdictions as a means of addressing heat island effects. The Project would be consistent with the City of Los Angeles Green Building Code, as further discussed in Section IV.D, Greenhouse Gas Emissions, of the Draft Supplemental EIR. These and other measures incorporated into the EIR would be consistent with strategies identified by the United States Environmental Protection Agency (EPA) to address heat island effects.

From an analysis standpoint, air quality and GHG impacts were analyzed using the SCAQMD recommended CalEEMod which accounts for area specific natural gas and electricity usage rates (e.g., increased usage of electricity from air conditioners for warmer areas) based on California Energy Commission's Forecasting Climate Zones. Climate Zone No. 8 was selected for the analyses by using the look up tables in Appendix F of the CalEEMod User's Guide based on the Project Site's zip code.

As discussed in Section IV.B, Air Quality, of the Draft Supplemental EIR, the localized effects from Project emissions (e.g., on-site construction traffic and heavy-duty construction equipment) to sensitive land uses in close proximity to the Project Site (i.e., adjacent residences and including the elderly) were evaluated according to the SCAQMD's localized significance threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard (e.g., NO<sub>2</sub>), and are developed based on the ambient concentrations of that pollutant for each source receptor area (West San Fernando Valley) and distance to the nearest sensitive receptor. These ambient air quality standards provide public health protection, including protecting the health of "sensitive" populations, such as asthmatics, children, and the elderly. As evaluated in Section IV.B, Air Quality, of the Draft Supplemental EIR, maximum localized construction emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds with implementation of mitigation measures. Furthermore, the health effects from exposure to diesel exhaust have been evaluated and demonstrate that construction-related health risk impacts from cancer are approximately 0.9 in one million and below SCAQMD's significance threshold for cancer of 10 in one million. Refer to Appendix FSEIR-5, of this Final Supplemental EIR, for the quantitative Health Risk Assessment analysis.

On December 24, 2018, the California Supreme Court (Court) issued the *Sierra Club v. County of Fresno* (Friant Ranch) decision that concluded the EIR for Friant Ranch Project was deficient in its informational discussion of the human health impacts associated with the Project's significant and unavoidable impacts related to air quality. A supplemental discussion of the potential health effects related to the Project's significant and unavoidable criteria pollutant emissions is added as Appendix U, Public Health Impacts, to the Draft Supplemental EIR and is appended to this Final Supplemental EIR. Appendix U provides additional details regarding the potential health effects from the Project's significant and unavoidable criteria pollutant emissions, relating the effects in the context of relevant science, and explains why it is not scientifically feasible at the time of drafting of the Supplemental EIR to quantitatively and reliably connect this individual Project's air quality impacts to likely health consequences.

**Comment No. 220-4**

The developer of the Project relies on the guidance of the Warner Center 2035 Specific Plan (Warner Center Plan), a municipal ordinance. As such, residents in Woodland Hills and surrounding communities should have reason to trust the Los Angeles Department of City Planning (LADCP) to do all within its authority to ensure that area residents enjoy “the benefits of a healthy environment” and that the “burdens of pollution” are not “focused on sensitive populations or on communities that already are experiencing its adverse effects” (Harris, 2012). The above-average aging and elderly population of Woodland Hills is a sensitive population that already experiences the undue burdens of stationary and mobile sources of pollution, from the numerous construction projects underway and planned and from the US 101 and all traffic that these new development projects are generating. And yet, the DSEIR has betrayed the people of Woodland Hills by failing to consider the cumulative air-quality effects of the many thousands of vehicle trips that would be generated at completion of the Project. This error of omission is environmentally unjust and discriminatory to all area residents, but particularly to the sensitive population of aging and elderly people in Woodland Hills. New analyses must be made employing current and updated measurements of the concentrations of operational pollutant emissions at full buildout of the Project, including VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>, as these pollutants relate to the expected traffic generated by the Project to the Project.

**Response to Comment No. 220-4**

Contrary to the commenter’s assertion that the Draft Supplemental EIR fails to consider the cumulative effects of other construction projects and projects in operation within the vicinity of the Project Site, the cumulative analysis throughout the Draft Supplemental EIR analyzed related projects or full buildout of the Warner Center Plan (as applicable) as part of the cumulative analysis. Refer to Response to Comment Nos. 220-2 and 220-3, above, regarding cumulative impacts and the SCAQMD recommended methodology for evaluation of localized air quality impacts, TACs and health risk.

On December 24, 2018, the California Supreme Court (Court) issued the *Sierra Club v. County of Fresno* (Friant Ranch) decision that concluded the EIR for Friant Ranch Project was deficient in its informational discussion of the human health impacts associated with the Project’s significant and unavoidable impacts related to air quality. A supplemental discussion of the potential health effects related to the Project’s significant and unavoidable criteria pollutant emissions is added as Appendix U, Public Health Impacts, to the Draft Supplemental EIR and is included in this Final Supplemental EIR. Appendix U provides additional details regarding the potential health effects from the Project’s significant and unavoidable criteria pollutant emissions, relating the effects in the context of relevant science, and explains why it is not scientifically feasible at the time of drafting of the

Supplemental EIR to quantitatively and reliably connect this individual Project's air quality impacts to likely health consequences.

### **Comment No. 220-5**

The above-average concentration of people age 55 or older must be considered a sensitive-receptor population for the purposes of reevaluating this project. The localized impacts from on-site construction activities will likely be significant and unavoidable because of the loophole in Warner Center Plan Mitigation Measure AQ-1. To wit, "Warner Center Plan Mitigation Measure AQ-1 requires the use of off-road diesel-powered construction equipment greater than 50 hp to meet the Tier 4 emission standards, *where available*" (Executive Summary, page I-44; emphasis added). What if these types of trucks and other equipment are not available? Of the 15-year buildout of the Project, on how many days would such Tier-4-compliant construction equipment not be available? On which locations within the 34 acres of the Project would such non-Tier-4-compliant construction equipment not be available? In estimating the "maximum localized construction emissions for sensitive receptors" the DSEIR relies heavily on the "incorporation of Warner Center Plan Mitigation Measure AQ-1" (see Executive Summary, page 1-43). However, the loophole may result in a lack of mitigation for the "maximum construction emissions" that the DSEIR estimates "Would exceed the SCAQMD-recommended localized screening threshold for NO<sub>x</sub> in Years 2019–2021 and PM<sub>10</sub> and PM<sub>2.5</sub> in Years 2019–2021 and 2031 primarily as a result of grading and hauling activities." This has significant implications for the lung health of all people living and working in Warner Center and adjacent neighborhoods or Census blocks.

### **Response to Comment No. 220-5**

In response to SCAQMD's letter (Comment Letter No. 3), Tier 4 off-road requirements under Warner Center Mitigation Measure B-1 provided in the Draft Supplemental EIR was revised to delete "where available." Refer to Section III, Revisions, Clarifications, and Corrections to the Draft Supplemental EIR, of this Final Supplemental EIR. This comment does not change any significance conclusions provided in the Draft Supplemental EIR.

As discussed above in Subsection IV.B.3.d in Section IV.B, Air Quality, of the Draft Supplemental EIR, the localized effects from Project emissions (e.g., on-site construction traffic and heavy-duty construction equipment) to sensitive land uses in close proximity to the Project Site (i.e., adjacent residences) were evaluated according to the SCAQMD's localized significance threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard (e.g., NO<sub>2</sub>), and are developed based on the ambient concentrations of that pollutant for each source

receptor area (West San Fernando Valley) and distance to the nearest sensitive receptor. These ambient air quality standards provide public health protection, including protecting the health of “sensitive” populations, such as asthmatics, children, and the elderly. As evaluated in Section IV.B, Air Quality, of the Draft Supplemental EIR, maximum localized construction emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds with implementation of mitigation measures.

#### **Comment No. 220-6**

The San Fernando Valley as a place has been rendered invisible through the scale comparison with the entire region encompassed by two administrative units: the SCAQMD and the SCAG. However, the SFV has unique conditions, particularly the fact that it is rimmed by mountains of varying heights, including the Simi Hills, the Santa Susana Mountains, the Santa Monica Mountains, and the San Gabriel Mountains. The Valley has a shape akin to a huge bowl, with a river, the Los Angeles River, and many of its tributaries, running through it. The land throughout the Valley gently slopes downward toward the river. This slope is easy to perceive from several north-south streets, from upper floors of office buildings, and from hillside communities.

#### **Response to Comment No. 220-6**

As discussed above in Response to Comment No. 220-2, the localized effects from Project emissions to sensitive land uses in close proximity to the Project Site were evaluated according to the SCAQMD’s localized significance threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area (San Fernando Valley) and distance to the nearest sensitive receptor. These ambient air quality standards provide public health protection, including protecting the health of “sensitive” populations, such as asthmatics, children, and the elderly. As shown in Table IV.B-6 on page IV.B-41 and Table IV.B-8 on page IV.B-46 of the Draft Supplemental EIR, maximum construction and operational emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds with implementation of mitigation measures. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 220-7****2. Further Impacts on Air Quality**

The DSEIR repeatedly states, “In the event that soil on the Project Site is not suitable for recompaction... then 1,430,000 cubic yards of export and 344,000 cubic yards of import would be required” (see pages I-42–I-43 in the Executive Summary). What attributes would make the soil unsuitable for recompaction? Would contaminants extant in the soil make it unsuitable for recompaction? Will the soil be tested for contaminants that pose risks to human health?

The DSEIR relies too heavily on the mitigating effects of as-yet-undeveloped technological advances in transportation and mobility as a crutch in predicting less-than-significant impacts on local air quality. There is no guarantee that these technological advances will occur, will be affordable, or will be used by a significant proportion of the population to effect any meaningful reductions in the worst air pollutants. The planned conversion of the Orange Line to light rail is not slated to begin until 2051. In the meantime, people will continue to largely rely on fossil-fuel-burning personal vehicles for mobility.

**Response to Comment No. 220-7**

With regard to the commenter’s question regarding recompaction, there are a range of reasons why soil may not be suitable for recompaction, such as the soil moisture content and the types of material found in the soil. As discussed on page 28 of the *Preliminary Geotechnical Engineering Investigation to Satisfy the Requirements For Filing a Vesting Tentative Tract Map with the Department of City Planning*, prepared by Geotechnologies Inc., on August 31, 2016<sup>85</sup>, the excavated on-site materials are believed to be satisfactory for reuse in the controlled fills as long as any debris and/or organic matter is removed. In addition, as discussed on page 29, it is anticipated that some of the soils will be above optimum moisture content and will require drying before recompaction. Thus, while it is anticipated that the soils on-site will be satisfactory for recompaction, the Draft Supplemental EIR conservatively evaluated the potential that soil on the Project Site is not suitable for recompaction. Furthermore, the Project would implement Mitigation Measure GEO-1, which requires that the Project prepare detailed geotechnical investigations that address site-specific geologic constraints of the specific building site including soil conditions and stability. Implementation of Mitigation Measure GEO-1 would determine the suitability of soils for recompaction.

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<sup>85</sup> Note, the *Preliminary Geotechnical Engineering Investigation to Satisfy the Requirements For Filing a Vesting Tentative Tract Map with the Department of City Planning*, prepared by Geotechnologies Inc., on August 31, 2016, was submitted to the City as part of the filing for the vesting tentative tract maps and is in the City’s file available for public review.

