

FINAL
ENVIRONMENTAL IMPACT REPORT

METROPOLITAN
TRANSPORTATION AUTHORITY
WEST LOS ANGELES
TRANSPORTATION FACILITY
AND
SUNSET AVENUE PROJECT
VENICE

(ENV 2004-1407-EIR)
(SCH No. 2003121036)
(SCH No. 2004031139)

FEBRUARY 2005



Metro

One Gateway Plaza
Los Angeles, CA 90012-2952



City of Los Angeles

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
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FINAL ENVIRONMENTAL IMPACT REPORT

WEST ADAMS-BALDWIN-LEIMERT COMMUNITY PLAN AREA

VENICE COMMUNITY PLAN AREA

Metropolitan Transportation Authority West Los Angeles Transportation Facility and Sunset Avenue Project

ENV-2004-1407-EIR

State Clearinghouse No. 2003121036/2004031139

Council District 10 / Council District 11

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

Project Address: 3475 South La Cienega Boulevard, Los Angeles, CA
100 East Sunset Avenue, Venice, CA

Project Description: (Metropolitan Transportation Authority West Los Angeles Transportation Facility) The proposed project consists of a state-of-the-art transportation facility from which to operate a fleet of up to 175 Compressed Natural Gas (CNG) powered buses and to provide improved public transit service in the central and western areas of Los Angeles County. Relocation of existing operations at Division 6 in Venice to this location would allow Metro to expand service from a more centralized location in response to growing ridership. Development of the transportation facility on the 4.66-acre site would provide Metro with expanded maintenance and administrative facilities, CNG fueling facilities, and bus and employee parking. The project would include approximately 53,120 square feet in a primary administration/maintenance building and approximately 18,800 square feet of auxiliary facilities.

(Sunset Avenue Project) The proposed project would replace the vacated Division 6 operation with a mix of residential and commercial uses supported by two levels of subterranean parking. Residential uses would occupy several individual structures that would each contain a varying number of dwelling units. Open areas between the individual structures would allow for communal walkways, common space for recreation or garden areas, water features, and landscaping. A maximum of 225 units would be constructed, with a total residential floor area of approximately 270,000 square feet. Residential structures that face Main Street and Pacific Avenue are proposed with building heights that would not exceed 35 feet, while structures in the center of the site and those facing Sunset Avenue and Thornton Place are proposed to be approximately 35 to 56 feet in height. Commercial uses include approximately 10,000 square feet of floor area in a ground floor setting facing Main Street. Commercial and retail space would be occupied by café, retail, and health club uses.

APPLICANTS:

Metropolitan Transportation Authority

RAD/Jefferson LLC

PREPARED BY:

Metropolitan Transportation Authority

**Los Angeles City Planning Department
Environmental Review Section**

February 2005

ENV-2004-1407-EIR

SCH Nos.: 2003121036 and 2004031139

PROJECT NAME: Metropolitan Transportation Authority West Los Angeles Transportation Facility and Sunset Avenue Project, Venice

RECOMMENDATION FOR ENVIRONMENTAL IMPACT REPORT CERTIFICATION

Pursuant to California Code of Regulations, Title 14, Section 15090, this Environmental Impact Report (EIR) has been completed in compliance with the California Environmental Quality Act and current State and City Guidelines and reflects the lead agencies independent judgment and analysis. Based on the information available, the Final EIR may be accepted and considered prior to making a final decision on the project. The decision-making bodies must certify that they have reviewed and considered the information contained in this EIR prior to making such decision.

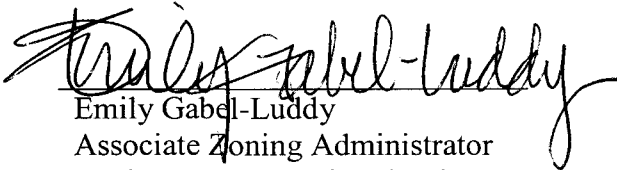
Submitted by:

Metropolitan Transportation Authority

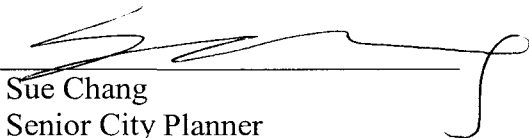


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Project Manager – Facilities
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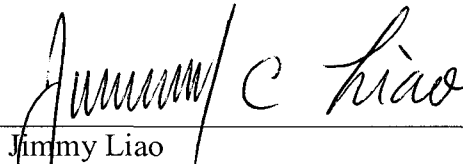
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I. SUMMARY

I. SUMMARY

This Final EIR has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA) with respect to the proposed Metropolitan Transportation Authority West Los Angeles Transportation Facility and the Sunset Avenue Project.

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

This Final EIR is intended to be a companion to the October 2004 Draft EIR, which is incorporated by reference and bound separately. (Refer to Volumes I through IV of the Draft EIR). This Final EIR is organized into four sections:

Section I, Summary—This section provides an overview and background of the proposed projects and their impacts.

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

Section III, Responses to Written Comments—This section presents a list of the parties that commented on the Draft EIR during the 60-day public review period, with cross-references to the general environmental topics addressed. This table is followed by each comment within the comment letter with a corresponding response.

Section IV, Mitigation Monitoring and Reporting Program (MMRP)—This section provides the full MMRP for the projects. The MMRP lists all of the proposed mitigation measures, by environmental topic, and identifies for each of the measures, the enforcement agency, the monitoring agency, the monitoring phase, the monitoring frequency, and the action indicating compliance.

Appendix A, Original Comment Letters—This Appendix includes comments letters in the form as they were submitted.

A. PROPOSED PROJECT

This EIR has been prepared to address the environmental impacts of both the West Los Angeles Transportation Facility and the Sunset Avenue projects. This decision between Metro and the City of Los Angeles has been made since proposed development of each site is related to the other site. Specifically, while approval decisions regarding the two projects are not necessarily tied together, both projects are related to a relocation of the existing Division 6 transportation facility currently located at the Sunset Avenue site. Upon completion of the West Los Angeles Transportation Facility, a new, larger, state-of-the-art facility for Compressed Natural Gas (CNG) buses proposed along Jefferson Boulevard, Metro has committed to relocate all service lines, employees, and administrative functions performed out of the antiquated Division 6 property in Venice. Completion of the West Los Angeles Transportation Facility and removal of the existing Division 6 facilities would then result in the reasonably foreseeable development of the Sunset Avenue property. Thus, this EIR analyzes both the potential individual and combined impacts of the West Los Angeles Transportation Facility and the Sunset Avenue projects.

1. West Los Angeles Transportation Facility

The project consists of a state-of-the-art fleet transportation center from which to operate a fleet of up to 175 CNG-powered buses and provide improved public transit service in the central and western areas of Los Angeles County including large portions of the City of Los Angeles (including the communities of West Adams, Mid-City and South L.A., etc.) and the incorporated cities of Beverly Hills, Culver City, Malibu, Santa Monica, and West Hollywood. Relocation of existing operations at Division 6 in Venice to this location in the West Adams-Baldwin Hills-Leimert Community of the City of Los Angeles would allow the Los Angeles County Metropolitan Transportation Authority (Metro) to improve service from a more centralized location in response to growing ridership. Development of the transportation facility on the 4.66-acre site would provide Metro with new administration and maintenance facilities. These facilities would include approximately 53,120 square feet in a primary Administration/Maintenance building with up to 14 High-Bays (for bus maintenance, repair and inspection), as well as office, storage, shop and staff support uses. In addition, there would be several auxiliary facilities including a bus washing and fueling area (approximately 10,400 square feet), inspection bay (approximately 4,900 square feet), chassis wash area (approximately 1,700 square feet), facilities maintenance area (approximately 700 square feet) and trash/recycling area (approximately 1,100 square feet). The facility would also provide up to 175

surface level bus parking spaces and up to 240 employee parking spaces on a grade separated parking deck.

2. Sunset Avenue Project

The project site is in the Venice Community of the City of Los Angeles. Following the completion of Metro's new West Los Angeles Transportation Facility, the existing Division 6 facility which presently occupies the project site would be permanently vacated by Metro. The existing structures, consisting of approximately 15,300 square feet of floor area, would be removed and any contamination associated with the site's previous use remediated. A mixed-use development is proposed to replace the Division 6 facility, which would consist of a maximum of 225 residential condominiums in addition to approximately 10,000 square feet of retail space. The retail component is proposed in a ground floor setting to be occupied by café, retail, and health club uses. Included in the project, are two levels of subterranean parking that would provide approximately 676 parking spaces. Residential vehicular ingress and egress is proposed via Sunset Avenue. Business patrons and delivery vehicles would ingress and egress via Main Street.

B. OVERVIEW OF THE PLANNING CONTEXT

The Los Angeles County Metropolitan Transportation Agency (Metro), Lead Agency for the West Los Angeles Transportation Facility project, determined that an Environmental Impact Report (EIR) would be required to evaluate the potential impacts of the project. As a result of this determination, a Notice of Preparation (NOP) of an EIR was distributed for the West Los Angeles Transportation Facility in December 2003. In accordance with the California Environmental Quality Act (CEQA), the purpose of the NOP was to request and obtain input from interested and responsible public agencies and members of the public at large regarding the scope and content of the EIR. A Notice of a Public Scoping Meeting was included as part of the NOP. This scoping meeting, which was held by Metro to obtain additional input as to the scope and content of the EIR, was held on December 16, 2003. With public and agency input received in response to the NOP and during the scoping meeting, an Initial Study was prepared for the West Los Angeles Transportation Facility which identifies the scope of the issues to be addressed in the EIR and provides a demonstration as to why other issues not addressed in the EIR will not result in a significant impact to the environment. Both the NOP and Initial Study for the West Los Angeles Transportation Facility, as well as written comments received in response thereto, are provided in Appendix A (A1) to the Draft EIR.

The City of Los Angeles, as Co-Lead Agency for the Sunset Avenue Project with Metro, also determined that an EIR should be prepared for the Sunset Avenue Project, and thus,

distributed an NOP and Notice of Public Scoping Meeting in March 2004 relative to this project. The scoping meeting for the Sunset Avenue Project was held by the City of Los Angeles on April 7, 2004. As with the Transportation Facility, with public and agency input received in response to the NOP and during the scoping meeting, an Initial Study was completed for the Sunset Avenue Project. This document identifies the scope of the issues to be addressed in the EIR regarding this project and provides a demonstration as to why other issues not addressed in the EIR will not result in a significant impact to the environment. The NOP and Initial Study for the Sunset Avenue project are also provided in Appendix A (A2) to the Draft EIR.

While the various steps within the CEQA process leading to preparation of the Draft EIR were completed separately for the West Los Angeles Transportation Facility and Sunset Avenue projects, a single Draft EIR was prepared to address the environmental impacts of both projects. This decision between Metro and the City of Los Angeles was made based on Metro's ownership of the Sunset Avenue property, Metro's commitments to close down the Division 6 Bus Depot when and if the West Los Angeles Transportation Facility opens and to operate the new Transportation Facility thereafter, and, finally, the awareness that redevelopment of the Sunset property is reasonably foreseeable.

For both the Transportation Facility and Sunset Avenue sites, the Draft EIR includes an analysis of the following environmental issue areas: Aesthetics; Air Quality; Geology/Seismic Hazards; Hazardous Materials; Water Quality; Land Use; Noise; Transportation and Circulation; Parking; and Utilities, including Water and Wastewater. In addition, the Draft EIR includes an analysis of Historic Resources with regard to the Sunset Avenue Project and Water Quality with regard to the West Los Angeles Transportation Facility.

On October 21, 2004, the Draft EIR was circulated for a 45-day public review period, as required by CEQA. However, in response to requests received by the lead agencies, the public review period was extended to 60 days, ending on December 21, 2004. Copies of the original written comments received during this extended 60-day public review period are provided in Appendix A of this Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, Metro and the City of Los Angeles, as lead agencies, have reviewed all comments received during the review period for the Draft EIR. Each of these written comments has been responded to within Section III, Responses to Written Comments, of this Final EIR.

C. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

West Los Angeles Transportation Facility. Concern was expressed at the public meeting that this transportation facility may be inappropriate in the project locale and may

adversely effect residential uses in the surrounding area as a result of bus traffic and associated air pollution emissions and noise. These issues are thoroughly investigated in this Draft EIR.

Sunset Avenue Project. The existing Division 6 bus operations and maintenance facility on the project site has long been recognized as a land use that is increasingly incompatible with the historic as well as the emerging land use fabric of the surrounding Venice Community. Its departure is made possible by this project in conjunction with the West Los Angeles Transportation Facility. With the opportunity to imagine its absence, the public scoping meeting gave forum to the expression of other ongoing local planning issues such as traffic congestion, particularly during the summer beach season, density and a pervasive community-wide parking deficiency. Each of these issues is also thoroughly investigated in this Draft EIR.

D. ALTERNATIVES TO REDUCE OR AVOID SIGNIFICANT EFFECTS

Consistent with CEQA requirements, the Draft EIR evaluates a range of alternatives to determine their comparative merits, relative to project objectives and the avoidance of potentially significant impacts. The selection of the alternatives chosen for analysis responds to the unique situation of the two projects and the two development sites. Four alternatives were selected for each site, each of which includes a No Project/No Build alternative. These alternatives assume that the two sites would continue their current uses and conditions. One alternative for each site is based on land uses reasonably expected to occur in the foreseeable future. Reduced project alternatives for both development sites were selected on the basis of their representing the same land use as the project, but at reduced density or intensity. In addition, an alternative location was considered for the West Los Angeles Transportation, and a reduced height alternative was considered for the Sunset Avenue site.

1. West Los Angeles Transportation Facility

Alternative A: No Project/No Build

Under the No Project/No Build alternative, the West Los Angeles Transportation facility site would remain in its current state without any modifications. The project site would remain vacant, and existing site buildings would be unused.

Accordingly, there would be no project impacts and, thus, fewer impacts than the proposed project, with regard to aesthetics, air quality, historic resources, geology/seismic hazards, land use/relationship to surrounding uses, noise, transportation, parking, and utilities. However, as the proposed project has no residual significant impacts, that alternative would not cause the avoidance of any such impacts. This alternative would be considered to have greater

impacts regarding hazardous materials, water quality, and land use/regulatory framework. Some contaminated soils on the project site would not be treated, and development to accommodate growth per applicable plans and policies would not occur. Further, without the implementation of this project component, it would be necessary for operations to increase in the current facility at the Sunset Project site. This would cause an increase in impacts at that site.

This alternative would not meet the project's basic objectives. It would not provide a modern facility that meets bus maintenance and servicing needs, supports the conversion to a 100 percent CNG fleet, enhances hours of service, relieves overcrowding at other facilities, and enhances bus operations. This alternative would not reduce costs that would result from enhanced facilities and efficiencies associated with a more centralized location. Operating costs would increase due to buses needing to travel from further, distant locations.

Alternative B: No Project/Community Plan

Under this alternative, the Transportation Facility site would be developed with uses that would be likely to occur if the proposed project were not to proceed. The uses are based on existing plan and zoning designations, as well as surrounding uses. The alternative would include light industrial uses in an industrial park development with approximately 121,800 sq.ft. of floor area, or a 0.6:1 FAR.

The impacts of the alternative would be substantially similar to the proposed project. The only variation would occur in regard to water consumption and wastewater, where anticipated uses could have greater impacts than the proposed uses.

This alternative would not meet the project's basic objectives. It would not provide a modern facility that meets bus maintenance and servicing needs, supports the conversion to a 100 percent CNG fleet, enhances hours of service, relieves overcrowding at other facilities, and enhances bus operations. This alternative would not reduce costs that would result from enhanced facilities and efficiencies associated with a more centralized location. Operating costs would increase due to buses needing to travel from further, distant locations.

Alternative C: Reduced Project

Under this alternative, the project site would be developed with a reduced version of the proposed West Los Angeles Transportation Facility. There would be 150 buses housed on-site, a reduction of approximately 14 percent, or 25 buses from the 175 buses proposed under the project. The Reduced Project alternative would continue to include 14 maintenance bays and a total of approximately 72,000 square feet of area, including auxiliary facilities, similar to the project. If this alternative were selected for development, alternative sites, including other

district transit facilities, would be needed to house and service the additional 25 buses needed for Metro's operation in West Los Angeles.

Environmental impacts would be somewhat similar to those of the proposed project. The variations in site impacts would be associated with a reduction in project trip generation for project buses, including reductions in traffic-related air quality and noise impacts. As the proposed project impacts for these topics are less than significant, the reductions would not be needed to avoid significant impacts. Further, while these impacts would be reduced, some additional traffic, with related air quality and noise impacts, could occur due to shuttling of excess buses between transportation facilities.

This alternative would not meet the project's basic objectives to the same extent as the proposed project. Nonetheless it would contribute to a degree by providing a modern facility that helps meet bus maintenance and servicing needs, supports the conversion to a 100 percent CNG fleet, enhances hours of service, relieves overcrowding at other facilities, and enhances bus operations. This alternative would contribute to a reduction in costs that would result from enhanced, modern facilities and efficiencies associated with a more centralized location, but to a lesser extent than the proposed project.

Alternative D: Alternative Location

Under this alternative, the Transportation Facility would be provided at an alternative location. The Metropolitan Transportation Authority does not currently own property that could serve as an alternative site for the West Los Angeles Transportation Facility. As a public service, Metro is entitled to practice eminent domain; however, it chooses to avoid this avenue of acquisition, unless specific situations warrant it, due to community relations and Metro's standard practices. Finding and acquiring development sites has been a difficult challenge for Metro since potential sites which would meet the needs of a transportation facility are limited. Metro has been attempting to find a new site for the relocation of Division 6 since 1976. The acquisition of the Jefferson Boulevard site represents the culmination of several years of searching for an alternative to the Sunset Avenue location and the merits of the selected site. In lieu of a specific alternative site, the alternative sites analysis addresses general areas that were deemed to be viable for the development of the proposed project.

Impacts with location of the project at an alternative site would be dependent on the specific site selected, but would likely offer similar impacts to those of the proposed project. The service area served by the Transportation Facility comprises a built urban environment with a roadway grid of urbanized traffic. Therefore, traffic impacts and associated air quality and noise impacts would not necessarily be reduced. As the project site is located within a light-industrial area, its separation from residential areas and lack of unique visual qualities (such as a

scenic corridor or crest of a hill) would be difficult to improve upon. As noted elsewhere, the proposed project would not generate significant impacts that could be lessened by location of the project at an alternative site. Further, impacts from increased operations at the Sunset Avenue site would increase during the delayed time until an alternative site could be acquired and developed.

This alternative could ultimately, partially meet some of the project's basic objectives, if a suitable site could be found and developed. It would ultimately provide a modern facility that would meet bus maintenance and servicing needs, support the conversion to a 100 percent CNG fleet, enhance hours of service, relieve overcrowding at other facilities, and enhance bus operations, albeit with a delay of a considerable number of years. This alternative would contribute substantially less than the proposed project to cost reductions that would result from enhanced facilities and efficiencies associated with a more centralized location. Operating costs would increase due to buses needing to travel from further, distant locations.

Environmentally Superior Alternative

The State CEQA Guidelines require that Environmental Impact Reports select one of the alternatives analyzed as the environmentally superior alternative. In cases where the No Project Alternative is so identified, an environmentally superior alternative must be identified among the remaining alternatives. Accordingly, the Reduced Project alternative has been identified as the environmentally superior alternative for the Transportation Facility site, since it would directly reduce some project impacts, would generate impacts similar to or less than the other built alternatives, and would partially meet the project objectives. However, the proposed project would be environmentally preferable to the "environmentally superior" Reduced Project alternative. The Reduced Project alternative would offer a lesser capacity for bus maintenance and servicing, thus causing greater shuttling of buses, with increased traffic, air quality and noise impacts. Further, it may be noted that the Reduced Project alternative would not cause any significant project impact to be avoided.

2. Sunset Avenue Project

Alternative E: No Project/No Build

Under this alternative, the proposed residential/commercial project would not be developed, and the Sunset Avenue site would continue its current site activities and conditions; i.e., housing the Transportation Facility activities. Metro would be expected to continue searching for an alternative site, but would likely increase operation at the site, with longer operating hours and greater site activity. At some point in the future, Metro would be in the position of housing buses at the Sunset Avenue site but fueling them at an alternate location.

Due to the need for off-site CNG fueling during non-operating hours, buses would be shuttled to fueling locations during the night, resulting in increased nighttime traffic noise in the surrounding residential neighborhood. The shuttling of buses would also be inefficient, costing a considerable number of additional travel miles.

This alternative would avoid the direct environmental impacts of implementing the proposed project, but would allow some adverse impacts to occur that would be addressed under the proposed project. This alternative would reduce impacts regarding aesthetic character, shading, air quality, historic resources, geology/seismic hazard, water quality, noise, transportation, and utilities. The alternative would not allow the improvements associated with removal of hazardous materials, nor certain land use benefits: the removal of the historically dated, light-industrial use from amidst residential uses; the provision of additional visitor/beach parking; the provision of affordable housing in the area; or support for plans and regulations calling for a mixed-use residential/commercial development at the project site. The alternative would also result in increased night-time traffic and noise due to increased bus operations at the project site.

This alternative would not meet the project's basic objectives. It would not allow the relocation of the Transportation Facility, nor would it provide the proposed market rate and affordable housing units in response to projected population growth, commercial uses, or public parking uses. Further, this alternative would not convert the historically outdated use of the property to uses that would revitalize the project area, as specified in City plans and policies. It would not maximize the value of the property, or support investment in the community.

Alternative F: Alternative Land Use—Commercial Uses

This alternative explores a site development that might occur if Metro vacated the Sunset Avenue site and the proposed residential/commercial project was not approved. The alternative uses are based on existing land uses in the general project vicinity, development trends, and plan and zoning designations for the project site. Under the alternative, the site would be developed with a commercial project, with approximately 102,250 sq.ft. of floor area, reflecting a floor area ratio (FAR) of 0.75:1.

This alternative would reduce utility impacts and shading impacts. The alternative would have lower heights than the proposed project, thus reducing the cause of its significant impact on aesthetic character. At the same time the commercial uses could cause an inharmonious transition in character with the properties across Sunset Avenue and Thornton Place, thus resulting in significant impact from the differing uses. Further, this alternative would generate more traffic than the proposed project. Traffic impacts would require mitigation, although a residual significant impact on traffic may occur, where no such significant impact occurs with

proposed project. Impacts on land use and illumination would be greater than those of the proposed project. Impacts would be similar with regard to views, air quality, historic resources, geology/seismic hazard, hazardous materials, water quality, noise, and parking.

This alternative would not meet most of the project's basic objectives. It might potentially support the relocation of the Transportation Facility, although it has not been determined that the alternative could provide the economic justification for doing so. This alternative could convert the historically outdated site use in a manner that would support revitalization of the neighborhood and a commercial presence on Main Street. Otherwise, it would not provide the proposed mixed-use project with market rate and affordable housing units in response to projected population growth rates and demand for such housing, as identified in applicable City plans and policies. Further, this alternative would not implement design objectives intended to create an aesthetic, comfortable living project that would complement surrounding uses and add to the overall character of the area.

Alternative G: Reduced Density

Under this alternative, the number of residential units would be reduced to 171 residential units. This is the number of units allowed under the designated CM zoning, exclusive of the affordable housing density bonus that is provided under City policies, and local plans. Notwithstanding, this project would include an affordable housing component. The residential floor area would be reduced from approximately 270,000 sq.ft. to approximately 204,500 sq.ft., a reduction of approximately 24 percent in residential floor area. The commercial component of the project would remain at 10,000 sq.ft.

This alternative would likely reduce the amount of building massing on the project site, however such reductions would not necessarily result in lower heights along Thornton Place and Sunset Avenue. Therefore, the project's significant impact on aesthetic character would not necessarily be reduced. The project's significant construction impact on air quality would be reduced, although not to a level of insignificance. The project's non-significant utility impacts would also be reduced. Shading impacts would not necessarily be reduced. Traffic generation would be reduced, although such reduction would not eliminate significant pre-mitigation impacts of the proposed project. (With mitigation, traffic impacts of the proposed project are less than significant.) Land use impacts would be somewhat similar to those of the proposed project, although this alternative would not implement density bonuses that have been included in plans to help support the provision of affordable housing and meet anticipated population needs, and identified in the applicable plans. Impacts would be similar with regard to views, illumination, historic resources, hazardous materials, water quality, and noise.

This alternative would not meet the primary objective to generate the land use and economic justification to relocate the Transportation Facility, nor would it meet the objective of providing a mix of affordable and market-rate housing in response to projected population growth and demands for such housing. This alternative would not maximize the value of the property. The alternative would convert the historically outdated site use in a manner that would support revitalization of the neighborhood and a commercial presence on Main Street. Further, this alternative would implement design objectives intended to create an aesthetic, comfortable living project that would add to the overall character of the area.

Alternative H: Reduced Height—Sunset Avenue Site

Under this alternative, project's four-story buildings along the frontages of Thornton Place and Sunset Avenue would be reduced to three floors. Thus, maximum building heights along those roadways would be similar to the project's building heights along Pacific Avenue and Main Street and would not exceed 35 feet. This height reduction would require the removal of the 15 units or their relocation to the central portion of the site. While some or all of these units could be relocated in the site's interior, this analysis assumes that the alternative would include 210 units and 10,000 sq.ft. of commercial uses.

This alternative would reduce the proposed project's significant impact regarding aesthetic character (associated with contrasting building heights along Thornton Place and Sunset Avenue) to a less-than-significant impact. It would also negligibly reduce the project's significant construction impact on air quality and noise, although not to a level of insignificance. The project's non-significant shading and utility impacts would also be reduced. Traffic generation would be slightly reduced, although such reduction would not eliminate significant pre-mitigation impacts of the project. (With mitigation, traffic impacts of the proposed project are less than significant.) Land use impacts would be somewhat similar to those of the proposed project, although this alternative would not provide the same level of visitor/beach parking as the proposed project. Impacts would be similar with regard to views, illumination, historic resources, hazardous materials, water quality, and noise.

This alternative would meet most of the primary objectives of the project, but to a lesser degree. It is not known whether reducing the relative satisfaction of the objectives would provide sufficient land use and economic justification to relocate the Transportation Facility. This alternative would not maximize the value of the property. The mix of market-rate and affordable housing provided would contribute to the objectives of providing such housing to meet projected growth and demand for such housing, but not to the same extent as the project.

Environmentally Superior Alternative

As noted above, the State CEQA Guidelines require that Environmental Impact Reports select one of the alternatives analyzed as the environmentally superior alternative. In cases where the No Project Alternative is so identified, an environmentally superior alternative must be identified among the remaining alternatives. Accordingly, the Reduced Height alternative has been identified as the environmentally superior alternative for the Sunset Avenue site. Of the alternatives analyzed, only this alternative would reduce the project's significant aesthetic impact. Further, it would also reduce other non-significant impacts associated with the number of units on site; e.g. there would be slightly less traffic generation. The Alternative Use/Commercial alternative would also have lower project heights, but would have less compatibility with aesthetic character of adjacent residential units; and would generate some impacts that would be greater than the proposed project, e.g. traffic impacts. The Reduced Density alternative would reduce the project's non-significant impacts overall to a slightly greater extent than would the Reduced Height alternative, but would not necessarily avoid the significant aesthetics impact. The Reduced Density alternative would not meet the project's basic objectives, whereas the Reduced Height alternative could partially meet them.

E. PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

1. Aesthetics

a. Project Impacts

(1) West Los Angeles Transportation Facility

Aesthetic Character. The proposed West Los Angeles Transportation Facility would convert the degraded, neglected character of the project site to the orderly, designed appearance of new improvements. The functional and efficient structures and related facilities will be consistent with, though more contemporary than, surrounding industrial and commercial improvements. The facility will be well screened by a perimeter wall with a minimum height of eight feet. The frontage along Jefferson Boulevard would include a decorative wall and landscaping that would soften the project appearance, and minimize street views of the on-site buses, and activities.

Therefore, the project would not detract from the valued visual character of the community, neighborhood or localized area by conversion of large areas of visible natural open space, or valued visual resources. Further, the project would not introduce inappropriate contrast between project elements and existing features that embody the area's valued aesthetic image.

Finally, the project would be consistent with those aesthetic goals and policies of plans and regulations that are applicable to the project. The West Los Angeles Transportation Facility would not have a significant impact on the aesthetic character of the area.

Views. Views of the project site are limited and occur mainly from the adjoining segment of Jefferson Boulevard, from across the Ballona Channel in Culver City, and from some locations in the Baldwin Hills and Blair Hills areas. No existing views along Jefferson Boulevard would be obstructed by the project development. Views of the improved project site from the Baldwin Hills would be at distant, low viewing angles such that the Transportation Facility would blend into the surrounding urban plain. Therefore, the project would not substantially alter views of valued viewsheds and would not obstruct any part of valued views available from a designated scenic highway, corridor, or parkway. Transportation Facility impacts on views would not be adverse.

Illumination. The proposed project is surrounded by compatible light-industrial and commercial land uses that are not sensitive to nighttime illumination. Nighttime illumination will comply with applicable City regulatory provisions to ensure that adjoining properties are not adversely affected. The illumination will not be expected to stand out against the greater city lights backdrop due to scale or illumination intensity. Further, the project would not include highly reflective building materials that would cause glare at sensitive off-site locations. Therefore, the Transportation Facility would not substantially affect nighttime views or substantially illuminate adjacent, off-site, light-sensitive uses.

Shading. The proposed structures are generally one level in height, less than 20 feet, and would not cast significant shadows at any time. The tallest structure, a three-level administration building, would be located on the eastern, back side of the property. As no shadow-sensitive uses are located nearby and since project-related shadows would be minimal, no adverse shading impacts attributable to this project are identified.

(2) Sunset Avenue Project

Aesthetic Character. The proposed Sunset Avenue Project would replace the vacated Division 6 operation with a mix of residential and commercial uses supported by two levels of subterranean parking. Residential uses would occupy several individual structures that would each contain a varying number of dwelling units, with varied heights and shapes. Commercial uses would be located on the ground floor of a structure that would be sited along Main Street on the Thornton Place side of the property, while residential uses would occupy the balance of the ground floor and all of the upper floors of that structure.

The Main Street portion of this structure would include three residential levels and would not exceed 35 feet above the site's determined datum level. To the rear, the interior portion of the structure will contain variously three, four, and five residential levels with maximum height along its Thornton Place and Sunset Avenue frontages not exceeding 50 feet, and with maximum height in the highest center of the structure not exceeding 56 feet. The remaining residential structures will mostly have four levels, though they step down to two and three levels at the Pacific Avenue frontage, where maximum height will not exceed 35 feet.

This project would rather dramatically convert the site's current appearance from that of a somewhat isolated and degraded automotive maintenance facility to a new mixed-use development with interplay between building volumes and open spaces for indoor and outdoor use and with a modern palette of building materials, finishes, and landscape. Subject to personal preferences, such a change could be perceived as a major enhancement or as a loss of underdeveloped, albeit industrial, space amidst the urban setting.

Main Street is wide and offers easy, open views of the site to passing motorists and pedestrians. The buildings along Main Street will provide a limited, urban setback of five feet. While the five-foot setback proposed along Main Street is greater than the zero foot setback requirement for commercial uses, a setback adjustment of two feet would be required for proposed residential uses along Main Street. However, the requested adjustment to the setback would be offset by the additional sidewalk width that already exists along Main Street. Building heights along Main Street will not exceed 35 feet, as established by the Specific Plan. Higher building heights deeper into the site are proposed and may be visible from Main Street. This is typical along mixed commercial streets and is not without precedent on Main Street. The current character of Main Street as it extends from north of Rose Avenue to locations south of the project site and Abbot Kinney Boulevard is highly eclectic with a wide mix of building uses, sizes, and styles, and in which newer and older structures are well represented. The project would effectively contribute to this mix and would not be out of place by use or general appearance. The commercial uses would be pedestrian-friendly and would contribute to a continuity of uses along Main Street. The project would also cause the beneficial conversion of isolated and no longer appropriately located transportation infrastructure facilities to appropriate urban improvements and form.

Pacific Avenue, in contrast to Main Street, is both a narrower and faster street, serving primarily as a transportation corridor. Adjoining structures with frontage on and near Pacific Avenue house single-family and multi-family residential uses and vary widely in height from 15 to 30 feet. A few taller, older buildings exist along the beach further west. After dedication of right-of way with which to widen Pacific Avenue, each of five proposed residential structures with frontage on this street will be set back approximately seven feet. Building heights would terrace down to two and three stories, respecting the 35-foot building height limitation and

heights of nearby residential units. With the proposed landscape, this edge of the proposed project should offer some welcome visual relief from the narrow, confused, and hard-edged visual character currently presented by the existing facilities on the project site and which typifies this busy street.

Sunset Avenue and Thornton Place are narrow passage ways. All uses and improvements along both streets are residential, and many of these improvements approach the respective property lines quite closely. These buildings are variously 15 to 30 feet in height on very narrow lots, some not wider than 25 feet. The project proposes a dedication of approximately 16 feet to widen Sunset Avenue and landscaped setbacks of 5 to 15 feet along both streets to open the appearance of these narrow streets and create separation from the respective structures across them. Upon completion, project buildings will be 50 to 60 feet away from existing structures opposite Sunset Avenue and 25 to 50 feet from existing residences along Thornton Place. The proposed structures will be architecturally articulated, employ attractive materials and finishes, and effectively landscaped. However, with four residential levels, they are proposed at heights ranging from 40 to 50 feet, higher than existing structures across Sunset Avenue or Thornton Place and higher than the 35-foot height limitation recommended by the Specific Plan.