With regard to the commenter's question regarding soil testing, as discussed further in Section IV.E, Hazards and Hazardous Materials, of the Draft Supplemental EIR, the Phase I Environmental Site Assessment, provided as part of Appendix G, of the Draft Supplemental EIR, did not identify any recognized environmental conditions (RECs) at, nor recommend any further environmental investigation of, the Project Site. However, to be conservative, soil and groundwater sampling was conducted at the Project Site. Soil samples were collected at thirteen locations at the Project Site. Groundwater samples were collected from three locations at the Project Site: the northwest corner, the northeast corner and the southern perimeter. Samples were analyzed for VOCs. No VOCs were detected in the soil samples. VOCs were not detected above screening levels in groundwater in the northern portion of the Project Site, but were detected [specifically tetrachloroethene (PCE)] above screening levels at one location in the southern perimeter. PCE is a solvent commonly used in dry cleaners. It is assumed that the detected VOCs are migrating from off-site. As construction activities for the Project would include excavating down a maximum of 75 feet for basement levels, buildings structures, and hardscape and landscape around structures, there is the potential to encounter contamination in the subsurface during excavation activities for the subterranean parking garages at depths at or below the groundwater level of approximately 16 to 30 feet below ground surface. Construction activities would occur in accordance with applicable federal, state, and local regulations and requirements, including specific OSHA requirements regarding worker safety. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. In the event that contaminated soils are encountered during excavation, based on visual, olfactory, or vapor reading detection, the nature and extent of the contamination shall be determined and appropriate handling, disposal and/or treatment shall be implemented in accordance with applicable regulatory requirements, such as SCAQMD Rule 1166. Therefore, the Draft Supplemental EIR found impacts related to the potential to encounter contamination in the subsurface during construction at the Project Site to be less than significant with compliance with regulatory requirements.

From an air quality standpoint, the Warner Center Plan EIR contained mitigation measures to reduce construction and operational air quality impacts. As part of Warner Center Plan Mitigation Measure B-1, use of Tier 4 construction equipment would be required. This comment correctly identifies that use of Tier 4 construction equipment contributes to a substantial reduction in pollutant emissions and reduces localized construction impacts to less than significant. It should be of note that the SCAQMD also recommends implementation of this measure (refer to Comment Letter No. 3).

Tier 4 equipment is not "as-yet-undeveloped technological advances." In fact, all off-road diesel-powered construction equipment greater than 50 hp manufactured post January 1, 2015 must meet the Tier 4 emission standards. While this comment correctly

identifies that this newer equipment is more expensive, it is available and would be used by the Project. This measure would be enforced by requiring each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit to be provided at the time of mobilization of each applicable unit of equipment.

Regarding the portion of the comment on the timing of the conversion of the Orange Line to light rail, the Draft Supplemental EIR analyses do not assume the reduction in pollutant emissions associated with the electrification of the Orange Line. Instead, the analyses in the Draft Supplemental EIR account for the close proximity to mass transportation further reducing the reliance on single-occupancy vehicles.

### **Comment No. 220-8**

#### **3. Contaminated Groundwater**

According to California's Groundwater Bulletin No. 118, South Coast Hydrologic Region, the San Fernando Valley Groundwater Basin is contaminated with VOCs. Specific VOCs that have been found in this groundwater are trichloroethylene (TCE), perchloroethylene (PCE), petroleum compounds, chloroform, nitrate, sulfate, and heavy metals. The western part of the basin has been found to have elevated sulfate concentrations. The DSEIR does not specify this groundwater contamination. In light of the stated excavation to 75 feet at the Project site, the developer should disclose where the soil was tested and whether or not the groundwater itself has been tested for VOCs. As the site is being excavated, how will contaminated groundwater, if found, be remediated, handled, and/or mitigated? What happens if such water were to evaporate or its droplets to become airborne?

### **Response to Comment No. 220-8**

The commenter correctly states that the San Fernando Valley Groundwater Basin is contaminated with VOCs. As discussed in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, groundwater contamination, primarily volatile organic compounds (VOCs) from industry, and nitrates from subsurface sewage disposal and past agricultural activities, exist in much of the ground water throughout the basin. In light of the contamination in parts of the basin, the California Department of Toxic Substances Control designated large areas of the basins, mainly in and around North Hollywood, Burbank and Glendale, as high priority Hazardous Substances Cleanup sites and these areas were also designated as Superfund sites by the USEPA. However, the commenter incorrectly states that the Draft Supplemental EIR does not specify the groundwater contamination. As discussed further on page IV.F-31 in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, based on the Project Site history, there is no indication of on-site sources of groundwater contamination. Soil samples were collected at thirteen locations at the Project Site. Groundwater samples were collected from three locations at the Project Site: the northwest



corner, the northeast corner and the southern perimeter. Samples were analyzed for volatile organic compounds (VOCs). No VOCs were detected in the soil samples. VOCs were not detected above screening levels in groundwater in the northern portion of the Project Site, but were detected (specifically PCE) above screening levels at one location in the groundwater along the southern perimeter. Detailed information can be found in Appendix G, of the Draft Supplemental EIR. With regard to the commenter's concern of encountering groundwater contamination during excavation of the Project Site, as discussed further on page IV.F-41 in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, dewatering is expected during construction. If groundwater contamination is detected during construction, the appropriate testing, handling, treatment and disposal would be implemented in accordance with applicable regulatory requirements, such as NPDES requirements or industrial sewer discharge user permit requirements. Temporary dewatering systems that may be implemented by the Project include, but are not limited to, dewatering tanks, sand media particulate, pressurized bag filters, and cartridge filters and these dewatering systems would be utilized in compliance with the NPDES permit, as required by Warner Center Plan Mitigation Measure HYDRO-4. With regard to the commenter's concern regarding contaminated water evaporating or its droplets to become airborne, the potential temporary dewatering systems do not involve large exposed pools of water on the Project Site that could evaporate and get absorbed into the air.

#### **Comment No. 220-9**

##### **4. Groundwater in General**

The developer should include innovative permeable surfaces as part of the Project to ensure significant recharging of the aquifer from the percolation of stormwater underneath the site.

#### **Response to Comment No. 220-9**

The Project will manage stormwater in compliance with City of Los Angeles Low Impact Development (LID) Ordinance requirements, as required by Warner Center Plan Mitigation Measure HYDRO-1, and with the geotechnical recommendations provided in the Initial Study, included in Appendix A, of the Draft Supplemental EIR. As discussed further on page IV.F-46 in Section IV.F, Hydrology, Surface Water Quality, and Groundwater, of the Draft Supplemental EIR, the Project would implement storm water capture and use, the feasibility of which would be determined according to criteria established in the LID manual, along with coordination with the City. In addition, implementation of the following LID BMPs, consistent with Warner Center Plan Mitigation Measure HYDRO-3, -4, and -5, would be included as part of the SUSMP for the Project to manage post-construction stormwater runoff:

- Provide storm drain system stenciling and signage to discourage illegal dumping;
- Design material storage areas and loading docks within structures or enclosures to prevent leaks or spills of pollutants from entering the storm drain system;
- Provide evidence of ongoing BMP maintenance as part of a legal agreement with the City of Los Angeles. Recorded covenant and agreements for BMP maintenance are part of standard building permit approval processing; and
- Design post-construction structural or treatment control BMPs before storing the stormwater. Stormwater treatment facilities and systems would be designed to meet the requirements of the SUSMP and LID Manual.

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 220-10**

#### **5. Population: False Scale Comparison**

On page IV.I-17 of Chapter IV, Environmental Impact Analysis, Section I, Population, Housing, and Employment, subsection 3.d.(2)(a) titled Direct Population Impacts, the impacts of the projected additional 3,714 residents generated by the project, using a household size of 2.73 persons per household in multi-family dwelling units and a 95% occupancy rate, has been deemed by the SEIR as “less than significant.” However, these additional residents must be considered as part of the greater whole of the forced and planned population increase in Warner Center and Woodland Hills caused by the addition of many thousands of residential units in a short period of time.

The SEIR relates this projected population growth on a 34-acre parcel within the 1.7-square-mile Warner Center to the 503-square-mile City of Los Angeles and the entire six-county region encompassed by the purview of the Southern California Association of Governments. Placing the projected population increase caused by the Promenade 2035 project within this much larger, regional context is nonsensical and misleading.

Instead, the SEIR should have considered this projected population growth in its local context, that of Woodland Hills, where thousands of residential units built in the last 10 years have already had deleterious effects on traffic, water and electric infrastructure, air quality, noise and light pollution, and community-serving businesses, such as grocery stores, clinics, and pharmacies. Many thousands more are currently being built or planned.

The SEIR is wholly deficient in considering the cumulative effects *to the local community* of not only the additional residents at Promenade 2035 but also the many thousands of guests and employees who would be expected to frequent the site on a daily basis. The local community must be defined as Woodland Hills and the western half of the San Fernando Valley. Therefore, the final EIR should estimate the impacts of the projected population growth as they relate to Warner Center, Woodland Hills, and the adjacent communities of Canoga Park, Winnetka, West Hills, Calabasas, and Hidden Hills, not to the City of Los Angeles or region as a whole. This new calculation must be made, since if all units envisioned in the Warner Center 2035 Specific Plan are built and occupied at a rate of 2.73 persons per household, at full buildout, the population of Woodland Hills will grow by more than approximately 82% in a short period of time over its 2008 level of 63,414.

The basis for the figure of 63,414 residents in Woodland Hills in 2008 came from the L.A. Department of City Planning estimates. If the 19,000 additional units envisioned in the Warner Center 2035 Specific Plan are built, multiplying these 19,000 units by the factor of 2.73 yields 51,870 more people living in Warner Center. Since Warner Center is part of Woodland Hills, this population increase would represent 81.79% more people living in Woodland Hills over its estimated 2008 level of 63,414.

#### **Response to Comment No. 220-10**

The Project's proposed number of housing units and residential population are consistent with the number of residential units and population in the Warner Center Plan and Warner Center Plan EIR. As the comment notes, Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, analyzes the impacts of the Project's number of housing units and associated population relative to projected growth for the Warner Center geographical area and the City of Los Angeles as a whole, and concludes that both Project growth and cumulative growth are consistent with the long-range regional growth forecast prepared by SCAG. There are no growth forecast data available from SCAG for an "intermediate geography," such as Woodland Hills. In addition, the commenter incorrectly states that 51,870 more people would be living in Warner Center at full buildout of the Warner Center Plan. Rather, as stated on page IV.I-23, in Section IV.I, Population, Housing, and Employment, of the Draft Supplemental EIR, at buildout, the Warner Center Plan could result in an addition of approximately 44,658 residents.

#### **Comment No. 220-11**

##### **6. Trees**

Because of the important ecosystem services provided by the nearly 290 trees on the Project site, most of these trees should be prioritized for preservation. At no time should removal of trees result in any temporal net loss of trees on the site. As trees are removed, similar mature trees in boxes should be placed on the site.

The urban forest of Los Angeles is in crisis. Thousands of trees are being lost per year. U-R-W should prioritize trees beyond just replacing trees at the end of each construction phase. As current trees are removed, replacement trees in boxes should be temporarily placed on site.

### **Response to Comment No. 220-11**

With regard to on-site trees, of the 292 existing trees within the Project Site, eight trees are Western Sycamore trees and are considered protected per the City's Protected Tree Ordinance. Six of the eight protected Western Sycamore trees are proposed to be relocated; however, based on the current health of the two remaining protected Western Sycamore trees, it was determined that those two trees would require removal as the trees would be unlikely to survive boxing and relocation. While the City's Protected Tree Ordinance (Ordinance No. 177404) requires protected trees to be replaced at a 2:1 ratio, the Board of Public Works routinely requires protected trees to be replaced at a minimum 4:1 ratio. Therefore, as set forth in Project Design Feature A-1, the Project proposes to replace all protected trees at a ratio of 4:1. As replacements are considered removals by Urban Forestry, the Project proposes to plant at least 32 replacement Western Sycamore trees on-site (a 4:1 replacement for all eight protected trees).