Implementation of the project would require Specific Plan Exceptions to regulations regarding building height and floor area ratio (FAR). Approvals of such exceptions are being sought as project actions. Such exceptions are consistent with the overall intent of the plan to encourage affordable housing, and would exercise a trade-off that is anticipated in the Plan, but would none-the-less facilitate massing impacts greater than surrounding areas, and greater than anticipated in the Specific Plan requirements. The project's new development would introduce substantial contrast between proposed project elements and existing features that embody the area's valued aesthetic image. Therefore, it is concluded that the project's impact on aesthetic character would be significant.

Views. Views of the project site from public vantages occur mainly from the public thoroughfares adjacent to the project site: Main Street and Pacific Avenue. Neither of these roadways is designated as a scenic highway, corridor or parkway. Existing views along both of these roadways is of the built, urban environment. The project site is neither a large natural area nor a valued view resource in its own right. In fact, as an aging transportation infrastructure facility, it may be characterized as quite the opposite. Further, as infill development, the project would continue the built development pattern between these roadways and would not affect views or viewsheds for travelers.

Other views over the project site from private vantages are limited due to level terrain, intervening development, and low elevations of surrounding buildings from which views may be accessible. A few private locations that are elevated can see over the site to the urban setting

beyond. Project impacts on views from private locations as may occur would be limited to a few locations and would be of a type that regularly occurs with infill development in an urban setting where one private party's "view" is through the buildable space of another private party's property.

The project would not obstruct views of the Pacific Ocean, a coastal, visual resource. The project would be consistent with Coastal Zone policies regarding visual access to coastal resources.

Illumination. The project site is currently illuminated during evening hours by relatively bright pole-mounted fixtures arrayed in toward the site's interior from locations near the periphery to support the existing bus parking and maintenance activities. The proposed project would have lighting that is similar to other residential and commercial uses in the vicinity. Project lighting would be directed on-site, broken up by multiple building masses, and illumination levels would be less than what currently exists on the project site. Lighting would conform to Municipal Code requirements regarding illumination impacts. The project would not include highly reflective building materials. The project's lighting would not affect nighttime views, nor illuminate adjacent, off-site, light-sensitive uses.

Shading. The project's shading impacts would be limited. Potentially sun-sensitive uses are limited to residential units in the area that might be designed for sun utilization. The proposed project would not cause any shading on residential uses along Pacific Avenue or Thornton Place during the main day-time hours. Potential shading on the artist's lofts units on Main Street would be extremely limited. The greatest shading during the hours analyzed would occur on the winter solstice when shading would fall along the foot of the buildings for less than an hour. The greatest potential for shading would occur on the residential units along Sunset Avenue. Shading at the summer solstice and equinoxes would be non-existent and/or negligible. The greatest shading would occur on the winter solstice. Such shading would not occur for more than three hours, which is the significance threshold for the period falling between late October and early April. Project impact from shading would be less than significant.

(3) Combined Projects

Each of the proposed projects is located in a different community within different viewsheds. Therefore, the two projects would have the effects reported for each individually, and would not contribute to a combined impact.

b. Cumulative Impacts

The proximity of related projects to the two project sites is limited. Related projects would typically be in-fill projects at more distant locations than would be required to comply with local regulations. None of the related projects is located in the immediate vicinity of the Transportation Facility site so as to cause a notable, combined aesthetic impact. Only two of the related projects are located within the same viewshed as the Sunset Avenue Project. These related projects are in keeping with the uses and eclectic character of the area along and east of Main Street. They contribute to the continuation of that character. The analysis of project impacts determined that a significant aesthetic impact, due to a substantial change in local visual character associated with proposed building heights, would occur. The conclusion was based on the proposed massing of project buildings and their relationship to the surrounding community. The addition of the related projects does not contribute to the conclusion regarding project impacts alone, nor would they exacerbate those impacts. Nonetheless, since the project's impact is significant and the project is a component of the cumulative condition, the cumulative impact of the project, in conjunction with related projects, must be considered significant.

None of the related projects to either the West Los Angeles Transportation Facility or the Sunset Avenue Project would contribute to cumulative impacts on aesthetic resources, views, illumination, or shading.

c. Mitigation Measures**West Los Angeles Transportation Facility.**

This project has no significant adverse aesthetic impacts; therefore, no mitigation is required.

Sunset Avenue Project.

Mitigation Measure Sunset-A.1. This project's significant adverse aesthetic impact due to substantially abrupt transition in building heights across Sunset Avenue and Thornton Place may be mitigated by reducing on-site building heights along these streets to conform to the 35-foot height limit prescribed by the Specific Plan. In considering the feasibility of this measure, the benefits of such mitigation should be weighed against this project's potential to displace the existing on-site automotive maintenance facility, provide affordable housing, and provide beach impact zone parking. This solution was the basis of Alternative H: Reduced Height Alternative for the Sunset Avenue site in the Draft EIR. Should this be the decision-makers' intent, it would most appropriately be implemented via approval of the Reduced Height Alternative rather than imposing a height reducing mitigation measure. Therefore, this mitigation measure is not

proposed for inclusion in the Mitigation Monitoring and Reporting Program in Section IV of this Final EIR.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. This project would not cause adverse aesthetic impacts upon aesthetic character, views, illumination, or shading.

Sunset Avenue Project. This project would not cause significant view, illumination, or shading impacts upon surrounding properties. However, aesthetic impacts associated with building heights would be significant and unavoidable.

Combined Projects. Each of the proposed projects is located in a different community within different viewsheds. Therefore, the two projects would have the effects reported for each individually, and would not contribute to a combined impact.

2. Air Quality

a. Project Impacts

West Los Angeles Transportation Facility. Construction of the Transportation Facility would generate fugitive dust and combustion emissions. Regional construction emissions would exceed the South Coast Air Quality Management District (SCAQMD) daily significance threshold for NO_x but would fall below the SCAQMD daily significance thresholds for CO, PM₁₀, ROC and SO_x. Thus, construction emissions would result in a significant short-term regional air quality impact for NO_x without incorporation of mitigation. Construction activity would also result in the emissions of PM₁₀, NO₂, and CO that are of concern on a local level. A localized analysis completed using SCAQMD recommended guidance indicated that the project's worst-case maximum on-site construction emissions would remain below their respective SCAQMD localized significance thresholds. As such, localized construction impacts would be less than significant.

Operation of the project would result in a redistribution of the physical location where buses from existing routes are currently parked and maintained, as well as a redistribution of physical location where existing employees work to accommodate such changes. Mobile emissions related to the change in non-revenue miles¹ as a result of the physical location where

¹ Also known as "deadhead" miles, non-revenue miles are the travel miles that are incidental the transit route (revenue) miles (e.g., the "out of service" travel between a service route and maintenance facility).

buses from existing routes are currently parked and maintained would decrease and mobile emissions related to changes in existing worker commute trip lengths due to changes in workplace facility locations would increase for some employees and decrease for others resulting in a negligible change in overall commute trip VMT and related air pollutant emissions. Therefore, the project would result in a beneficial net decrease in long-term regional mass daily emissions. During the operational phase of the project, project traffic would have the potential to generate local area CO impacts. An analysis was performed to determine the potential for creation of CO hotspots attributable to the project. This analysis indicated that project-related traffic would not result in any exceedances of the State 1-hour or 8-hour CO standards.

The air quality analysis examined the consistency of the project with the SCAQMD's Air Quality Management Plan (AQMP). No significant impacts would occur as a result of the project with respect to consistency with applicable air quality management policies.

With regard to air toxics, diesel buses are being phased out of the MTA bus fleet in favor of CNG or other alternative fuels. The only diesel buses using the facility would be for occasional maintenance purposes. However, the project would comply with all SCAQMD rules governing the use of CNG fuel (i.e., vapor control technology and nuisance avoidance) which would limit the potential of emissions that could impact sensitive receptors in the project area. Therefore, project-related air toxic impacts would be less than significant.

Sunset Avenue Project. Construction of the Sunset Avenue site would generate fugitive dust and combustion emissions. Regional construction emissions would exceed the SCAQMD daily significance threshold for NO_x but would fall below the SCAQMD daily significance thresholds for CO, PM₁₀, ROC, and SO_x. Thus, construction emissions would result in a significant short-term regional air quality impact for NO_x without incorporation of mitigation. Construction activity would also result in the emissions of PM₁₀, NO₂, and CO that are of concern on a local level. A localized analysis completed using SCAQMD recommended guidance indicated that the project's worst-case maximum on-site construction emissions would remain below their respective SCAQMD localized significance thresholds. Thus, localized construction impacts would be less than significant.

Air pollutant emissions associated with project occupancy and operation would be generated by both the consumption of energy (electricity and natural gas) and by the operation of on-road vehicles. Regional emissions resulting from project operation would remain below the SCAQMD thresholds for all criteria pollutants. Therefore, operation of the project would not result in a significant impact to regional air quality. During the operational phase of the project, project traffic would have the potential to generate local area CO impacts. An analysis was performed to determine the potential for creation of CO hotspots attributable to the project. This

analysis indicated that project-related traffic would not result in any exceedances of the State 1-hour or 8-hour CO standards.

The air quality analysis examined the consistency of the project with the SCAQMD's Air Quality Management Plan (AQMP). No significant impacts would occur as a result of the project with respect to consistency with applicable air quality management policies.

Potential sources of air toxic emissions (e.g., detergents, cleaning compounds, glues, polishes, floor finishes, cosmetics, antiperspirants, rubbing alcohol, room fresheners, and paint and lawn products) from the project are typical within the urban environment and would contribute small amounts of toxic air pollutants to the project vicinity, and would be well below any levels that would result in a significant impact on human health. Also, the project would result in removal of the existing bus depot, and thus, result in a reduction of diesel particulate emissions in the project area. Thus, the project would not result in a significant air toxic impact.

Combined Projects. The Transportation Facility site location would be fully completed and operational prior to the demolition and redevelopment of the Sunset Avenue site location. Therefore, there would be no construction activity overlap between the two project site locations. However, there would be a period of overlap with the Transportation Facility site operations-period emissions and the Sunset Avenue site construction-period emissions. Composite daily emissions would remain below SCAQMD significance thresholds for CO, PM₁₀, ROC, and SO_x but emissions of NO_x would exceed the established SCAQMD daily regional construction significance threshold without incorporation of mitigation.

Following the completion and occupancy of the Sunset Avenue site location, there would be overlap with respect to the Transportation Facility and Sunset Avenue site operations-period emissions. Composite mass emissions would remain below SCAQMD daily significance thresholds. As such, combined operations impacts would be less than significant on regional and local levels.

b. Cumulative Impacts

The two project sites would not result in concurrent construction and since the applicant has no control over the timing or sequencing of the related projects in the study area, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be entirely speculative. A portion of the Mid-City/Exposition Light Rail Transit (LRT) alignment is located within the Transportation Facility project study area. However, construction of the LRT alignment is not anticipated to start until year 2007, which is well after the scheduled development of the Transportation Facility project site. Given that the project has short-term regional construction impact for the ozone precursor NO_x at both site

locations, combined with the fact that the Basin is non-attainment for ozone, the project would contribute to a significant cumulative construction air quality impact.

With respect to long-term project operations, the Transportation Facility project would be consistent with the underlying growth assumptions on which the AQMP is based and the marginal increase in ROC and CO emissions that would occur as a result of development of the Sunset Avenue site would not be cumulatively considerable.

With regard to cumulative localized effects, the localized CO impact analysis evaluated the mobile CO emissions related to project, related project, and ambient growth traffic volumes. Increases in localized CO concentrations would not exceed SCAQMD significance thresholds. As such, localized air quality impacts would be less than significant on a cumulative level.

c. Mitigation Measures

West Los Angeles Transportation Facility. Mitigation Measures B-1 through B-4 implement recommended mitigation measures provided in SCAQMD's *CEQA Air Quality Handbook*, Chapter 11 and/or URBEMIS 2002 for reduction of short-term significant construction regional NO_x impacts

Mitigation Measure WLA-B-1: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Mitigation Measure WLA-B-2: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would have their engines turned off when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Mitigation Measure WLA-B-3: Use electricity from power poles, rather than temporary diesel or gasoline powered generators if or where feasible.

Mitigation Measure WLA-B-4: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

Sunset Avenue Project. Mitigation Measures B-1 through B-4 implement recommended mitigation measures provided in SCAQMD's *CEQA Air Quality Handbook*, Chapter 11, and/or URBEMIS 2002 for reduction of short-term significant construction regional NO_x impacts.

Mitigation Measure Sunset B-1: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Mitigation Measure Sunset B-2: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would have their engines turned off when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Mitigation Measure Sunset B-3: Use electricity from power poles, rather than temporary diesel or gasoline powered generators if or where feasible.

Mitigation Measure Sunset B-4: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. The implementation of mitigation measures described in Section IV.B., Air Quality, of this EIR would reduce NO_x emissions during construction to a level that is less than significant. As such, construction activities at the West Los Angeles Transportation Facility site location would not have a significant impact on air quality. In addition, as indicated in Section VI.E., Potential Secondary Effects, no significant secondary impacts associated with air quality would occur from implementation of the proposed mitigation measures included throughout Chapter IV.

Sunset Avenue Project. Although implementation of the project features and mitigation measures described in Section IV.B., Air Quality, of this EIR would reduce construction air quality impacts, activities related to construction of the project would continue to exceed the SCAQMD daily emission thresholds for regional NO_x. As such, construction of the project would have a significant and unavoidable impact on air quality. In addition, as indicated in Section VI.E., Potential Secondary Effects, no significant secondary impacts associated with air quality would occur from implementation of the proposed mitigation measures included throughout Chapter IV.

3. Historic Resources

a. Project Impacts

West Los Angeles Transportation Facility. It was determined in the Initial Study that the West Los Angeles Transportation Facility would not have adverse impacts upon historic resources. However, precautionary mitigation is proposed regarding accidental discovery of human remains from recent, historic or pre-historic periods, or of vertebrate fossil resources, during construction.

Sunset Avenue Project. Under the proposed project, all of the buildings associated with the project site are scheduled for demolition and the site cleared for new construction. The existing Metro Division 6—Venice bus maintenance site and associated buildings appear ineligible for listing in the National Register, California Register, and for local designation. In addition, the property is not considered a historic resource for the purposes of CEQA compliance. Therefore, no adverse impacts regarding historic resources for this property are expected. However, under this project, direct impacts would occur to the Vietnam POW/MIA Memorial Mural located on the western portion of the site and as such would pose a potential adverse impact on what may be considered a historic or cultural resource. The mural located on the concrete block wall of the bus washing structure is to be removed. Its retention in place is infeasible since its size, location and content would not be compatible with residential development of the Sunset Avenue Project. Although the mural appears ineligible for the National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument, it is eligible for special consideration in the local planning process. Further, in light of relevant federal, state and local laws and regulations related to murals, the Vietnam POW/MIA Memorial Mural can be looked upon as a historic resource for the purposes of CEQA. Therefore, a potential adverse impact may occur due to the demolition of the mural and mitigation measures are recommended to implement this project. Further mitigation is recommended as a precautionary measure regarding accidental discovery of human remains from recent, historic or pre-historic periods, or of vertebrate fossil resources, during construction.

Combined Projects. The West Los Angeles Transportation Facility and the Sunset Avenue Project would not have a combined impact on paleontological resources due to their geographic separation. The proposed projects would not contribute to a combined impact for historical resources.

b. Cumulative Impacts

None of the related projects identified in Section III.B, Related Projects, of this Draft EIR is known to adversely effect cultural resources of any sort. Although murals are a well-

represented form of public art in the Venice and Santa Monica area surrounding the Sunset Avenue Project, none are known to be threatened with removal. Therefore, cumulative impacts considered in conjunction with the Sunset Avenue Project's proposed removal of the on-site MIA/POW Mural would not expand the assessment of this project impact to a significant adverse level.

c. Mitigation Measures

(1) Historical Resources—Sunset Avenue Project

Mitigation Measure Sunset-C.1: Photography and Recordation. As the initial step in any mitigation program, and prior to alteration, relocation, or demolition of the mural, a photographic documentation report shall be prepared by a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61. This report shall document the significance of the mural and its physical conditions, both historic and current through photographs and text. Photographic documentation should be taken utilizing 35-mm black and white film. The photographer should be familiar with the recordation of historic resources. Photographs should be prepared in a format consistent with the Historic American Buildings Survey (HABS) standards for field photography. Copies of the report shall be submitted to the California Office of Historic Preservation, the City of Los Angeles Planning Department,² the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

Mitigation Measure Sunset-C.2: Relocation. The feasibility of relocating the mural to an off-site location should be explored to mitigate project impacts on this historic resource. A determination of a reasonable and acceptable cost for the mural's relocation will be established between the Applicant, Metro, and a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61. Relocation of the mural in whole to another publicly accessible location within the project area, if conducted in accordance with the guidelines recommended by the National Park Service that are outlined in the booklet "Moving Historic Buildings" by John Obed Curtis (1979), would fully mitigate the impact associated with this historic resource and the proposed project. Additionally, relocation of the mural off-site to a location with similar or compatible historical context (i.e. along a public roadway) would also fully mitigate the impact. However, prior to any relocation efforts the physical condition of the mural should be considered, assessed, and

² *Effective July 1, 2004, the City Planning Department has taken over functions previously performed by the Cultural Affairs Department.*

documented by a qualified historic architect and structural engineer. Additionally, the cost of relocation versus the overall historical and artistic value of the mural should be quantified in that assessment, to further evaluate relocation feasibility. The relocation plan shall also be developed in conjunction with a qualified architectural historian, historic architect, or historic preservation professional. Additionally, the plan shall be reviewed and approved by the Deputy Historic Preservation Officer of the City of Los Angeles' Planning Department. Because this mitigation, with the recommended cost to Applicant limitation, would not directly or indirectly affect the objectives of the proposed project, it appears feasible.

(2) Accidental Discovery of Human Remains or Vertebrate Fossil Resources

West Los Angeles Transportation Facility

Mitigation Measure WLA-C.1: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less-than-significant levels.

Mitigation Measure WLA-C.2: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). With implementation of this measure, potential project impacts in this category would be reduced to less-than-significant levels.

Sunset Avenue Project

Mitigation Measure Sunset-C.3: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less-than-significant levels.

Mitigation Measure Sunset-C.4: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). With implementation of this measure, potential project impacts in this category would be reduced to less-than-significant levels.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. Under CEQA, the recommended mitigation measures would reduce the potential adverse impacts of accidental discovery of the unknown, unanticipated vertebrate, fossil or traditional burial resources to less-than-significant levels.

Sunset Avenue Project. The recommended mitigation measures would reduce the potential adverse impacts on the recognized cultural resource (the MIA/POW Mural) and the accidental discovery of the unknown, unanticipated vertebrate, fossil or traditional burial resources to less-than-significant levels.

Combined Projects. Considering both projects will have no adverse impacts after implementation of mitigation measures, neither the proposed projects would contribute to a combined impact.

4. Geology/Seismic Hazards

a. Project Impacts

West Los Angeles Transportation Facility. Topographically, the site and the surrounding area are relatively level with an elevation of approximately 79 feet above sea level. Additionally, the site has been used for light industrial purposes for approximately 52 years, hence the site has been graded and altered several times over that time period. No prominent or distinct geologic features, such as hillsides, canyons, rock outcrops or ravines exist on the site. As such, the project would not destroy, permanently cover, or materially or adversely modify any distinct and prominent geologic or topographic features.

Similar to development throughout southern California, implementation of the project would result in exposure of people on-site to groundshaking and other seismic hazards, including liquefaction and lateral spreading. Therefore, the proposed project would be constructed in accordance with applicable provisions of the Uniform Building Code (UBC) and would be designed to meet structural requirements as defined by the southern California Seismic Zone IV standards. Further, project designs would comply with structural design standards as defined by Los Angeles Municipal Code (LAMC) and site preparation requirements identified in the geotechnical study prepared for this Draft EIR. As such, implementation of these design standards and regulations would reduce the potential for seismic activity to result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury to acceptable, less than significant levels. Therefore, impacts related to geology/seismic hazards would be less than significant. Further analysis of geotechnical impacts is provided in Section IV.D of this Draft EIR.

Sunset Avenue Project. The site and the surrounding area is a dense urban landscape where elevations range from approximately 20 to 30 feet above sea level. Developed since 1901, the site has been a rail yard for Los Angeles Pacific Electric and a bus facility for approximately 103 years. Hence, the site has been graded and altered several times over that time period. No prominent or distinct geologic features, such as hillsides, canyons, rock outcrops or ravines exist on the site. As such, the project would not destroy, permanently cover, or materially or adversely modify any distinct and prominent geologic or topographic features.

Similar to development throughout southern California, implementation of the project would result in exposure of people on-site to groundshaking and other seismic hazards, including liquefaction and lateral spreading. Therefore, the proposed project would be constructed in accordance with applicable provisions of the Uniform Building Code (UBC) and would be designed to meet structural requirements as defined by the southern California Seismic Zone IV standards. Further, project designs would comply with structural design standards as defined by Los Angeles Municipal Code (LAMC) and site preparation requirements identified in the geotechnical study prepared for this Draft EIR. As such, implementation of these design standards and regulations would reduce the potential for seismic activity to result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury to acceptable, less than significant levels. Therefore, impacts related to geology/seismic hazards would be less than significant. Further analysis of geotechnical impacts is provided in Section IV.D of this Draft EIR.

Combined Projects. Due to the geographic distance between the two projects and their distinct set of related projects, it is determined that after mitigation there are no combined impacts from either construction or operation of the two sites in relation to geologic or seismic hazards.

b. Cumulative Impacts

Numerous related projects have been identified related to both the West Los Angeles Transportation Facility and the Sunset Avenue Project. To assess cumulative impacts of related project development and their potential affects upon distinct and prominent geologic or topographic features, aerial photographs of each project were studied in relation to the related projects maps provided in Section IV.I., Transportation and Circulation. Related projects to be developed near the West Los Angeles Transportation Facility are all located on currently developed land. The aerial shows that the related project sites are currently developed as industrial, commercial/office, or residential uses. None of the sites are currently vacant or in an undeveloped state. Similarly, related projects for the Sunset Avenue site are also to be located in developed areas. The aerial shows that urban development is continuous from the City of Santa Monica through to Los Angeles County's Marina del Rey Small Craft Harbor. A few areas that did not have structures were developed as at-grade parking lots, parks, or golf courses. This analysis has determined that the related projects and the proposed projects of this EIR would all be located on sites that have been altered by urban development. If any of these locations had distinct and prominent geologic or topographic features in the past, then they have been long removed. Therefore, the proposed and related projects analyzed in this EIR would not result in landform alterations that would have adverse cumulative impacts.

With regard to geologic hazards, one related project to the West Los Angeles Transportation Facility located at 3525 Eastham Drive would also be developed within a delineated Alquist-Priolo Fault Hazard Zone. Similar to West Los Angeles Transportation Facility, this related project would need to prepare a Fault-Rupture Assessment to determine if the site is located on a Holocene fault-rupture and have the assessment approved by the State Geologist with the California Geologic Survey. Additionally, all related projects for both the West Los Angeles Transportation Facility and the Sunset Avenue Project would need to comply with Uniform Building Code design standards for southern California Seismic Zone IV. Implementation of applicable provisions of the UBC, as well as all mitigation measures that are required pursuant to the geotechnical studies prepared for each related project, would reduce potential cumulative impacts that could result in risk of injury to people to acceptable, less than significant levels.

c. Mitigation Measures

West Los Angeles Transportation Facility. With regard to seismic hazards, numerous mitigation measures for preparation of the West Los Angeles Transportation Facility site are recommended as follows:

Mitigation Measure WLA-D.1: Remove all loose soil and other deleterious materials, including old foundations, prior to fill placement.

Mitigation Measure WLA-D.2: A minimum of three feet of soil should be removed and recompact as structural fill before support footings and slab-on-grade construction begins.

Mitigation Measure WLA-D.3: The exposed bottom of removal areas should be scarified, mixed, and moisture conditioned to a minimum depth of 8 inches.

Mitigation Measure WLA-D.4: To reduce risk of foundation movement, it is recommended that footings be supported on structural fill or on deepened piles embedded into competent alluvium, not both.

Mitigation Measure WLA-D.5: If the excavation to remove existing subsurface structures, pipelines, and loose fill soils extends below the minimum depth of over-excavation, it is recommended that all subsurface structures, utility lines, and uncontrolled fill extending below the over-excavation depth be removed to expose undisturbed, native soils across the entire building pad.

Mitigation Measure WLA-D.6: All fill material should be placed in controlled, horizontal layers with optimum depth and moisture.

Mitigation Measure WLA-D.7: Excavated soils, cleaned of deleterious materials (including rocks), can be re-used for fill.

Mitigation Measure WLA-D.8: Each layer of fill under the building area within the upper 48 inches of the finished pad grade should be of similar composition to provide a relatively uniform expansion index beneath the building.

Mitigation Measure WLA-D.9: Materials to be used as compacted fill should be analyzed by the Geotechnical Engineer to determine the physical properties of the materials.

Mitigation Measure WLA-D.10: An evaluation of the consequences related to lateral settlement of the project's proposed structure is recommended.

Mitigation Measure WLA-D.11: Prior to the start of the site preparation and/or construction. It is recommended that there be a meeting with the selected contractor and Advanced Geotechnical Services, Inc., to further discuss tasks related to the backfill of utility

trenches, temporary excavations, foundation types and their installation, slab-on-grade, retaining wall design, drainage, structural pavement sections, and corrosive protection.³

Sunset Avenue Project.

Mitigation Measure Sunset-D.1: Remove all loose soil and other deleterious materials, including old foundations, prior to fill placement.

Mitigation Measure Sunset-D.2: In areas to receive fill or to support slab-on-grade construction, a minimum of eight feet of the existing soils should be removed and recompacted as the structural fill in the proposed construction areas.

Mitigation Measure Sunset-D.3: The exposed bottom of removal areas should be scarified, mixed, and moisture conditioned to a minimum depth of 8 inches

Mitigation Measure Sunset-D.4: If the excavation to remove existing subsurface structures, pipelines, and loose fill soils extends below the minimum depth of over-excavation, it is recommended that all subsurface structures, utility lines, and uncontrolled fill extending below the over-excavation depth be removed to expose undisturbed, native soils across the entire building pad.

Mitigation Measure Sunset-D.5: All fill material should be placed in controlled, horizontal layers with optimum depth and moisture.

Mitigation Measure Sunset-D.6: To reduce risk of foundation movement, it is recommended that footings be supported on structural fill, and that the thickness of structural fill beneath the footings and the slab area be relatively uniform.

Mitigation Measure Sunset-D.7: Due to the high moisture content, shallow groundwater, and high compressibility of the on-site native soil, additional stabilization methods may be required. Acceptable stabilization methods include: (1) float rock worked into the soft soils and covered with a filter fabric; (2) geofabric with a 24-inch-wide overlap between sheets; or (3) a combination of both.

Mitigation Measure Sunset-D.8: If construction delays or the weather result in the drying of the fill surface, the surface should be scarified and moisture conditioned before the

³ *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed MTA Transportation Facility, October 23, 2003.*

next layer of fill is added. Each new layer of fill should be placed on a rough surface so planes of weakness are not created in the fill.

Mitigation Measure Sunset-D.9: Excavated soils, cleaned of deleterious materials (including rocks), can be re-used for fill.

Mitigation Measure Sunset-D.10: Each layer of fill under the building area within the upper 24 inches of the finished pad grade should be of similar composition to provide a relatively uniform expansion index beneath the building.

Mitigation Measure Sunset-D.11: Materials to be used as compacted fill should be analyzed by the Geotechnical Engineer to determine the physical properties of the materials.

Mitigation Measure Sunset-D.12: An evaluation of the consequences related to lateral settlement of the project's proposed structure is recommended.

Mitigation Measure Sunset-D.13: Prior to the start of the site preparation and/or construction. It is recommended that there be a meeting with the selected contractor and Advanced Geotechnical Services, Inc., to further discuss tasks related to the backfill of utility trenches, temporary excavations, shallow foundations, slab-on-grade, retaining wall design, and drainage.⁴

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. With implementation of the recommended mitigation measure, significant geotechnical impacts associated with grading and site design and seismic hazards would not occur as a result of the proposed project.

Sunset Avenue Project. Implementation of the recommended mitigation measure, significant geotechnical impacts associated with grading and site design and seismic hazards would not occur as a result of the proposed project.

Combined Projects. Due to the geographic distances between the two sites it is determined that there would be no combined impacts after mitigation measures are implemented on each site. Hence, the level of significance after mitigation at both locations would reduce the potential for geologic hazards to acceptable, less-than-significant levels.

⁴ *Advanced Geotechnical Services, Inc., Geotechnical Engineering Study Proposed Multi-Family Residential, February 13, 2004.*

5. Hazardous Materials

a. Project Impacts

West Los Angeles Transportation Facility. Based on the results of the site's exploration and laboratory analyses, shallow soil impacts from total recoverable petroleum hydrocarbons (TRPHs) are limited in lateral and vertical extent and can be removed or treated on-site and do not require remediation. Low detections of acetone in soil samples do not require further investigations as Environmental Support Technologies, Inc. (EST) has determined that the existing constituents will naturally degrade. Low isolated areas of soil and groundwater detections of total volatile petroleum hydrocarbons-gasoline (TVPHg), aromatic hydrocarbons, and fuel oxygenates (i.e., methyl tert butyl ether (MTBE) and tert amyl methyl ether (TAME)) are associated with unknown sources. Low concentrations of TVPHg, aromatic hydrocarbons, and fuel oxygenates in the soil or groundwater do not pose a significant risk to human health or the environment and do not warrant further assessment or remediation.

Although on-site uses have not resulted in significant impacts to soils or groundwater resources, a known northwest trending gasoline plume from a location southeast of the project site may result in a future adverse impact on groundwater resources beneath the project site.⁵ Remediation of the plume is on-going, but groundwater beneath the site could be adversely affected by TRPH, MTBE, and aromatic hydrocarbons. However, as the plume is not related to the construction or operation of the site, and construction activities would not require deep excavation that would encounter the underlying groundwater. No adverse impacts from hazardous materials would result from development of the project.

Sunset Avenue Project. Soil analyses and laboratory investigations indicate that oil and grease related TRPHs are present in the near-surface soils in numerous areas of the site, as well as in deeper soils around the existing fuel island. However, the Streamlined Risk Assessment has determined that the chemicals of potential concern (COPCs) would not have a significant impact on either human health or the environment.⁶

Groundwater analyses detected chloroform and 1,4-dioxane in two of the four samples. These detections are isolated and appear minor. According to the Streamlined Risk Assessment, the presence of the chloroform and 1,4-dioxane had no associated source(s) detected in the soil or soil vapor investigation. Chloroform sources cited in the United States Public Health Service

⁵ Telephone communication with Kirk Thompson, Registered Hydrogeologist and Environmental Assessor for Environmental Support Technologies, Inc., May 11, 2004.

⁶ MACTEC, Final Report—Streamlined Risk Assessment. August 17, 2004.

Web Page (<http://www.eco-usa.net/toxics/chcl3.shtml>) indicates that usual sources of chloroform releases are chemical companies, paper mills, and wastewater from sewage treatment plants. None of those land uses are associated with the Metro Division 6 property. Therefore, as no such COPCs were detected in the soil samples and as no such associated land uses that would generate such substances are present on the project site, no significant impact to groundwater would occur. No further analysis is required.

Combined Projects. Both the West Los Angeles Transportation Facility and the Sunset Avenue project sites have been determined to be candidates for case closure by the Los Angeles Regional Water Quality Control Board.⁷ Consequently, the LARWQCB has granted case closure on the Sunset Avenue site as of August 10, 2004.⁸ Neither site has significant levels of hazardous materials in either the soils or groundwater, thus, they would have no combined impacts. No further analysis is required.

b. Cumulative Impacts

West Los Angeles Transportation Facility. The existing contaminated soils on the West Los Angeles Transportation Facility can be treated through removal or on-site treatment. Hence, development of this site would not contribute a cumulative impact related to exposure of people to a health hazard. However, operation of the project would require the daily use and storage of hazardous materials, which may, in connection to related projects, have the potential to contribute to a cumulative risk to people or property as a result of a potential accidental release or explosion of a hazardous substance. Of the 11 sites identified as related projects (see Section III.B, Related Projects, and Section IV.I, Transportation and Circulation) to the Transportation Facility, one other location has the potential to contribute to cumulative impacts related to hazardous materials. A 250,000-sq.ft. industrial project is planned within the City of Culver City to be located at 10100 Jefferson Boulevard. As an industrial use, there is potential for this related project to have hazardous materials on-site. Should this related project store higher than threshold quantities of hazardous materials as defined by Chapter 6.95 of the California Health and Safety Code, then this project would be required to file an Accidental Risk Prevention Program with the City of Culver City Fire Department, which would contain information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. Further, employees and contracted service providers who would potentially be exposed to hazardous waste would be required under OSHA and Cal/OSHA to be trained and certified to handle hazardous waste and materials. As this related project and the Transportation Facility would comply with these

⁷ *Environmental Support Technologies, Inc., Phase II Site Assessment, November 18, 2003; MACTEC, Draft Final Report—Streamlined Risk Assessment. April 16, 2004.*

⁸ *California Regional Water Quality Control Board-Los Angeles Region, Underground Storage Tank Program Case Closure Division 6 100 Sunset Avenue, Venice (ID# 902910152), August 10, 2004.*

Federal and State regulations, the probable frequency and severity of cumulative consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance would be reduced to a less-than-significant level. Further, this related project and the Transportation Facility would develop and implement Accidental Risk Prevention Programs with the City of Culver City Fire Department and LAFD, respectively. Implementation of these federal, State, and local requirements would also reduce the potential for the related project and the Transportation Facility to result in cumulative impacts that would interfere with existing response or evacuation plans to a less-than-significant level.

Sunset Avenue Project. TRPHs in the soils and chloroform and 1,4-dioxane in the groundwater have been determined to not be present in significant concentrations, thus there are no significant impacts from hazardous materials on the site. Further, the LARWQCB has granted case closure on the Sunset Avenue site as of August 10, 2004.⁹ However, the existing Underground Storage Tanks (USTs) and the stored hazardous materials that exist on-site would be removed to prepare the site for redevelopment. Removal of these structures and hazardous materials could result in consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance. Additionally, related projects that may be developed during a similar timeframe, could result in the potential for a cumulative impact related to hazardous substances. Of the 21 identified related projects in proximity to the Sunset Avenue site (see Section III.B, Related Projects, and IV.I, Transportation and Circulation), one project has the potential to contribute to a cumulative impact. Within the City of Los Angeles, a gasoline station and mini-mart is proposed to be developed at 2005 Lincoln Boulevard. If developed concurrently, each site would potentially be handling and transporting hazardous materials and USTs. However, each site would comply with OSHA and Cal/OSHA regulations that require employees and contracted service providers to be trained and certified to handle hazardous waste and materials. Further, this related project would be required to develop and implement an Accidental Risk Prevention Program pursuant to Chapter 6.95 of the California Health and Safety Code and file with LAFD. The Accidental Risk Prevention Program would contain information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. Implementation of these Federal, State, and local requirements would reduce the potential for the related project and the Sunset Avenue Project from resulting in cumulative impacts that would result in an accidental release or explosion of a hazardous substance or interfere with existing response or evacuation plans to a less-than-significant level.

⁹ *California Regional Water Quality Control Board-Los Angeles Region, Underground Storage Tank Program Case Closure Division 6 100 Sunset Avenue, Venice (ID# 902910152), August 10, 2004.*

c. Mitigation Measures

West Los Angeles Transportation Facility.

Mitigation Measure WLA-E.1: Soils impacted with TRPH concentrations of 1,000 mg/Kg or greater shall be excavated during the grading for the proposed project.

Sunset Avenue Project.

Although no significant impacts associated with emergency response and evacuation would occur, the following mitigation measure is proposed to ensure emergency response and excavation is not significantly impacted during construction of the project:

Mitigation Measure Sunset-E.1: A Transportation Plan will be developed for the hauling of soil and debris from the project site.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. Implementation of the mitigation measures identified above would clear the Transportation Facility site of the existing contaminated soils. Once removed, the project would reduce the frequency of exposure or severity of consequences to people of exposure to health hazards to a less-than-significant level.

Sunset Avenue Project. No mitigation is required related to hazards or hazardous materials.

Combined Projects. Development of the West Los Angeles Transportation Facility and the Sunset Avenue projects would not result in significant impacts related to hazards or hazardous materials.

6. Water Quality

The analysis of water quality presented in this EIR regards the West Los Angeles Transportation Facility only. It was determined in the Initial Study that redevelopment of the Sunset Avenue project would have beneficial surface and groundwater quality effects. Although the Division 6 facility is in compliance with the waste load allocation (WLA) requirements of the NPDES Industrial Activities Storm Water Discharge permit (Order No. 97-03-DWQ), discharges of storm water runoff from the site are treated to the maximum extent practicable. Thus, insignificant amounts of industrial pollutants are discharged from the site, usually under intense

weather conditions. Therefore, by redeveloping the site as a residential use, the project would comply with a NPDES Municipal Storm Water and Urban Runoff permit (Order No. 01-182) and the Standard Urban Storm Water Mitigation Plan (SUSMP). Both the NPDES permit and the SUSMP ensure that storm water is treated on-site to reduce the level of typical residential pollutants (i.e., fertilizers and pesticides) to the maximum extent practicable. Hence, the beneficial effect on storm water quality would be related to replacing this industrial use with a residential use, which even under intense weather conditions would discharge fewer pollutants of a lower intensity than the Division 6 site.

a. Project Impacts

West Los Angeles Transportation Facility.

Construction. Construction of the project would first require the demolition and the clearing of the entire 4.66-acre site. Clearing of the site would expose all underlying soils to potential erosion, transportation via storm water, or direct contact with pollutants. Erosion and transport of these soils from the site could adversely affect surface water quality, while pollutants could migrate through the exposed soils into the groundwater beneath the site. Additionally, construction activities and exposure of construction materials may also lead to surface or groundwater pollution.

Adherence to the Best Management Practices (BMPs) required by the National Pollutant Discharge Elimination System (NPDES) General Construction Activity Permit and those identified in the Storm Water Pollution Prevention Plan (SWPPP) associated with the permit, would reduce the potential for construction materials and soils exposed during the grading and construction process from being transported off-site and into nearby storm water drainage infrastructure or from potentially percolating through the soils into the groundwater. Hence, through construction scheduling, proper use and maintenance of BMPs, and compliance with SWPPP guidelines, the project would not violate regulatory standards as identified in the NPDES permit or the Basin Plan for storm water discharges to receiving surface or groundwaters.

Operation. During the project's operational phase, the Transportation Facility would include a bus and chassis washing area, a CNG fueling station, bus maintenance bays, trash and vacuum containers, and open surface parking for both buses and employee vehicles. These uses have potential to adversely effect surface water quality. To specifically address the runoff from the bus and chassis washing area, a reclamation area would be located adjacent to the wash bays that would recycle the water to be reused on-site. Further, compliance with the requirements of the State NPDES Industrial Activities Permit and SWPPP, along with the City of Los Angeles' Standard Urban Storm Water Mitigation Plan (SUSMP) would ensure that the project's

operational activities, the type and placement of BMPs, and monitoring of the site's storm water runoff would result in no significant impact on water quality.

During the operational phase of the project, the majority of the 4.66-acre site would be covered by impervious surfaces. This would act as an effective barrier between storm water and other nuisance waters from percolating into the soils. By barring percolation, the potential for waters from the site to reach groundwater resources would be eliminated. As this is not a significant change in relation to the site's existing impervious conditions, impeding percolation of storm and/or nuisance waters would not result in an adverse effect on groundwater recharge. Additionally, water to be used on-site would be delivered via water utility lines provided by the City of Los Angeles Department of Water and Power. No direct use of groundwater resources would occur on the project site. Therefore, the project would have no adverse impacts on groundwater levels.

b. Cumulative Impacts

West Los Angeles Transportation Facility. Eleven related projects have been identified in proximity to the proposed West Los Angeles Transportation Facility site. The eleven projects fall into one of four categories: industrial, transportation, office, or residential. These urban development projects could potentially contribute point and non-point source pollutants to the surface or groundwater resources, resulting in a cumulative impact to water quality. However, all of the related projects would also be subject to State NPDES permit requirements for both construction and operation, including developing SWPPPs. Development of SUSMPs is dependant on a project's location within the City of Los Angeles. Regardless of location, each project would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to surface and groundwater quality. Thus, cumulative impacts to water quality would be less than significant.

c. Mitigation Measures

West Los Angeles Transportation Facility. The proposed project would comply with all standards, guidelines, and requirements of the State NPDES Construction Activities and Industrial Permits, and City of Los Angeles requirements as part of these regulations. The SWPPP and a SUSMP would be developed specifically for the project site to address the individual characteristics of the site's needs to treat potential storm water contamination. Compliance with these requirements is mandated by law to ensure that impacts to surface and groundwater quality are reduced to less than significant levels. As such, these permits, plans, and BMPs are not considered to be mitigation measures, but integral parts of the project design and operation. Therefore, no mitigation measures are required.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. Compliance with regulatory requirements would ensure that significant impacts to water quality would not occur as a result of the project, and no mitigation measures are required.

7. Land Use

a. Project Impacts

West Los Angeles Transportation Facility. The Transportation Facility Project would provide the development of new uses on the project site that are consistent with the Industrial Use designation and policies presented in the West Adams-Baldwin Hills-Leimert Community Plan. The project is consistent with use, density, and height restrictions prescribed under the City's MR1 1VL zoning designation, but the project's front-yard setback may be less than the prescribed 15 feet. However, pursuant to Section 53090 et. seq. of the California Government Code, as the proposed project is a rapid transit facility, Metro is not required to comply with City of Los Angeles zoning regulations for the development of property located in the City of Los Angeles. Metro nevertheless intends that the development of the West Los Angeles Transportation Center comply with City zoning regulations to the maximum extent feasible. Compliance with the full front yard setback requirement of this zone, would require Metro to reduce the proposed number of bus parking spaces, thereby decreasing Metro's ability to effectively serve the central and western portions of its service area. Metro would nevertheless provide the maximum feasible setback along Jefferson Boulevard consistent with Metro's ability to achieve project objectives. Further, pursuant to Section 53090 et. seq., the approximately 72,000 square-foot project would not be subject to Section 16.05 of the Los Angeles Municipal Code, which provides that projects containing 50,000 square feet or more of nonresidential floor area are subject to approval of Site Plan Review by the City.

Implementation of the proposed project would support the Community Plan objectives pertaining to industrial uses and job opportunities, generally; and within existing areas so designated, more specifically. It would also support City Framework Element and SCAG regional policies, related to cost minimization in the provision of infrastructure and provision of services, as well as support for conversion of vehicles to clean fuel/alternative fuel; effectiveness of services, and involvement of the private sector in developing community-level accessibility plans.

The Transportation Facility Project would not be inconsistent with the adopted land use/density designation in the Community Plan for the site; nor would it be inconsistent with the

General Plan or adopted environmental goals or policies contained in other applicable plans. Impacts regarding the regulatory framework would be less than significant.

Implementation of the Transportation Facility Project would alter the project site from its current state, a vacant parcel with three small unused and neglected buildings, to an improved state with the project's bus parking and related maintenance and administration facilities. The project is an in-fill project, light-industrial in use, comparable to and consistent with the light-industrial uses surrounding the project site and located throughout this larger light-industrial/commercial district. It would not alter any land-use patterns in the area. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Impacts of the Transportation Facility Project regarding surrounding uses would be less than significant.

Sunset Avenue Project. The Sunset Avenue site is located within the boundaries of the Venice Community Plan, the Venice Local Coastal Program Land Use Plan, and the Venice Coastal Zone Specific Plan, which establish general development policies for the project site, as well as specific regulations regarding use, density, heights and setbacks. They also establish policies and regulations aimed at protecting coastal resources pursuant to the California Coastal Act.

While existing Community Plan and Coastal Plan designations reflect Industrial use and the current zoning is M1, the Specific Plan proposes a re-designation of the site's current M1 zoning to a zone of CM-1. The most direct policy regarding future use of the site, Policy I.C.7 of the Local Coastal Program Land Use Plan, recommends that future development of this site should "... include affordable housing, which may be a mixed-use residential-commercial project, and public parking structure as a measure to improve public access."

The proposed project is a mixed-use project that includes a maximum of 225 residential units, of which 17 units would be designated for very low income households, and 10,000 square feet of commercial use, as well as 71 parking spaces for public use, in accordance with Beach Impact Zone provisions and an additional 44 spaces that could be used to provide fee parking for surrounding residents. Therefore, by virtue of its mixed-use composition inclusive of an affordable housing component and public parking, the proposed project would be consistent with Policy I.C.7. The project's proposed rezoning of the site to CM-1 would be consistent with the intent of the Specific Plan.

Development of the proposed uses would also contribute to various regional policies. It would support SCAG policies and Citywide Framework Element policies that encourage land use patterns with a range of densities, mixed-use development, the development of community centers with a range of uses, and increases in housing availability at a variety of densities and

costs, and the establishment of a Community Center in the vicinity of the project site that is designated in the City's Framework Element.

With a maximum of 225 residential units the project's residential density would be consistent with plan density designations (pursuant to the CM zone) as adjusted by plan policies and City regulation that offer density bonuses and other incentives; e.g., increased heights to encourage the provision of affordable housing. The density bonus is 25 percent, and an additional 10 percent is allowed when such housing is located in areas with qualifying characteristics. The later 10 percent bonus would require a plan amendment by the Coastal Commission, upon a showing that the additional density would not have adverse effects on coastal resources. With the inclusion of 17 affordable units for very low-income occupants, the site would have an allowable base CM zone density of 171 units. 214 units would be allowed under the 25 percent bonus, and 231 units would be allowed with the additional 10 percent. A mitigation measure is included below requiring the plan amendment for any number of units greater than 214.

The project proposes Specific Plan exceptions for height and FAR. This would allow heights of up to approximately 56 feet, an amount greater than the 35-foot limit and a FAR of approximately 2.0:1 in contrast to the 1.5:1 ratio designated in the plan. An increase in building heights and FAR commensurate with the increase in density should be expected and would be consistent with the intent of the plan policies and regulations. Therefore, the project would not be inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; nor would it be inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

While project's densities, height and FAR would be consistent with the plan and regulations, when accounting for the encouraged density bonuses, the increase in site density would have certain affects on the physical environment. This increased density has been considered in and has contributed to the conclusions that the proposed project would not have significant impacts on any environmental subject which may be influenced by density, except the aesthetics subject due to project building heights.

As a condition of approval for the project, the applicant will be required to provide affordable dwelling units in accordance with the requirements of the Venice Local Coastal Program and applicable provisions of State law. In connection with these requirements, the applicant will be required to execute a covenant to the satisfaction of the Los Angeles Housing Department guaranteeing that the applicable affordability criteria will be observed for at least 30 years from the issuance of the certificate of occupancy for the project.

The project would not have adverse affects on coastal resources, even with the full application of the density bonuses. The uses would be consistent with those recommended in the certified Coastal Land Use plan, and responsive to coastal policies. The public parking would support public access to the coastal zone and shoreline, in particular. The commercial uses would contribute to the development of Main Street as a visitor-destination. The project would not have adverse affects on visual pedestrian access to coastal resources.

Implementation of the Sunset Avenue Project would convert the project site from its current use as a bus parking and maintenance facility to a developed site with up to 225 residential units and 10,000 square feet of commercial uses, including a health club/spa, coffee shop and retail. While site character and activity would change, the project would not alter the general land use relationships in the area. Main Street and Pacific Avenues would maintain their current transportation functions, and Sunset Avenue and Thornton Avenue would continue to allow neighborhood vehicular access as well as pedestrian access between Main Street and Pacific Avenue. As infill development, the proposed project would continue existing development patterns in the immediate locale. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Impacts of the Sunset Avenue Project regarding surrounding uses would be less than significant.

Combined Projects. Potential adverse land use impacts associated with each of the projects are based on local conditions and the specific development proposals at each of the development sites. Therefore, the impacts are as reported for the Transportation Facility and Sunset Avenue Projects, independently. Their relationship to applicable regulations occurs in different Community Plan areas, and the proposed developments are neither large enough, nor sufficiently proximate to combine in affecting the overall urban form.

At the same time, it may be noted that implementation of each of the projects is interrelated. The net effect is to allow relocation of an infrastructural type of use into an area that is more distant from residential areas, and outside of the coastal zone. In combining the two projects, an opportunity is created for Metro to meet its obligations for supporting public transit, without having to rely on eminent domain, relocation of existing uses, or seeking amendments to existing plans. Thus, the combined projects are supportive of policies that encourage innovative solutions, efficiency in the provision of public transit services and private/public partnerships in furthering land use goals and policies.

b. Cumulative Impacts

Each of the proposed projects is located in a different community with impacts affected by a different set of related projects and local regulations. The changes in land use impacts and potential cumulative changes are localized in nature and would not involve alterations in the

larger-scale regional form. Impacts of the two projects would not have combined effects with regard to land use.

The proximity of related projects to the two project sites is limited. Related projects would typically be in-fill projects at more distant locations than would be required to comply with local regulations. The nearest related project that could potentially have land use effects, is the Exposition LRT line that would pass north of the Transportation Facility site with a station located at the intersection of Jefferson Boulevard and La Cienega Boulevard. This project would include mitigation measures to address land use issues related to neighborhood effects and displacement and relocation; and would reduce potential impacts of that project to less than significant. Therefore, the proposed project would not combine with other projects in affecting the regulatory framework nor the patterns of local development.

Therefore, the proposed projects would not contribute to a cumulative inconsistency with the adopted land use/density designation in the Community Plans, redevelopment plans or specific plan; nor would they contribute to a cumulative inconsistency with the General Plan or adopted environmental goals or policies contained in other applicable plans. The projects would not contribute to a cumulative affect that would cause the disruption, division or isolation of an existing neighborhood, community or land use. Cumulative impacts would be less than significant.

c. Mitigation Measures

West Los Angeles Transportation Facility. With implementation of the West Los Angeles Transportation Facility, land use impacts would be less than significant and no mitigation measures would be required.

Sunset Avenue Project. The following mitigation measures are recommended to ensure that the Sunset Avenue Project is consistent with the Local Coastal Land Use Plan.

Mitigation Measure Sunset-G.1 The total number of units and market/affordable mix shall be consistent with California Code Section 65915, as reflected in LUP Policy I.A.13 (a).

Mitigation Measure Sunset-G.2 Any number of units in addition to 214 shall only be allowed upon a certified LCP amendment, based on a finding that no adverse impacts on coastal resources would result per LUP Policy 1.A.13 (d).

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. The Transportation Facility Project would not be inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site, nor would it be inconsistent with the General Plan or adopted goals or policies contained in other applicable plans. Therefore, impacts regarding the regulatory framework would be less than significant.

The Transportation Facility Project would be an in-fill project contributing to the over-all form of the light-industrial/commercial area in which it is proposed. It would not alter any land-use patterns in the area. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Impacts of the Transportation Facility Project regarding surrounding uses would be less than significant.

Sunset Avenue Project. The Sunset Avenue Project would be compatible with the overall aims of applicable plans and therefore considered not to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project would not be inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site, nor would it be inconsistent with the General Plan or adopted goals or policies contained in other applicable plans. Therefore, impacts of the Sunset Avenue Project regarding the regulatory framework would be less than significant.

The Sunset Avenue Project would be an in-fill project placing residential uses amidst existing and anticipated residential uses. It would not alter the activities along Main Street, contributing to its mixed-use character, or activities along Pacific Avenue. It would not alter any land-use patterns in the area. Therefore, the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Impacts of the Sunset Avenue Project regarding surrounding uses would be less than significant.

8. Noise

a. Project Impacts

West Los Angeles Transportation Facility. Project construction would require the use of mobile heavy equipment with high noise level characteristics. Noise levels from on-site construction activity would result in a marginal noise level increase of 2 dBA L_{eq} at the closest sensitive land use (i.e., Syd Kronenthal Park) in comparison to the construction-period incremental noise significance criterion of 5 dBA. At the nearest residence location (within Blair Hills) that has a direct line-of-sight to the project site, construction-period noise would result in a

maximum noise level increase of 3 dBA L_{eq} , which is also less than the 5 dBA significance criterion. Noise level increases would be less at all other noise-sensitive receiver locations due to greater sound-distance attenuation benefit and/or higher baseline ambient sound conditions. As such, short-term on-site construction noise impacts would be less than significant. With respect to impact pile driving, ground borne vibration would be approximately 0.124 inch per second peak particle velocity (PPV) at a distance of 75 feet from the source. As no structures are present within 75 feet of potential pile driving activity, potential vibration impacts would be well below the 0.2 inch per second PPV significance threshold. Vibration impacts associated with construction would be less than significant and no mitigation measures are required.

During the operational phase, traffic related to the project would not result in an increase in the CNEL along any roadway segment by 5 dBA or 5 dBA L_{eq} during the project peak hour. In addition, project-related operational (i.e., non-roadway) noise sources, including idling buses, backup alarm beeps, a bus wash operation, and air compressor machines, would not increase ambient noise by 5 dBA and would be in compliance with the City Noise Ordinance. Noise levels from on-site activity would result in a marginal noise level increase of 0.3 dBA and 1.9 dBA to the daytime and nighttime ambient sound levels, respectively, at the closest sensitive land use (i.e., Syd Kronenthal Park). At the nearest residence location (within Blair Hills) that has a direct line-of-sight to the project site, noise from on-site activity would result in a marginal increase of 0.7 dBA and 1.5 dBA to the daytime and nighttime ambient sound level, respectively. Noise level increases would be less at all other noise-sensitive receiver locations due to greater sound-distance attenuation benefit and/or higher baseline ambient sound conditions. As noise level increases would not exceed the 5-dBA significance criterion, impacts related to on-site facility noise levels would be less than significant. No mitigation would be necessary.

Sunset Avenue Project. Noise levels from on-site construction activity would exceed the construction-period noise significance criterion by adding 5 dBA or more to ambient noise levels at property locations immediately surrounding the project site prior to implementation of feasible mitigation measures. With respect to impact pile driving, ground borne vibration would be approximately 0.124 inch per second PPV at a distance of 75 feet from the source. As structures are present within 75 feet of potential pile driving activity, potential vibration impacts would exceed the 0.2 inch per second PPV significance threshold without incorporation of mitigation measures.

During the operational phase, traffic related to the project would not result in an increase in the CNEL along any roadway segment by 5 dBA. In addition, project-related operational (i.e., non-roadway) noise sources would not increase ambient noise by 5 dBA and would be in compliance with the City Noise Ordinance. As noise level increases would not exceed the 5-dBA significance criterion, impacts related to on-site facility noise levels would be less than significant. No mitigation would be necessary.

Combined Projects. There would be no construction activity overlap occurring at the Transportation Facility and Sunset Avenue project site locations. In addition, the project sites are located approximately 6 miles apart. Noise events that occur at one site location would thus have no effect on the noise environment that surrounds the other site location. As such, impacts would be less than significant.

The project sites are located approximately 6 miles apart. Noise events that occur at one site location would thus have no effect on the noise environment that surrounds the other site location. In addition, there is sufficient distance between the two project site locations such that the “areas of potential effect” for roadway noise impacts are mutually exclusive. As such, impacts would be less than significant.

b. Cumulative Impacts

Traffic volumes from the proposed project and 34 related projects (i.e., 11 related projects in the area surrounding the Transportation Facility site location and 23 related projects in the area surrounding the Sunset Avenue site location), combined with ambient growth traffic, would result in a maximum increase of 0.7 dBA CNEL in areas subject to noise exposure deemed “conditionally unacceptable” or “normally unacceptable,” and result in a maximum increase of 3.3 dBA CNEL in areas subject to noise exposure deemed “normally acceptable.”

In addition to noise from the related projects discussed above, long-term operation of the Mid-City/Exposition Light Rail Transit (LRT) alignment (which is anticipated to be operational in year 2012) would also add to cumulative noise exposure along Jefferson Boulevard near the Transportation Facility site location. Based on the noise analysis published in the Mid-City/Westside Transit Draft EIS/EIR and using FHWA RD-77-108 calculation procedures to adjust for distance, noise exposure from long-term LRT operation would be approximately 56 dBA CNEL at the closest noise-sensitive location (Syd Kronenthal Park) and 66 dBA CNEL at the industrial uses that are immediately adjacent to the LRT alignment. The overall cumulative impact (i.e., noise from project, related projects, and ambient growth traffic volumes, and noise from the LRT alignment) would be 4.3 dBA CNEL and 4.7 dBA CNEL at the Syd Kronenthal Park and adjacent industrial use locations, respectively.¹⁰ The cumulative noise increases would not exceed the 5 dBA significance threshold. As such, cumulative roadway and LRT noise impacts would be less than significant

¹⁰ Refer to Appendix E (Noise) for supporting calculations.

Due to City of Los Angeles Municipal Code provisions that limit stationary-source noise from items such as roof-top mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project.

c. Mitigation Measures

West Los Angeles Transportation Facility. Although no significant impacts associated with construction or operation of the Transportation Facility were identified, the following mitigation measures are prescribed to implement measures requested in the Motion by Supervisor Yvonne B. Burke and approved by the Metro Board of Directors on Agenda Item No. 26, dated September 25, 2003: (The Motion is included in this Draft EIR as Appendix H-1).

Mitigation Measure WLA-H.1: The composite noise level emanating from the Transit Facility shall not exceed 84 dBA when measured at a distance of 25 feet from the site perimeter between the hours of 9:00 P.M. and 7:00 A.M.

Mitigation Measure WLA-H.2: Employees shall not congregate in the roof-top parking area between the hours of 9:00 P.M. and 7:00 A.M. Signs stating such a message shall be posted conspicuously throughout the roof-top parking facility area.

Mitigation Measure WLA-H.3: Employees shall not activate car alarms in the roof-top parking area between the hours of 9:00 P.M. and 7:00 A.M. Signs stating such a message shall be posted conspicuously throughout the roof-top parking facility area.

Sunset Avenue Project. Mitigation Measures H-1 through H-7 implement mitigation measures to reduce potentially significant construction impacts.

Mitigation Measure Sunset-H.1: Prior to the issuance of any grading, excavation, foundation, or building permits, the Applicant shall ensure that all construction documents require contractors to comply with Los Angeles Municipal Code Section 41.40 which requires all construction and demolition activity located within 500 feet of a residence to occur between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturday;

Mitigation Measure Sunset-H.2: In the event pile driving is required, pile drivers shall be equipped with noise control having a minimum quieting factor of 10 dBA;

Mitigation Measure Sunset-H.3: To the extent feasible, loading and staging areas must be located on site and away from noise-sensitive uses surrounding the project site;

Mitigation Measure Sunset-H.4: Heavy-duty trucks shall utilize a City-approved haul route that avoids noise-sensitive land uses to the maximum extent feasible;

Mitigation Measure Sunset-H.5: During periods of active construction activity, an eight-foot temporary sound barrier (e.g., wood fence) shall be erected around the site perimeter such that the “line of sight” between construction activity and adjacent residential properties is obstructed;

Mitigation Measure Sunset-H.6: All pile driving within 75 feet of any off-site adjacent structure shall be conducted with equipment such as sonic pile driver, or similar type of equipment, which generates a level of ground-borne vibration that is less than 0.2 inch per second of peak particle velocity at a reference distance of 50 feet; and

Mitigation Measure Sunset-H.7: All exterior walls, floor-ceiling assemblies (unless within a unit) and windows having a line of sight (30 degrees measured from the horizontal plane) of Pacific Avenue or Main Street shall be constructed with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a Sound Transmission Class of 50 (45 if field tested) as defined in the UBC Standard No. 35-1, 1982 edition. City of Los Angeles sign-off shall be required prior to obtaining a building permit. The Applicant, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the City of Los Angeles which achieves a maximum interior noise of CNEL 45 dBA (Residential).

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. No significant impacts associated with construction or operation of the Transportation Facility were identified.

Sunset Avenue Project. Mitigation Measures Sunset-H.1 through Sunset-H.5 would reduce noise impacts during construction by 3 to 10 dBA at areas immediately adjacent to the project site. However, noise levels would continue to exceed the 5-dBA significance criterion at residential properties that are located immediately north of the project site across Sunset Avenue, east of the project site across Main Street, south of the project site across Thornton Place, and west of the project site across Pacific Avenue.

Mitigation Measure Sunset-H.6, identified above, would reduce potential impacts from ground-borne vibration during construction to a level that is less than significant.

Mitigation Measure Sunset-H.7, identified above, would ensure that interior noise within residential dwellings meet adopted City standards. As such, potential impacts with respect to community noise exposure/land use compatibility would be less than significant.

9. Transportation and Circulation

a. Project Impacts

West Los Angeles Transportation Facility. During construction, the West Los Angeles Transportation Facility would generate traffic from construction equipment, crew, vehicles, haul trucks and delivery vehicles. In general, construction hours and days are planned to occur from 7 A.M. to 3 P.M., Monday through Friday with occasional overtime hours and some weekends. Since construction workers' trips would occur outside of the morning and afternoon peak hours, construction impacts from this particular type of traffic activity would be less than significant.

As indicated in the traffic analysis, a short-term adverse traffic impact may occur in the immediate area during the busiest construction phases. Excavation activity at the project site would be limited and construction impacts would be less than significant. Nonetheless, Work Area Traffic Control Plans are typically advised in construction projects, to minimize non-significant adverse impacts, and to assure that significant impacts do not occur. Therefore mitigation measures are proposed, requiring a Work Area Traffic Control Plan that includes traffic control measures, signs, delineators and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.

During operation, it is estimated that the Transportation Facility would generate an average of 1,666 vehicle trips per day with 107 peak-hour morning trips and 103 peak-hour afternoon trips at the project driveways.¹¹ Bus traffic occurs throughout the day and, as such, has less impact during A.M. and P.M. peak hours than typically occurs with other uses. None of the study intersections analyzed are impacted by project traffic volume using the significant impact criteria established by LADOT. Since none of the project impacts exceed the significance threshold, less than significant traffic impacts would occur.

However, a potentially significant bus routing impact has been identified at the intersection of Jefferson and La Cienega Boulevards due to the physical roadway constraints at this intersection. Inbound buses traveling southbound on La Cienega Boulevard may have a difficult right-turn maneuver to westbound Jefferson Boulevard. The travel path of the

¹¹ Each bus was converted to an equivalent number of passenger cars PCE, to account for the additional space occupied and operating capabilities compared to passenger cars. Pursuant to the Highway Capacity Manual, the recommended average PCE value for converting heavy vehicles is 2.0.

southbound bus would need to encroach into the adjacent through lane to negotiate this southbound right turn. Test runs have been made by Metro and it has been determined that the buses can negotiate the turn, but it is restricted. At peak times, this intersection is congested and this right turn could present an operating challenge. A mitigation measure is recommended to alleviate the operating challenge.¹² The proposed mitigation measure would also increase the storage capacity of the left-turn lane for eastbound Jefferson Boulevard travelers onto northbound La Cienega Boulevard to accommodate additional project traffic.

Sunset Avenue Project. As with the Transportation Facility, construction equipment, crew vehicles, haul trucks and delivery vehicles would generate traffic during construction activities. Construction workers' trips would occur outside of the morning and afternoon peak hours, and therefore, construction impacts from this type of traffic activity would be less than significant. Construction would include the export of approximately 125,000 cubic yards of material. During the early stages of the grading operation, it is estimated that moving this amount of material would generate up to approximately 100 truckloads per day, or 200 directional daily trips. During excavation, conflicts between truck haul activities and street traffic, and pedestrian travel could occur due to site constraints related to the project's location, with nearby neighborhoods and certain roadway limitations. Therefore, the project's construction impacts on traffic due to excavation on traffic are considered a potentially significant short-term impact, prior to mitigation. A mitigation measure requiring a Work Area Traffic Control Plan is proposed to identify all traffic control measures, signs, delineators and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.

The net new operational traffic added to the local streets by the Sunset Avenue Project is 1,168 daily trips with 107 A.M. peak-hour trips and 174 P.M. peak-hour trips. Access to the proposed residential uses would be located via Sunset Avenue, approximately 100 feet west of Main Street. The residential access would provide egress to both Main Street and Pacific Avenue with ingress from Main Street only. The project's commercial and visitor access would be provided by an entrance/exit on Main Street. The proposed project would significantly impact two intersections located in the City of Los Angeles including the following: Main Street and Rose Avenue (P.M. only) and Main Street and Sunset Avenue (P.M. only). Because of public comments regarding potential traffic impacts on weekends, a traffic analysis was also performed

¹² This traffic analysis identified an alternative mitigation measure for this intersection. This measure would reroute the inbound buses to continue southbound on La Cienega Boulevard to Rodeo Road and make the southbound right-turn at that intersection with another right turn from westbound Rodeo Road to northbound Jefferson Boulevard. The revised inbound route provides right-turn capacity that can accommodate the bus maneuvers but may create noise impact to nearby residential units. Supervisor Yvonne B. Burke's motion of September 25, 2003, Agenda Item No. 26, calls for avoiding this routing during peak periods, and the hours of 9:00 P.M. to 7:00 A.M. to avoid noise impact. Therefore, this alternative routing is not currently proposed.

for the Saturday peak hour. At this time the project would generate 1,417 net daily trips with 147 Saturday midday peak-hour trips. This is 29 fewer trips than would occur during the significantly impacted, weekday P.M. peak hour. Significant impacts would not occur at any intersections during the week end peak hour.

b. Cumulative Impacts

Cumulative effects of traffic have been incorporated into the above analysis for the Transportation Facility and Sunset Avenue Projects. Consequently, impacts of cumulative growth are already incorporated in the traffic models for each project.

Based on the 2002 Congestion Management Program, the nearest CMP monitoring location to the West Los Angeles Transportation Facility is La Cienega Boulevard and Jefferson Boulevard. In the absence of the Transportation Facility, future traffic conditions at the three study intersections are expected to worsen over existing conditions during both A.M. and P.M. peak hours. Although the project would contribute to a decline in service at each study intersection, the contribution would be less than significant, as it would not exceed the thresholds established by LADOT. Therefore, no specific off-site mitigation measures are required for the Transportation Facility site.

The intersection of Lincoln Boulevard and Venice Boulevard is the closest CMP location to the Sunset Avenue Project. The proposed project does not exceed these CMP traffic growth limits at this location. Therefore, no additional CMP analysis is necessary. Future traffic conditions without the Sunset project would result in reduced service, compared to existing conditions, at the 13 study intersections during both A.M. and P.M. peak hours. The proposed project would contribute to significant impacts at three of the study intersections prior to mitigation. Mitigation measures for the Sunset Avenue Project have been recommended at each significantly impacted intersection.

c. Mitigation Measures

West Los Angeles Transportation Facility

1. Construction Mitigation

Mitigation Measure WLA-I.1: Prior to the issuance of construction permits the developer shall prepare Work Area Traffic Control Plans that at a minimum should include:

- Identification of a designated haul route to be used by construction trucks;

- Provide an estimate of the number to trucks trips and anticipated trips;
- Identification of traffic control procedures, emergency access provisions, and construction alternative crew parking locations;
- Identification of the on-site location of vehicle and equipment staging;
- Provide a schedule of construction activities;
- Limitations on any potential lane closures to off-peak travel periods;
- Scheduling the delivery of construction materials during non-peak travel periods, to the extent possible;
- Coordinating deliveries to reduce the potential of trucks waiting to unload building materials;
- Prohibiting parking by construction workers on neighborhood streets as determined in conjunction with City Staff.