With regard to the remaining 284 on-site trees that are not of a protected tree species, pursuant to Warner Center Plan Mitigation Measure BIO-2, all non-native trees greater than four inches in diameter at breast height would be replaced at a 2:1 ratio. Therefore, 568 replacement trees would be planted on-site to mitigate the removal of the 284 non-protected on-site trees. While many of these trees may be relocated on-site, relocation is considered removal by Urban Forestry, and therefore would be required to be "replaced" at the 2:1 ratio. In total, 600 trees would be planted on-site by the Project, replacing 292 existing on-site trees, for an increase of 308 trees within the Project Site.

None of the 90 street trees proposed for removal are of a protected tree species. Of the 90 street trees proposed for removal, 73 trees are located within the jurisdiction of the City of Los Angeles (along Erwin Street, Owensmouth Avenue, and Oxnard Avenue), while the remaining 17 trees are located within the jurisdiction of the California Department of Transportation (Caltrans) along Topanga Canyon Boulevard. While many of these trees may be relocated on-site, relocation is considered removal by Urban Forestry, and therefore the analysis in the Draft Supplement EIR looked at the replacement requirements for all street trees. The Department of Public Works, Bureau of Street Services, Urban Forestry Division frequently requires street trees to be replaced on a 2:1 basis, which would result in 146 replacement trees (73 trees within the jurisdiction of the City of Los Angeles at a 2:1 ratio). However, based on the spacing requirements for street lights and utilities set forth by the Department of Public Works, 95 of a possible 146 replacement street trees could be planted within the Erwin Street, Owensmouth Avenue, and Oxnard Avenue right-

of-ways. Therefore, Mitigation Measure A-1 is proposed, which would replace the 73 street trees within the jurisdiction of the City to the satisfaction of the City's Department of Public Works, Bureau of Street Services, Urban Forestry Division through on-site replacement and a combination of other measures.

The street trees located on Topanga Canyon Boulevard would be replaced in accordance with Caltrans requirements as set forth in Mitigation Measure A-2, provided in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR. New street trees would be planted in accordance with the species listed in Figure 1 through Figure 11 of the Warner Center Plan. These tree species would be drought-tolerant and/or climate-adapted and would primarily require moist to dry soil conditions.

The removal of the existing on-site and street trees would temporarily reduce the visual character of the Project Site and surrounding streets during construction of the Project. However, replacement trees would be required to be planted in connection with each removal. Additionally, as discussed above, the Project would provide at least 600 trees within the Project Site, an increase of 308 trees over existing conditions. The street frontages surrounding the Project Site would also benefit from a greater number of trees, as well as enhanced parkways, pedestrian paths, and trees/landscaping consistent with the Warner Center Plan. All new trees would be a minimum size of 36-inch/48-inch box size, as required by the LAMC, which would provide shading for pedestrians immediately upon planting. The minimum size of 36-inch/48-inch box size would suit a variety of planting conditions where planting a larger box tree would not be possible due to utility or hardscape conflicts.

### **Comment No. 220-12**

#### **7. Historical Resources**

Given the context of the pending loss of the architecturally significant Sears building nearby, also to U-R-W, the historically significant Macy's building should be preserved. Its bells should be reinstalled, and it should be retrofitted to withstand earthquakes and incorporated into the Project design.

### **Response to Comment No. 220-12**

The Draft Supplemental EIR includes a seismic evaluation by structural engineer Nabih Youssef & Associates, as provided in Appendix R, of the Draft Supplemental EIR, that examines what would be required to bring the Macy's building into compliance with the City of Los Angeles' mandatory standards for non-ductile concrete buildings. The historic preservation consultants at Page & Turnbull reviewed the structural engineer's recommendations, as provided in Appendix S, of the Draft Supplemental EIR, and

concluded that the proposed seismic strengthening would involve substantial modifications to the building's exterior, including several character-defining features such as the projecting volumes, cylindrical columns, and decorative wall tiles. The modifications would alter the design of the building in such a way that its design integrity would be compromised, and it would no longer be an eligible historic resource.

The Macy's bells are no longer a part of the building, having been removed several years ago prior to the initiation of the Project, and therefore are not a current character-defining feature of the building. At the time of removal, a set of the bells was donated to the San Fernando Valley Relics Museum to be put on public display.

The historic evaluation in the Draft Supplemental EIR found no cumulative impacts to historic resources as a result of the Project. Two of the five other mid-20th century department store buildings identified as potential historic resources in the San Fernando Valley, including the Sears building at 21851 Victory Boulevard in Canoga Park, have been found not to be eligible historic resources after further analysis due to significant alterations after the 1994 Northridge earthquake. The other department store buildings that once housed Ohrbach's Panorama City, Broadway-Valley Department Store, and Montgomery Ward, do not have proposed projects that would affect their historic status.

### **Comment No. 220-13**

#### **8. Housing**

Given the context of the housing crisis in Los Angeles and California more broadly, U-R-W should redesign the Project to avail itself of available funding sources to include at least 20% affordable units in the residential buildings. There are funds for transit-oriented developments such as the Promenade 2035 Project. An example is Measure JJJ. Otherwise, the Project engages in exclusionary development: only wealthy people will be able to afford to live there. People of middle to low income, particularly those individuals who would be expected to work in the numerous services, food, and retail establishments that the Project purports to attract, would simply not be able to afford to live in the luxury apartments planned for this development. SCAG promotes social justice, but there is nothing socially just about the Project, as proposed. Students from Pierce College, for example, would not be able to live there. I have spoken with several people who work at Westfield's the Village. None of them live in Woodland Hills or in the Warner Center neighborhood, because it is too expensive to do so. Whether they are in the 20s or 50s, none of these people live nearby. I argue that U-R-W and all other developers in Warner Center should practice inclusionary development, otherwise, they are engaging in de facto redlining of specific districts, keeping all but the wealthy out.

### **Response to Comment No. 220-13**

Although the Project does not propose below-market rate (affordable) housing units, the Project is consistent with the requirements of the Warner Center Plan, which does not include any inclusionary housing requirements. Additionally, the Project proposes to provide 1,432 housing units comprised of a variety of unit types and price points for different income levels. With regard to the potential rent values, CEQA does not require review of a project's potential effects that are strictly economic or social in nature. CEQA is an environmental statute meant to address environmental impacts. The purpose of an EIR is to provide public agencies and the public with "detailed information about the effect which a proposed project is likely to have on the environment." (Pub. Resources Code, § 21061.) The CEQA Guidelines specifically state that "[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment." (CEQA Guidelines, §§ 15131(a); 15064(e).) When there is no evidence that potential economic or social impacts will result in some significant effect on the environment, "CEQA does not apply to such impacts." (*Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 566.) In addition, when an indirect physical change "is speculative or unlikely to occur," that change is not "reasonably foreseeable," and should not be included in the EIR's analysis. (*Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1061; see CEQA Guidelines, § 15145.)

This comment does not provide information on how those potential economic or social changes will lead to a direct or indirect physical impact on the environment, and such analysis of those potential impacts is speculative and not reasonably foreseeable. The comments regarding affordable housing are noted for the record and have been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

### **Comment No. 220-14**

#### **9. Open Space**

The publicly accessible open space is wholly inadequate and does not serve the local community. Woodland Hills needs more open, grassy areas where children and teenagers can run and play. As well, Warner Center needs a basketball court and a community center, both of which are gratis for community members to use. PAOS that is characterized by hardscaping, planter boxes, and constricted tight walkways (such as at the Village) do not afford area residents the space in which to play games such as Frisbee or throw a ball. U-R-W, if it wants to adhere to its principles of corporate social responsibility, should gift five acres of the 34 acres to the City of Los Angeles for the purpose of creating a community-serving park. This park would have many amenities, including structures for artistic and cultural purposes, as well as open grassy areas for athletic pursuits.

**Response to Comment No. 220-14**

Refer to Topical Response No. 7, Open Space, above, for a discussion of the Project's landscaped open space and pedestrian pathways consistent with the Warner Center Plan.

**Comment No. 220-15****10. Greenhouse Gas Emissions**

The statement on page I-63 of the Executive Summary is nonsensical. If individual projects are not considered for their impacts on global climate, then why have any environmental laws at all?

**Response to Comment No. 220-15**

The Draft Supplemental EIR states that a project would generate an incremental contribution to and cumulative increase in sources of GHGs. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. Thus, potential GHG impacts are addressed as a cumulative impact for environmental review purposes. When taking into consideration implementation of project design features provided throughout this Draft Supplemental EIR, including the requirements set forth in the City of Los Angeles Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project in 2033 would equal 1,513 MTCO<sub>2e</sub> per year during construction and 10,225 MTCO<sub>2e</sub> per year during operation of the Project with a combined total of 11,738 MTCO<sub>2e</sub> per year. In addition, when comparing the Project GHG emissions with the calculated efficiency target for 2033, the Project would emit 1.67 metric tons per year CO<sub>2e</sub> per service population. This is lower than the calculated efficiency target for 2033 (2.6 metric tons per year CO<sub>2e</sub> per service population), further demonstrating the Project's consistency with AB 32's 2020 target and SB 32's 2030 target and establishing consistency with the Scoping Plan and other applicable plans and policies adopted to reduce GHG emissions in accordance with AB 32 and SB 32.

**Comment No. 220-16****11. The Sports and Entertainment Center**

This is the wrong location for this massive structure, particularly given the environmental context of already-poor air quality and congested traffic.



**Response to Comment No. 220-16**

Refer to Topical Response No. 2, Entertainment and Sports Center, for a discussion regarding the entertainment uses encouraged by the Warner Center Plan and the Project's consistency with the Warner Center Plan as well as a summary of the Entertainment and Sport Center's environmental impacts. The comment expressing opposition to the Entertainment and Sports Center is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 220-17**

Attachment 1: Thornburg\_Gina\_Public Comment\_ENV.2016-3909-EIR.pdf

**Response to Comment No. 220-17**

This attachment is a duplicate of the comments provided above. No further responses are necessary.

**Comment No. 220-18**

Attachment 2: Thornburg\_Gina\_Public Comment\_ENV.2016-3909-EIR.docx

**Response to Comment No. 220-18**

This attachment is a duplicate of the comments provided above. No further responses are necessary.

**Comment Letter No. 221**

T. Jennifer Tran  
5500 Owensmouth Ave., Unit 233  
Woodland Hills, CA 91367-7007

**Comment No. 221-1**

As a resident and homeowner of Woodland Hills, I'm excited about Westfield's plans to overhaul the old Promenade Mall. I love everything about the project—especially the new stores, restaurants, entertainment, and sports center. It will also allow us to have more things to do in the Valley versus commuting all the way to downtown. It will truly enhance the community for the better.

I also love the many benefits it will bring—namely, thousands of new jobs. It wasn't that long ago that we were in a recession, so it's important to continue to create jobs in the Valley.

I believe it's also imperative to convey the Valley is business-friendly. Please approve the Promenade project, this will let people know the Valley welcomes smart development projects and is pro-business.

Thank you for your time and consideration.

**Response to Comment No. 221-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 222**

Laura Trickey  
21021 Erwin St., #315  
Woodland Hills, CA 91367-3839

**Comment No. 222-1**

My family and I have been residents of Woodland Hills Warner Center for the past three years. The Promenade 2035 Plan is a project that includes housing, office, hotel space as well as a major entertainment element. As a neighbor, I am completely excited about the entertainment element of the project even though I had some concerns about how the additional activity in the area would affect traffic, noise, etc.