2. Operational Mitigation

Mitigation Measure WLA-I.2: Provide intersection modifications, such as street widening and restriping at the intersection of Jefferson and La Cienega Boulevards to alleviate the tight right-turn. Widen Jefferson Boulevard along the south side west of La Cienega Boulevard and shift the traffic lanes southerly providing a wider westbound curb lane for buses to turn into. This mitigation measure is shown in Section IV.I, Transportation and Circulation. This street widening is within the proposed Exposition Light Rail Transit Project right-of-way and must be done in conjunction with any future Exposition transit project. The design of both projects shall be coordinated for compatibility. Further, the improvements at this intersection shall include restriping of the left-turn queuing lane on Jefferson Boulevard to northbound La Cienega Boulevard to increase the storage capacity, pursuant to discussions with LADOT.

Sunset Avenue Project

1. Construction Mitigation

Mitigation Measure Sunset-I.1: Prior to the issuance of construction permits the developer shall prepare Work Area Traffic Control Plans that should include:

- Identification of a designated haul route to be used by construction trucks;

- Provision of an estimate of the number to trucks trips and anticipated trips;
- Identification of traffic control procedures (including, but not limited to, the use of a flagman during ingress and egress of trucks and heavy equipment), emergency access provisions, and construction alternative crew parking locations;
- Identification of the on-site location of vehicle and equipment staging;
- Provision of a schedule of construction activities;
- Limitations on potential lane closures to off-peak travel periods;
- Scheduling the delivery of construction materials during non-peak travel periods, to the extent possible;
- Coordination of deliveries to reduce the potential of trucks waiting to unload building materials (delivery trucks shall be brought onto and stored within the project site);
- Prohibition of parking by construction workers on neighborhood streets as determined in conjunction with City;
- Identification of off-site staging procedures for haul trucks during excavation;
 - Haul truck staging shall occur on a designated major arterial street, or off-street parking lot where the potential for residential parking and traffic impacts are less than significant. Off-site trucks shall then be called to the site for loading operations;
 - Staging on Main Street shall be avoided to the extent feasible. Any staging on Main Street shall be very limited and allowed only on special occasions and pre-approved by the City via a street use permit
- Provision of off-street parking capacity for construction workers with sufficient capacity for those who cannot park on-site during the demolition, grading, and parking structure construction phases, with shuttle services as necessary.

2. Operational Mitigation

Mitigation Measure Sunset-I.2: Right-Turn Restrictions—The proposed Main Street non-residential access shall be restricted to right-turns only (i.e., no left-turn ingress or egress will be permitted at this driveway).

Mitigation Measure Sunset-I.3: Main Street and Rose Avenue—Implement the improvement listed for Main Street and Rose Avenue pursuant to the Venice Community Plan Transportation Program by restriping the east- and westbound Rose Avenue approaches to Main Street to provide an exclusive left-turn lane and an optional thru/right-turn lane. Implementation of this improvement would require the removal of approximately four on-street parking spaces on Rose Avenue east of Main Street.

Mitigation Measure Sunset-I.4: Main Street and Sunset Avenue—Modify the southbound Main Street approach to Sunset Boulevard to provide an optional thru/left-turn lane, one through lane and a right-turn lane. Restripe the westbound Sunset Avenue approach to Main Street to provide an exclusive right-turn lane and one optional thru/left-turn lane. Construct and restripe the west leg of the intersection to include one exclusive right-turn lane and one through/left-turn lane. Implementation of this improvement would require the removal of approximately three on-street parking spaces on the west side of Main Street north of Sunset Avenue.

(The above required street improvements shall be guaranteed before the issuance of building permits through the B-permit process of the Bureau of Engineering.)

Mitigation Measure Sunset-I.5: Upgrade the existing pedestrian crossings located across Main Street at Sunset Avenue and across Pacific Avenue at Sunset Avenue with flashing markers/signage; i.e., “Smart Crosswalks

Mitigation Measure Sunset-I.6: Lincoln Boulevard and Rose Avenue—The proposed project shall provide a fair-share contribution to the planning and implementation of the rapid bus transit system on Lincoln Boulevard currently under study by the Lincoln Corridor Task Force (LCTF).

Mitigation Measure Sunset-I.7: Pursuant to Section 6 of the Coastal Transportation Corridor Specific Plan (CTCSP), the applicant, except as exempted, shall pay or guarantee payment of a Transportation Impact Assessment Fee (TIA) prior to issuance of any building permit, as applicable.

Mitigation Measure Sunset-I.8: The applicant shall consult with LADOT for driveway and internal circulation requirements.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. The traffic impacts associated with the construction activities are less than significant. (Mitigation measures were not required, however pursuant to Standard Construction Practices, mitigation measures that reduce the non-significant impacts were proposed.) In addition, the Transportation Facility would not significantly impact any of the three study intersections analyzed; therefore, no mitigation measures are required. Routing impacts would be less than significant with the proposed mitigation for Jefferson and La Cienega Boulevards.

Sunset Avenue Project. The proposed Work Area Traffic Control Plans that are recommended as project mitigation measures address specific adverse conditions that could arise due to conflicts between truck-haul activities and street traffic and pedestrian travel. These measures would reduce potential construction impacts to less-than-significant levels. Impacts from project traffic operations would be less than significant with the implementation of the proposed mitigation measures.

Combined Projects. The future cumulative analysis included related projects, either under construction or planned, located within each project's study area. The lists of related projects were developed pursuant to direction from the LADOT, Culver City and Santa Monica. The lists of related projects for the Transportation Facility and Sunset Avenue do not share any projects. Therefore, their study areas are distinct and their combined impacts would be less than significant.

10. Parking

a. Project Impacts

West Los Angeles Transportation Facility. Construction of the proposed project would result in a temporary demand for employee parking and equipment staging areas. When on-site staging and parking is not available, a secondary staging area is planned to occur in the parking lane on the east side of Jefferson Boulevard, adjacent to the site. The project applicant would be required to submit formal construction staging and traffic control plans. Short-term on-street parking impacts may occur in the immediate area during the busiest construction phases (e.g., foundation, building shell and finish construction phases). However, due to the size of the project site and the relatively limited area of the proposed structural improvements, considerable on-site parking capacity should be available during most of the construction period for construction workers. As a result, substantial off-site parking inconvenience would not occur and a less than significant parking impact would occur during construction.

Upon the completion of construction, the proposed project would provide surface parking stalls for up to 175 buses. The project would provide a parking deck with 240 spaces serving the employees working on-site in maintenance and administrative functions as well as bus driving staff. These parking provisions exceed the parking requirements set forth in the LAMC, and would more than accommodate the employees required to meet the project workloads. Therefore, the Transportation Facility's parking impact during operation would be less than significant.

Sunset Avenue Project. Residential parking is very limited in the project area as a result of historical development patterns in which the coastal area of Venice developed prior to extensive reliance on the automobile for personal mobility. Construction of the Sunset Avenue Project would be completed in approximately 24 months and would occur in three general phases, each phase generating its own combination of construction equipment. The surrounding neighborhood would experience different impacts based on the phase, its duration and equipment mix. Due to the increase in the number of employees during construction, on-street parking could be affected in the project area. As a result, the Sunset Avenue Project would cause a substantial temporary inconvenience to automobile parkers during construction and a significant parking impact could occur during construction. The traffic mitigation program would require the approval of a Work Area Control Plan to minimize potential conflicts between construction activities, residents, street traffic, and pedestrians. In addition, parking mitigation measures are proposed to address temporary parking impacts in the community.

Following construction, the entire project would rely on the newly provided parking capacity in the two-level subterranean parking facility. Commercially available parking for beach visitors and business patrons would be located on-site within the subterranean parking facility. The project would provide 676 parking spaces. Of these, 561 spaces are intended to meet the needs of on-site uses in accord with City ordinances, 71 spaces are intended to meet parking needs pursuant to Beach Impact Zone regulations, and the remaining 44 spaces would be in excess of parking requirements and could be used to provide fee parking for surrounding residents. Based on a maximum of 225 dwelling units, the proposed commercial program, and the Beach Impact Zone requirements, 632 parking spaces would be required to comply with LAMC and the Venice Coastal Zone Specific Plan. The Specific Plan requirements are based on recent evaluations of parking needs in the area and reflect the expected demand that would be generated by the project's uses. The parking that is provided under Beach Impact Zone requirements would not be required to meet any demand generated by project activities, nor would the additional 44 excess spaces proposed to supplement parking in the area, and that could be used to provide fee parking for surrounding residential uses. Therefore, project parking would meet all parking regulations and would exceed the amount of parking needed to meet demand generated by project activities by 115 spaces. The provision of 115 parking spaces is

equal to the parking demand generated by 46 residential units.¹³ Therefore, the proposed project would not only meet the parking demand, it would provide increased parking opportunities in a parking-deficient neighborhood.

The provisions of site access would require the removal of approximately four on-street parking spaces on Rose Avenue east of Main Street, approximately three on-street parking spaces on the west side of Main Street north of Sunset Avenue and approximately two parking spaces on the west side of Main Street south of Sunset Avenue for the installation of the project driveway, resulting in the loss of nine on-street spaces in the project locale. This is five spaces less than the 14 diagonal spaces proposed for a widened Sunset Avenue adjacent to the site. Impacts on parking would be beneficial and less than significant.

Combined Projects. Parking impacts occur in a localized area, generally within 0.25 mile of a proposed project. The West Los Angeles Transportation Facility and the Sunset Avenue Project are approximately 6 miles apart, and, therefore, no combined impacts on local parking resources would be experienced in either project locale or in areas located between the respective project sites.

b. Cumulative Impacts

The only two related projects in the immediate vicinity of the Transportation Facility are an 11,000 sq.ft. live/work development on Eastham Drive and the Exposition LRT Project with its park and ride transit facilities proposed on La Cienega Boulevard. It is expected that all related projects would be required to provide parking capacity in compliance with the City of Los Angeles and Culver City requirements, respectively. The Exposition LRT may be used by project employees, thus reducing the demand for parking on the project site. The EIS/EIR for the LRT Project has identified potential parking impacts along the LRT corridor and recommended mitigation measures that would reduce such impacts to less-than-significant levels. As the proposed project would meet all of its parking requirements on site, the project would not contribute to a cumulative significant impact on parking.

In regard to the Sunset Avenue Project, the two related projects in the immediate vicinity include the 51-unit Venice Art Lofts Project and a 35-unit condominium project, soon to start construction. Both related projects are located across Main Street. All related projects would be expected to provide parking capacity in compliance with City of Los Angeles requirements. Therefore, the cumulative impacts of related projects would be less than significant and would not dilute the beneficial parking effects of the proposed project.

¹³ 2.5 parking spaces/unit = 46 residential units.

c. Mitigation Measures

West Los Angeles Transportation Facility Project. The Transportation Facility would have no adverse impacts on existing local parking resources and no mitigation measures are required.

Sunset Avenue Project. The Sunset Avenue Project would have no adverse impacts on existing local parking resources during operation and no mitigation measures are required. However, a short-term adverse parking impact would occur during construction. As such, the following mitigation measures are proposed.

Mitigation Measure Sunset-J.1: Off-site parking areas, with adequate capacity to serve existing demand and construction worker demand, such as the public parking lot located one block north of the site shall be used for construction worker parking when on-site parking capacity is insufficient. Such off-site parking areas shall be located within walking distance of the project site or shuttle service shall be provided by the contractor between the off-site parking areas and the project site.

Mitigation Measure Sunset-J.2: With the implementation of Mitigation Measure Sunset-J.1, construction workers shall not be allowed to park on the residential neighborhood streets.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. There would be no adverse significant impacts, and therefore, mitigation measures are not required. LAMC requirements would be met with on-site parking facilities.

Sunset Avenue Project. With implementation of the mitigation measures, parking impacts during construction would be reduced to less-than-significant levels. There would be no adverse significant impacts during operation of the proposed project and, therefore, mitigation measures are not required. Specific Plan requirements for residential uses as well as beach impact zone parking would be met with on-site parking facilities located in the subterranean parking structure. In addition, the Sunset Avenue Project would provide 71 additional parking spaces in compliance with the Specific Plan's Beach Impact Zone requirements and 14 diagonal street parking spaces along the south side of Sunset Avenue. As a result, the proposed project would have a net beneficial impact on parking in a parking-deficient neighborhood.

11. Utilities

Water

a. Project Impacts

West Los Angeles Transportation Facility. The proposed project would generate a total domestic water demand of 6,624 gallons per day (gpd). Although the site is currently vacant with no water demand, the water demand estimate will be accommodated by the site's existing water infrastructure. Additionally, the on-site infrastructure will provide a fire service pressure of 600 gallons per minute (gpm) at 97 pounds per square inch (psi), which exceeds the proposed need of 475 gpm for on-site fire systems such as overhead sprinklers. The public fire flow demand of 2,500 gpm will also be accommodated by the existing water infrastructure's capacity. The proposed project's water consumption estimate would be 0.0011 percent of City of Los Angeles Department of Water and Power's current daily water distribution. The water demand estimate is consistent with local ordinances regarding water consumption and conservation and is under the thresholds to enact state legislation regarding water demand for specific developments. Implementation of the West Los Angeles Transportation Facility will have no adverse impact on the City's water supply and distribution systems.

Sunset Avenue Project. Water consumption for the Sunset Avenue Project would increase by 38,578 gpd for total domestic water demand over existing conditions. The existing on-site infrastructure will accommodate this increase in domestic water demand in addition to supplying adequate on-site fire service pressure of 600 gpm at 72 psi, which exceeds the proposed need of 475 gpm. Public fire flow can also be accommodated by existing infrastructure capacity. The proposed mixed-use development water consumption estimate will not require an upgrade or expansion of the City's water delivery system. Capacity data provided by the Department of Water and Power concludes that existing water mains will be sufficient to serve the proposed mixed residential and commercial development. The Sunset Avenue Project will not have adverse impacts on the City's water infrastructure and supply.

Combined Projects. The City of Los Angeles Department of Water and Power has determined both sites' infrastructure to be sufficient for future capacity and that water supply capacity is accommodated by regional growth forecasts. Therefore, the proposed projects would not contribute to a combined impact on the City's water distribution or water supply capacity.

b. Cumulative Impacts

There are 11 related projects in the vicinity to West Los Angeles Transportation Facility and those combined with the proposed demand from the project will generate a water consumption demand of 116,926 gpd. The 23 related projects to the Sunset Avenue Project combined with the proposed Sunset Avenue Project water demand would consume an estimated

2,346,306 gpd. When both the West Los Angeles Transportation Facility and the Sunset Avenue Project and their related projects are combined the estimated water demand generated will be approximately 2,463,232 gpd. This total is .41 percent of the City's current daily water delivery. The Playa Vista project contributes approximately 63 percent of the cumulative total and the City determined water supply capacities would be adequate to serve that project. The City's water supplies are also sufficient for the remaining related projects, each of which will be evaluated on a project-by-project basis. No adverse cumulative water demand impacts would result directly due to the related projects identified in conjunction with the West Los Angeles Transportation Facility and the Sunset Avenue Project.

c. Mitigation Measures

West Los Angeles Transportation Facility. Since this project would not result in significant adverse impacts to the City's water supply or conveyance systems as confirmed by the service provider, mitigation measures are not required.

Sunset Avenue Project. This project also would not result in a significant adverse impact to the City's water supply or conveyance systems, as confirmed by the service provider. Therefore, mitigation measures are not required.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. No significant impacts to the City's water supply, infrastructure or related facilities would occur as a result of the West Los Angeles Transportation Facility project

Sunset Avenue Project. No significant impacts to the City's water supply, infrastructure or related facilities would occur as a result of the Sunset Avenue Project.

Combined Projects. Neither the West Los Angeles Transportation Facility or the Sunset Avenue Project have individual impacts that require mitigation for demand on the City's water supply or distribution systems. As such, the proposed projects would not contribute to a combined impact.

Wastewater

a. Project Impacts

West Los Angeles Transportation Facility. The proposed project would generate 5,760 gallons per day (gpd) of wastewater. Although the site is currently vacant with no wastewater generated, the new generation estimate will be accommodated by the site's existing sewer

infrastructure. The West Los Angeles Transportation Facility's total wastewater generation is 0.005 percent of the 119 mgd of available dry weather wastewater capacity at the Hyperion Treatment Plant (HTP). Additionally the West Los Angeles Transportation Facility's total wastewater generation will be only 0.012 percent of the 5.0 mgd annual increase in total wastewater treated at HTP in accordance with Ordinance No. 166,060. As such, wastewater generation by the West Los Angeles Transportation Facility is anticipated to be accommodated by the City's collection facilities and the Hyperion Treatment Plant. Therefore, no adverse projects impact on the City's wastewater infrastructure are expected

Sunset Avenue Project. Wastewater generated for the Sunset Avenue Project would increase by 33,546 gpd over existing conditions. Capacity data provided by the Department of Public Works concludes that the proposed mixed-use development's wastewater generation will not require an upgrade or expansion of the City's sewer infrastructure. The two existing 6-inch sewer lines will accommodate the increase in wastewater discharge by evenly distributing wastewater to both lines. The Sunset Avenue Project's total wastewater generation will be less than 0.03 percent of the unutilized treatment capacity at the HTP. Also, its contribution to the delineated annual increase in wastewater to be treated at the HTP is less than 0.7 percent of the allocated 5.0 mgd. Development of this mixed-use project is not expected to exceed existing sewage collection capacity servicing the site, nor treatment capacity at the Hyperion Treatment Plant. Therefore, no adverse project impacts on the City's wastewater infrastructure are expected.

Combined Projects. The City of Los Angeles Department of Public Works has determined that existing sewer infrastructure for both sites is sufficient for future capacity. Additionally, the HTP has adequate future capacity for both projects. Therefore, the proposed projects would not contribute to a combined impact on the capacity of the City's infrastructure or treatment facilities.

b. Cumulative Impacts

There are 11 related projects in the vicinity to the West Los Angeles Transportation Facility and those combined with the proposed demand from the project will cumulatively generate 101,797 gpd of wastewater. The 23 related projects for the Sunset Avenue Project including the proposed project would cumulatively generate 2,279,743 gpd of wastewater. Combined, the West Los Angeles Transportation Facility and the Sunset Avenue Project and their related projects would generate 2,381,540 gpd of wastewater. Over 66 percent of this total estimate will be associated with a single large, multi-phase, multi-year project, the Playa Vista project. This cumulative total represents approximately 2.0 percent of the unutilized dry weather capacity at HTP, indicating that the City's wastewater treatment capacity is more than adequate to accommodate the cumulative demand associated with the West Los Angeles Transportation Facility and Sunset Avenue Project. No adverse cumulative wastewater generation impacts

would result directly due to the related projects identified in conjunction with the West Los Angeles Transportation Facility and the Sunset Avenue Project.

c. Mitigation Measures

West Los Angeles Transportation Facility. Since the West Los Angeles Transportation Facility would not result in any significant environmental impacts upon the City's wastewater collection and treatment infrastructure, mitigation measures are not required.

Sunset Avenue Project. The increased wastewater generation attributable to the Sunset Avenue Project will not create an impact on existing wastewater collection and treatment infrastructure maintained by the City of Los Angeles. Therefore, no mitigation measures for the Sunset Avenue project are required.

d. Level of Significance After Mitigation

West Los Angeles Transportation Facility. No significant impacts to the City's wastewater collection and treatment infrastructure would occur as a result of the West Los Angeles Transportation Facility project.

Sunset Avenue Project. No significant impacts to the City's wastewater collection and treatment infrastructure would occur as a result of the Sunset Avenue Project.

Combined Projects. Neither the West Los Angeles Transportation Facility or the Sunset Avenue Project have individual impacts on the City's wastewater collection and treatment infrastructure. Additionally, the City of Los Angeles Department of Public Works has adequate future wastewater generation capacity, therefore, the proposed projects would not contribute to a combined impact.



II. CORRECTION AND ADDITIONS TO THE DRAFT EIR

II. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

This section of the Final EIR provides changes to the Draft EIR that have been made to provide clarification or corrections as a result of public and agency comments or new information. Deletions are shown with ~~striketrough~~ and additions are shown with underline. Such changes to the Draft EIR are indicated below under the appropriate EIR section or appendix heading.

I. SUMMARY

Section I, Summary of this Final EIR incorporates revisions to Section I, Summary of the Draft EIR based on comments and responses to comments received on the Draft EIR (see Section III, Responses to Written Comments of this document) and other refinements including additions to mitigation measures presented in the Draft EIR.

II. PROJECT DESCRIPTION

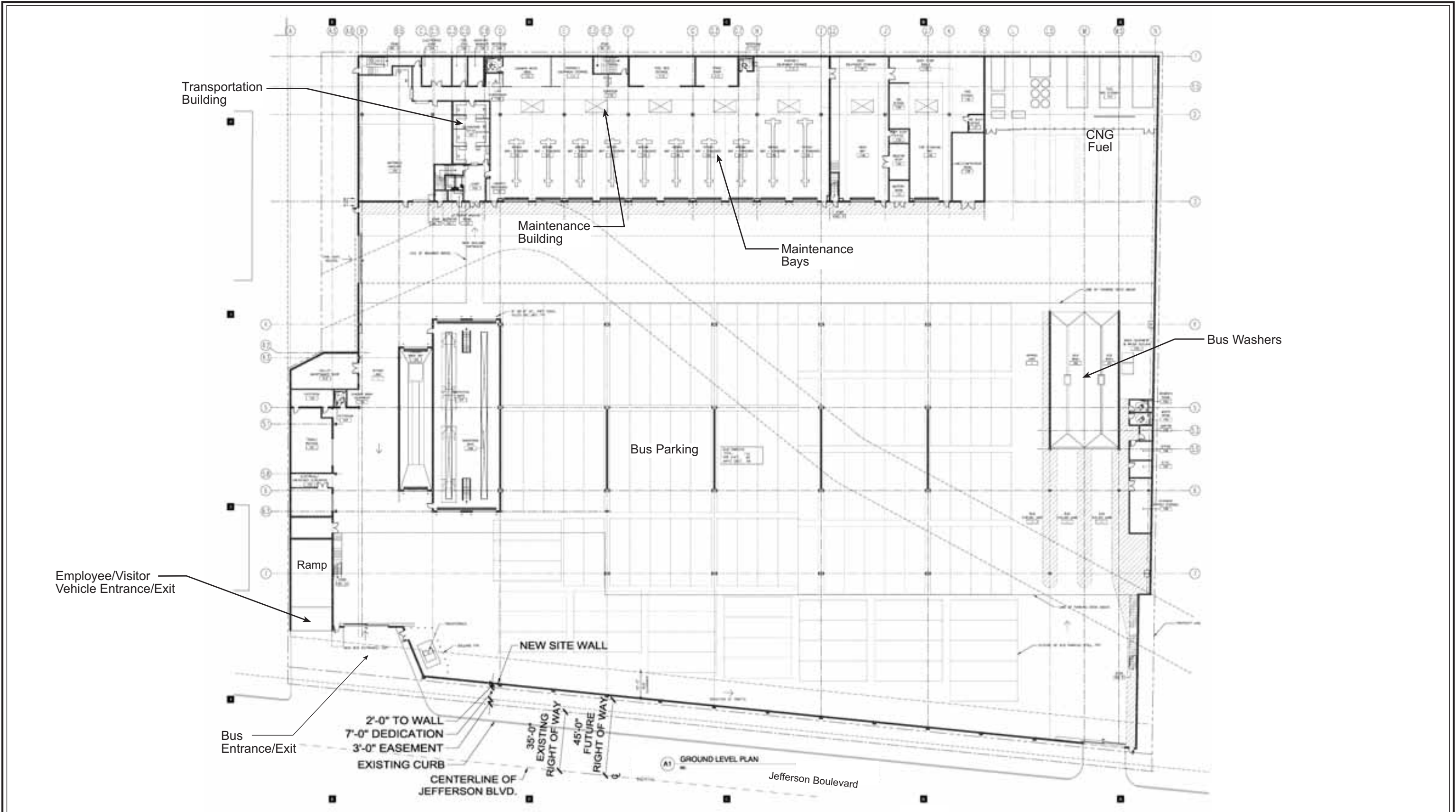
II.(1) Volume I, Section II, Project Description, Figure II-2, on page 69, has been enhanced to show minor modifications and additional information.

II.(2) Volume I, Section II, Project Description, page 72, add the following text to the end of the first partial paragraph:

As a condition of approval for the project, the applicant will be required to provide affordable dwelling units in accordance with the requirements of the Venice Local Coastal Program and applicable provisions of State law. In connection with these requirements, the applicant will be required to execute a covenant to the satisfaction of the Los Angeles Housing Department guaranteeing that the applicable affordability criteria will be observed for at least 30 years from the issuance of the certificate of occupancy for the project.

II.(3) Volume I, Section II, Project Description, page 78, third paragraph, add the following bullet after the first bullet for the Sunset Avenue project:

- Approval of a setback adjustment for residential uses along Main Street




 0 32 64 Feet
 Scale in approximate feet
 Source: RNL Design, 2005

Figure II-2
 West Los Angeles Transportation Facility
 Site Plan

III. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING

III.(1) Volume I, Section III, Environmental Setting, page 89, first full paragraph, revise the fifth sentence as follows:

The LRT will use an elevated bridge structure to cross over La Cienega Boulevard at Jefferson Boulevard, and the Station will be located atop an elevated structure.

III.(2) Volume I, Section III.B, Related Projects, page 92, revise Table III-2 to add two projects as follows:

Revised Table III-2

**SUNSET AVENUE PROJECT
RELATED PROJECTS DESCRIPTIONS**

No.	Proposed Use	Size	Location
1.	Mixed-Use	111 townhomes and 6,000 sf office less 86,563 sf office	SWC Washington Boulevard & Via Dolce
2.	Mixed-Use Second Generation	531 Apartments 288 Room Hotel 125 Boat Slips 2 Acre Park	E/S Via Marina S/O Marquesas Way
3.	Mixed-Use Second Generation	960 Apartments 241 Senior Apts. 4,000 s.f. retail 439 boat slips	E/S Via Marina S/O Panay Way
4.	Mixed-Use	100 Apartments 6,885 s.f. commercial	Parcel 20 Panay Way
5.	Mixed-Use	80 lofts 40,000 s.f. storage less 32,000 s.f. storage	1046 Princeton Street
6.	Apartments	300 dwelling units	Princeton Street and Carter Avenue
7.	Retail/Restaurant	42,270 s.f. retail 9,200 s.f. restaurant	4141 Lincoln Boulevard
8.	Office	15,180 s.f.	2100 Abbot Kinney Boulevard
9.	Gas Station	6 pumps and 720 sf mini mart	2005 Lincoln Boulevard
10.	Mixed-Use	197,000 s.f. retail 280 unit apartments	1430 Lincoln Boulevard
11.	Condominiums	35 units	s/o 615 Hampton Drive
12.	Art Lofts	51 dwelling units	615 Hampton Drive
13.	Mixed-Use	9,000 s.f. retail 24 condominiums	212 Marine Street

Revised Table III-2

**SUNSET AVENUE PROJECT
RELATED PROJECTS DESCRIPTIONS**

No.	Proposed Use	Size	Location
14.	Apartments	44 units	2209 Main Street
15.	Mixed-Use	6,553 s.f. retail 26 apartments	2021–29 Main Street
16.	Mixed-Use	11,549 s.f. retail 107 apartments	2012–24 Main Street
17.	Condominiums	9 units	125 Pacific Street
18.	Civic Center Garage	12,500 s.f. retail 885 parking spaces	1685 Main Street
19.	RAND Headquarters	308,900 s.f. less existing 295,000 s.f.	1700 Main Street
20.	Playa Vista	<u>Phase 1</u> 3,246 units 3,241,950 s.f. office 35,000 s.f. retail 120,000 s.f. public/civic <u>Phase 2—Village at Playa Vista</u> 2,600 units 175,000 s.f. office 150,000 s.f. retail 40,000 s.f. community serving	Jefferson & Lincoln Boulevards
21.	Pioneer Bakery	70 condominiums 3,953 s.f. restaurant 1,726 s.f. bakery/retail	512 Rose Avenue
<u>22.</u>	<u>Marina Pointe</u>	<u>138 condominiums</u>	<u>Marina Pointe Drive</u>
<u>23.</u>	<u>Lincoln Place</u>	<u>850 condominiums^a</u>	<u>1042 Frederick Street</u>

^a This project as approved would replace 795 apartments with approximately 850 condominiums resulting in a net increase of 55 units. The status of the Lincoln Place project is uncertain.

Source: Overland Traffic Consultants, Inc., April 2004, updated February 2005.

III.(3) Volume I, Section III.B, Related Projects, page 94. Replace Figure III-2 with the revised figure as shown on page 66.

IV.A.Aesthetics

IV.A.(1) Volume I, Section IV.A, Aesthetics, page 107, after the second paragraph, add the following:

Also, the project would be required to meet City regulations for lighting. All street lighting in the City is designed to meet the Recommended Practice for Roadway Lighting (RP-8) of the Illuminating Engineering Society of North America. In addition, the following Sections of the Municipal Code are relevant to the project site:

Chapter 1, Article 2, Sec. 12.21 A5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and any adjacent premises.

Chapter 1, Article 7, Sec. 17.08C. Plans for street lighting systems shall be submitted to and approved by the Bureau of Street Lighting.

Chapter 9, Article 3, Sec. 93.01117. No exterior light source may cause more than two footcandles (21.5lx) of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

IV.A.(2) Volume I, Section IV.A, Aesthetics, page 107, prior to the subsection Environmental Impacts, add the following:

In addition, the LAMC and Specific Plan provide that Residential uses in the CM zone are required to comply with the requirements of the R3 zone, except that front yard setbacks are not required. Side yard setbacks for residential buildings in the CM zone are required to comply with the requirements of the R4 zone, according to which setbacks for buildings less than three stories in height are required to be a minimum of five feet, and one additional foot is required for every story above two stories. Setbacks are not required for buildings used exclusively for commercial purposes. No setbacks would, therefore, be required for the ground floor commercial component of the project. Since the project site consists of an entire city block, there are no rear yards on the property. The portions of the property facing Thornton Place and Sunset Avenue front on narrow streets across which residential uses have been developed also fronting on Sunset Avenue and Thornton Place. The Sunset Avenue and Thornton Place frontages are therefore arguably front yards, and the Main Street and Pacific Avenue frontages are arguably side yards. Front yard setbacks of five feet would therefore be required for all residential buildings on Sunset Avenue and Thornton Place, and side yard setbacks of five feet

would be required for all residential buildings less than three stories in height on Main Street and Pacific Avenue. Portions of the residential buildings more than two stories in height along Main Street and Pacific Avenue would be required to be setback an additional foot for each story above two stories.

IV.A.(3) Volume I, Section IV.A, Aesthetics, page 112, at the end of the paragraph at the top of the page, add the following:

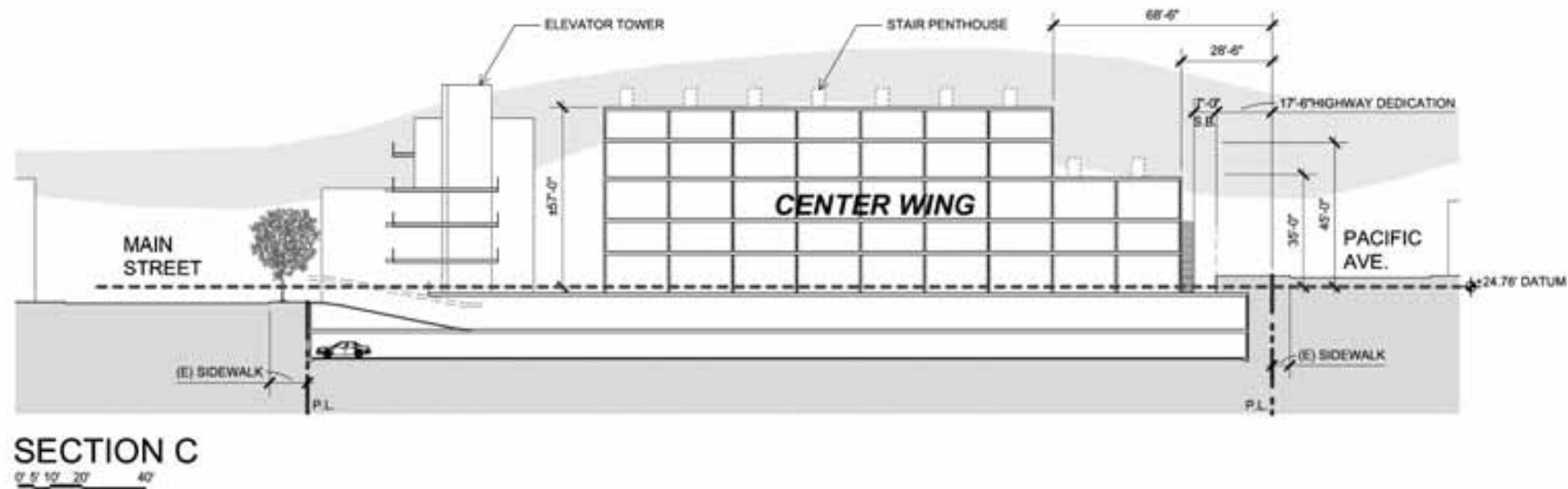
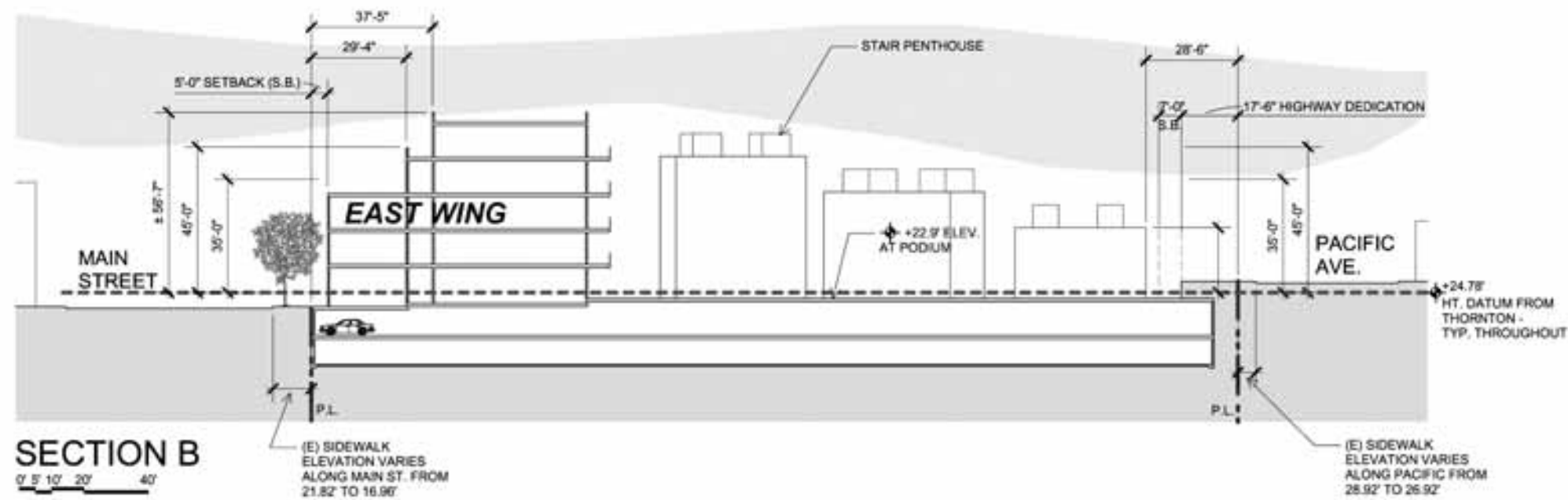
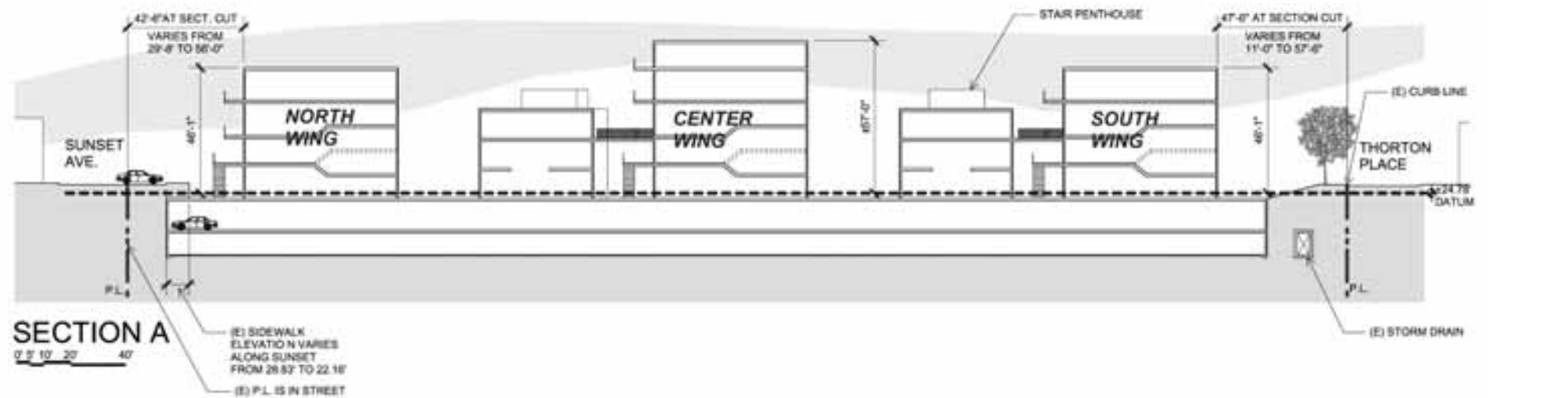
Project lighting would be reviewed by the City during site plan review, and plans for street lighting systems would be submitted to and approved by the Bureau of Street Lighting, per Chapter 1, Article 7, Section 17.08C of the Municipal Code. All street lighting in the City is designed to meet the Recommended Practice for Roadway Lighting (RP-8) of the Illuminating Engineering Society of North America. It is not anticipated that the street/pedestrian lighting improvements associated with the project will create new assessments or increase existing assessments to property owners. However, to the extent that any street/pedestrian lighting improvements associated with the project create new assessments or increase existing assessments to property owners, the Applicant would cooperate in the Proposition 218 process, which requires voter approval for certain assessments.¹⁴

IV.A.(4) Volume I, Section IV.A, Aesthetics, page 113, first full paragraph, revise the fourth sentence as follows:

~~To the rear, the~~ The interior portions of the ~~structure-site~~ would contain variously three, four, and five residential levels with maximum heights along ~~its~~ Thornton Place and Sunset Avenue frontages ~~of ranging from~~ approximately ~~31-35~~ feet ~~and 45 feet, respectively, and with maximum height in the highest portion of the structure, oriented toward at the Pacific Avenue edge to approximately 45 feet.~~ The tallest buildings would occur in the ~~interior-central portions~~ of the project site, ~~of approximately and would be approximately~~ 56 feet.

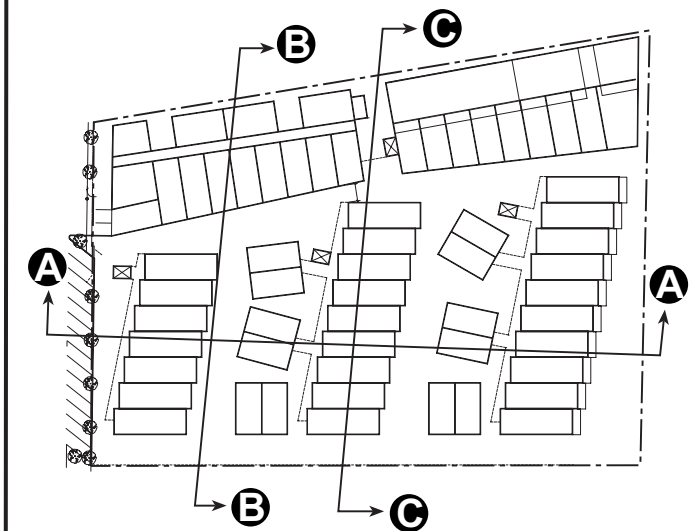
IV.A.(5) Volume I, Section IV.A, Aesthetics, Figure IV.A-8, on page 115, has been enhanced to include building heights and setbacks. This revised figure is shown as Revised Figure IV.A-8 on page 69.

¹⁴ Proposition 218 was approved by the state's voters in November 1996. It is the general intent of Proposition 218 to ensure that all taxes and most charges on property owners are subject to voter approval. Proposition 218 establishes circumstances and procedures regarding assessments.



LEGEND

Section Key



Revised Figure IV.A-8
Sunset Avenue Project
Project Sections

Source: KoningEizenberg Architects

IV.A.(6) Volume I, Section IV.A, Aesthetics, page 116. Replace the fifth full sentence of the first partial paragraph as follows:

The buildings along Main Street will provide a limited, urban setback of five feet, and building height will not exceed 35 feet, as established by the Specific Plan. ~~(The setback is five feet greater than the 0-foot commercial setback requirement established in the Specific Plan.) While the five-foot setback is greater than the 0-foot setback requirement for commercial uses, a setback adjustment of two feet would be required for proposed residential uses along Main Street. Specifically, based on LAMC and Specific Plan requirements for setbacks in the CM zone described above, a seven foot setback would be required for the residential uses along Main Street. The existing 12 foot wide sidewalk (where only 10 feet is required) connected to the five-foot setback would result in a 17-foot setback from the curb line. Thus, the existing 12-foot wide sidewalk adjacent to the property would offset the requested two-foot adjustment.~~

IV.A.(7) Volume I, Section IV.A, Aesthetics, page 117, second full paragraph, add the following:

Notwithstanding, for purposes of aesthetics it should be noted that the height and FAR regulations presented in the Specific Plan were placed in the Plan, in part, to limit potential aesthetic impacts, pursuant to Policies I.E.2 and I.E.3 of the Venice Local Coastal Program Land Use Plan. Policy I.E.2, Scale, states: “New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods.... Roof access structures shall be limited to the minimum size necessary to reduce visual impacts while providing access for fire safety....” Policy I.E.3, Architecture, is an implementation strategy to be implemented through the Venice Specific Plan. It states: “Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.” Allowing the greater heights and FAR would exercise a trade-off that is anticipated in the Plan, but would none-the-less facilitate the massing impacts cited above.

IV.A.(8) Volume I, Section IV.A, Aesthetics, pages 118-119, fourth full paragraph, revise as follows:

~~Further, the project’s potential impact on views of coastal resources, per policies of the California Coastal Act, would not be adverse. The~~ With regard to views of

coastal resources, the proposed project would exceed height limits described in the Venice Coastal Zone Specific Plan, but would not adversely affect views of coastal resources. The height limits in the Venice Coastal Specific Plan are intended to address California Coastal Act Section 30251 regarding the protection of coastal views, and Policy I.D.3 of the Venice Local Coastal Program Land Use Plan. Policy I.D.3 states: “The scale of development shall comply with height limits, setbacks and standards for building massing specified in Policy Groups I.A and I.B, Residential and Commercial Land Use and Development Standards, of this LUP, in order to protect public views of highly scenic coastal areas and vista points, including, but not limited to, the canals, lagoon, jetty, pier, Ocean Front Walk, walk streets and pedestrian oriented communities.” However, ~~it may be noted that the~~ view impacts associated with the Sunset Avenue Project would result from development of the first three levels, below the 35-foot height limit described in that Plan. No nearby dwelling units that can see over the project site enjoy viewing vantages with elevations exceeding 35 feet above the site’s elevation datum point. The one view resource within the larger project vicinity is the Pacific Ocean. That resource lies outside of the project’s viewshed, and the project would not obstruct existing views thereto from public thoroughfares or nearby uses. Therefore, the project would be consistent with the intent of Section 30251 of the California Coastal Act that protects the scenic and visual qualities of the coastal zone and with the intent of Policy I.D.3.

IV.A.(9) Volume I, Section IV.A, Aesthetics, page 119, after the first full paragraph, add the following:

Project lighting would be reviewed by the City during site plan review, and plans for street lighting systems would be submitted to and approved by the Bureau of Street Lighting, per Chapter 1, Article 7, Section 17.08C of the Municipal Code. All street lighting in the City is designed to meet the Recommended Practice for Roadway Lighting (RP-8) of the Illuminating Engineering Society of North America. It is not anticipated that the street/pedestrian lighting improvements associated with the project will create new assessments or increase existing assessments to property owners. However, to the extent that any street/pedestrian lighting improvements associated with the project create new assessments or increase existing assessments to property owners, the Applicant would cooperate

in the Proposition 218 process, which requires voter approval for certain assessments.¹⁵

IV.B. AIR QUALITY

IV.B.(1) Volume I, Section IV.B, Air Quality, page 140, first full paragraph, revise as follows:

Operation. The URBEMIS 2002 software was also used to compile the mass daily emissions estimates from mobile- and area-sources that would occur during long-term project operations. In calculating mobile-source emissions, the URBEMIS 2002 default trip length assumptions were applied to the average daily trip (ADT) estimates provided by the project traffic consultant to arrive at vehicle miles traveled (VMT). Compressed natural gas (CNG) transit bus emissions estimates were derived by applying adjustment factors to EMFAC 2002 urban bus emissions factors, and multiplying such emissions factors to CNG transit bus VMT. Stationary-source emissions were compiled using procedures outlined in the SCAQMD CEQA Handbook. Localized CO concentrations were evaluated using the CALINE4 microscale dispersion model, developed by Caltrans, in combination with EMFAC 2002 emission factors. All emissions calculation worksheets and air quality modeling output files are provided in Appendix B of this EIR.

IV.B.(2) Volume I, Section IV.B, Air Quality, page 145, revise Table IV.B-4 as follows:

¹⁵ Proposition 218 was approved by the state's voters in November 1996. It is the general intent of Proposition 218 to ensure that all taxes and most charges on property owners are subject to voter approval. Proposition 218 establishes circumstances and procedures regarding assessments.

Revised Table IV.B-4

**WEST LOS ANGELES TRANSPORTATION CENTER FACILITY
ESTIMATE OF WORST-CASE EMISSIONS DURING CONSTRUCTION
(pounds per day)**

	ROC ^a	NO_x	CO	SO_x	PM₁₀ ^b
Demolition					
On-Site	<u>34</u>	44	36	0	6
Off-Site	2	41	8	1	1
Total	<u>36</u>	85	44	1	7
Site Preparation					
On-Site	34	39	44	0	12
Off-Site	3	62	13	1	2
Total	37	101	57	1	14
Building Erection/Finishing					
On-Site	45	58	58	0	3
Off-Site	0	0	3	0	0
Total	45	58	61	0	3
Worst-Case On-Site Total	45	58	58	0	12
Localized Significance Threshold ^c	—	249	3,502	—	181
Over (Under) Threshold	—	(191)	(3,444)	—	(169)
Exceed Threshold?	N/A	No	No	N/A	No
Worst-Case Emissions Total	45	101	61	1	14
Regional Significance Threshold	75	100	550	150	150
Over (Under) Threshold	(30)	1	(489)	(149)	(136)
Exceed Threshold?	No	Yes	No	No	No

^a The on-site ROC emissions estimates for demolition and site preparation have been increased by 28 pounds per day to account for potential soils-release ROC emissions that may occur during these activities (EPA, Estimating Air Emissions from Petroleum UST Cleanups, 1989).

^b PM₁₀ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression, which require that no visible dust be present beyond the site boundaries. A copy of SCAQMD Rule 403 is included in the Air Quality Appendix.

^c The project site is located in SCAQMD Source Receptor Area (SRA) No. 2. These LSTs are based on the site location SRA, distance to nearest sensitive receptor location from the project site (200 meters), and project area that could be under construction on any given day (five acres). Although recommended by the SCAQMD, currently, the use of LSTs for purposes of impact evaluation is voluntary.

Source: PCR Services Corporation, 2005. Construction emission calculation worksheets are included in Appendix B-2 to this EIR.

IV.B.(3) Volume I, Section IV.B, Air Quality, page 147, first paragraph, add the following text after the first partial sentence:

Metro projects that by 2010, 99 percent of its fleet of approximately 2,500 buses will be fueled by CNG.

IV.B.(4) Volume I, Section IV.B, Air Quality, page 147, last bullet point, revise as follows:

Non-Revenue Miles.¹⁶ Net non-revenue miles would decrease, since the bus maintenance facility would be moved from Venice (which is situated at the westernmost boundary of the service area) to an area that is more central to the overall service area. ~~At this time, a quantitative, non-revenue miles analysis has not been conducted since it is unknown exactly how bus maintenance and overnight parking assignments would change; however, it is conservatively estimated that non-revenue miles would be reduced by an average of 2.5 miles per trip, for each bus that would be parked and maintained at the new Transportation Facility location. Based on preliminary analyses, it is estimated by Metro that non-revenue miles will be reduced by 73,168 annual miles (200 mile per day average) as a result of the relocated facility.~~¹⁷ This net reduction in non-revenue mile VMT will lead to a marginal decrease in air pollutant emissions.

IV.B.(5) Volume I, Section IV.B, Air Quality, page 149, revise Table IV.B-5 as follows:

¹⁶ Also known as “deadhead” miles, non-revenue miles are travel miles which are incidental to the transit route (revenue) miles (e.g., the “out of service” travel between a service route and maintenance facility).

¹⁷ A non-revenue mile reduction summary table is provided in Appendix B-3.

Revised Table IV.B-5

**WEST LOS ANGELES TRANSPORTATION FACILITY
PROJECT BUILDOUT OPERATIONAL EMISSIONS
(Pounds per Day)**

	CO	NO_x	PM₁₀	ROC	SO_x
Future with Proposed Development					
Revenue Miles	—	—	—	—	—
Non-Revenue Miles VMT Reduction	<u>(30)</u>	<u>(4)</u>	(<1)	<u>(<1)</u>	(<1)
Worker Commute VMT	—	—	—	—	—
Area and Stationary Source	1	2	<1	<1	<1
Net Emissions	<u>(29)</u>	<u>(2)</u>	—	<u>—</u>	—
SCAQMD Significance Threshold	550	55	150	55	150
Over (Under)	<u>(579)</u>	<u>(57)</u>	(150)	<u>(55)</u>	(150)
Significant?	No	No	No	No	No

Worksheets are included in Appendix B-3 of this Draft EIR.

Source: PCR Services Corporation, 2005.

IV.B.(6) Volume I, Section IV.B, Air Quality, page 150, replace Table IV.B-6 with the following:

Revised Table IV.B-6

**WEST LOS ANGELES TRANSPORTATION FACILITY
LOCAL AREA CARBON MONOXIDE DISPERSION ANALYSIS**

Intersection	Peak Period^a	Maximum 1-Hour 2006 Base Concentration^b (ppm)	Maximum 1-Hour 2006 w/ Project Concentration^c (ppm)	Significant 1-Hour Impact^d	Maximum 8-Hour 2006 Base Concentration^e (ppm)	Maximum 8-Hour 2006 w/ Project Concentration^f (ppm)	Significant 8-Hour Impact^d
Jefferson Blvd and National Blvd	A.M.	7.2	7.3	No	4.4	4.5	No
	P.M.	7.5	7.5	No	4.5	4.5	No
Jefferson Blvd and Rodeo Rd	A.M.	9.2	9.2	No	5.2	5.2	No
	P.M.	7.3	7.3	No	4.4	4.5	No
Jefferson Blvd and La Cienega Blvd	A.M.	10.4	10.5	No	5.7	5.7	No
	P.M.	11.2	11.2	No	6.1	6.1	No
With Proposed Traffic Mitigation							
Jefferson Blvd and La Cienega Blvd	A.M.	10.0	10.0	No	5.6	5.7	No
	P.M.	11.2	11.3	No	6.2	6.2	No

ppm = parts per million

^a Peak-hour traffic volumes are based on the Traffic Impact Study prepared for the Project by Overland Traffic Consultants, April 2004.

^b SCAQMD 2006 1-hour ambient background concentration (4.96 ppm) + 2006 Base traffic CO 1-hour contribution.

^c SCAQMD 2006 1-hour ambient background concentration (4.96 ppm) + 2006 w/ Project traffic CO 1-hour contribution.

^d The most restrictive standard for 1-hour CO concentrations is 20 ppm and for 8-hour concentrations is 9.0 ppm.

^e SCAQMD 2006 8-hour ambient background concentration (3.12 ppm) + 2006 Base traffic CO 8-hour contribution.

^f SCAQMD 2006 8-hour ambient background concentration (3.12 ppm) + 2006 w/ Project traffic CO 8-hour contribution.

Source: PCR Services Corporation, 2005.

IV.B.(7) Volume I, Section IV.B, Air Quality, page 156, revise Table IV.B-10 as follows:

Revised Table IV.B-10

**COMPOSITE TRANSPORTATION FACILITY OPERATIONS-PERIOD AND
SUNSET AVENUE CONSTRUCTION-PERIOD EMISSIONS
(Pounds per Day)**

	CO	NO _x	PM ₁₀	ROC	SO _x
Combined Project Site Emissions					
Transportation Facility Operations-Period	(29)	(2)	—	—	—
Sunset Avenue Construction-Period	85	217	13	65	2
Net Emissions	56	215	13	65	2
SCAQMD Construction Significance Threshold	550	100	150	75	150
Over (Under)	(494)	115	(137)	(10)	(148)
Significant?	No	Yes	No	No	No
Net Emissions	56	215	13	65	2
SCAQMD Operational Significance Threshold	550	55	150	55	150
Over (Under)	(494)	160	(137)	10	(148)
Significant?	No	Yes	No	Yes	No

Worksheets are included in the Air Quality Appendix.

Sources: PCR Services Corporation, 2005.

IV.C. HISTORIC RESOURCES

IV.C.(1) Volume I, Section IV.C, Historic Resources, top of page 181, revise the text as follows:

The Metro Division 6—Venice site and associated buildings appear ineligible for listing in the National Register, California Register, and for local designation. ~~A final determination of eligibility will be the responsibility of the State Historic Preservation Officer with the Office of Historic Preservation.~~

IV.C.(2) Volume I, Section IV.C, Historic Resources, top of page 182, renumber Mitigation Measure Sunset C-2 as follows:

Mitigation Measure Sunset-C.21: Photography and Recordation.

IV.C.(3) Volume I, Section IV.C, Historic Resources, top of page 182, revise the text as follows:

Mitigation Measure Sunset-C.12: Relocation. Prior to implementing any project related tasks associated with the west wall of the bus washing structure, ~~t~~The feasibility of relocating the mural to an off-site location should be explored by the Applicant to mitigate project impacts on this historic resource. The cost of such a feasibility assessment shall be financed by the Applicant and reviewed and approved by the Deputy Historic Preservation Officer of the City of Los Angeles' Planning Department¹⁸ (Historic Preservation Officer) and a qualified conservator, architectural historian, historic architect, or historic preservation professional. A determination of a reasonable and acceptable cost for the mural's relocation will be established between the Applicant, Metro, and a-the qualified conservator, architectural historian, historic architect, or historic preservation professional. The preservation consultant shall be selected and hired by the Applicant with the final approval by the Historic Preservation Officer and/or Metro. The consultant selected shall ~~who~~satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61 or those qualifications as defined by the American Institute for Conservation of Historic & Artistic Works (AIC).¹⁹ Relocation of the mural in whole to another publicly accessible location within the project area, if conducted in accordance with the guidelines recommended by the National Park Service that are outlined in the booklet "Moving Historic Buildings" by John Obed Curtis (1979), would fully mitigate the impact associated with this historic resource and the proposed project. Additionally, relocation of the mural off-site to a location with similar or compatible historical context (i.e. along a public roadway) would also fully mitigate the impact. However, prior to any relocation efforts the physical condition of the mural should be considered, assessed, and documented by a qualified conservator, historic architect and structural engineer. Additionally, the cost of relocation versus the overall historical and artistic value of the mural should be quantified in that assessment, to further evaluate relocation feasibility. ~~The A~~ relocation plan for the mural shall also be ~~developed~~ financed by the Applicant and developed in conjunction with ~~a-the~~ qualified conservator, architectural historian, historic architect, or historic preservation professional. Additionally, the plan shall be reviewed and approved by the ~~Deputy~~ Historic Preservation Officer ~~of the City of Los Angeles' Planning Department.~~²⁰

¹⁸ Effective July 1, 2004, the City Planning Department has taken over functions previously performed by the Cultural Affairs Department.

¹⁹ Those qualifications and competency skills as outlined in "Defining the Conservator: Essential Competencies" by the American Institute for Conservation of Historic & Artistic Works, 2003.

²⁰ ~~Effective July 1, 2004, the City Planning Department has taken over functions previously performed by the Cultural Affairs Department.~~

Because this mitigation, with the recommended cost to Applicant limitation, would not directly or indirectly affect the objectives of the proposed project, it appears feasible. (This measure addresses impacts regarding the Vietnam POW/MIA Memorial Mural as discussed beginning on page 181 of this Section of the Draft EIR.)

IV.D. GEOLOGY/SEISMIC HAZARDS

There were no corrections or additions to this section of the Draft EIR.

IV.E. HAZARDOUS MATERIALS

IV.E.(1) Volume I, Section IV.E, Hazardous Materials, page 229, add a second paragraph as follows:

Nevertheless, due to the nature of the use of the site, soil grading and excavation for property development would be performed using a soil excavation plan. This soil excavation plan would be prepared along with the developer's excavation specifications. The soil excavation plan would discuss proper handling of petroleum-impacted soils that are presently unknown, but have the potential to be encountered. Any excavation of contaminated soil and export for off-site disposal or treatment would occur in compliance with federal, state, and local requirements related to hazardous materials, including those requirements set forth by DTSC, OSHA and Cal-OSHA.

IV.F. WATER QUALITY

There were no corrections or additions to this section of the Draft EIR.

IV.G. LAND USE

IV.G.(1) Volume I, Section IV.G, Land Use, page 266, second paragraph. Insert the following after the second bullet

- In addition, as described in Section IV.A, Aesthetics of the Draft EIR, within the CM zone, front yard setbacks of five feet would be required for all residential buildings on Sunset Avenue and Thornton Place, and side yard setbacks of five feet would be required for all residential buildings less than three stories in height on Main Street and Pacific Avenue. Portions of the residential buildings more than two stories in

height along Main Street and Pacific Avenue would be required to be setback an additional foot for each story above two stories. No setback would be required for the ground floor commercial component of the project along Main Street.

IV.G.(2) Volume I, Section IV.G, Land Use, page 271, third full paragraph, add a footnote to the last sentence as follows:

Policy I.C.2 Coastal Industry, states: “Boat building, servicing, supply, and marine support industry, as they are considered a coastal-related use and are particularly suitable for the industrially designated lands in the Venice Coastal Zone, shall be encouraged.” As the project site is currently designated for industrial use, this policy has some applicability. However, while this policy encourages coastal-related uses for industrially designated lands, Policy I.C.7, which applies to the site specifically, states that “...priority uses for the site include affordable housing, which may be a mixed use project, and public parking structure.” Deferral to Policy I.C.7, which is site specific, is consistent with the overall intent of the Venice Coastal Land Use Plan.

IV.G.(3) Volume I, Section IV.G, Land Use, page 272, top of page, add a footnote to the end of the sentence as follows:

Policy I.B.12 Parking Structures; Policy II.A.2 Expansion of Public Beach Parking, Supply; Policy II.A.2, Expansion of Public Beach Parking Supply; and Policy II.A.4 Parking Requirements in the Beach Impact Zone (BIZ) are all policies regarding parking for project uses and beach impact zone (i.e. coastal access) parking. These policies are implemented through the Venice Specific Plan. All of these remaining policies are indirectly addressed through the discussion of the project’s compliance with the parking provisions of the Venice Specific Plan, as the implementing vehicle.

IV.G.(4) Volume I, Section IV.G, Land Use, page 272, first full paragraph, add a footnote to the end of the first sentence as follows:

Policies I.A.1, Residential Development; I.B.2, Mixed-Use Development; I.B.1, Commercial Intensity; and I.B.7, Commercial Development Standards are policies that address site uses, densities, and other development regulations. These policies are all implemented through the Venice Specific Plan. Therefore, this discussion of the Specific Plan in the Land Use analysis indirectly addresses all of these policies.

IV.G.(5) Volume I, Section IV.G, Land Use, page 272, add the following text after the last paragraph:

As a condition of approval for the project, the applicant will be required to provide affordable dwelling units in accordance with the requirements of the Venice Local Coastal Program and applicable provisions of State law. In connection with these requirements, the applicant will be required to execute a covenant to the satisfaction of the Los Angeles Housing Department guaranteeing that the applicable affordability criteria will be observed for at least 30 years from the issuance of the certificate of occupancy for the project.

IV.G.(6) Volume I, Section IV.G, Land Use, page 273, third paragraph, first full sentence, replace with the following:

With the exception of setbacks adjacent to residential uses along Main Street, the project would be consistent with setback requirements. While the five-foot setback proposed along Main Street is greater than the zero foot setback requirement for commercial uses, a setback adjustment of two feet would be required for proposed residential uses along Main Street. Specifically, based on LAMC and Specific Plan requirements for setbacks in the CM zone described above, a seven foot setback would be required for the residential uses along Main Street. However, the existing 12-foot wide sidewalk (where only 10 feet is required) connected to the five-foot setback would result in a 17-foot setback from the curb line. Thus, the existing 12-foot wide sidewalk adjacent to the property would offset the requested two-foot adjustment and the reduction of the setback by two feet will not jeopardize the purpose and intent of the local and general plans.

IV.G.(7) Volume I, Section IV.G, Land Use, page 276, first paragraph, add a footnote to the end of the first sentence as follows:

Policy III.A.1 General (Recreational Opportunities) states: “New recreational opportunities should be provided, and existing recreational areas, shown on Exhibits 19a through 21b, shall be protected, maintained and enhanced for a variety of recreational opportunities for both residents and visitors including passive recreational and educational activities, as well as active recreational uses....” The project site is not identified on Exhibit 20a as containing a recreation or visitor serving facility, and therefore this policy is not specifically applicable to the project. However, the introduction to Policy Group III, Recreation and Visitor-Serving Facilities, states the following: “Private business such as retail shops, restaurants and vendors along Ocean Front Walk and Main Street are also an attraction and service for residents and visitors alike.”

IV.H. NOISE

IV.H.(1) Volume I, Section IV.H, Noise, page 324, Subsection 5, under subheading West Los Angeles Transportation Facility, revise text as follows:

Although no significant impacts are identified, mitigation measures are proposed to implement measures requested in a Motion by Supervisor Yvonne B. Burke and approved by the Metro Board of Directors. Please see Appendix H1 of the Draft EIR for a copy of this Motion. ~~No significant impacts associated with construction or operation of the Transportation Facility were identified.~~

IV.I. TRANSPORTATION AND CIRCULATION

IV.I.(1) Volume I, Section IV.I, Transportation and Circulation, page 328, fourth paragraph, revise the second sentence as follows:

The nearest regional transportation facility serving the Sunset Avenue site is Lincoln Boulevard (State Route 1), with the Santa Monica Freeway (Interstate 10) located approximately 2 miles to the north and the Marina Freeway (State Highway 90) ~~which is located east of Marina del Rey and~~ approximately ~~1.25~~2.5 miles southeast of the project site.

IV.I.(2) Volume I, Section IV.I, Transportation and Circulation, page 354, revise the second sentence as follows:

This measure would reroute the inbound buses to continue southbound on La Cienega Boulevard to Rodeo Road and make the southbound right-turn at that intersection with another right turn from westbound Rodeo Road to northbound Jefferson Boulevard.

IV.J. PARKING

IV.J.(1) Volume I, Section IV.J, Parking, page 367, third paragraph, revise the third sentence as follows:

Improvements for site access would require the removal of approximately four on-street parking spaces on Rose Avenue east of Main Street, ~~and~~ approximately three on-street parking spaces on the west side of Main Street north of Sunset Avenue, and approximately two parking spaces on the west side of Main Street

south of Sunset Avenue for the installation of the project driveway, a total of seven-nine on-street parking spaces in the project locale, which would be seven five spaces less than the 14 diagonal spaces proposed on a widened Sunset Avenue adjacent to the site. Therefore, street parking impacts would result in a net benefit of seven-five parking spaces and no adverse on-street parking impacts.

IV.K. UTILITIES

IV.K.1.(1) Volume I, Section IV.K.1, Water, pages 378–379. Revise second paragraph as follows:

Similarly, 21-23 related projects have been identified in the greater vicinity of the Sunset Avenue Project. As summarized in Table IV.K.1-4 on page 380, these related projects are conservatively forecasted to generate increased water demand of 2,103,212-2,307,728 gpd. The total of the related projects and the proposed project is 2,141,790-2,346,306 gpd. The majority of this cumulative demand is due to the Playa Vista project, which accounts for almost 70 percent of the estimated total. As summarized in Table IV.K.1-5 on page 381, both projects and all of the respective related projects would generate cumulative total demand for nearly 2,258,716-2,463,232 gpd or .38-.41 percent of the DWP's current daily water delivery. Approximately 65-63 percent of this cumulative total is attributable to the Playa Vista project, which DWP has determined can be adequately served with available supplies.²¹ These supplies are also sufficient for the remaining related projects, each of which will be evaluated on a project-by-project basis. No adverse cumulative water demand impacts would result directly due to the related projects identified in conjunction with the West Los Angeles Transportation Facility and the Sunset Avenue Project.

²¹ "Draft Environmental Impact Report: Village at Playa Vista," Volume 1, Book 3, Subsection IV.N.(1), Water Consumption, page 1092.