After reviewing the Environmental Report, I can say my concerns have been assuaged. I was happy to learn that they extensively studied and addressed the impacts of the Entertainment Center. Knowing that these impacts are not significant has allowed me to focus on what I do love about the project, which is just how active it feels. I LOVE the idea of having a walkable community around the corner and being able to shop and enjoy my time locally. We already walk to the Village, the Topanga Mall and surrounding areas regularly. It will be amazing to have cultural entertainment and possibly sports activities in our own neighborhood, rather than having to drive to Downtown L.A. or to West L.A.

We have attended the community meetings that Westfield has held and they have a great team in place. I look forward to what the future holds for our community.

Thank you for your time.

**Response to Comment No. 222-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 223**

Zennon Ulyate-Crow  
P.O. Box 680  
Topanga, CA 90290-0680

**Comment No. 223-1**

I would just like to say, as a 15-year-old who will be growing up into this housing crisis within the area, I am in full support of this development in all its aspects.

**Response to Comment No. 223-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 223-2**

If you could send notifications to PO BOX 680, Topanga, CA, 90290, that would be fantastic.

**Response to Comment No. 223-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 224**

Cindy and Maurice Verloop  
4215 Saltillo St.  
Woodland Hills, CA 91364-5927

**Comment No. 224-1**

My husband and I are home owners in Woodland Hills and members of the WHHO. We'd like to add our voices to the deafening choir of other home owners who absolutely OPPOSE the referenced Promenade Development Project in our back yard.

Aside from the overwhelming number of shopping malls already in our neighborhood, and those that are already being built and/or refurbished nearby—and there are many!—our biggest concern is the massive increase in car traffic this project will inevitably generate.

We both work ~20 miles east of Woodland Hills and travel on the 101 every week day. Our normal commute in both directions is already a soul-crushing ONE HOUR—each way! While there are other highways that flow into Woodland Hills from the north, the massive traffic problem that already exists in our area must be addressed! Building more apartments, shopping centers, a sports complex, etc, etc will only serve to further deteriorate our quality of life.

Two years ago, we moved from Hollywood to Woodland Hills to escape the growing traffic congestion problem in Hollywood, as greedy developers have apparently been handed free reign over that once-great neighborhood. After 20 years in Hollywood, the city became so unpleasantly crowded, we sadly had to leave. Knowing our new commute would be longer, we were happy to find a quite [sic] place in Woodland Hills to which we can escape every evening while staying close enough to our employers to continue our employment there.

As we patiently sit in heavy traffic every morning and every night, we pass by ENORMOUS buildings along the 101 that are vacant and have FOR LEASE or FOR SALE signs on them. Why not refurbish some of those buildings instead of letting them fall into disrepair, become eye-sores and attract unwelcome guests.

PLEASE stop this ridiculously oversized “development” project! In the end, it will only benefit the pocketbooks of a few who are behind the proposal. We residents DO NOT WANT THIS PROJECT IN OUR NEIGHBORHOOD!

Thank you for providing us an opportunity to submit our thoughts on this project.

With gratitude and respect,

**Response to Comment No. 224-1**

Refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding the Project's impacts related to traffic during construction and operation of the Project. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 224-2**

Thank you, Elva.

4215 Saltillo St.  
Woodland Hills, CA 91364

**Response to Comment No. 224-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 225**

John A. Vickers  
23757 Burton St.  
West Hills, CA 91304-5703

**Comment No. 225-1**

I live in West Hills, just north of Woodland Hills. I used to frequent the stores and restaurants at what is now referred to as the “Westfield Topanga” mall, (between Vanowen and Victory). I also shopped at the “old” Costco on Roscoe Blvd.

I attempted to shop at the Costco and the Video and Audio Center, newly located in “The Village at Westfield” (between Victory and Erwin), but only once. The traffic, the crowds, and the horrific parking conditions, especially upon departure, have ended my patronage of ALL stores & restaurants in the “The Village”. [sic]

As it currently stands, during Christmas and “Black Friday”, [sic] I am forced to avoid the “Westfield Complex” entirely because of parking, crowds, and what had become an undriveable [sic] Topanga Blvd due to gridlock and traffic congestion.

With congestion the way it currently is, how on this earth could any “objective” study support cramming 244,000 square feet of retail and restaurant space, 629,000 square feet of office space, 572 hotel rooms, and, if you can believe it, a 15,000-seat entertainment and sports center into the Promenade and adjacent area? The “upside” is it will surely depress Woodland Hills’ housing values and thus “help” make home ownership more affordable. Our so-called “planning officials” are intent on making the area as hostile to homeowners and cars as they can, and seek to eliminate what little mobility we presently have to drive around that area.

Furthermore, if this abusive and foolish project goes forward, anyone subsequently attempting to commute on the 101 south, will be forced to the major parallel streets, as is the case now. There’s simply not enough “band width” on the 101 to handle today’s traffic (compliments of California’s auto-friendly government), let alone accommodate the traffic associated with the insane Promenade 2035 project.

**Response to Comment No. 225-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. In addition, refer to

Topical Response No. 1, Warner Center 2035 Specific Plan, regarding the transit-oriented nature of the Warner Center Plan and Project. Furthermore, refer to Topical Response No. 3, Traffic and Parking, for a discussion of traffic impacts of the Project and neighborhood traffic protection measures.

**Comment No. 225-2**

I intentionally live in the suburbs to avoid the typical problems associated with “cities”, [sic] such as awkward accessibility, congestion, crowds, crime, homelessness, drug use, slums, etc.; but the “city planners” seem bent on jamming a mini city in what has already become a seriously congested blight to our west valley suburb. If this doesn’t perfectly characterize the decline of California living conditions, nothing else will. Thank goodness I will likely be dead by 2035.

**Response to Comment No. 225-2**

Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, above, for a discussion regarding the Project’s consistency with the Warner Center 2035 Specific Plan. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 226**

Purnanda Wagle  
22330 Victory Blvd.  
Woodland Hills, CA 91367-1842

**Comment No. 226-1**

I wanted to let you know how excited I am about the Westfield Promenade project. Revamping the Promenade property is long overdue—the site served its purpose when we were more auto-centric, but today, people want to live closer to where they live, work and enjoy recreational activities (i.e., less driving and more walking and public transportation). Let's get this project started.

**Response to Comment No. 226-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 227**

Pat & Don Walker  
walkerdp01@hotmail.com

**Comment No. 227-1**

We would like to comment on the Promenade development. There is too much traffic and congestion in the Valley now. Builders/developers seem to have priority. A stadium in the Promenade would increase the traffic and congestion. Right now people cannot find enough parking at the Village and use the Promenade lot.

**Response to Comment No. 227-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion regarding the Entertainment and Sports Center and its environmental impacts, including potential traffic and parking impacts.

**Comment No. 227-2**

Why couldn't a park be part of the Promenade? There is so much cement that those who do live in apartments nearby could utilize a green space.

**Response to Comment No. 227-2**

As discussed in Topical Response No. 7, Open Space, above, the Project would provide a variety of open space and recreational amenities to comply with and exceed the LAMC and Warner Center Plan requirements. The Project would provide a total of approximately 246,000 square feet of publicly accessible, ground-level open space, equivalent to approximately 5.6 acres. This includes the approximately 60,000 square foot Promenade Square, approximately 48,000 square feet of required setbacks, the Gardens comprising approximately 22,000 square feet, approximately 32,000 square feet of additional large open space areas, and approximately 84,000 square feet of landscaped open space pathways through the Project Site. Additionally, the Project would provide approximately 5 acres of private roofdeck open space for the Project's residential, office and hotel uses. This includes approximately 165,000 square feet of residential common outdoor open space, 14,000 square feet of creative office outdoor open space, and 41,000 square feet of hotel outdoor open space.

**Comment Letter No. 228**

Diana Williams  
5302 Don Pio Dr.  
Woodland Hills, CA 91364-1735

**Comment No. 228-1**

I submitted a letter in favor of Westfield Promenade 2035 as CEO of the West Valley–Warner Center Chamber of Commerce. This letter is sent to reflect my personal views about the project.

In my job, I come across many companies and business leaders who take an active interest in the community. Westfield is one of them. They sponsor and host events, make charitable contributions to worthy causes and have created a sense of community in the West Valley with their Topanga and Village properties.

In short, Westfield has made tremendous investments to build a better community and I am thrilled that these will continue with the revitalization of the Promenade property. It will be great to have another place to dine and shop, wander around a new public park and catch an evening performance at the entertainment and sports venue. We will finally have night life, arts and cultural events available here in the West valley. Together with the Warner Center Plan, the Promenade project will transform the neighborhood.

As someone who grew up in a small town in Illinois, I understand the importance of community. We are so fortunate to have Westfield committed to the West Valley to make it a better place to live, work and enjoy life.

I hope the city will give Westfield Promenade strong consideration.

**Response to Comment No. 228-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 229**

Buzz Wilms  
2740 Marquette Dr.  
Topanga, CA 90290-4016

**Comment No. 229-1**

I am asking that the City stop the planned Westfield development before it it [sic] too late. Topanga is a fragile link between the Valley and PCH. Over the 30 years I have lived here I've witnessed the degradation of Topanga's unique environment, much of it from an overwhelming amount of traffic. This plan will only make it worse. Why Topanga was not included in the SEIR is a mystery but it will suffer if this plan goes forward.

Thank you.

**Response to Comment No. 229-1**

The Traffic Study analyzed a Study Area which included 49 intersections with the greatest potential to experience significant traffic impacts due to the Project. This Study Area was developed in consultation with both LADOT and Caltrans. Intersections at the periphery of the Project's Study Area were determined not to have significant impacts as a result of the addition of Project traffic. Therefore, the intersections beyond the Study Area would not experience significant impacts, given that Project traffic dissipates farther from the Project Site, and as such, the intersections within the community of Topanga would not be significantly impacted by the Project. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 230**

Rohan Wiratunga  
19850 Buttonwillow Dr.  
Winnetka, CA 91306-2671

**Comment No. 230-1**

As a longtime Valley resident I have watched my community grow over the years. In Los Angeles, it seems growth is inevitable, but how we choose to go about it is entirely up to us. That is why I have supported the Warner Center 2035 Plan. The Warner Center 2035 Plan represents an important path to successfully grow forward as a community.

It's important to me that any further growth adhere to this plan and that's why I was relieved to learn in the Draft Environmental Impact Report that the Westfield Promenade 2035 plan does just that.

I understand that growth is inevitable, but growth like this, isn't growth for growth's sake. It's progress. It's a new way to think about our shared future. I think the Promenade Plan is to be applauded for its investment in outdoor space and walkability.

I for one support this project and hope to see it approved by the City Council quickly.

**Response to Comment No. 230-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 231**

Randy Witt  
5121 Van Nuys Blvd., Ste. 222  
Sherman Oaks, CA 91403-6123

**Comment No. 231-1**

As you review the Westfield Promenade project, I hope you recognize there's widespread support for it. Westfield is one of the first developers planning a large-scale project that will be consistent with the Warner Center 2035 Plan, which requires them to develop more public open space, new streets, and activate the streets to encourage walking and reduce the need for car trips. The Plan's requirements are designed to reinvigorate our community and the best way to do that is through master planning for the future, like Promenade 2035. The only way we are going to get great projects like this to come to our neighborhood is to make it easier, not harder, for developers to invest in our community.

I understand that some people may be concerned with the Entertainment & Sports Center, but this is the best alternative. The Warner Center Plan calls for non-residential uses that create jobs, and the Entertainment & Sports Center is a great use for this area. If this was not part of the Promenade project and was swapped out for a similar square footage of office space, there would be much more traffic in the peak hour every single day (unlike the Entertainment & Sports Center, which is a non-peak hour traffic use and therefore, much less impactful to the community as a whole).

I support the Promenade project and hope you will approve it.

**Response to Comment No. 231-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 232**

Douglas J. Wolf  
23651 Gerrad Way  
West Hills, CA 91307-1319

**Comment No. 232-1**

My wife and I are residents in West Hills, having lived here since 1985. We enjoy the area and are very pleased with the changes that have been and are continuing to occur in the area.

Specifically, I am thrilled that Westfield continues to add to the variety of choices in the area. I am excited about the prospects of Promenade 2035. I endorsed the project early on.

With the recently released Draft Environmental Impact Report, I continue to believe that the plans appear to be carefully developed, allowing for the proper complement of development and open space. It's reassuring to know that after a thorough analysis of potential project impacts, i.e., traffic, parking, noise, air quality, and more, the identified impacts could be addressed through mitigation measures. One needs to acknowledge that any large project is bound to produce potential environmental impacts.

For the sake of future generations in the Valley, I hope that Westfield will be allowed to move forward with its Promenade project.

**Response to Comment No. 232-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 233**

Patrick Yaghoobi  
Managing Partner  
Amplify Development Co.  
19730 Ventura Blvd., Ste. 5  
Woodland Hills, CA 91364-2690

**Comment No. 233-1**

I understand the comment period for the draft environmental impact report on Westfield Promenade was extended from 45 to 90 days. I can't say I'm surprised, but I am disappointed.

These types of extensions seem to be the norm in Los Angeles. Quite frankly, it's surprising that any development projects get built as there is endless, costly red tape to delay or halt them.

Westfield Promenade is a terrific project and a win-win for the community and the local economy.

This project deserves your support, not extensions to delay its approval. We need to eliminate barriers to smart projects like Promenade.

Thank you for your time.

**Response to Comment No. 233-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.



**Comment Letter No. 234**

Cynthia Yokoyama  
cegyokoyama@yahoo.com

**Comment No. 234-1**

I hope this email finds you well. I am writing as resident of The Fountain Park community, specifically a townhouse close to the proposed construction of the Westfield's Promenade 2035. We are the closest neighborhood community affected by this proposed construction.

I am formally writing that my neighbors and myself are against the development as proposed. From the hotels to an entertainment sports center, not only will the daily traffic be severely congested, loud events booming at all hours, and a parking nightmare, but also the amount of people at late hours walking around is unsafe in light of current local and world affairs. Having more police in the area to regulate traffic, end public disturbances, etc. will also put undue financial stress on our beloved city.

**Response to Comment No. 234-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, for a discussion related to the noise, traffic and security associated with operation of the Entertainment and Sports Center. In addition, Topical Response No. 5, Public Services, provides a summary of the Project impacts to police protection and the project design features and mitigation measures that would be implemented by the Project to reduce these impacts.

**Comment No. 234-2**

Furthermore, we believe it destroys the property value of our neighborhood by making it an unappealing place to live. We bought here as a quiet, family-friendly, walkable neighborhood, as have countless others. The Promenade 2035 will inherently change that atmosphere. I feel it will no longer be safe nor quiet for my children. We also bought here to stay for a long time, gaining property value, and safely raising our family. Besides the nuisance laws and afterhours sound violations, the damages of property value lost will be incurred if we feel we have to prematurely move because it's unsafe, loud, and unappealing to live here.

I truly hope that the developers of Promenade 2035, and thus the City of LA, Dept of City Planning hear our heartfelt plea to change their plans due to the negative impact on our great community. Thank you for your time in reading my email!

**Response to Comment No. 234-2**

Refer to Topical Response No. 7, Open Space, regarding the Project's walkability and open space, family-friendly areas. Refer to Topical Response No. 5, Public Services, regarding police protection and to Section IV.H, Noise, of the Draft Supplemental EIR, regarding the potential noise impacts of the Project. Property values are not an environmental topic evaluated under CEQA. This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 235**

Bryan Young  
20734 Clark St.  
Woodland Hills, CA 91367-6825

**Comment No. 235-1**

As you look at the merits of Westfield Promenade, I hope you will consider the fact that the project will generate thousands of jobs, keeping people employed during and long after construction.

I think this fact gets lost as people tend to complain about noise, traffic and an overall “Not in My Backyard” sentiment with any development project. Without jobs, the economy suffers as do families, neighborhoods, businesses, etc.

Notwithstanding job creation, the project will be a great addition to the Warner Center. I look forward to seeing live performances at the entertainment and sports center, dining at the new restaurants and enjoying the many new retail stores.

I hope you will give Westfield Promenade your full support.

**Response to Comment No. 235-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 236**

Rick Young  
23106 Park Contessa  
Calabasas, CA 91302-1709

**Comment No. 236-1**

My support for the Promenade 2035 project is very simple. I support green growth in my community. As our economy continues to grow, it's not just enough to bring a project to the table. You need to bring smart green projects to the table.

By my estimation, Promenade 2035 is doing this a [sic] two distinct ways. Firstly, they are committed to building green. From my reading of the Draft Environmental Impact Report, as released by the City, that means we can expect to see green features, both expected and unexpected, like low flow fixtures and daylight harvesting (which I had to look up).

But, as important as the building, is the green in the project design itself. This isn't just an office project, or an entertainment project, or a housing project, it's so much more. Its uniqueness is in the way everything will work together and how that will relieve stress on the roadways, on air quality and on a great many things.

The Warner Center Plan envisioned this. Promenade 2035 is making it a reality. I support Promenade 2035.

Thank you for your time.

**Response to Comment No. 236-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 237**

Bob and Joyce Yovannone  
22276 Buenaventura St.  
Woodland Hills, CA 91364-5006

**Comment No. 237-1**

Robberies / crime [sic] is up in the Woodland Hills area since the Village opened up. Crime also goes up when subways come to the neighborhood.

We don't care about the so call housing shortage. Get your priorities straight, fix the freeway traffic problems first.

**Don't allow Wakefield [sic] or any other developers to do any more development.**

**Cancel the Warner Ctr 2035 plans.** We don't need anymore [sic] traffic and we certainly don't need 1 more car on the 101 and 405 freeways.

15,000 seat arena, totally crazy. Don't add downtown to Woodland Hills.

We don't need 2 hotels, Apts, Restaurants and Art Galleries. We have enough. The only thing we need is a department store.

So..... right now we are in the midst of a heat wave.. and DWP has announced a FLEX alert...

Is the electrical and water infrastructure there, or planned for all the massive building of apartments, condos, office, retail and entertainment projects in progress and being planned? Or will this further drain our resources?

**Response to Comment No. 237-1**

This is a duplicate of Comment Letter No. 210, above. Refer to responses provided therein.

**Comment Letter No. 238**

Sarah Stockham  
Assistant Construction Coordinator  
California Home Builders  
21510 Roscoe Blvd.  
Canoga Park, CA 91304-4144

Matt Modrzejewski  
Vice President  
Land Development  
California Home Builders  
21510 Roscoe Blvd.  
Canoga Park, CA 91304-4144

**Comment No. 238-1**

Please see attached letter of support for the Westfield Promenade 2035 Project.

I am writing to express my support for Westfield's Promenade 2035 Plan. I am member of the Warner Center Association, an organization comprised of property owners and businesses with the mission to create and enhance opportunities for the benefit of Warner Center.

At the core of the Warner Center 2035 Plan is the idea of "local living", which envisions a community where one can live, work and play. The Warner Center 2035 Plan takes a thoughtful approach to planned growth that balances the need for housing, jobs and services for the broader community.

The Westfield Promenade 2035 Plan complies with the Warner Center 2035 Plan and will revitalize the area by creating an exciting mixed-use development within the Downtown District. The Plan will include residences, offices, hotels, retail, public open green spaces, new streets and pedestrian paths, more dining and leisure options as well as an entertainment/sports venue.

I am proud to support the Westfield Promenade 2035 Plan and believe it will greatly enhance the area and further Warner Center's goal for "local living."

**Response to Comment No. 238-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 239**

Roger Pugliese  
Chairperson  
Topanga Association for a Scenic Community  
P.O. Box 352  
Topanga, CA 90290-0352

Carolyn Day  
Topanga Association for a Scenic Community  
P.O. Box 352  
Topanga, CA 90290-0352

**Comment No. 239-1**

Our organization the TOPANGA ASSOCIATION FOR A SCENIC COMMUNITY represents over 200 residents living in Topanga Canyon in the Santa Monica Mountains. Our organization has been involved in every land use battle in Topanga since 1963.

We have had the opportunity to review the above mentioned draft SEIR with an emphasis on the traffic studies. We are concerned that the traffic impacts to our community have not been considered nor addressed. We believe the SEIR traffic study is inadequate for the following reasons:

**A. Proposed Project Traffic Impacts to Topanga Canyon**

The entire town of Topanga has only one primary artery—Topanga Canyon Blvd. There are no alternative routes, so every commuter, every concert/sporting event attendee, and every shopper further clogs an already over-burdened highway, making the road more congested and hazardous for residents and our children. In 2008, a traffic study showed that over 18,000 cars per day traverse our canyon road, which has only increased in recent years.

Furthermore, Topanga Canyon Blvd is the first State highway west of the 405 freeway to connect Woodland Hills with the Pacific Coast Highway. As such, the proposed project will increase traffic substantially on Topanga Canyon Blvd. We have not seen nor has any traffic Study been done by Caltrans or the LA County Dept of Public Works.

We are requesting that a full study be done before any approvals be given.

Some primary concerns are:



Westfield's proposed expanded center will increase daily traffic by the multiples of thousands on Topanga Canyon Blvd, which is already overloaded.

- The 15,000 seat arena, in particular, will draw people from the west side, not only increasing the number of cars on the road, but likely having drivers under the influence and/or smoking who will be navigating an unfamiliar, winding road as they return home.
- Traffic violations increase in direct correlation to the number of cars on the road. Most violations in Topanga are due to driving at unsafe speeds and DUI's. [sic] Many times, wildfires and death are the result.

Increased traffic will lead to the following impacts to Topanga:

1. Increased fire risks. The threat of wildfire is so great in Topanga, and escape time so narrow, that Topanga Canyon conducts periodic fire safety meetings with LA County Fire personnel to remind residents to be vigilant in fire safety. Commuters traveling through Topanga Canyon to a stadium are most likely unaware of the extreme fire dangers that are caused by a simple cigarette butt.
2. More congestion, longer travel times.
3. Trash along Topanga Canyon Blvd, which is also hazardous to the creek and animals.
4. Increased sound. This is especially problematic at night after an event—include in the proposed Traffic study a sound test must be included.
5. Reduced air quality, as exhaust pollution gets trapped between the mountains.
6. Ingress and egress problems with County neighborhood streets flowing onto Topanga Canyon Blvd.
7. Increased risk to wildlife crossing along Topanga Canyon Blvd.

B. The SEIR is incomplete and inadequate with examples below

The SEIR completely fails to take into account the impact that the proposed project will have on Topanga. In fact, Topanga Canyon was not even mentioned as an area of study in the SEIR. This is extremely concerning for the following reasons:

1. On p. IV.K-17, the SEIR states that 47 intersections were analyzed for the proposed project. Yet none of those 47 intersections were located in Topanga Canyon, which is a glaring omission.
2. Of the 47 intersections analyzed, 4 were determined to operate at LOS E or worse, which is defined as POOR and indicates long lines of waiting traffic. One of these 4

LOS E intersections is the intersection of Topanga Canyon Blvd and Ventura Blvd. As a point of reference, virtually every vehicle that travels north on Topanga Canyon Blvd, including residents of Topanga, already must encounter that intersection at TCB and Ventura Blvds. The fact that this intersection has already been determined to have the very POOREST conditions indicates that there is an existing major problem. The proposed project will increase traffic immensely at this already problematic intersection. This is unacceptable to residents of Topanga, and must be addressed.