IV.K.1.(2) Volume I, Section IV.K.1, Water, page 380, revise Table IV.K.1-4 to add two projects as follows:

Revised Table IV.K.1-4

**SUNSET AVENUE PROJECT
WATER DEMAND FOR RELATED PROJECTS ^a**

No.	Proposed Use	Size	Location	Generation Rate (gpd)	Generation (gpd)
1.	Townhouses	111	SWC Washington Blvd. &	207 ^c	22,977
	Office	6,000	Via Dolce	172.5 ^b	1,035
2.	Apartments	531	E/S Via Marina S/O Marquesas Way	184 ^c	97,704
	Hotel	288		138 ^c	39,744
3.	Apartments	1,201	E/S Via Marina S/O Panay Way	184 ^c	220,984
	Retail	4,000		92 ^b	368
	Commercial	6,000		172.5 ^b	1,035
4.	Apartments	100	Parcel 20 Panay Way	184 ^c	18,400
	Commercial	6,885		172.5 ^b	1,188
5.	Lofts	80	1046 Princeton Street	138 ^c	11,040
	Storage	8,000		23 ^b	184
6.	Apartments	300	Princeton Street and Carter Avenue	184 ^c	55,200
7.	Retail	42,270	4141 Lincoln Boulevard	92 ^b	3,889
	Restaurant	9,200		345 ^b	3,174
8.	Office	15,180	2100 Abbot Kinney Boulevard	172.5 ^b	2,619
9.	Gas Station	500	2005 Lincoln Boulevard	92 ^b	46
	Mini-Mart Retail	720		92 ^b	66
10.	Apartments	280	1430 Lincoln Boulevard	184 ^c	51,520
	Retail	197,000		92 ^b	18,124
11.	Condominiums	35	S/O 615 Hampton Drive	207 ^c	7,245
12.	Art lofts	51	615 Hampton Drive	138 ^c	7,038
13.	Condominiums	24	212 Marine Street	207 ^c	4,968
	Retail	9,000		92 ^b	828
14.	Apartments	44	2209 Main Street	184 ^c	8,096
15.	Apartments	26	2021-29 Main Street	184 ^c	4,784
	Retail	6,553		92 ^b	603
16.	Apartments	107	2012-24 Main Street	184 ^c	19,688
	Retail	11,549		92 ^b	1,063
17.	Condominiums	9	125 Pacific Street	207 ^c	1,863
18.	Civic Center Garage	110,625	1685 Main Street	92 ^b	10,178
	Retail	12,500		92 ^b	1,150
19.	RAND Headquarters	13,900	1700 Main Street	172.5 ^b	2,398
20.	Playa Vista	Phase 1	Jefferson & Lincoln Boulevards	^d	965,000
		Phase 2		^d	503,000
21.	Condominiums	70	512 Rose Avenue	207 ^c	14,490
	Restaurant	3,953		345 ^b	1,364
	Bakery/Retail	1,726		92 ^b	159
<u>22.</u>	<u>Marina Pointe Condominiums</u>	<u>138</u>	<u>Marina Point Drive</u>	<u>207^c</u>	<u>28,566</u>

Revised Table IV.K.1-4

**SUNSET AVENUE PROJECT
WATER DEMAND FOR RELATED PROJECTS ^a**

No.	Proposed Use	Size	Location	Generation Rate (gpd)	Generation (gpd)
<u>23.</u>	<u>Lincoln Place Condominiums</u>	<u>850^c</u>	<u>1042 Frederick Street</u>	<u>207^c</u>	<u>175,950</u>
	Sunset Avenue Project	3.13 acres	100 Sunset Avenue	Subtotal	<u>2,307,728</u>
					<u>38,578</u>
				Total	<u>2,346,306</u>

^a Water demand rates are equal to 115 percent of wastewater generation factors as provided by the City of Los Angeles, Department of Public Works, Bureau of Engineering, Development Services Division—Sewer Worksheet, June 6, 1996.

^b /1,000 sq.ft.

^c Per residential unit.

^d Based on Playa Vista Draft EIRs: First Phase, September, 1992; Second Phase, August 2003.

^e This project as approved would replace 795 apartments with approximately 850 condominiums resulting in a net increase of 55 units. The status of the Lincoln Place project is uncertain.

Source: PCR Services Corporation, February 2005

IV.K.1.(3) Volume I, Section IV.K.1, Water, page 381, revise Table IV.K.1-5 to add two projects as follows:

Revised Table IV.K.1-5

**WEST LOS ANGELES TRANSPORTATION FACILITY AND
SUNSET AVENUE PROJECT
TOTAL WATER DEMAND FOR RELATED PROJECTS**

West Los Angeles Transportation Facility	
Related Projects	110,300 gpd
West Los Angeles Transportation Facility	<u>6,624 gpd</u>
Subtotal	116,926 gpd
Sunset Avenue Project	
Related Projects	<u>2,307,728 gpd</u>
Sunset Avenue Project	<u>38,578 gpd</u>
Subtotal	<u>2,346,306 gpd</u>
Total	<u>2,463,232 gpd</u>

Source: PCR Services Corporation, ~~May 2004~~ February 2005.

IV.K.2.(1) Volume I, Section IV.K.2, Wastewater, page 387. Revise second paragraph as follows:

Similarly, ~~21-23~~ local projects have been identified as related projects in the vicinity of the Sunset Avenue Project. As shown in Table IV.K.2-4 on page 389, wastewater generation from these related projects is conservatively estimated to be ~~2,068,357-2,246,197~~ gpd. In combination with the West Los Angeles Transportation Facility, nearly ~~2,101,903-2,279,743~~ gpd of wastewater would be generated. As summarized in Table IV.K.2-5 on page 390, both projects and all of the respective related projects would generate a cumulative total of ~~2,203,700-2,381,540~~ gpd, over ~~68-66~~ percent of which will be associated with a single large, multi-phase, multi-year project, Playa Vista. This cumulative total represents approximately ~~1.9-2.0~~ percent of the unutilized dry weather capacity at HTP, indicating that the City's wastewater treatment capacity is more than adequate to accommodate the cumulative demand associated with the West Los Angeles Transportation Facility and Sunset Avenue Project. Also, considering that the Playa Vista project is to be implemented over a five-year period, cumulative wastewater generation would be well below the City's policy threshold of 5 mgd of increased wastewater per year.

IV.K.2.(2) Volume I, Section IV.K.2, Wastewater, page 389, revise Table IV.K.2-4 to add two projects as follows:

Revised Table IV.K.2-4

**SUNSET AVENUE PROJECT
WASTEWATER GENERATION FOR RELATED PROJECTS**

No.	Proposed Use	Size	Location	Generation Rate (gpd) ^a	Generation (gpd)
1.	Townhouses	111	SWC Washington Blvd. & Via Dolce	180 ^c	19,980
	Office	6,000		150	900
2.	Apartments	531	E/S Via Marina S/O Marquesas Way	160 ^c	84,960
	Hotel	288		120 ^c	34,560
3.	Apartments	1,201	E/S Via Marina S/O Panay Way	160 ^c	192,160
	Retail	4,000		80 ^b	320
	Commercial	6,000		150 ^b	900
4.	Apartments	100	Parcel 20 Panay Way	160 ^c	16,000
	Commercial	6,885		150 ^b	1,033
5.	Lofts	80	1046 Princeton Street	120 ^c	9,600
	Storage	8,000		20 ^b	160
6.	Apartments	300	Princeton St. and Carter Ave.	160 ^c	48,000
7.	Retail	42,270	4141 Lincoln Blvd.	80 ^b	3,382
	Restaurant	9,200		300 ^b	2,760
8.	Office	15,180	2100 Abbot Kinney Blvd.	150 ^b	2,277
9.	Gas Station	500	2005 Lincoln Blvd.	80 ^b	40
	Mini-Mart Retail	720		80 ^b	58

Revised Table IV.K.2-4

**SUNSET AVENUE PROJECT
WASTEWATER GENERATION FOR RELATED PROJECTS**

No.	Proposed Use	Size	Location	Generation Rate (gpd)^a	Generation (gpd)
10.	Apartments	280	1430 Lincoln Blvd.	160 ^c	44,800
	Retail	197,000		80 ^b	15,760
11.	Condominiums	35	S/O 615 Hampton Dr.	180 ^c	6,300
12.	Art lofts	51	615 Hampton Dr.	120 ^c	6,120
13.	Condominiums	24	212 Marine St.	180 ^c	4,320
	Retail	9,000		80 ^b	720
14.	Apartments	44	2209 Main St.	160 ^c	7,040
15.	Apartments	26	2021–29 Main St.	160 ^c	4,160
	Retail	6,553		80 ^b	524
16.	Apartments	107	2012–24 Main St.	160 ^c	17,120
	Retail	11,549		80 ^b	924
17.	Condominiums	9	125 Pacific St.	180 ^c	1,620
18.	Garage	110,625	1685 Main St.	80 ^b	8,850
	Retail	12,500		80 ^b	1,000
19.	RAND Headquarters	13,900	1700 Main St.	150 ^b	2,085
20.	Playa Vista	Phase 1	Jefferson Blvd. & Lincoln Blvd.	^d	1,059,000
		Phase 2		^d	457,000
21.	Condominiums	70		180 ^c	12,600
	Restaurant	3,953		300 ^b	1,186
	Bakery/Retail	1,726		80 ^b	138
<u>22.</u>	<u>Marina Pointe Condominiums</u>	<u>138</u>	<u>Marina Point Drive</u>	<u>180^c</u>	<u>24,840</u>
<u>23.</u>	<u>Lincoln Place Condominiums</u>	<u>850</u>	<u>1042 Frederick Street</u>	<u>108^c</u>	<u>153,000</u>
				Subtotal	2,068,357
Sunset Avenue Project 3.13 acres 100 Sunset Ave.					<u>33,546</u>
				Total	2,101,903

^a City of Los Angeles Department of Public Works Bureau of Engineering, Development Services Division—Sewer Worksheet, June 6, 1996.

^b Per 1,000 square feet.

^c Per residential unit.

^d Based on Playa Vista Draft EIRs: First Phase, September, 1992; Second Phase, August 2003.

Source: PCR Services Corporation, February 2005.

IV.K.2.(3) Volume I, Section IV.K.2, Wastewater, page 389, revise Table IV.K.2-5 as follows:

Revised Table IV.K.2-5

**WEST LOS ANGELES TRANSPORTATION FACILITY AND
SUNSET AVENUE PROJECT
TOTAL WASTEWATER GENERATION FOR RELATED PROJECTS**

No.	Proposed Use West Los Angeles Transportation Facility	Generation (gpd)
1.	Related Project	96,037
2.	West Los Angeles Transportation Facility	5,760
	Subtotal	101,797

No.	Proposed Use Sunset Avenue Project	Generation (gpd)
1.	Related Projects	<u>2,246,197</u>
2.	Sunset Avenue Project	33,546
	Subtotal	<u>2,279,743</u>
	Overall Total	<u>2,381,540</u>

Source: PCR Services Corporation, ~~May 2004~~ February 2005.

V. ALTERNATIVES TO THE PROPOSED PROJECT

V.(1) Volume I, Section V.I, Alternative H, page 453, first paragraph, revise the eighth sentence as follows:

In addition, the resulting height of the project along the street frontages would be three stories, similar-consistent with the height requirements of the Venice Coastal Specific Plan (30 feet for flat roofs, 35 feet for varied roofs). Building heights within the central part of the project site would continue to rise to approximately 56 feet.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

VI.(1) Volume I, Section VI, Other Environmental Considerations, page 479, footnote 265, revise the second sentence as follows:

This measure would reroute inbound buses to [continue southbound on La Cienega Boulevard to](#) Rodeo Road and make the southbound right-turn at that intersection with another right turn from westbound Rodeo Road to northbound Jefferson Boulevard.

VI.(2) Volume I, Section VI, Other Environmental Considerations, page 482, third paragraph, revise the second sentence as follows:

Implementation of Mitigation Measures Sunset-I.3 and Sunset-I.4 would result in the removal of ~~seven~~[nine](#) on-street parking spaces.

VII. PERSONS AND ORGANIZATIONS CONSULTED

There were no corrections or additions to this section of the Draft EIR.

VIII. REFERENCES AND ACRONYMS

There were no corrections or additions to this section of the Draft EIR.

APPENDICES

APPENDIX B—AIR QUALITY

West Los Angeles Transportation Facility

App.(1) Volume II, Appendix B, Air Quality, Appendix B2—West Los Angeles Transportation Facility Printout Sheets, revise title page as follows:

Appendix B-2

West Los Angeles Transportation Facility Printout Sheets

- Construction-Period Mass Emissions (URBEMIS 2002 printout sheets)
- [Non-Revenue Miles Emissions Analysis and Documentation](#)
- Operations-Period Mass Emissions (URBEMIS 2002 printout sheets)
- Operations-Period Localized CO Evaluation (CALINE-4 printout sheets)

App.(2) Volume II, Appendix B, Air Quality, Appendix B2—West Los Angeles Transportation Facility Printout Sheets, insert after Construction-Period Mass Emissions (URBEMIS 2002 printout sheets) as shown on the following 28 pages:

Transportation Center Project - Deadhead Miles Emissions

Deadhead Miles Emissions - Year 2006					
	ROG ^b	NOx ^c	CO ^d	SO2	PM10
EMFAC 2002 Factor (Urban Bus) (grams/mile)	1.395	10.595	11.207	0.132	0.176
CNG Adjustment Factor ^a	0.65	0.75	6.00	1.00	0.80
CNG Emissions Factor (grams/mile)	0.907	7.946	67.242	0.132	0.141
Net Emissions Reduction (lbs/day)	0	4	30	0	0

^a Source: Harvard University, "Diesel and CNG Heavy-duty Transit Bus Emissions over Multiple Driving Schedules: Regulated Pollutants and Project Overview", 2002

^b ROG emission factors were calculated based on an ambient temperature of 85°F for the worst case scenario

^c NOx emission factors were calculated based on an ambient temperature of 75°F for the worst case scenario

^d CO emission factors were calculated based on an ambient temperature of 60°F for the worst case scenario

^e Calculated based on 200 VMT per day

Title : Los Angeles County Avg 2006 Winter Default Title
 Version : Emfac2002 V2.2 Apr 23 2003
 Run Date : 01/24/05 16:40:30
 Scen Year: 2006 -- Model Years: 1965 to 2006
 Season : Winter
 Area : Los Angeles County

 Year:2006 -- Model Years 1965 to 2006 Inclusive -- Winter
 Emfac2002 Emission Factors: V2.2 Apr 23 2003
 County Average Los Angeles County

Pollutant Name: Carbon Monoxide (g/mi) Temperature: 60F Relative Humidity: 70%

Speed							
MPH	LDA	LDT	MDT	HDT	UBUS	MCY	ALL
30	4.479	6.306	5.622	6.819	11.207	26.879	5.268

Title : Los Angeles County Avg 2006 Summer Default Title
 Version : Emfac2002 V2.2 Apr 23 2003
 Run Date : 01/24/05 16:42:36
 Scen Year: 2006 -- Model Years: 1965 to 2006
 Season : Summer
 Area : Los Angeles County

 Year:2006 -- Model Years 1965 to 2006 Inclusive -- Summer
 Emfac2002 Emission Factors: V2.2 Apr 23 2003

Pollutant Name: Oxides of Nitrogen (g/mi) Temperature: 75F Relative Humidity: 70%

Speed							
MPH	LDA	LDT	MDT	HDT	UBUS	MCY	ALL
30	0.343	0.560	0.931	9.092	10.595	0.956	0.909

Pollutant Name: Reactive Org Gases (g/mi) Temperature: 85F Relative Humidity: 70%

Speed							
MPH	LDA	LDT	MDT	HDT	UBUS	MCY	ALL
30	0.196	0.270	0.298	0.763	1.395	2.411	0.262

Pollutant Name: Sulfur Dioxide (g/mi) Temperature: 85F Relative Humidity: 70%

Speed							
MPH	LDA	LDT	MDT	HDT	UBUS	MCY	ALL
30	0.004	0.005	0.009	0.137	0.132	0.002	0.012

Pollutant Name: PM10 (g/mi) Temperature: 85F Relative Humidity: 70%

Speed							
MPH	LDA	LDT	MDT	HDT	UBUS	MCY	ALL
30	0.012	0.019	0.023	0.272	0.176	0.032	0.028

MTA Deadhead Miles Summary

Currently the Venice Division (6) operates 66 buses in revenue service. Those buses operate on weekdays only.

The EIR for the new West Los Angeles Transportation Center assumes a total of 175 buses housed at the facility. Assuming a 20% spare ratio, this equates to 146 in-service buses. Service will be operated all days of the week.

Using current pull in and pull out information for Divisions 6, 7, and 10, 60 weekday, 70 Saturday, and 56 Sunday buses were moved to the West Los Angeles Transportation Center from Divisions 7 and 10. Below are current and estimated pull hours and miles associated with the West Los Angeles Transportation Center project, using this approach.

Annual savings equal to 4,220 pull hours and 73,168 pull miles are derived.

Since the comparison is only between Westside/Central Divisions the number of in-service buses at the proposed facility are not maximized in this analysis. There were only so many buses whose movement would generate a savings. Also, assumptions regarding which lines currently not in the Westside/Central Sector would be moved require discussion between the involved sectors. However, in maximizing the number of in-service buses, only those that generate savings would be moved. Thus, the savings would be greater than shown above.

Weekday - Current Buses, Pulls, Pull Hours and Pull Miles				
Division	No. of buses	No. of pulls	Pull Hours	Pull Miles
6	66	230	71.9	1693
7	219	706	227.5	4067
10	241	724	232.9	5657
Total	526	1660	532.3	11417

Saturday - Current Buses, Pulls, Pull Hours and Pull Miles				
Division	No. of buses	No. of pulls	Pull Hours	Pull Miles
6	0	0	0	0
7	128	276	74.8	1353
10	154	362	98.3	2627
Total	282	638	173.1	3980

Sunday - Current Buses, Pulls, Pull Hours and Pull Miles				
Division	No. of buses	No. of pulls	Pull Hours	Pull Miles
6	0	0	0	0
7	97	214	65.1	1228
10	129	302	76.8	1880
Total	226	516	141.9	3108

Weekday - Proposed Buses, Pulls, Pull Hours and Pull Miles				
Division	No. of buses	No. of pulls	Pull Hours	Pull Miles
WLATC	126	414	122.5	2919.8
7	177	586	193.2	3573.9
10	223	660	202.7	4784.1
Total	526	1660	518.4	11277.8

MTA Deadhead Miles Summary

Saturday - Proposed Buses, Pulls, Pull Hours and Pull Miles				
Division	No. of buses	No. of pulls	Pull Hours	Pull Miles
WLATC	72	166	46.7	979.1
7	88	194	54.0	1002.3
10	122	278	67.0	1564.7
Total	282	638	167.7	3546.1

Sunday - Proposed Buses, Pulls, Pull Hours and Pull Miles				
Division	No. of buses	No. of pulls	Pull Hours	Pull Miles
WLATC	56	118	31	620.9
7	58	134	40.4	794.3
10	112	264	63.7	1432.3
Total	226	516	135.1	2847.5

Difference of Current versus Proposed			
No. of buses	No. of pulls	Annual Pull Hours	Annual Pull Miles
Weekday - 0	0	-3544.5	-35496
Saturday - 0	0	-280.8	-22563
Sunday - 0	0	-394.4	-15109
		-4220	-73168

**Supporting Data Sheets
Non-revenue Miles Analyses**

Division Addresses

Division 6 (Venice), 100 Sunset Avenue, Venice, California

Division 7 (West Hollywood), 880 Santa Monica Boulevard, West Hollywood, California

Division 10 (Gateway), 742 North Mission Road, Los Angeles, California

(Please see attached Division Map)

Routes Used in Calculations

1

14

20

30

33

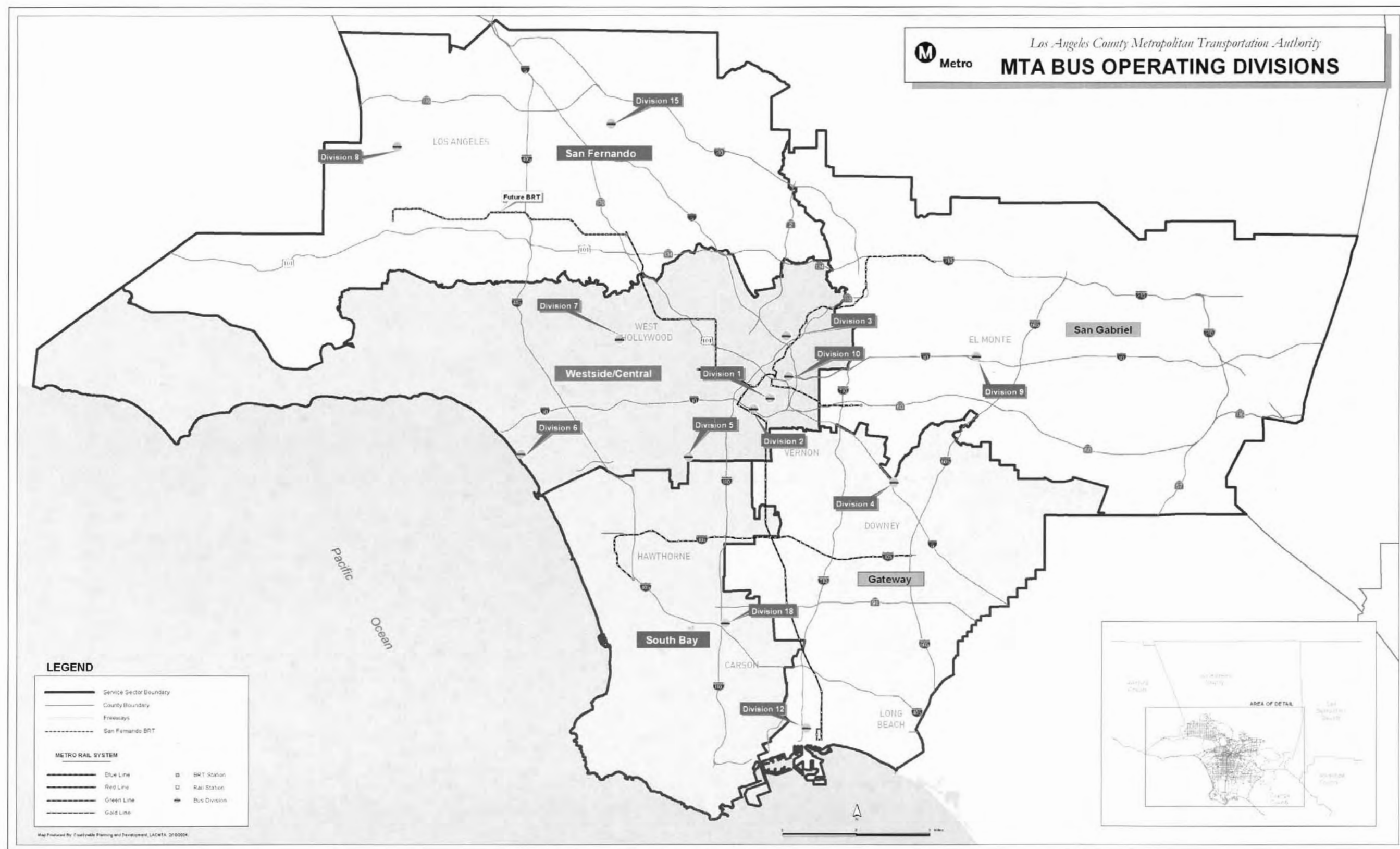
38

68

217

434

(Please see attached system map)



Weekday Non-revenue Miles Analyses

File Edit Trips Blocks Measurements Info View Lists Help

Vehicle schedule: Tnew06 1 Weekday 06 Magic pulls D6:126buses DECO4

vsc08 - Vehicle Schedule Statistics - [Monday - 5/11]

File

Vehicle schedule: Tnew06 1 Weekday 6 Magic pulls D6:126buses

Trip Summary

Statistics	Count	Duration	Distance	Percent	Average Speed
In-Service	844	1030h08	13484.060	80.10%	13.100
Deadhead	51	18h35	431.680	2.60%	23.200
Pull	414	122h29	2919.800	17.30%	23.800
Total	1309	1171h12	16835.539	100.00%	14.400

Free trips: 0 Trips for information only: 0

Time Summary

Statistics	Duration	Percent
In-Service	1030h08	78.68%
Load	1h45	0.14%
Layovers	138h01	10.54%
Wait	48h06	3.67%
Deadhead	18h35	1.42%
Pull	122h29	9.36%
Preparation	0h00	0.00%
Total	1309h13	100.00%

Block Summary

Statistics	Count	Duration
Block	207	
By block number	172	
Min. veh. required	126	
Shortest block		1h41
Longest block		20h45

Distance

42.086
36.377
22.744
101.930
22.433
24.800
24.686
24.686
24.800
107.065
24.800
36.377
24.686
139.100
196.844
126.100
153.400
117.000
125.900
135.600
115.113
177.300
77.100
69.600
50.400

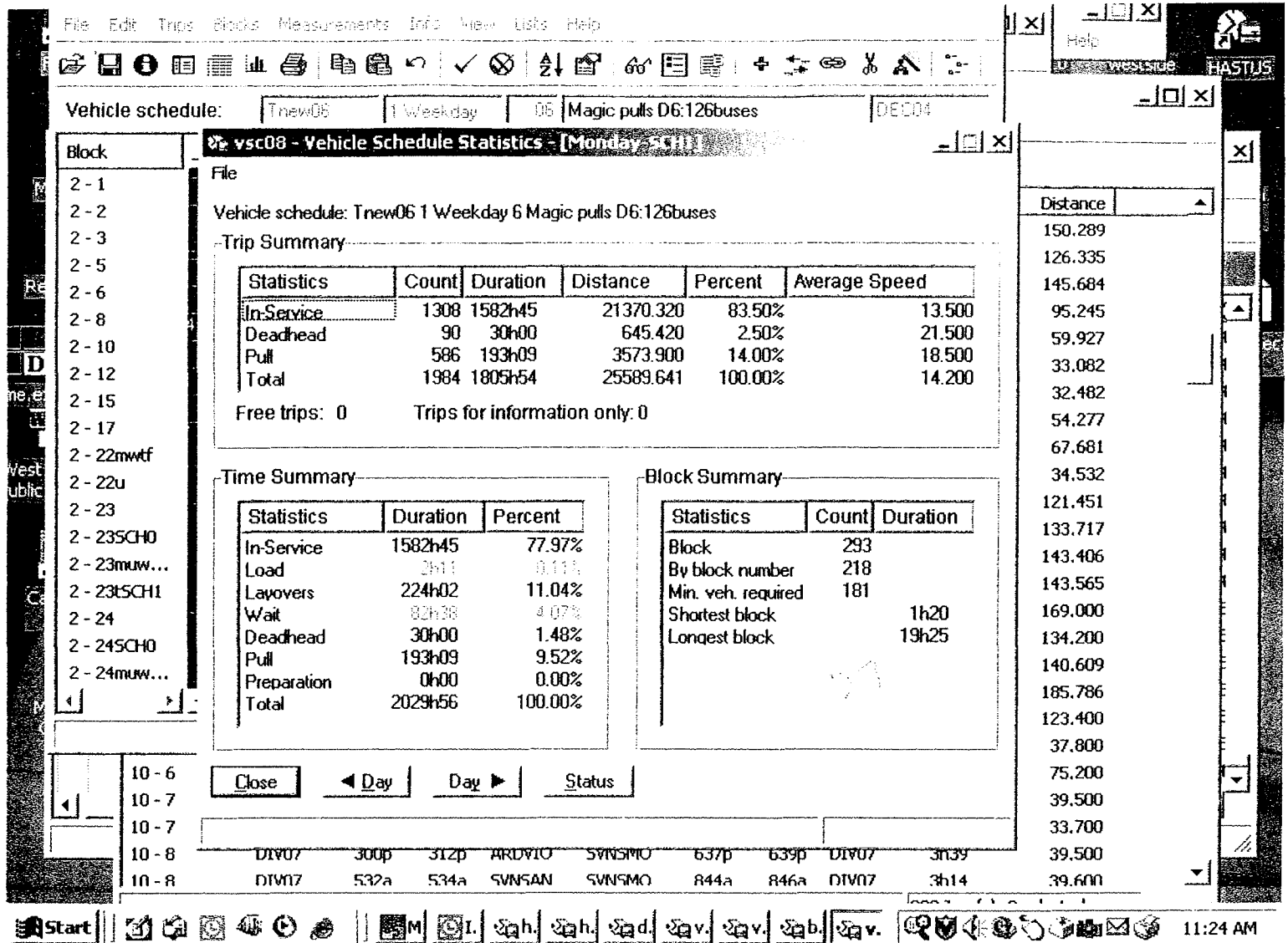
20 - 25
20 - 27
20 - 28
20 - 28
20 - 29

Close Day Day Status

DIV06N 1259p 117p MATPIC VETRED 742p 757p DIV06N 6h58
DIV06N 515a 533a MATPIC 2ND SAN 755a 813a DIV06N 2h58

Start M L h h d v v b v 11:23 AM

Week A



File Edit Trips Stops Measurements Info View Lists Help

Vehicle schedule: Tnew06 1 Weekday 06 Magic pulls D6:126buses DEC04

Block

2-4
2-7
2-9
2-11
2-13
2-14
2-16
2-18
2-19
2-20
2-21
2-22
2-26
2-29
2-30SCH0
2-30muw...
2-30SCH1
2-31SCH0
2-31muw...