3. Even worse, on p. IV.K-78, the SEIR studied the 47 intersections under the category "Existing with Full Promenade (Including ESC) Plus EMP". [sic] This study determined that 2 of the 47 intersections received the absolute worst rating, which is LOS F. The definition of LOS F = FAILURE. Incredibly, both of these 2 FAILURE intersections are 2 intersections in which Topangans are directly impacted, including the intersection of TCB and Ventura Blvd.
4. Mitigation: Throughout the SEIR, there are mentions of mitigation. Yet nowhere in the SEIR does it state any specific mitigations when it comes to the problematic intersection of TCB and Ventura Blvds. There is also no mention of any impact to Topanga traffic, much less any possible mitigation.

We believe that the traffic portion of the SEIR is inadequate. We ask that you incorporate the impacts that the proposed project will have on the 8000 residents of Topanga Canyon.

#### **Response to Comment No. 239-1**

This is a duplicate of Comment Letter No. 24, above. Refer to responses provided above.

**Comment Letter No. 240**

Stacy Sledge  
President  
Topanga Town Council  
P.O. Box 1085  
Topanga, CA 90290-1085

**Comment No. 240-1**

Of the 12,000 people who live in Topanga and the thousands more who already seek out our town as visitors, are attracted by its unique, natural mountain character. We are the largest urban wild land interface in the United States. Since Topanga's earliest days, it has required major effort on the part of residents, Federal, State and County representatives, many environmental agencies and organizations to preserve and protect that natural environment to which is of benefit to not only Topangans, but those beyond its borders.

All that is now being threatened.

We have several grave concerns about the deficiencies within the proposed Westfield development Environmental Impact Report (EIR) and how it will adversely affect Topanga—the greatest of which is traffic. Specifically, the serious omission of studying the impact of traffic on Topanga Canyon Boulevard from Woodland Hills ("the Valley") to Pacific Coast Highway ("PCH") will have serious harmful consequences. The EIR for the Westfield Development inexplicably neglects to address this key transit corridor in Topanga Canyon. We draw your attention to the following facts, observations and likely occurrences:

**Response to Comment No. 240-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 240-2**

1. The massive Westfield development will increase daily traffic on Topanga Canyon Blvd ("TCB") by many thousands of cars, especially during peak hours. In 2008, a traffic study showed that over 18,000 cars per day traverse our canyon road. Traffic has increased over the years due to past valley and westside development and from phone traffic apps redirecting commuters from congested freeway systems.

2. Countless studies have shown that traffic violations increase in direct correlation to the number of cars on the road. CHP's monthly reports to the Topanga Town Council indicate the primary collision factors are from unsafe turning (22107 VC) and unsafe speed (22350). Inevitably these infractions will increase in number putting more people in jeopardy.
3. The proposed 15,000 seat arena, in particular, will draw people to and from the west side, not only increasing the number of cars on the road, but likely introducing many drivers under the influence (alcohol and cannabis) who will be navigating an unfamiliar, winding road as they return home from valley events.
4. The more cars on the road creates a greater likelihood of a wildfire caused by the spark from a hot engine coming into contact with dry brush or cigarettes being thrown out vehicle windows. Cal Fire statistics indicate that more than 300 wildfires between 2011 and 2016 were caused by these factors. As we all know, it only takes ONE wildfire to wipe out a town.

### **Response to Comment No. 240-2**

It is unclear which traffic study from 2008 references "over 18,000 cars per day traverse our canyon road." A review of 2008 Caltrans traffic volume data (accessed from <http://www.dot.ca.gov/trafficops/census/>) indicates that approximately 16,500 daily vehicles travelled along Topanga Canyon Boulevard, south of Mulholland Drive; this is lower than the volume identified in the comment. Review of Caltrans traffic volume data from 2016 (the most recent available data) indicates a total daily volume of approximately 14,700 daily vehicles along Topanga Canyon Boulevard, south of Mulholland Drive. This represents a general decline in traffic volume through this portion of Topanga Canyon Boulevard.

The Traffic Study analyzed a Study Area which included 49 intersections with the greatest potential to experience significant traffic impacts due to the Project. This Study Area was developed in consultation with both LADOT and Caltrans. Intersections at the periphery of the Project's Study Area were determined not to have significant impacts as a result of the addition of Project traffic. Therefore, the intersections beyond the Study Area would not experience significant impacts, given that Project traffic dissipates farther from the Project Site, and as such, the intersections within the community of Topanga would not be significantly impacted by the Project.

To identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the

significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

Refer to Topical Response No. 3, Traffic and Parking, above, for a summary of the Project's traffic analysis and impacts. Refer to Topical Response No. 2, Entertainment and Sports Center, for a summary of the traffic analysis associated with the Entertainment and Sports Center. In addition, as discussed in Topical Response No. 2, Entertainment and Sports Center, the Project would include crowd management and control through implementation of Project Design Features J-1 through J.1-5, as provided in Section IV.J.1, Public Services—Police Protection, of the Draft Supplemental EIR. The remainder of this comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

With regard to fire risks, as discussed in the Initial Study provided in Appendix A, of the Draft Supplemental EIR, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.<sup>86</sup> The nearest City-designated Very High Fire Hazard Severity Zone is located approximately 0.8 mile south of the Project Site, across US-101. Therefore, the Project would not subject people or structures to a significant risk of loss.

### **Comment No. 240-3**

Other important concerns of the impact to Topanga of a massive adjacent development:

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<sup>86</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed August 2, 2016. The VHFHSZ was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

1. Topangans are extremely aware of the high fire risk of living and working in the canyon and take great precautions to protect our families, businesses, homes and environment. Increased traffic congestion will only further inhibit timely emergency response, both for the evacuation of residents and businesses and the accessibility of emergency responders. People unfamiliar with Topanga and who lack an understanding of its inherent dangers can become a real threat to the safety of our community.
2. Topanga has one main artery of ingress and egress that when congested, especially during peak hours, severely inhibits residents and patrons from safely entering the boulevard. With current traffic, it frequently takes five minutes or more to access TCB from side neighborhood streets, not to mention the additional travel time.
3. The increased traffic as a result of the development, especially the 15,000-seat arena, will willfully generate harmful air and sound pollution—contradicting Los Angeles County's commitment to clean air and a healthy environment.
4. More traffic leads to more trash which then results to many hazards: a) animals eat debris and get entangled, b) trash pollutes the creek thus creating clogged drains and pollution at the beach, c) creates a toxic environment for the animals, d) defaces our state sanctioned Scenic Highway 27.
5. Topanga has no wildlife crossing like that which is being constructed over the 101 freeway. Our wildlife must traverse Topanga Canyon Boulevard as part of their natural habitat. More cars equal greater risk of injury and death.
6. We concur with Topanga Association for a Scenic Community (TASC) regarding their evaluation of the SEIR.

### **Response to Comment No. 240-3**

Refer to Sections IV.B, Air Quality; IV.E, Hazards and Hazardous Materials; IV.H, Noise; IV.J.2, Public Services—Fire Protection; and IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, regarding air quality, emergency access, fire risk, and traffic. The Project will not result in any significant impacts to the Topanga community. Refer to Response to Comment No. 240-2 with regard to fire risks. Also refer to Topical Response No. 2, Entertainment and Sports Center, for a summary of the noise analysis conducted for the Entertainment and Sports Center. With regard to the commenter's statements that more traffic leads to more trash, this is not related to the analysis of the Draft Supplemental EIR. However, as required by Warner Center Plan Mitigation Measure AES-2, every building, structure, or portion thereof, would be maintained in a safe and sanitary conditions and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation, or other similar material. In addition, with regard to the commenter's concerns regarding wildlife, as discussed further in the Initial Study, provided in Appendix A, of the Draft Supplemental EIR, the Project Site is located in an urbanized area and is currently developed with the existing Shopping Center. The areas surrounding the Project Site are

also fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

#### **Comment No. 240-4**

In conclusion, The Topanga Town Council respectfully requests the following:

- Provide a detailed traffic study that includes data on the potential and probable impact on Topanga Canyon Boulevard from Ventura Blvd to PCH.
- Eliminating or relocating the arena to reduce traffic on TCB to PCH. If this is not an option, the developers should significantly reduce the arena capacity to under 500 occupants and devise a way to block or divert traffic from using TCB as a pass-through.
- After an event, traffic should be directed to side streets using timed signals, and traffic officers should steer cars away from using TCB as a means to access PCH.
- Encouraging bus or train service to reduce the number of cars through Topanga Canyon.

#### **Response to Comment No. 240-4**

Refer to Topical Response No. 3, Traffic and Parking, above for a discussion regarding the Project's impact analysis, which was reviewed and approved by LADOT. The analyzed Study Area included 49 intersections with the greatest potential to experience significant traffic impacts due to the Project; this Study Area was developed in consultation with both LADOT and Caltrans. Intersections at the periphery of the Project's Study Area were determined not to have significant impacts as a result of the addition of Project traffic, with implementation of the Warner Center mitigation measures and project design features. Therefore, the intersections beyond the Study Area would not experience significant impacts, given that Project traffic dissipates farther from the Project Site, and as such, the intersections within the community of Topanga would not be significantly impacted by the Project.

Also discussed in Topical Response No. 3, Traffic and Parking, is Project Design Feature K-6, which is the implementation of an Event Management Plan (EMP). The EMP will include coordination with Metro on the timing of transit service to the Project Site before

and after events, and would include traffic control officers. The EMP is intended to be an evolving document subject to modification over time in coordination, and consultation with, LADOT and Caltrans, in order to respond to changes in traffic patterns and mobility/parking technologies that may alter the travel to and attendance of events at the Entertainment and Sports Center. The measures described in the EMP would be implemented in accordance with a tiered operational plan that is based on attendance.

Section 7.8 of the Warner Center Plan describes the TDM requirements for all new development within Warner Center. Further, Appendix D, of the Warner Center Plan, identifies that a portion of the Warner Center Mobility Fee is designated for TDM implementation. The Project would implement Project Design Feature K-7, which is the development of a Project level TDM plan, and Mitigation Measure K-2, which is the payment of the Warner Center Mobility Fee. TDM elements, which promote non-automobile travel and reduce the use of single-occupant vehicles, would be incorporated into the Project.

#### **Comment No. 240-5**

- Permanently increasing the number of CHP officers to manage the traffic, potential violations, and noise levels in our canyon.

#### **Response to Comment No. 240-5**

Refer to Topical Response No. 2, the Entertainment and Sports Center, regarding the traffic and noise impacts from the Project associated with the Entertainment and Sports Center. As discussed therein, Project-level and cumulative impacts with regard to on-site sources of operational noise would be less than significant. Additionally, as discussed in the Draft Supplemental EIR (see page IV.H-12 in Section IV.H, Noise, of the Draft Supplemental EIR), the noise sensitive receptors were selected based on relative distant to the Project Site (i.e., nearest) and representative of the noise-sensitive use in that direction. Specifically, noise receptor location R3 was selected to represent the noise sensitive uses southwest of the Project Site, including the canyon areas to the south of the Project Site. As analyzed in the Draft Supplemental EIR, traffic noise impacts associated with departing events would result in less than significant impacts along roadway segments surrounding the canyon community including; Oxnard Street (between Shoup Avenue and Topanga Canyon Boulevard), Topanga Canyon Boulevard (between Oxnard Street and Burbank Boulevard), Burbank Boulevard (between Shoup Avenue and Topanga Canyon Boulevard), and Shoup Avenue (between Oxnard Street and Burbank Boulevard). Therefore, traffic related noise impacts associated with departing events would be less than significant in the canyon referenced.



**Comment No. 240-6**

The Town Council and the entire Topanga community appreciates your attention in this matter and your help in preserving our treasured mountain lifestyle.

**Response to Comment No. 240-6**

This concluding comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 241**

Sandra Berube  
4409 Vanalden Ave.  
Tarzana, CA 91356-5521

**Comment No. 241-1**

1. where [sic] are the cars going to be for the 15,000 seat 'stadium'? the [sic] streets are crowded as it is [sic]
2. will [sic] there be any opportunity to make revisions for the project re: parking and density?

**Response to Comment No. 241-1**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the Project traffic impact analysis and proposed mitigation measures that were reviewed and approved by LADOT. Refer to Topical Response No. 2, Entertainment and Sports Center, and Topical Response No. 3, Traffic and Parking, above, which provides a discussion of the Project's proposed shared parking which is consistent with the Warner Center Plan guiding principles to: "Provide a comprehensive parking strategy that limits the over-production of parking and encourages both existing and proposed parking to be shared amongst many developments (Section 2—Purpose)." Further detail is provided about Project Design Feature K-6, which is the development of an Event Management Plan.

The Project is subject to public input and public hearings, where the Project's discretionary approvals will be considered by the decision-makers. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 241-2**

3. why [sic] not have **future hearings in the Promenade Mall itself?** It's largely available and there's great parking!

A lot more Valley concerned citizens *would be able to attend...*

I hope my comments make it in time...

p.s. [sic] I have attended meetings and workshops about the plans for the Promenade...

**Response to Comment No. 241-2**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the existing Promenade Mall is currently closed for security reasons. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 241-3**

thank [sic] you for your prompt reply [sic]

my [sic] mailing address:

Sandra Berube  
4409 Vanalden Avenue  
Tarzana CA 91356

I look forward to receiving future notifications...

**Response to Comment No. 241-3**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 242**

Debra S. Grether  
dshiergrether@gmail.com

**Comment No. 242-1**

I am writing to express my concern about the above mentioned project. As a homeowner in Topanga for the last 19 years, I have seen traffic increase substantially.

**Response to Comment No. 242-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 242-2**

The impact of the proposed project on Topanga Canyon Blvd and it's [sic] residents has not been sufficiently evaluated. The traffic on Topanga Canyon Blvd is already bumper to bumper during commute hours. Thus, a project of this size and location will further tax an already busy commute route.

**Response to Comment No. 242-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the impacts associated with the addition of full Project traffic to each analyzed study intersection. As discussed above, impacts are anticipated to be less than significant with the full implementation of the Warner Center Mitigation Program and Project specific project design features. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation

Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking, for further details regarding the Warner Center Plan Implementation Board.

Estimates of the number of trips generated and the methodologies and assumptions for the arrival of the project trips are also summarized in Topical Response No. 3, Traffic and Parking. The scope of analysis of the Traffic Study was developed in consultation with LADOT staff, which reviewed and approved the Traffic Study; a copy of the Traffic Study and LADOT's assessment letter is provided in Appendix M, of the Draft Supplemental EIR.

**Comment No. 242-3**

I strongly oppose the proposed project.

**Response to Comment No. 242-3**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 243**

Paula Hayes  
6532 Penfield Ave.  
Woodland Hills, CA 91367-2733

**Comment No. 243-1**

My first question is WHY? And secondly, do those who think it is wonderful live nearby?

**Response to Comment No. 243-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 243-2**

This project would change the whole nature of the West Valley., [sic] all for the worst. We already have lines to exit the freeway that occur at any hour of the day, especially at Canoga and Topanga. Today, July 18 for example, there was a line at Canoga at 11:30AM. [sic]

Our quality of life will be totally diminished due to excessive traffic and noise. The traffic has already increased greatly in the last couple years due to the many new apartments that have been built in the general area surrounding the proposed project.

**Response to Comment No. 243-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for a discussion regarding the impacts associated with the addition of full Project traffic to each analyzed study intersection. As discussed above, impacts are anticipated to be less than significant with the full implementation of the Warner Center Mitigation Program and Project specific project design features. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

Estimates of the number of trips generated and the methodologies and assumptions for the arrival of the project trips are also summarized in Topical Response No. 3, Traffic and Parking. The scope of analysis of the Traffic Study was developed in consultation with LADOT staff, which reviewed and approved the Traffic Study; a copy of the Traffic Study and LADOT's assessment letter is provided in Appendix M, of the Draft Supplemental EIR.

A supplemental analysis of potential impacts to state facilities (freeways) was prepared based on Caltrans guidelines and is provided in Appendix M, of the Draft Supplemental EIR. As identified in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR, the Caltrans facilities analysis evaluated the Project's potential impacts on 11 freeway mainline segments; five off-ramps along US-101 were also evaluated to determine whether the length of the ramps was sufficient to accommodate vehicle queue lengths. It is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments.

To identify the Project's contribution toward the cumulative effects of traffic growth on the state transportation network (freeway mainline and off-ramps), a proportionate share calculation was prepared based on Appendix B of the Caltrans TIS Guidelines, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft Supplemental EIR. As indicated, a project's proportionate share is calculated by dividing the project traffic growth by the total traffic growth from existing to future conditions. Further, it is important to note that Caltrans does not have or identify significance thresholds under CEQA to measure the significance of Project effects on freeway mainline segments. Nevertheless, a supplemental analysis of the Project's impacts prepared to the requirements of Caltrans, is provided in Appendix M, of the Draft Supplemental EIR.

The proportionate share was prepared for each anticipated phase of the Project and will be utilized to identify the Project's financial contribution toward the future implementation of a transportation improvement project to be selected by Caltrans. The proportionate share recognizes that the Project may not necessarily cause immediate impacts to the freeway network, but may contribute to the overall effects of cumulative traffic; this is calculated as the Project's percentage of the total projected traffic growth on a freeway mainline segment (up to year 2035, consistent with Caltrans analysis requirements). The proportionate share is ultimately applied to the cost estimate of a local improvement project, to be identified by Caltrans; this will be used to determine the financial contribution that Caltrans will request of the Project. Upon collection of the proportionate share, Caltrans will determine the availability of funding to implement the improvement project.

As discussed further in the Caltrans Analysis, the average proportionate share of mainline freeway growth is 2.51 percent without an ESC event in 2035; the corresponding

proportionate share with a sold-out ESC event is 5.20 percent in 2035. The Applicant would contribute a proportionate share toward improvements that Caltrans identifies for the freeway mainline and off-ramps to mitigate cumulative impacts to the state transportation network.

With regard to potential noise impacts of the Project, please refer to Section IV.H, Noise, of the Draft Supplemental EIR.

The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 243-3**

A 15,000 seat stadium—NOT DESIRABLE IN THIS LOCATION !!!! It will totally clog the streets when in use. We do not need it here!

**Response to Comment No. 243-3**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 243-4**

And where will the water come from? (See “On the Brink” documentary if you have not seen it). [sic]

**Response to Comment No. 243-4**

Refer to Topical Response No. 6, Infrastructure, above, for a discussion regarding the ability of the water infrastructure system and LADWP to accommodate the Project.

**Comment No. 243-5**

The people housed in the area will have at least one car per family. More trouble!!

This is NOT why we live in the valley (Woodland Hills) or what we expected, or want to see happen here.. [sic]

Please rethink this project!! It is not good for any of the current residents!



**Response to Comment No. 243-5**

Refer to Topical Response No. 3, Traffic and Parking, regarding the traffic and parking associated with the Project. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 244**

Corinne Ho  
corinnemho@gmail.com

**Comment No. 244-1**

Please find attached my comments.

Thank you [sic]

My name is Corinne Ho. I live in Canoga Park and for identification purposes only, I am the Immediate Past President of the Canoga Park Neighborhood Council for the past five (5 years) and now a Board member. The feedback provided in this email reflect my own and is based on the many conversations I had with the Canoga Park stakeholders. These feedbacks do not reflect those of our Neighborhood Council.

The residents in Canoga Park are excited that in addition to the Westfield Topanga and the Village, we will have the Promenade 2035 that will create tremendous job opportunities in the area and I think that the idea to have newness in everything is always appealing to most.

**Response to Comment No. 244-1**

This introductory comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft Supplemental EIR are provided and responded to below.

**Comment No. 244-2**

There are however concerns with the proposed project. As anyone would predict, the number 1 concern is traffic. We know that Westfield will take measures to mitigate the traffic generated by the overall proposed project and the stadium with a 15,000 seating. It would be very helpful for the community to hear specifics about how this will be done.

**Response to Comment No. 244-2**

Refer to Topical Response No. 3, Traffic and Parking for a discussion of the Project traffic impact analysis, the Warner Center mitigation process, and Project Design Feature K-6 which is the implementation of an Event Management Plan (EMP). The Project will implement a number of street improvements adjacent to the Project Site, and pay Mobility

Fees to DOT to implement mitigation measures elsewhere in Warner Center. The Project will also implement a detailed EMP, to be approved by LADOT, which includes a number of measures to mitigate traffic impacts before and after events at the Entertainment and Sports Center, including the use of traffic control officers (based on the EMP, for events exceeding 10,000 attendees); coordination with Metro on transit service during events; and coordination with the citywide Traffic Management Center to facilitate the real-time monitoring of event traffic conditions along with real-time adjustments to traffic control equipment, including allowing adjustments to signal timing and synchronization. The EMP is intended to be an evolving document subject to modification over time in coordination and consultation with LADOT and Caltrans, in order to respond to changes in traffic patterns and mobility/parking technologies that may alter the travel to and attendance of events at the Entertainment and Sports Center. The measures described in the EMP would be implemented in accordance with a tiered operational plan that is based on attendance.

**Comment No. 244-3**

The community at large has indicated that they would like to see traffic studies including the concurrent projects that are happening in the Warner Center area.

**Response to Comment No. 244-3**

Refer to Topical Response No. 3, Traffic and Parking for a discussion regarding the methodology of the Project traffic impact analysis, which analyzed the Project along with full build out of the Warner Center Plan (including the anticipated cumulative growth both inside and outside of Warner Center).

**Comment No. 244-4**

There is an anticipation that new families are going to move into the residential units. The surrounding elementary schools could not support the influx of new families. Apart from paying the building permit to LAUSD, the community would like to see a concrete plan about how to accommodate the new enrollees coming into the area.

**Response to Comment No. 244-4**

As discussed in Section IV.J.3, Public Services—Schools, of the Draft Supplemental EIR, SB 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, LAUSD collects development fees for new construction within its district boundaries. Pursuant to California Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less-than-significant levels. As such, with payment of the

development fees set forth by LAUSD, potential impacts of the Project on school facilities would be less than significant. The comments regarding a concrete plan about how to accommodate the new students are outside of the purview of CEQA but are noted for the record and have been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 244-5**

Lastly, as indicated in Page I-115, the propose [sic] project would increase the police service population from 196,840 persons to 218,634 persons. The community would like to see a considerable increase in the number of police officers/units assigned to the Promenade 2035. There is currently one Senior Lead Officer serving the Topanga Mall, the Village and the residents within the Warner Center. The community would like to see more officers assigned to the Promenade 2035 project.

**Response to Comment No. 244-5**

Refer to Topical Response No. 5, Public Services, for a discussion regarding the Project's impacts to police protection and the project design features and mitigation measures that would be implemented to reduce the Project's impacts to police services. As discussed therein, the Project would provide private security on-site for the Entertainment and Sports Center and Project as a whole, and would be required to implement a security plan developed in coordination with LAPD and LAFD, as well as develop an Emergency Response Plan.