File

Vehicle schedule: Tnew06 1 Weekday 6 Magic pulls D6:126buses

Trip Summary

Statistics	Count	Duration	Distance	Percent	Average Speed
In-Service	1653	2116h15	28006.102	83.60%	13.200
Deadhead	119	35h19	720.280	2.10%	20.400
Pull	660	202h41	4784.100	14.30%	23.600
Total	2432	2354h15	33510.480	100.00%	14.200

Free trips: 0 Trips for information only: 0

Time Summary

Statistics	Duration	Percent
In-Service	2116h15	79.76%
Load	11h17	0.43%
Layovers	299h09	11.27%
Wait	109h13	4.12%
Deadhead	35h19	1.33%
Pull	202h41	7.64%
Preparation	0h00	0.00%
Total	2653h24	100.00%

Block Summary

Statistics	Count	Duration
Block	330	
By block number	284	
Min. veh. required	222	
Shortest block		1h43
Longest block		18h09

Close Day Day Status

20-2
20-3
20-4
20-5
20-6

DIV10 432a 447a TER028 PICRUM 643p 706p DIV10 14h34
DIV10 438a 445a TFR031 7THMAT 611n 626n DIV10 13h48

Start

11:24 AM

II. Corrections and Additions to the Draft EIR

Sample schedule: Tnew06 1 Weekday Scenario: 6 Magic pulls D6:126buses

VEHICLES IN SERVICE

Effective: 12/19/2004
Booking: DEC04

Route	600a - 900a			1200p - 1201p			300p - 600p			300x - 301x		
	Long	Short	Total	Long	Short	Total	Long	Short	Total	Long	Short	Total
4	5	18	23	6	0	6	17	8	25	0	0	0
14	7	13	20	6	0	6	11	1	12	1	0	1
20	12	9	21	9	0	9	13	12	25	0	0	0
30	4	1	5	4	0	4	4	1	5	0	0	0
33	8	15	23	7	0	7	13	8	21	0	0	0
38	6	2	8	6	0	6	7	0	7	0	0	0
68	6	1	7	5	0	5	8	1	9	0	0	0
217	4	4	8	4	0	4	7	2	9	2	0	2
434	5	6	11	4	0	4	12	1	13	0	0	0
Total	57	69	126	51	0	51	92	34	126	3	0	3

II. Corrections and Additions to the Draft EIR

Vehicle schedule: Tnew06 1 Weekday Scenario: 6 Magic pulls D6:126buses

Checked: 12/15/2007
Booking: DEC04

Route	600a - 900a			1200p - 1201p			300p - 600p			300x - 301x		
	Long	Short	Total	Long	Short	Total	Long	Short	Total	Long	Short	Total
2	12	15	27	10	0	10	23	5	28	0	0	0
4	8	4	12	8	0	8	11	0	11	3	0	3
10	6	12	18	5	0	5	6	6	12	1	0	1
14	7	12	19	7	0	7	15	7	22	1	0	1
16	7	13	20	7	0	7	14	5	19	0	0	0
30	6	0	6	6	0	6	7	0	7	0	0	0
38	1	0	1	1	0	1	1	0	1	0	0	0
68	2	0	2	2	0	2	3	0	3	0	0	0
217	5	2	7	4	0	4	11	2	13	0	0	0
220	3	0	3	3	0	3	3	0	3	0	0	0
305	5	0	5	3	0	3	5	0	5	0	0	0
550	3	2	5	3	0	3	5	0	5	0	0	0
705	4	4	8	4	0	4	5	4	9	0	0	0
720	30	14	44	9	0	9	41	2	43	0	0	0
Total	99	78	177	72	0	72	150	31	181	5	0	5

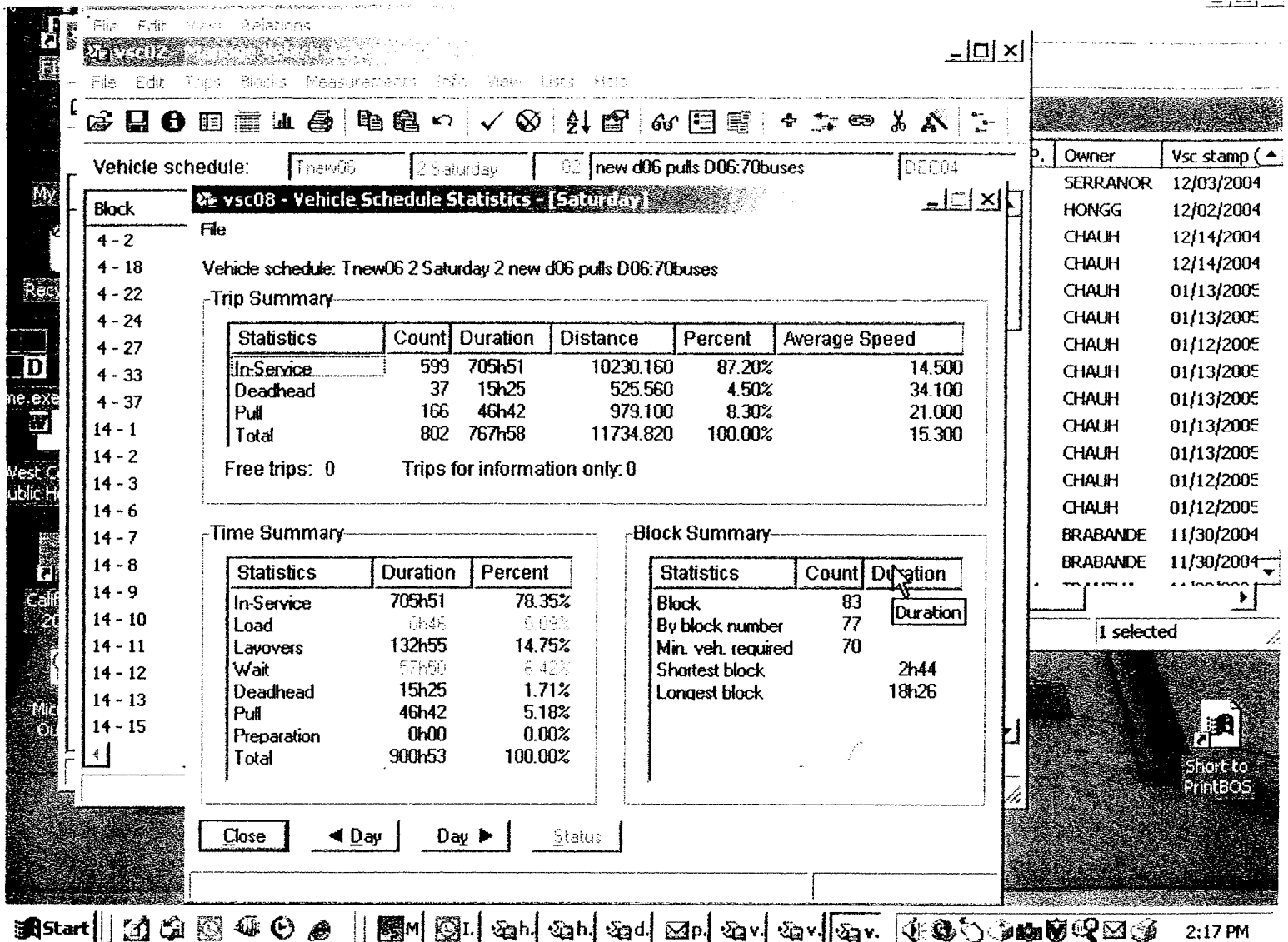
II. Corrections and Additions to the Draft EIR

Vehicle schedule: Tnew06 1 Weekday Scenario: 6 Magic pulls D6:126buses

BOOKING: 12/15/2004
Booking: DEC04

Route	600a - 900a			1200p - 1201p			300p - 600p			300x - 301x		
	Long	Short	Total	Long	Short	Total	Long	Short	Total	Long	Short	Total
2	13	7	20	11	0	11	17	3	20	0	0	0
4	12	10	22	12	0	12	20	5	25	4	0	4
20	20	1	21	18	0	18	24	2	26	5	0	5
30	12	14	26	12	0	12	27	1	28	2	0	2
33	15	9	24	14	0	14	21	4	25	3	0	3
38	6	9	15	5	0	5	12	1	13	0	0	0
40	7	9	16	6	0	6	9	0	9	1	0	1
42	7	6	13	6	0	6	9	0	9	0	0	0
68	14	6	20	14	0	14	20	0	20	0	0	0
434	4	5	9	3	0	3	2	4	6	0	0	0
446	6	3	9	6	0	6	9	1	10	0	0	0
720	18	10	28	18	0	18	22	3	25	0	0	0
Total	134	89	223	125	0	125	192	24	216	15	0	15

Saturday Non-revenue Miles Analyses



Saturday

Vehicle schedule: Tnew06 2 Saturday 02 new d06 pulls D06:70buses DEC04

vsc08 - Vehicle Schedule Statistics - (Saturday)

File

Vehicle schedule: Tnew06 2 Saturday 2 new d06 pulls D06:70buses

Trip Summary

Statistics	Count	Duration	Distance	Percent	Average Speed
In-Service	854	946h03	13306.864	92.00%	14.100
Deadhead	45	8h24	158.880	1.10%	18.900
Pull	194	53h58	1002.300	6.90%	18.600
Total	1093	1008h25	14468.044	100.00%	14.300

Free trips: 0 Trips for information only: 0

Time Summary

Statistics	Duration	Percent
In-Service	946h03	79.03%
Load	1h44	0.14%
Layovers	188h36	15.76%
Wait	77h36	6.48%
Deadhead	8h24	0.70%
Pull	53h58	4.51%
Preparation	0h00	0.00%
Total	1197h01	100.00%

Block Summary

Statistics	Count	Duration
Block	97	
By block number	97	
Min. veh. required	85	
Shortest block		6h15
Longest block		22h32

Close Day Day Status

Owner Ysc stamp

SERRANOR	12/03/2004
HONGG	12/02/2004
CHAUH	12/14/2004
CHAUH	12/14/2004
CHAUH	01/13/2005
CHAUH	01/13/2005
CHAUH	01/12/2005
CHAUH	01/13/2005
CHAUH	01/13/2005
CHAUH	01/13/2005
CHAUH	01/13/2005
CHAUH	01/12/2005
CHAUH	01/12/2005
BRABANDE	11/30/2004
BRABANDE	11/30/2004

1 selected

Short to PrintBOS

Start

2:17 PM

File Edit View Database

Vehicle schedule: Tnew06 2 Saturday 02 new d06 pulls D06:70buses DEC04

vsc08 - Vehicle Schedule Statistics - [Saturday]

File

Vehicle schedule: Tnew06 2 Saturday 2 new d06 pulls D06:70buses

Trip Summary

Statistics	Count	Duration	Distance	Percent	Average Speed
In-Service	1119	1404h15	19736.275	91.40%	14.100
Deadhead	53	13h21	283.980	1.30%	21.300
Pull	278	67h02	1564.700	7.20%	23.300
Total	1450	1484h38	21584.955	100.00%	14.500

Free trips: 0 Trips for information only: 0

Time Summary

Statistics	Duration	Percent
In-Service	1404h15	81.04%
Load	5h47	0.33%
Layovers	248h05	14.32%
Wait	98h20	5.73%
Deadhead	13h21	0.77%
Pull	67h02	3.87%
Preparation	0h00	0.00%
Total	1732h43	100.00%

Block Summary

Statistics	Count	Duration
Block	139	
By block number	139	
Min. veh. required	117	
Shortest block		5h29
Longest block		22h02

Close Day Day Status

Owner Vsc stamp

SERRANOR	12/03/2004
HONGG	12/02/2004
CHAUH	12/14/2004
CHAUH	12/14/2004
CHAUH	01/13/2005
CHAUH	01/13/2005
CHAUH	01/12/2005
CHAUH	01/13/2005
CHAUH	01/13/2005
CHAUH	01/13/2005
CHAUH	01/13/2005
CHAUH	01/12/2005
CHAUH	01/12/2005
BRABANDE	11/30/2004
BRABANDE	11/30/2004

1 selected

Short to PrintBOS

Start [Icons] M L h h d p v vsc02 - Manage Vehicle Schedules [Icons] 2:18 PM

II. Corrections and Additions to the Draft EIR

Vehicle schedule: Tnew06 2 Saturday Scenario: 2 new d06 pulls D06:70buses

vehicles in service

Effective: 12/19/2004
Booking: DEC04

Route	600a - 900a			1200p - 1201p			300p - 600p			300x - 301x		
	Long	Short	Total	Long	Short	Total	Long	Short	Total	Long	Short	Total
4	6	0	6	6	0	6	6	0	6	0	0	0
14	11	0	11	12	0	12	14	1	15	0	0	0
20	8	0	8	9	0	9	10	0	10	0	0	0
30	9	0	9	10	0	10	10	0	10	0	0	0
33	8	0	6	6	0	6	5	0	5	0	0	0
38	7	0	7	7	0	7	7	0	7	0	0	0
40	1	0	1	1	0	1	1	0	1	0	0	0
68	2	0	2	3	0	3	3	0	3	0	0	0
217	3	0	3	4	0	4	4	0	4	1	0	1
434	6	4	10	4	0	4	7	3	10	0	0	0
446	0	0	0	0	0	0	1	0	1	0	0	0
Total	59	4	63	62	0	62	68	4	72	1	0	1

II. Corrections and Additions to the Draft EIR

LA001111

vehicles in service

Effective: 12/19/2004
Booking: DEC04

Vehicle schedule: Tnew06 2 Saturday Scenario: 2 new d06 pulls D06:70buses

Route	600a - 900a			1200p - 1201p			300p - 600p			300x - 301x		
	Long	Short	Total	Long	Short	Total	Long	Short	Total	Long	Short	Total
2	10	0	10	12	0	12	14	0	14	0	0	0
4	12	0	12	12	0	12	12	0	12	3	0	3
10	6	0	6	9	0	9	9	0	9	1	0	1
14	2	0	2	4	0	4	5	0	5	2	0	2
16	8	0	8	11	0	11	13	0	13	0	0	0
30	3	0	3	3	0	3	3	0	3	0	0	0
38	1	0	1	1	0	1	1	0	1	0	0	0
68	3	0	3	3	0	3	3	0	3	0	0	0
217	7	0	7	8	0	8	9	0	9	1	0	1
220	3	0	3	3	0	3	3	0	3	0	0	0
305	3	0	3	3	0	3	3	0	3	0	0	0
550	3	0	3	3	0	3	3	0	3	0	0	0
720	8	0	8	10	0	10	10	0	10	0	0	0
Total	69	0	69	82	0	82	88	0	88	7	0	7

II. Corrections and Additions to the Draft EIR

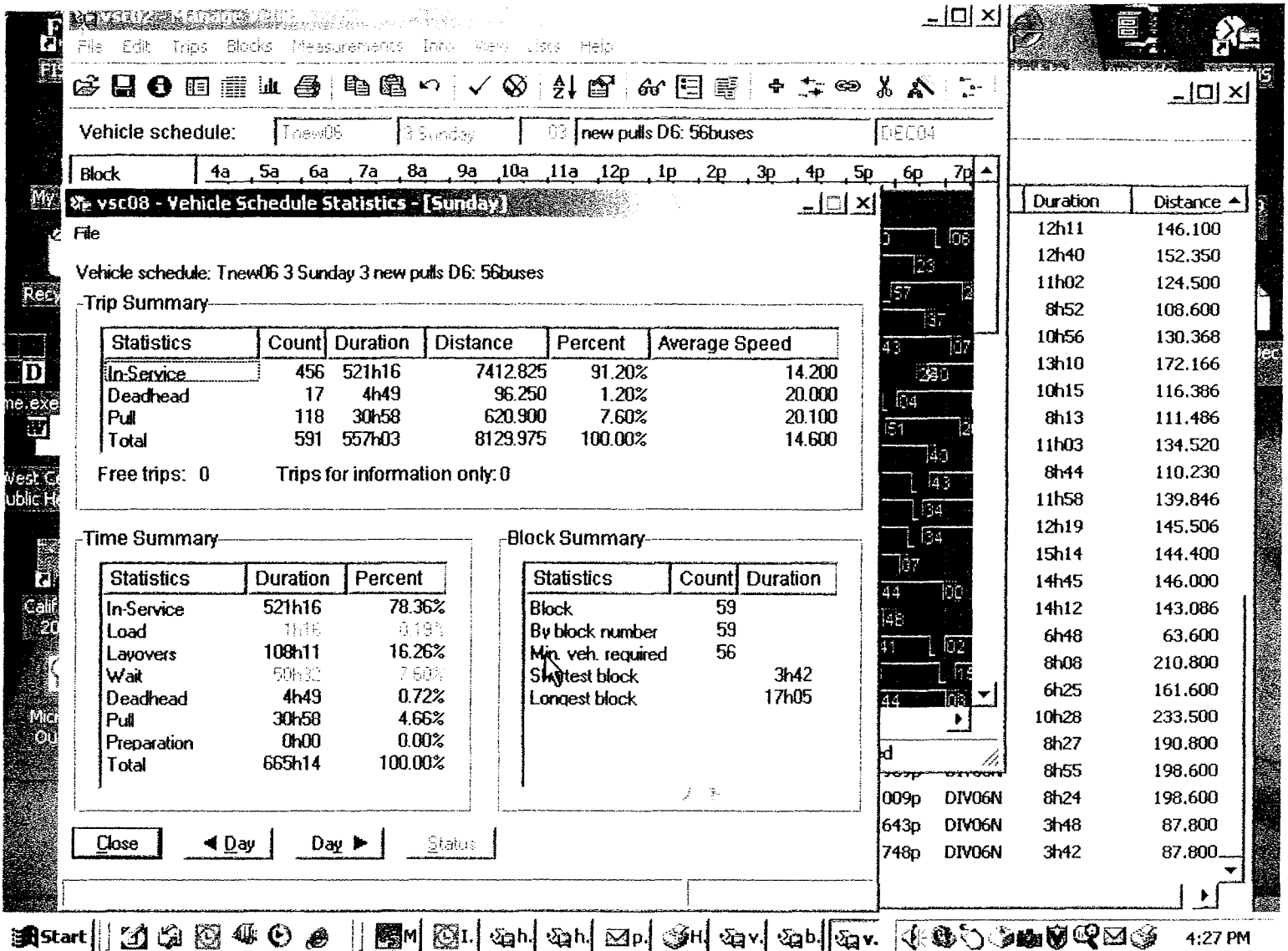
Vehicle schedule: Tnew06 2 Saturday Scenario: 2 new d06 pulls D06:70buses

vehicles in service

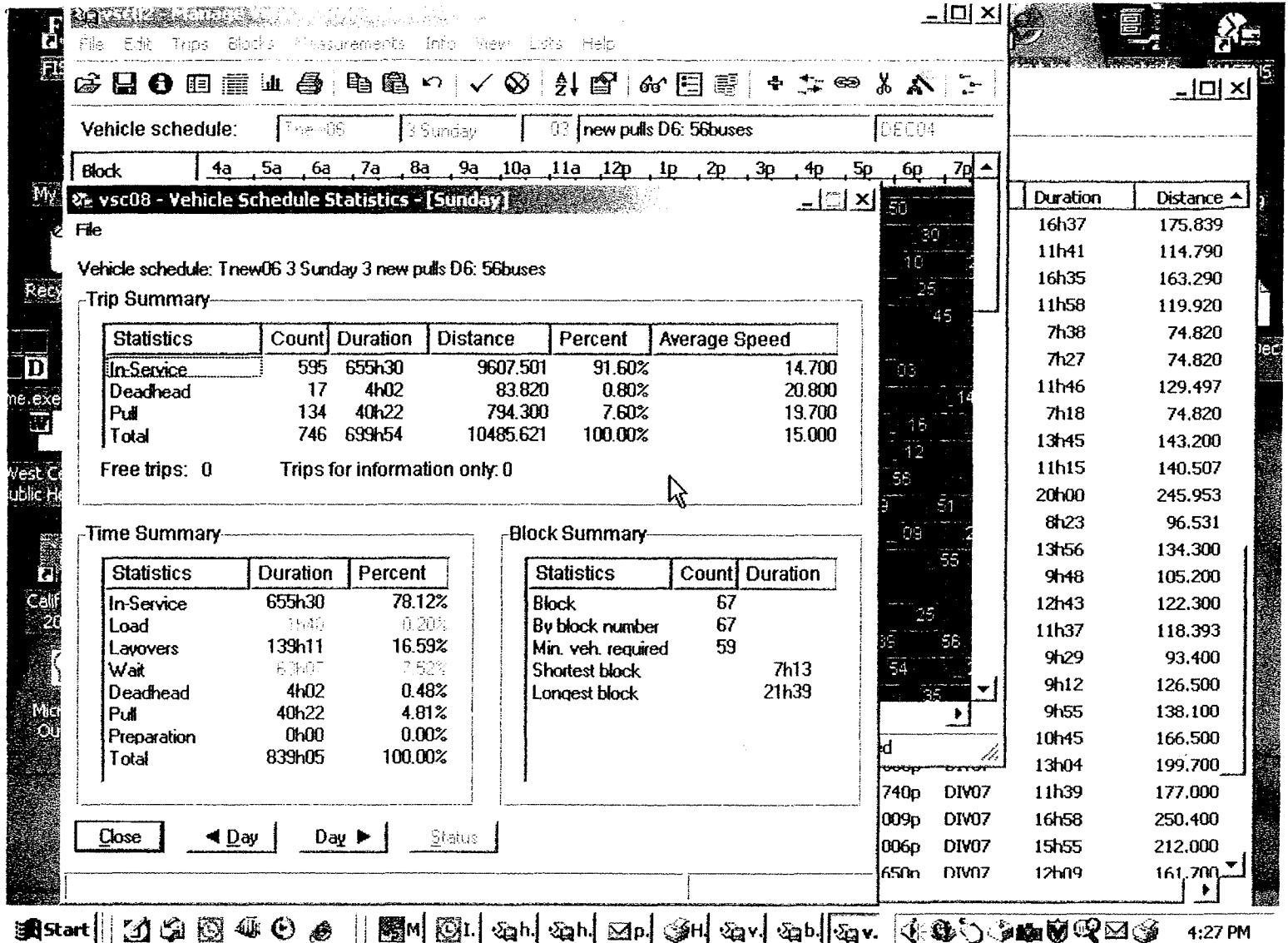
Effective: 12/19/2004
Booking: DEC04

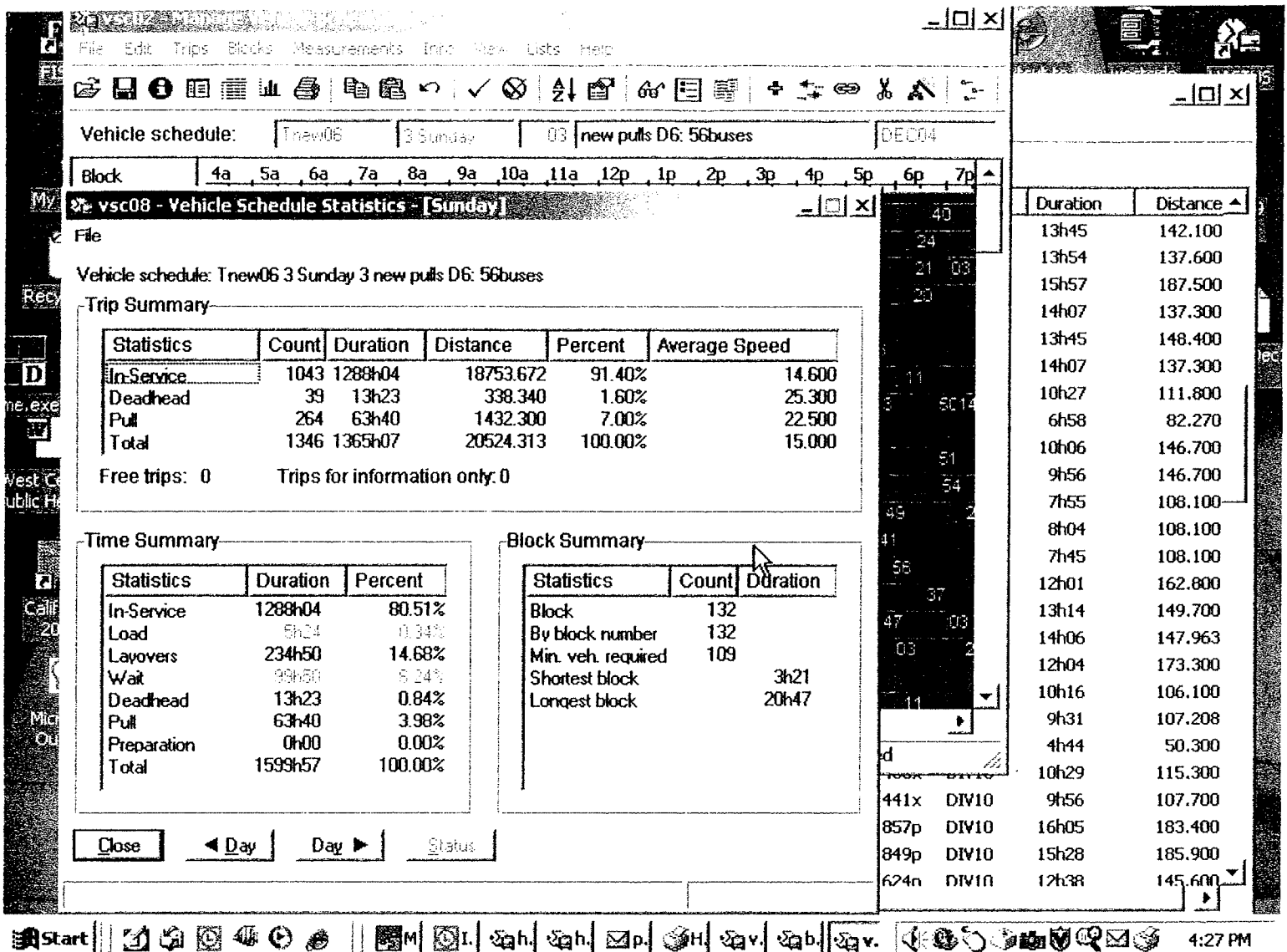
Route	600a - 900a			1200p - 1201p			300p - 600p			300x - 301x		
	Long	Short	Total	Long	Short	Total	Long	Short	Total	Long	Short	Total
2	6	0	6	6	0	6	7	0	7	0	0	0
4	15	0	15	18	0	18	18	0	18	4	0	4
20	10	0	10	11	0	11	13	0	13	5	0	5
30	8	0	8	9	0	9	13	0	13	2	0	2
33	20	0	20	20	0	20	22	0	22	3	0	3
38	4	0	4	5	0	5	5	0	5	0	0	0
40	5	0	5	6	0	6	5	0	5	1	0	1
42	3	0	3	3	0	3	4	0	4	0	0	0
68	5	0	5	7	0	7	11	0	11	0	0	0
446	4	0	4	4	0	4	4	0	4	0	0	0
720	19	0	19	20	0	20	20	0	20	0	0	0
Total	99	0	99	109	0	109	122	0	122	15	0	15

Sunday Non-revenue Miles Analyses



SUNDAY





II. Corrections and Additions to the Draft EIR

Vehicle schedule: Tnew06 3 Sunday Scenario: 3 new pulls D6: 56buses

vehicles in service

Effective: 12/19/2004
Booking: DEC04

Route	600a - 900a			1200p - 1201p			300p - 600p			300x - 301x		
	Long	Short	Total	Long	Short	Total	Long	Short	Total	Long	Short	Total
2	1	0	1	2	0	2	2	0	2	0	0	0
4	3	0	3	3	0	3	4	0	4	1	0	1
14	7	0	7	12	0	12	12	0	12	0	0	0
20	1	0	1	1	0	1	1	0	1	0	0	0
30	7	0	7	13	0	13	14	0	14	0	0	0
33	3	0	3	5	0	5	5	0	5	0	0	0
38	2	0	2	4	0	4	4	0	4	0	0	0
68	1	0	1	4	0	4	4	0	4	0	0	0
217	3	0	3	3	0	3	4	0	4	0	0	0
434	3	0	3	4	0	4	4	2	6	0	0	0
Total	31	0	31	51	0	51	54	2	56	1	0	1

II. Corrections and Additions to the Draft EIR

vehicle schedule: Tnew06 3 Sunday Scenario: 3 new pulls D6: 56buses

Vehicles in Service

Effective: 12/19/2004
Booking: DEC04

Route	600a - 900a			1200p - 1201p			300p - 600p			300x - 301x		
	Long	Short	Total	Long	Short	Total	Long	Short	Total	Long	Short	Total
2	9	0	9	11	0	11	11	0	11	0	0	0
4	6	0	6	11	0	11	11	0	11	2	0	2
10	2	0	2	4	0	4	4	0	4	1	0	1
14	1	0	1	1	0	1	1	0	1	2	0	2
16	6	0	6	8	0	8	10	0	10	0	0	0
30	1	0	1	1	0	1	1	0	1	0	0	0
38	1	0	1	1	0	1	1	0	1	0	0	0
68	1	0	1	2	0	2	2	0	2	0	0	0
217	4	0	4	5	0	5	5	0	5	2	0	2
220	3	0	3	3	0	3	3	0	3	0	0	0
305	3	0	3	3	0	3	3	0	3	0	0	0
550	3	0	3	3	0	3	3	0	3	0	0	0
720	2	0	2	3	0	3	3	0	3	0	0	0
Total	42	0	42	56	0	56	58	0	58	7	0	7

II. Corrections and Additions to the Draft EIR

Vehicle schedule: Tnew06 3 Sunday Scenario: 3 new pulls D6: 56buses

VEHICLES IN SERVICE

CHIEFIVE. 12/13/2004
Booking: DEC04

Route	600a - 900a			1200p - 1201p			300p - 600p			300x - 301x		
	Long	Short	Total	Long	Short	Total	Long	Short	Total	Long	Short	Total
2	1	0	1	2	0	2	3	0	3	0	0	0
4	12	0	12	16	0	16	15	1	16	4	0	4
20	16	0	16	16	0	16	18	0	18	5	0	5
30	6	0	6	6	0	6	6	0	6	2	0	2
33	11	0	11	15	0	15	19	0	19	3	0	3
38	1	0	1	1	0	1	2	0	2	0	0	0
40	7	0	7	8	0	8	8	0	8	1	0	1
42	3	0	3	3	0	3	3	0	3	0	0	0
68	5	0	5	8	0	8	8	0	8	0	0	0
446	3	0	3	3	0	3	3	0	3	0	0	0
720	17	0	17	20	0	20	26	0	26	0	0	0
Total	82	0	82	98	0	98	111	1	112	15	0	15

App.(3) Volume II, Appendix B, Air Quality, Appendix B2—West Los Angeles Transportation Facility Printout Sheets, replace MTA Division 6 Bus Maintenance Facility Regional Emissions Calculations Table with the following page:

MTA Division 6 Bus Maintenance Facility

Regional Emission Calculations (lbs/day)

	CO	NOx	PM10	ROC	SOx
Project					
Mobile	-30	-4	0	0	0.0
Stationary	0.3	0.8	0.0	0.1	0.1
Total Project	-30	-3	0	0	0.1
SCAQMD Significance Threshold	550	55	150	55	150
Difference	(580)	(58)	(150)	(55)	(150)
Significant?	No	No	No	No	No

App.(4) Volume II, Appendix B, Air Quality, Appendix B2—West Los Angeles Transportation Facility Printout Sheets, replace CALINE4 Modeling Results beginning at Transportation Center Project (Jefferson) CALINE4 1-hour Carbon Monoxide concentrations with the following 18 pages:

Transportation Center Project (Jefferson)

CALINE4 Modeling Results and Estimated Local 1-Hour Carbon Monoxide Concentrations (ppm)

Projected Background 1-Hour CO Concentrations (ppm) ^a

Monitoring Station: West LA

Year	1-Hr Concentration
2006	4.96

Intersection and Receptor Locations	Future Without Project		Future With Project		
	Traffic CO Contribution ^b	Estimated Local CO Concentration ^c	Traffic CO Contribution ^b	Estimated Local CO Concentration ^c	Exceedance of Significance Threshold ^d
Jefferson Boulevard and La Cienega Boulevard (w/o Mitigation) AM					
NE	4.9	9.9	5.0	10.0	NO
SE	5.1	10.1	5.1	10.1	NO
SW	4.3	9.3	4.4	9.4	NO
NW	5.4	10.4	5.5	10.5	NO
Jefferson Boulevard and La Cienega Boulevard (w/o Mitigation) PM					
NE	4.6	9.6	4.6	9.6	NO
SE	6.2	11.2	6.2	11.2	NO
SW	5.4	10.4	5.4	10.4	NO
NW	4.7	9.7	4.7	9.7	NO
Jefferson Boulevard and La Cienega Boulevard (w/Mitigation) AM					
NE	4.8	9.8	4.9	9.9	NO
SE	5.0	10.0	5.0	10.0	NO
SW	4.3	9.3	4.3	9.3	NO
NW	4.6	9.6	4.7	9.7	NO
Jefferson Boulevard and La Cienega Boulevard (w/Mitigation) PM					
NE	4.6	9.6	4.6	9.6	NO
SE	6.2	11.2	6.3	11.3	NO
SW	5.3	10.3	5.3	10.3	NO
NW	4.6	9.6	4.6	9.6	NO
Jefferson Boulevard and National Boulevard AM					
NE	1.7	6.7	1.7	6.7	NO
SE	2.0	7.0	2.1	7.1	NO
SW	2.2	7.2	2.3	7.3	NO
NW	2.2	7.2	2.3	7.3	NO
Jefferson Boulevard and National Boulevard PM					
NE	1.6	6.6	1.7	6.7	NO
SE	2.5	7.5	2.5	7.5	NO
SW	2.1	7.1	2.2	7.2	NO
NW	1.7	6.7	1.7	6.7	NO
Jefferson Boulevard and Rodeo Road AM					
NE	2.8	7.8	2.8	7.8	NO
SE	2.2	7.2	2.2	7.2	NO
SW	3.5	8.5	3.5	8.5	NO
NW	4.2	9.2	4.2	9.2	NO
Jefferson Boulevard and Rodeo Road PM					
NE	2.2	7.2	2.2	7.2	NO
SE	2.2	7.2	2.2	7.2	NO
SW	2.3	7.3	2.3	7.3	NO
NW	2.2	7.2	2.3	7.3	NO

a Based on guidance provided by the AQMD Air Quality Analysis Guidance Handbook.

b The 1-hour traffic contribution (ppm) is determined by inputting total traffic volumes into the CALINE4 model.

c The estimated local concentration is the traffic contribution + the background concentration.

d The California Ambient Air Quality Standard for 1-hour CO concentrations is 20 ppm.

Transportation Center Project (Jefferson)**CALINE4 Modeling Results and Estimated Local 8-Hour Carbon Monoxide Concentrations (ppm)**

Projected Background 8-Hour CO Concentrations (ppm) ^a		Average Persistence Factor = 0.70	
Monitoring Station: West LA			
Year	8-Hr Concentration		
2006	3.12		

Intersection and Receptor Locations	Future Without Project		Future With Project		
	Traffic CO Contribution ^b	Estimated Local CO Concentration ^c	Traffic CO Contribution ^b	Estimated Local CO Concentration ^c	Exceedance of Significance Threshold ^d
Jefferson Boulevard and La Cienega Boulevard (w/o Mitigation) AM					
NE	2.6	5.7	2.6	5.7	NO
SE	2.4	5.5	2.4	5.5	NO
SW	2.5	5.6	2.6	5.7	NO
NW	2.6	5.7	2.6	5.7	NO
Jefferson Boulevard and La Cienega Boulevard (w/o Mitigation) PM					
NE	2.6	5.7	2.6	5.7	NO
SE	2.9	6.1	2.9	6.1	NO
SW	2.9	6.0	3.0	6.1	NO
NW	2.5	5.6	2.5	5.6	NO
Jefferson Boulevard and La Cienega Boulevard (w/Mitigation) AM					
NE	2.5	5.6	2.6	5.7	NO
SE	2.3	5.4	2.3	5.4	NO
SW	2.5	5.6	2.6	5.7	NO
NW	2.4	5.5	2.5	5.6	NO
Jefferson Boulevard and La Cienega Boulevard (w/Mitigation) PM					
NE	2.6	5.7	2.6	5.7	NO
SE	2.9	6.1	2.9	6.1	NO
SW	3.1	6.2	3.1	6.2	NO
NW	2.4	5.5	2.4	5.5	NO
Jefferson Boulevard and National Boulevard AM					
NE	1.1	4.2	1.1	4.2	NO
SE	1.1	4.2	1.1	4.2	NO
SW	1.3	4.4	1.3	4.5	NO
NW	1.1	4.2	1.1	4.2	NO
Jefferson Boulevard and National Boulevard PM					
NE	1.0	4.1	1.1	4.2	NO
SE	1.3	4.4	1.3	4.4	NO
SW	1.3	4.5	1.3	4.5	NO
NW	1.1	4.2	1.1	4.2	NO
Jefferson Boulevard and Rodeo Road AM					
NE	1.7	4.8	1.7	4.8	NO
SE	1.3	4.4	1.3	4.4	NO
SW	1.8	4.9	1.8	4.9	NO
NW	2.0	5.2	2.0	5.2	NO
Jefferson Boulevard and Rodeo Road PM					
NE	1.3	4.4	1.3	4.4	NO
SE	1.2	4.3	1.3	4.4	NO
SW	1.3	4.4	1.3	4.4	NO
NW	1.3	4.4	1.3	4.5	NO

a Based on guidance provided by the AQMD Air Quality Analysis Guidance Handbook.

b The persistence factor is calculated as recommended in Table B.15 in the Transportation Project-Level Carbon Monoxide Protocol (Institute of Transportation Studies, UC Davis, Revised 1997). This is a generalized persistence factor likely to provide a conservative estimate in most situations.

c The estimated local concentration is the traffic contribution + the background concentration.

d The California Ambient Air Quality Standard for 8-hour CO concentrations is 9 ppm.