**Comment Letter No. 245**

Charlene Hopey  
1226 Old Topanga Canyon Rd.  
Topanga, CA 90290-3826

**Comment No. 245-1**

Really not a good idea.

People sit on Topanga Canyon in the morning for an hour+ what should take 10–15 minutes—for [sic] their morning commute.

And longer on PCH at times. Prices a little cheaper will be for those mostly commuting to westside, downtown, BH, etc. and some to hollywood [sic] area.

Then we have the 405 in the morning, evening and whenever.

Old Topanga Can. is already compromised with Calabasas speeders.

People who can afford this will mostly be commuters.

Develop wisely—this is not wise—and developers are foreigners—not a clue about traffic—and probably don't care.

You're messing with quality of life—first in Topanga with more noise and air pollution that the mountains hold in to the canyons.

Then in the valley, I do not even continue thru the valley on Topanga Canyon anymore because of delays at certain intersection—I switch to Canoga, which has it's [sic] many issues—talk about speeding!

Cops don't catch many of them—so many!!!. [sic]

And then with PCH, ocean recreation. westside [sic] traffic.

LA Traffic is already causing people to relocate—what are you thinking with over committing all the canyons, especially Topanga, the 101, 405, 10 [sic] to more commuters, let alone just living here. You will start losing industry because no one wants to live here—oh wait—that's already happening.

Plus traffic not conducive for all vacationers the economy depends on either!

**Response to Comment No. 245-1**

Refer to Topical Response No. 3, Traffic and Parking, for a discussion regarding the Project's impacts to traffic during construction and operation of the Project as well as the proposed project design features and mitigation measures that would address impacts to traffic. In addition, the Project would not result in significant localized air quality or noise impacts to the Topanga community. Refer to Sections IV.B, Air Quality, and IV.H, Noise, of the Draft Supplemental EIR. The comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 245-2**

Resending to add my address:  
Charlene Hopey  
1226 Old Topanga Cyn Rd.  
Topanga, CA 90290

**Response to Comment No. 245-2**

The commenter has been added to the Project's mailing list and will receive future environmental and public hearing notices related to the Project.

**Comment Letter No. 246**

Nicole Jacks  
19700 Arundel Pl.  
Woodland Hills, CA 91364-3603

**Comment No. 246-1**

My Name is Nicole Jacks and I live at 19700 Arundel Place Woodland Hills, CA 91364.

I am opposed to this project. It is not beneficial to this community. We do not need this overdevelopment project. I have been a resident of Woodland Hills since December 22, 1998. The appeal of this community was its open spaces. It is a shame and very depressing to see what is becoming of this community and we residents have little power or control.

Please do not let this happen.

**Response to Comment No. 246-1**

This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, this comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 247**

Donald Kreuzberger  
kreuzon@sbcglobal.net

**Comment No. 247-1**

Just because something CAN BE DONE does NOT mean it SHOULD BE DONE. Especially when it sneaks around the Backside of responsible community growth standards. The fact that our Sacramento “representatives” have found a shady way forward to exempt themselves from responsible planning (Senate Bill 743, tacked on to the California Environmental Quality Act, doesn’t mean OUR local representatives should USE IT AGAINST US.

**Response to Comment No. 247-1**

Senate Bill (“SB”) 743 was adopted to encourage in-fill development, which reduces vehicle miles travelled and associated air quality and greenhouse gas impacts. As discussed in detail in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft Supplemental EIR, Public Resources Code Section 21099 provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” As the Project qualifies under SB 743, the Project’s aesthetic and parking impacts shall not be considered a significant impact on the environment. Nonetheless, the Draft Supplemental EIR fully analyzed both environmental areas. Also refer to Topical Response No. 1, Warner Center 2035 Specific Plan, for a discussion of the Project’s consistency with the Warner Center Plan.

**Comment No. 247-2**

If someone finds a diamond ring on the ground, with no one around to witness it, ought the finder pocket the jewelry as if it now belongs to him/her? We are not in grade school. Finders-keepers doesn’t play in a world where some person has lost something of immense value. As a member of a community we have a minimum responsibility to behave as we would hope others would in finding OUR belongings.

If someone finds a legal loop-hole which bypasses the will of constituents, ought they use it [sic]

I am a resident living within the area certain to be negatively impacted by the proposed “Warner Center 2035 / Promenade 2035” Plan.



I was all for them moving my Costco closer to me (from Roscoe and Canoga to Victory and Owensmouth.) I've done about 90% of my food and sundry shopping with that company for over fifteen years.

**Response to Comment No. 247-2**

The Project is not requesting any variances or exceptions to the land uses permitted under the Warner Center Plan for the Project Site; refer to Topical Response No. 1, Warner Center 2035 Specific Plan, for a discussion of the Project's consistency with the Warner Center Plan. This comment does not raise an issue specific to the Draft Supplemental EIR and the environmental impacts addressed therein. However, the comment is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 248**

Paul Lawler  
19811 Henshaw St.  
Woodland Hills, CA 91364-2604

**Comment No. 248-1**

I am writing to you as a Business owner and Resident of the Woodland Hills since 1976 to make clear my full support for Westfield's Promenade 2035 project.

I researched the Draft Environmental Impact Report and found no reason why this project should be delayed but plenty of reasons why it should be allowed to go forward.

I believe the Promenade 2035 project embodies many of the key elements, goals, and vision for Warner Center. From the economic benefits of construction to new employment opportunities, the project has the potential to generate thousands of jobs and new revenues for the city.

Westfield's investment will bring major improvements to the area by creating a hub for creative offices, entertainment, and leisure activities.

In addition, the Westfield project will create 1,400 new residential units, helping to meet the city's growing demand for housing.

Promenade 2035 according to what I read, goes farther than anything I've seen proposed to date to meet the spirit as well as the intent of the Warner Center Specific Plan. For these reason and more I wholeheartedly support the Promenade 2035 Plan as contained in Westfield's DEIR.

I have been a resident and business owner in Woodland Hills since 1976.

I am in full support of the Westfield project as presented in the EIR for Warner center [sic]

It is very comprehensive and informative.

We need this project to move forward as soon as possible.

**Response to Comment No. 248-1**

This comment indicating support is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment Letter No. 249**

Carol Riel  
calyteri@gmail.com

**Comment No. 249-1**

As a Topanga resident, I am deeply concerned about the fire evacuation concern that the Westfield development will cause. Major fires in Topanga are not a matter of if but when. Any extra traffic both in the canyon and the roadways at the base of the mountain are extremely dangerous for all needing to evacuate. If Westfield continues with this monstrosity, I for one will never step foot on their development.

**Response to Comment No. 249-1**

As discussed in Topical Response No. 3, Traffic and Parking, the Project's traffic impacts would be less than significant with the addition of full Project traffic to each analyzed study intersection and the full implementation of the Warner Center Mitigation Program and Project specific project design features. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking, for further details regarding the Warner Center Plan Implementation Board.

Also refer Section IV.E, Hazards and Hazardous Materials, and Section IV.J-2, Fire Protection, of the Draft Supplemental EIR, regarding the Project's less than significant impacts associated with emergency access.

**Comment Letter No. 250**

Terri Starrett  
tstarr06@sbcglobal.net

**Comment No. 250-1**

I would like to go on record as OPPOSING the “Promenade 2035 Project “, [sic] the massive urban village planned for Warner Center area of Woodland hills. [sic]

**Response to Comment No. 250-1**

This comment expressing opposition to the Project is noted for the record and has been incorporated into the Final Supplemental EIR for review and consideration by the decision-makers prior to any action on the Project.

**Comment No. 250-2**

The traffic congestion caused by all the influx of Residential units, office space, restaurant, hotel sports center is going to be absolutely ridiculous... and no more additional roads or freeway onramps/offramps to handle this mess...

It is already getting more and more congested with the “Village” addition on Topanga Canyon. The Traffic Movement is already rated an “F” . [sic]

I live in Woodland hills [sic] because I don’t want to live in the awful traffic congestion on the West side caused by too much development.

**Response to Comment No. 250-2**

Refer to Topical Response No. 3, Traffic and Parking, above, regarding how the Project’s traffic impacts will be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. The traffic analysis assumes full buildout under the Warner Center Plan. In addition, as discussed further in Topical Response No. 3, Traffic and Parking, above, impacts for operation of Phases 1–3 (interim) conditions would also be less than significant with full implementation of the Warner Center Mitigation Program and Project specific project design features. However, in the event that the Warner Center Mitigation Program is not implemented by operation of Phases 1–3, then Project-level and cumulative significant impacts would remain until implementation of those improvements.

To ensure that the Warner Center Mitigation Program is implemented on a timely basis, Section 10 of the Warner Center Plan requires the creation of the Warner Center Plan Implementation Board for implementing the Warner Center Plan. In June 2018, the City Council approved Ordinance No. 185618 (effective July 30, 2018) implementing the Warner Center Plan Implementation Board, and the Warner Center Plan Implementation Board's first meeting was in November 2018. It is anticipated that with the oversight and coordination facilitated by the Warner Center Plan Implementation Board and the Council Office, the implementation of the Warner Center Mitigation Program, including those mitigation measures associated with the Project, should be accelerated. Refer to Topical Response No. 3, Traffic and Parking, for further details regarding the Warner Center Plan Implementation Board.

**Comment No. 250-3**

Where was the Public meetings where this project was explained to the public and the public got to voice their opposition, views or concerns ???

**Response to Comment No. 250-3**

As part of the CEQA process, a Scoping Meeting was held for the Project on November 29, 2016. Future public hearings will also be held as part of the entitlement process with the City of Los Angeles after completion of this Final Supplemental EIR. As part of the public hearing process, public notices will be published for future public hearings and the commenter will be added to the mailing list for these notices.

**Comment Letter No. 251**

Susan Stearns  
Berkshire Hathaway California Properties  
23925 Park Sorrento  
Calabasas, CA 91302-4010

**Comment No. 251-1**

I am writing you to express my opposition to this proposed plan... specifically, the 15,000 seat stadium. This proposed 15,000 seat stadium is terribly out of place for this residential area. To the west of this proposed stadium are 220 homeowners in the Fountain Park community, and hundreds more just to the south. These communities are residential, not hotels or apartments. These are established homeowners within the established neighborhoods, not transients.

**Response to Comment No. 251-1**

Refer to Topical Response No. 2, Entertainment and Sports Center, above, which provides a discussion regarding the entertainment uses encouraged by the Warner Center Plan as well as a summary of the environmental impacts of the Entertainment and Sports Center. Refer to Topical Response No. 1, Warner Center 2035 Specific Plan, for a discussion of the Project's consistency with the Warner Center Plan.

**Comment No. 251-2**

Not only is this a disruption of the Woodland Hills community, but the traffic of all the cars, the quality of air being destroyed by the exhaust pollution is swill [sic] be added to with [sic] the apartment buildings and hotels being planned within the space.

Westfield stated at one Woodland Hills Homeowners association meeting [sic] had done a sound study and had [sic]

**Response to Comment No. 251-2**

Refer to Topical Response No. 3, Traffic and Parking, above, for a summary of the Project's impacts related to traffic during construction and operation of the Project as well as the project design features and mitigation measures that would be implemented by the Project to reduce these impacts. With regard to air quality, localized air quality impacts from vehicular traffic were addressed on page IV.B-46 of Section IV.B, Air Quality, of the Draft Supplemental EIR. As described therein, impacts related to localized mobile-source emissions would be less than significant.

Refer to Topical Response No. 2, the Entertainment and Sports Center, regarding the sound study and noise analyses conducted for the Entertainment and Sports Center.