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JELAAMP.txt

JOB: Jefferson Boulevard and La Cienega Boulevard AM NP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGHT= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	Y1	X2	Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	6	-450	6	-150	* AG	3139	4.9	.0	19.5
B. NA	6	-150	6	0	* AG	2973	8.2	.0	18.0
C. ND	6	0	6	150	* AG	3593	6.1	.0	13.5
D. NE	6	150	6	450	* AG	3593	4.9	.0	19.5
E. SF	-6	450	-6	150	* AG	2056	4.9	.0	19.5
F. SA	-6	150	-6	0	* AG	1968	7.4	.0	18.0
G. SD	-6	0	-6	-150	* AG	1677	5.3	.0	13.5
H. SE	-6	-150	-6	-450	* AG	1677	4.9	.0	19.5
I. WF	450	10	150	10	* AG	1152	5.8	.0	15.0
J. WA	150	10	0	10	* AG	1037	10.8	.0	18.0
K. WD	0	10	-150	10	* AG	1417	12.2	.0	9.9
L. WE	-150	10	-450	10	* AG	1417	5.8	.0	15.0
M. EF	-450	-6	-150	-6	* AG	1091	5.8	.0	15.0
N. EA	-150	-6	0	-6	* AG	605	10.4	.0	18.0
O. ED	0	-6	150	-6	* AG	751	7.7	.0	9.9
P. EE	150	-6	450	-6	* AG	751	5.8	.0	15.0
Q. NL	0	0	3	-150	* AG	166	7.0	.0	9.9
R. SL	0	0	-3	150	* AG	88	7.0	.0	9.9
S. WL	0	0	150	5	* AG	115	10.4	.0	9.9
T. EL	0	0	-150	-4	* AG	486	10.4	.0	9.9

III. RECEPTOR LOCATIONS

RECEPTOR	* X	Y	Z
1. NE3	15	19	1.8
2. SE3	15	-13	1.8
3. SW3	-15	-12	1.8
4. NW3	-15	14	1.8
5. NE7	19	23	1.8
6. SE7	19	-17	1.8
7. SW7	-19	-16	1.8
8. NW7	-19	17	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* CONC (PPM)	* PRED CONC (PPM)	A	B	C	D	E	F	G	H
1. NE3	261.	4.9	.0	.0	1.3	.0	.0	.5	.0	.0	.0
2. SE3	353.	5.1	.0	.0	.8	2.3	.2	.4	.5	.0	.0
3. SW3	5.	4.3	.0	.0	.3	.7	.3	1.8	.0	.0	.0
4. NW3	93.	5.4	.0	.0	.7	.0	.0	.9	.0	.0	.0
5. NE7	257.	3.7	.0	.0	1.0	.0	.0	.5	.0	.0	.0
6. SE7	280.	3.4	.0	1.2	.0	.0	.0	.0	.3	.0	.0
7. SW7	8.	3.6	.0	.0	.4	.5	.1	1.4	.0	.0	.0
8. NW7	166.	3.7	.0	1.2	.0	.0	.0	.1	.7	.0	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	J	K	L	M	N	O	P	Q	R	S	T
1. NE3	.0	.4	1.9	.0	.2	.3	.0	.0	.0	.0	.0	.3
2. SE3	.0	.4	.0	.0	.0	.0	.4	.0	.0	.0	.0	.0
3. SW3	.0	.0	.6	.0	.0	.3	.0	.0	.0	.0	.0	.3
4. NW3	.3	1.5	1.6	.0	.0	.0	.0	.2	.0	.0	.0	.0
5. NE7	.0	.0	1.3	.0	.0	.3	.0	.0	.0	.0	.0	.3
6. SE7	.0	.0	.6	.2	.0	.7	.0	.0	.0	.0	.0	.4
7. SW7	.0	.0	.5	.0	.0	.4	.0	.0	.0	.0	.0	.2
8. NW7	.0	.0	1.1	.0	.0	.2	.0	.0	.1	.0	.0	.2

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JELAAMP.txt

JOB: Jefferson Boulevard and La Cienega Boulevard AM WP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGHT= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	6	-450	6	-150	* AG	3139	4.9	.0	19.5
B. NA	6	-150	6	0	* AG	2973	8.2	.0	18.0
C. ND	6	0	6	150	* AG	3613	6.1	.0	13.5
D. NE	6	150	6	450	* AG	3613	4.9	.0	19.5
E. SF	-6	450	-6	150	* AG	2107	4.9	.0	19.5
F. SA	-6	150	-6	0	* AG	2019	7.4	.0	18.0
G. SD	-6	0	-6	-150	* AG	1677	5.3	.0	13.5
H. SE	-6	-150	-6	-450	* AG	1677	4.9	.0	19.5
I. WF	450	10	150	10	* AG	1154	5.8	.0	15.0
J. WA	150	10	0	10	* AG	1039	10.8	.0	18.0
K. WD	0	10	-150	10	* AG	1470	12.2	.0	9.9
L. WE	-150	10	-450	10	* AG	1470	5.8	.0	15.0
M. EF	-450	-6	-150	-6	* AG	1114	5.8	.0	15.0
N. EA	-150	-6	0	-6	* AG	608	10.4	.0	18.0
O. ED	0	-6	150	-6	* AG	754	7.7	.0	9.9
P. EE	150	-6	450	-6	* AG	754	5.8	.0	15.0
Q. NL	0	0	3	-150	* AG	166	7.0	.0	9.9
R. SL	0	0	-3	150	* AG	88	7.0	.0	9.9
S. WL	0	0	150	5	* AG	115	10.4	.0	9.9
T. EL	0	0	-150	-4	* AG	506	10.8	.0	9.9

III. RECEPTOR LOCATIONS

RECEPTOR	* X	* Y	* Z
1. NE3	15	19	1.8
2. SE3	15	-13	1.8
3. SW3	-15	-12	1.8
4. NW3	-15	14	1.8
5. NE7	19	23	1.8
6. SE7	19	-17	1.8
7. SW7	-19	-16	1.8
8. NW7	-19	17	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	* B	* C	* D	* E	* F	* G	* H
1. NE3	261.	5.0	.0	.0	1.3	.0	.0	.6	.0	.0
2. SE3	353.	5.1	.0	.8	2.3	.2	.4	.5	.0	.0
3. SW3	5.	4.4	.0	.0	.3	.7	.3	1.9	.0	.0
4. NW3	93.	5.5	.0	.0	.7	.0	.0	.9	.0	.0
5. NE7	257.	3.7	.0	.0	1.0	.0	.0	.5	.0	.0
6. SE7	280.	3.4	.0	1.2	.0	.0	.0	.3	.0	.0
7. SW7	8.	3.7	.0	.0	.5	.5	.1	1.4	.0	.0
8. NW7	166.	3.7	.0	1.2	.0	.0	.0	.1	.7	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	* J	* K	* L	* M	* N	* O	* P	* Q	* R	* S	* T
1. NE3	.0	.4	1.9	.0	.2	.3	.0	.0	.0	.0	.0	.3
2. SE3	.0	.4	.0	.0	.0	.0	.4	.0	.0	.0	.0	.0
3. SW3	.0	.0	.6	.0	.0	.3	.0	.0	.0	.0	.0	.3
4. NW3	.3	1.5	1.6	.0	.0	.0	.0	.2	.0	.0	.0	.0
5. NE7	.0	.0	1.4	.0	.0	.3	.0	.0	.0	.0	.0	.3
6. SE7	.0	.0	.6	.2	.0	.7	.0	.0	.0	.0	.0	.4
7. SW7	.0	.0	.5	.0	.0	.4	.0	.0	.0	.0	.0	.2
8. NW7	.0	.0	1.1	.0	.0	.2	.0	.0	.1	.0	.0	.2

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JELAPMNP.txt

JOB: Jefferson Boulevard and La Cienega Boulevard PM NP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	6	-450	6	-150	* AG	2636	4.9	.0	19.5
B. NA	6	-150	6	0	* AG	2563	8.8	.0	18.0
C. ND	6	0	6	150	* AG	3426	8.2	.0	13.5
D. NE	6	150	6	450	* AG	3426	4.9	.0	19.5
E. SF	-6	450	-6	150	* AG	1931	4.9	.0	19.5
F. SA	-6	150	-6	0	* AG	1857	8.5	.0	18.0
G. SD	-6	0	-6	-150	* AG	2084	5.8	.0	13.5
H. SE	-6	-150	-6	-450	* AG	2084	4.9	.0	19.5
I. WF	450	10	150	10	* AG	832	5.8	.0	15.0
J. WA	150	10	0	10	* AG	768	9.5	.0	18.0
K. WD	0	10	-150	10	* AG	725	6.8	.0	9.9
L. WE	-150	10	-450	10	* AG	725	5.8	.0	15.0
M. EF	-450	-6	-150	-6	* AG	2374	5.8	.0	15.0
N. EA	-150	-6	0	-6	* AG	1606	10.4	.0	18.0
O. ED	0	-6	150	-6	* AG	1538	10.8	.0	9.9
P. EE	150	-6	450	-6	* AG	1538	5.8	.0	15.0
Q. NL	0	0	3	-150	* AG	73	7.9	.0	9.9
R. SL	0	0	-3	150	* AG	74	7.9	.0	9.9
S. WL	0	0	150	5	* AG	64	9.5	.0	9.9
T. EL	0	0	-150	-4	* AG	768	10.4	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	* X	* Y	* Z
1. NE3	15	19	1.8
2. SE3	15	-13	1.8
3. SW3	-15	-12	1.8
4. NW3	-15	14	1.8
5. NE7	19	23	1.8
6. SE7	19	-17	1.8
7. SW7	-19	-16	1.8
8. NW7	-19	17	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	* B	* C	CONC/LINK (PPM) D	E	F	G	H
1. NE3	258.	4.6	.0	.0	1.6	.0	.0	.6	.0	.0
2. SE3	353.	6.2	.0	.7	3.0	.2	.4	.6	.0	.0
3. SW3	85.	5.4	.0	.8	.0	.0	.0	.0	.7	.0
4. NW3	172.	4.7	.3	.9	.0	.0	.0	.5	1.4	.0
5. NE7	187.	3.7	.2	1.9	.0	.0	.0	.0	.2	.4
6. SE7	346.	4.2	.0	.2	2.0	.0	.0	.8	.0	.0
7. SW7	80.	4.1	.0	.8	.0	.0	.0	.0	.6	.0
8. NW7	166.	3.5	.0	1.1	.0	.0	.0	.1	1.0	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	* J	* K	* L	* M	* N	* O	* P	* Q	* R	* S	* T
1. NE3	.0	.3	.5	.0	.0	.8	.0	.0	.0	.0	.0	.5
2. SE3	.0	.3	.0	.0	.0	.0	1.0	.0	.0	.0	.0	.0
3. SW3	.3	.1	.0	.0	.0	.7	2.4	.2	.0	.0	.0	.0
4. NW3	.0	.0	.3	.0	.0	.7	.0	.0	.0	.0	.0	.4
5. NE7	.0	.4	.0	.0	.0	.0	.5	.0	.0	.0	.0	.0
6. SE7	.0	.3	.0	.0	.0	.0	.8	.0	.0	.0	.0	.0
7. SW7	.1	.3	.0	.0	.0	.6	1.6	.0	.0	.0	.0	.0
8. NW7	.0	.0	.3	.0	.0	.6	.0	.0	.0	.0	.0	.3

II. Corrections and Additions to the Draft EIR

JELAPMWP.txt
 CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
 JUNE 1989 VERSION
 PAGE 1

JOB: Jefferson Boulevard and La Cienega Boulevard PM WP
 RUN: Hour 1 (WORST CASE ANGLE)
 POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
 BRG= WORST CASE VD= .0 CM/S
 CLAS= 7 (G) VS= .0 CM/S
 MIXH= 1000. M AMB= .0 PPM
 SIGHT= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	X1	Y1	X2	Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	6	-450	6	-150	* AG	2636	4.9	.0	19.5
B. NA	6	-150	6	0	* AG	2563	8.8	.0	18.0
C. ND	6	0	6	150	* AG	3437	8.2	.0	13.5
D. NE	6	150	6	450	* AG	3437	4.9	.0	19.5
E. SF	-6	450	-6	150	* AG	2002	4.9	.0	19.5
F. SA	-6	150	-6	0	* AG	1928	8.5	.0	18.0
G. SD	-6	0	-6	-150	* AG	2084	5.8	.0	13.5
H. SE	-6	-150	-6	-450	* AG	2084	4.9	.0	19.5
I. WF	450	10	150	10	* AG	833	5.8	.0	15.0
J. WA	150	10	0	10	* AG	769	9.5	.0	18.0
K. WD	0	10	-150	10	* AG	797	6.8	.0	9.9
L. WE	-150	10	-450	10	* AG	797	5.8	.0	15.0
M. EF	-450	-6	-150	-6	* AG	2388	5.8	.0	15.0
N. EA	-150	-6	0	-6	* AG	1609	10.4	.0	18.0
O. ED	0	-6	150	-6	* AG	1541	10.8	.0	9.9
P. EE	150	-6	450	-6	* AG	1541	5.8	.0	15.0
Q. NL	0	0	3	-150	* AG	73	7.9	.0	9.9
R. SL	0	0	-3	150	* AG	74	7.9	.0	9.9
S. WL	0	0	150	5	* AG	64	9.5	.0	9.9
T. EL	0	0	-150	-4	* AG	779	10.4	.0	9.9

III. RECEPTOR LOCATIONS

RECEPTOR	X	Y	Z
1. NE3	15	19	1.8
2. SE3	15	-13	1.8
3. SW3	-15	-12	1.8
4. NW3	-15	14	1.8
5. NE7	19	23	1.8
6. SE7	19	-17	1.8
7. SW7	-19	-16	1.8
8. NW7	-19	17	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG * (DEG)	* PRED * CONC * (PPM)	A	B	C	D	E	F	G	H
1. NE3	258.	4.6	.0	.0	1.6	.0	.0	.6	.0	.0
2. SE3	353.	6.2	.0	.7	3.0	.2	.4	.6	.0	.0
3. SW3	85.	5.4	.0	.8	.0	.0	.0	.0	.7	.0
4. NW3	172.	4.7	.3	.9	.0	.0	.0	.6	1.4	.0
5. NE7	255.	3.7	.0	.0	1.3	.0	.0	.6	.0	.0
6. SE7	346.	4.2	.0	.2	2.0	.0	.0	.9	.0	.0
7. SW7	10.	4.3	.0	.0	.9	.3	.0	1.6	.0	.0
8. NW7	166.	3.6	.0	1.1	.0	.0	.0	.1	1.0	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	I	J	K	L	M	N	O	P	Q	R	S	T
1. NE3	.0	.3	.6	.0	.0	.8	.0	.0	.0	.0	.0	.5
2. SE3	.0	.3	.0	.0	.0	.0	1.0	.0	.0	.0	.0	.0
3. SW3	.3	.1	.0	.0	.0	.7	2.4	.2	.0	.0	.0	.0
4. NW3	.0	.0	.3	.0	.0	.7	.0	.0	.0	.0	.0	.4
5. NE7	.0	.0	.4	.0	.0	.8	.0	.0	.0	.0	.0	.5
6. SE7	.0	.3	.0	.0	.0	.0	.8	.0	.0	.0	.0	.0
7. SW7	.0	.0	.2	.0	.0	1.0	.0	.0	.0	.0	.0	.3
8. NW7	.0	.0	.3	.0	.0	.6	.0	.0	.0	.0	.0	.3

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JEMIAMP.txt

JOB: Jefferson Boulevard and La Cienega Boulevard AM NP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	6	-450	6	-150	* AG	3139	4.9	.0	19.5
B. NA	6	-150	6	0	* AG	2973	8.2	.0	18.0
C. ND	6	0	6	150	* AG	3593	6.1	.0	13.5
D. NE	6	150	6	450	* AG	3593	4.9	.0	19.5
E. SF	-6	450	-6	150	* AG	2056	4.9	.0	19.5
F. SA	-6	150	-6	0	* AG	1968	7.4	.0	18.0
G. SD	-6	0	-6	-150	* AG	1677	5.3	.0	13.5
H. SE	-6	-150	-6	-450	* AG	1677	4.9	.0	19.5
I. WF	450	10	150	10	* AG	1152	4.9	.0	15.0
J. WA	150	10	0	10	* AG	1037	10.4	.0	18.0
K. WD	0	10	-150	11	* AG	1417	12.2	.0	9.9
L. WE	-150	11	-450	11	* AG	1417	4.9	.0	15.0
M. EF	-450	-7	-150	-7	* AG	1091	4.9	.0	15.0
N. EA	-150	-7	0	-7	* AG	605	9.9	.0	18.0
O. ED	0	-7	150	-6	* AG	751	7.0	.0	9.9
P. EE	150	-6	450	-6	* AG	751	4.9	.0	15.0
Q. NL	0	0	3	-150	* AG	166	7.0	.0	9.9
R. SL	0	0	-3	150	* AG	88	7.0	.0	9.9
S. WL	0	0	150	7	* AG	115	9.9	.0	9.9
T. EL	0	0	-150	-5	* AG	486	9.9	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	* X	* Y	* Z
1. NE3	15	19	1.8
2. SE3	15	-13	1.8
3. SW3	-15	-13	1.8
4. NW3	-15	19	1.8
5. NE7	19	23	1.8
6. SE7	19	-17	1.8
7. SW7	-19	-16	1.8
8. NW7	-19	23	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	* B	* C	* D	* E	* F	* G	* H
1. NE3	260.	4.8	.0	.0	1.3	.0	.0	.5	.0	.0
2. SE3	353.	5.0	.0	.8	2.3	.2	.4	.5	.0	.0
3. SW3	5.	4.3	.0	.0	.3	.7	.3	1.8	.0	.0
4. NW3	172.	4.6	.4	1.0	.0	.0	.0	.7	1.0	.0
5. NE7	255.	3.6	.0	.0	1.0	.0	.0	.5	.0	.0
6. SE7	342.	3.3	.0	.4	1.4	.0	.0	.7	.0	.0
7. SW7	8.	3.6	.0	.0	.4	.5	.1	1.4	.0	.0
8. NW7	166.	3.4	.0	1.2	.0	.0	.0	.3	.7	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	* J	* K	* L	* M	* N	* O	* P	* Q	* R	* S	* T
1. NE3	.0	.4	1.8	.0	.1	.3	.0	.0	.0	.0	.0	.3
2. SE3	.0	.4	.0	.0	.0	.0	.3	.0	.0	.0	.0	.0
3. SW3	.0	.0	.6	.0	.0	.3	.0	.0	.0	.0	.0	.2
4. NW3	.0	.0	.9	.0	.0	.2	.0	.0	.1	.0	.0	.2
5. NE7	.0	.1	1.3	.0	.0	.3	.0	.0	.0	.0	.0	.3
6. SE7	.0	.4	.0	.0	.0	.0	.3	.0	.0	.0	.0	.0
7. SW7	.0	.0	.5	.0	.0	.4	.0	.0	.0	.0	.0	.2
8. NW7	.0	.0	.8	.0	.0	.2	.0	.0	.1	.0	.0	.2

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JEMIAMP.txt

JOB: Jefferson Boulevard and La Cienega Boulevard AM WP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S ZO= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGHT= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	Y1	X2	Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	6	-450	6	-150	* AG	3139	4.9	.0	19.5
B. NA	6	-150	6	0	* AG	2973	8.2	.0	18.0
C. ND	6	0	6	150	* AG	3613	6.1	.0	13.5
D. NE	6	150	6	450	* AG	3613	4.9	.0	19.5
E. SF	-6	450	-6	150	* AG	2107	4.9	.0	19.5
F. SA	-6	150	-6	0	* AG	2019	7.4	.0	18.0
G. SD	-6	0	-6	-150	* AG	1677	5.3	.0	13.5
H. SE	-6	-150	-6	-450	* AG	1677	4.9	.0	19.5
I. WF	450	10	150	10	* AG	1154	4.9	.0	15.0
J. WA	150	10	0	10	* AG	1039	10.4	.0	18.0
K. WD	0	10	-150	11	* AG	1470	12.2	.0	9.9
L. WE	-150	11	-450	11	* AG	1470	4.9	.0	15.0
M. EF	-450	-7	-150	-7	* AG	1114	4.9	.0	15.0
N. EA	-150	-7	0	-7	* AG	608	9.9	.0	18.0
O. ED	0	-7	150	-6	* AG	754	7.0	.0	9.9
P. EE	150	-6	450	-6	* AG	754	4.9	.0	15.0
Q. NL	0	0	3	-150	* AG	166	7.0	.0	9.9
R. SL	0	0	-3	150	* AG	88	7.0	.0	9.9
S. WL	0	0	150	7	* AG	115	9.9	.0	9.9
T. EL	0	0	-150	-5	* AG	506	10.4	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	* X	Y	Z
1. NE3	15	19	1.8
2. SE3	15	-13	1.8
3. SW3	-15	-13	1.8
4. NW3	-15	19	1.8
5. NE7	19	23	1.8
6. SE7	19	-17	1.8
7. SW7	-19	-16	1.8
8. NW7	-19	23	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	B	C	D	E	F	G	H
1. NE3	260.	4.9	.0	.0	1.3	.0	.0	.6	.0	.0
2. SE3	353.	5.0	.0	.8	2.3	.2	.4	.5	.0	.0
3. SW3	5.	4.3	.0	.0	.3	.7	.3	1.8	.0	.0
4. NW3	172.	4.7	.4	1.0	.0	.0	.7	1.0	.0	.0
5. NE7	255.	3.7	.0	.0	1.0	.0	.5	.0	.0	.0
6. SE7	342.	3.3	.0	.4	1.4	.0	.8	.0	.0	.0
7. SW7	8.	3.7	.0	.0	.5	.5	1.1	1.4	.0	.0
8. NW7	166.	3.5	.0	1.2	.0	.0	.3	.7	.0	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	J	K	L	M	N	O	P	Q	R	S	T
1. NE3	.0	.4	1.9	.0	.1	.3	.0	.0	.0	.0	.0	.3
2. SE3	.0	.4	.0	.0	.0	.0	.3	.0	.0	.0	.0	.0
3. SW3	.0	.0	.6	.0	.0	.3	.0	.0	.0	.0	.0	.3
4. NW3	.0	.0	1.0	.0	.0	.2	.0	.0	.1	.0	.0	.2
5. NE7	.0	.1	1.3	.0	.0	.3	.0	.0	.0	.0	.0	.3
6. SE7	.0	.4	.0	.0	.0	.0	.3	.0	.0	.0	.0	.0
7. SW7	.0	.0	.5	.0	.0	.4	.0	.0	.0	.0	.0	.2
8. NW7	.0	.0	.8	.0	.0	.2	.0	.0	.1	.0	.0	.2

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JEMIPMNP.txt

JOB: Jefferson Boulevard and La Cienega Boulevard PM NP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S ZO= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	6	-450	6	-150	* AG	2636	4.9	.0	19.5
B. NA	6	-150	6	0	* AG	2563	8.8	.0	18.0
C. ND	6	0	6	150	* AG	3426	8.2	.0	13.5
D. NE	6	150	6	450	* AG	3426	4.9	.0	19.5
E. SF	-6	450	-6	150	* AG	1931	4.9	.0	19.5
F. SA	-6	150	-6	0	* AG	1857	8.5	.0	18.0
G. SD	-6	0	-6	-150	* AG	2084	5.8	.0	13.5
H. SE	-6	-150	-6	-450	* AG	2084	4.9	.0	19.5
I. WF	450	10	150	10	* AG	832	4.9	.0	15.0
J. WA	150	10	0	10	* AG	768	9.2	.0	18.0
K. WD	0	10	-150	11	* AG	725	5.8	.0	9.9
L. WE	-150	11	-450	11	* AG	725	4.9	.0	15.0
M. EF	-450	-7	-150	-7	* AG	2374	4.9	.0	15.0
N. EA	-150	-7	0	-7	* AG	1606	9.9	.0	18.0
O. ED	0	-7	150	-6	* AG	1538	10.8	.0	9.9
P. EE	150	-6	450	-6	* AG	1538	4.9	.0	15.0
Q. NL	0	0	3	-150	* AG	73	7.9	.0	9.9
R. SL	0	0	-3	150	* AG	74	7.9	.0	9.9
S. WL	0	0	150	7	* AG	64	9.2	.0	9.9
T. EL	0	0	-150	-5	* AG	768	9.9	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	* X	* Y	* Z
1. NE3	15	19	1.8
2. SE3	15	-13	1.8
3. SW3	-15	-13	1.8
4. NW3	-15	19	1.8
5. NE7	19	23	1.8
6. SE7	19	-17	1.8
7. SW7	-19	-16	1.8
8. NW7	-19	23	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	* B	* C	CONC/LINK (PPM)	D	E	F	G	H
1. NE3	186.	4.6	.2	2.4	.2	.0	.0	.0	.3	.4	
2. SE3	353.	6.2	.0	.7	3.0	.2	.4	.6	.0	.0	
3. SW3	85.	5.3	.0	.8	.0	.0	.0	.0	.7	.0	
4. NW3	173.	4.6	.4	.8	.0	.0	.0	.8	1.3	.1	
5. NE7	187.	3.7	.2	1.9	.0	.0	.0	.0	.2	.4	
6. SE7	346.	4.2	.0	.2	2.0	.0	.0	.8	.0	.0	
7. SW7	82.	4.4	.0	.7	.0	.0	.0	.0	.6	.0	
8. NW7	166.	3.4	.0	1.1	.0	.0	.0	.3	.9	.0	

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	* J	* K	* L	* M	* N	* O	* P	* Q	* R	* S	* T
1. NE3	.0	.4	.0	.0	.0	.0	.5	.0	.0	.0	.0	.0
2. SE3	.0	.3	.0	.0	.0	.0	1.1	.0	.0	.0	.0	.0
3. SW3	.2	.1	.0	.0	.0	.7	2.4	.2	.0	.0	.0	.0
4. NW3	.0	.0	.2	.0	.0	.5	.0	.0	.0	.0	.0	.3
5. NE7	.0	.4	.0	.0	.0	.0	.5	.0	.0	.0	.0	.0
6. SE7	.0	.2	.0	.0	.0	.0	.8	.0	.0	.0	.0	.0
7. SW7	.2	.2	.0	.0	.0	.7	1.8	.0	.0	.0	.0	.0
8. NW7	.0	.0	.2	.0	.0	.5	.0	.0	.0	.0	.0	.3

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JEMIPMWP.txt

JOB: Jefferson Boulevard and La Cienega Boulevard PM WP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	Y1	X2	Y2	* TYPE	VP	EF (G/MI)	H (M)	W (M)
A. NF	6	-450	6	-150	* AG	2636	4.9	.0	19.5
B. NA	6	-150	6	0	* AG	2563	8.8	.0	18.0
C. ND	6	0	6	150	* AG	3437	8.2	.0	13.5
D. NE	6	150	6	450	* AG	3437	4.9	.0	19.5
E. SF	-6	450	-6	150	* AG	2002	4.9	.0	19.5
F. SA	-6	150	-6	0	* AG	1928	8.5	.0	18.0
G. SD	-6	0	-6	-150	* AG	2084	5.8	.0	13.5
H. SE	-6	-150	-6	-450	* AG	2084	4.9	.0	19.5
I. WF	450	10	150	10	* AG	833	4.9	.0	15.0
J. WA	150	10	0	10	* AG	769	9.2	.0	18.0
K. WD	0	10	-150	11	* AG	797	5.8	.0	9.9
L. WE	-150	11	-450	11	* AG	797	4.9	.0	15.0
M. EF	-450	-7	-150	-7	* AG	2388	4.9	.0	15.0
N. EA	-150	-7	0	-7	* AG	1609	9.9	.0	18.0
O. ED	0	-7	150	-6	* AG	1541	10.8	.0	9.9
P. EE	150	-6	450	-6	* AG	1541	4.9	.0	15.0
Q. NL	0	0	3	-150	* AG	73	7.9	.0	9.9
R. SL	0	0	-3	150	* AG	74	7.9	.0	9.9
S. WL	0	0	150	7	* AG	64	9.2	.0	9.9
T. EL	0	0	-150	-5	* AG	779	9.9	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	* X	Y	Z
1. NE3	15	19	1.8
2. SE3	15	-13	1.8
3. SW3	-15	-13	1.8
4. NW3	-15	19	1.8
5. NE7	19	23	1.8
6. SE7	19	-17	1.8
7. SW7	-19	-16	1.8
8. NW7	-19	23	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	B	C	D	E	F	G	H
1. NE3	186.	4.6	.2	2.4	.2	.0	.0	.0	.3	.4
2. SE3	353.	6.3	.0	.7	3.0	.2	.4	.6	.0	.0
3. SW3	85.	5.3	.0	.8	.0	.0	.0	.0	.7	.0
4. NW3	173.	4.6	.4	.8	.0	.0	.0	.8	1.3	.1
5. NE7	187.	3.7	.2	1.9	.0	.0	.0	.0	.2	.4
6. SE7	346.	4.2	.0	.2	2.0	.0	.0	.9	.0	.0
7. SW7	82.	4.4	.0	.7	.0	.0	.0	.0	.6	.0
8. NW7	166.	3.4	.0	1.1	.0	.0	.0	.3	.9	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	J	K	L	M	N	O	P	Q	R	S	T
1. NE3	.0	.4	.0	.0	.0	.0	.5	.0	.0	.0	.0	.0
2. SE3	.0	.3	.0	.0	.0	.0	1.1	.0	.0	.0	.0	.0
3. SW3	.2	.1	.0	.0	.0	.7	2.4	.2	.0	.0	.0	.0
4. NW3	.0	.0	.3	.0	.0	.5	.0	.0	.0	.0	.0	.3
5. NE7	.0	.4	.0	.0	.0	.0	.5	.0	.0	.0	.0	.0
6. SE7	.0	.2	.0	.0	.0	.0	.8	.0	.0	.0	.0	.0
7. SW7	.2	.2	.0	.0	.0	.7	1.8	.0	.0	.0	.0	.0
8. NW7	.0	.0	.2	.0	.0	.5	.0	.0	.0	.0	.0	.3

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JENAMNP.txt

JOB: Jefferson Boulevard and National Boulevard AM NP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	-34	-450	-34	-150	* AG	605	4.9	.0	15.0
B. NA	-34	-150	-34	-5	* AG	605	12.2	.0	9.9
C. ND	37	3	37	150	* AG	0	6.6	.0	9.9
D. NE	37	150	37	450	* AG	0	4.9	.0	15.0
E. SF	31	450	31	150	* AG	0	4.9	.0	10.5
F. SA	31	150	31	15	* AG	0	11.4	.0	9.9
G. SD	-43	15	-43	-150	* AG	1237	12.2	.0	9.9
H. SE	-43	-150	-43	-450	* AG	1237	4.9	.0	10.5
I. WF	450	15	150	15	* AG	1886	4.9	.0	15.0
J. WA	150	15	0	15	* AG	854	7.2	.0	13.5
K. WD	0	15	-150	15	* AG	854	5.2	.0	9.9
L. WE	-150	15	-450	15	* AG	854	4.9	.0	15.0
M. EF	-450	-21	-150	-21	* AG	521	4.9	.0	15.0
N. EA	-150	-21	0	0	* AG	521	7.2	.0	9.9
O. ED	0	0	150	3	* AG	921	5.3	.0	9.9
P. EE	150	3	450	3	* AG	921	4.9	.0	15.0
Q. NL	0	-570	0	-540	* AG	0	11.4	.0	9.9
R. SL	0	-570	0	-540	* AG	0	11.4	.0	9.9
S. WL	-43	12	150	15	* AG	1032	7.4	.0	9.9
T. EL	0	-570	0	-540	* AG	0	7.0	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	* X	* Y	* Z
1. NE3	45	26	1.8
2. SE3	-27	-24	1.8
3. SW3	-52	-24	1.8
4. NW3	25	23	1.8
5. NE7	49	30	1.8
6. SE7	-23	-28	1.8
7. SW7	-56	-28	1.8
8. NW7	21	27	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	* B	* C	CONC/LINK (PPM)								
						D	E	F	G	H				
1. NE3	249.	1.7	.0	.0	.0	.0	.0	.0	.3	.0				
2. SE3	191.	2.0	.0	1.0	.0	.0	.0	.0	.9	.0				
3. SW3	170.	2.2	.0	.4	.0	.0	.0	.0	1.7	.0				
4. NW3	96.	2.2	.0	.0	.0	.0	.0	.0	.0	.0				
5. NE7	244.	1.5	.0	.1	.0	.0	.0	.0	.3	.0				
6. SE7	193.	1.5	.0	.7	.0	.0	.0	.0	.8	.0				
7. SW7	75.	1.8	.0	.3	.0	.0	.0	.0	.7	.0				
8. NW7	97.	1.6	.0	.0	.0	.0	.0	.0	.0	.0				

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	* J	* K	* L	* M	* N	* O	* P	* Q	* R	* S	* T
1. NE3	.0	.5	.0	.0	.0	.3	.0	.0	.0	.0	.6	.0
2. SE3	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0
3. SW3	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0
4. NW3	.3	.9	.0	.0	.0	.0	.0	.3	.0	.0	.7	.0
5. NE7	.0	.4	.0	.0	.0	.2	.0	.0	.0	.0	.4	.0
6. SE7	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0
7. SW7	.0	.2	.0	.0	.0	.0	.3	.0	.0	.0	.3	.0
8. NW7	.3	.5	.0	.0	.0	.0	.0	.3	.0	.0	.5	.0

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JENAAMWP.txt

JOB: Jefferson Boulevard and National Boulevard AM WP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	-34	-450	-34	-150	* AG	628	4.9	.0	15.0
B. NA	-34	-150	-34	-5	* AG	628	12.2	.0	9.9
C. ND	37	3	37	150	* AG	0	6.6	.0	9.9
D. NE	37	150	37	450	* AG	0	4.9	.0	15.0
E. SF	31	450	31	150	* AG	0	4.9	.0	10.5
F. SA	31	150	31	15	* AG	0	11.4	.0	9.9
G. SD	-43	15	-43	-150	* AG	1292	12.2	.0	9.9
H. SE	-43	-150	-43	-450	* AG	1292	4.9	.0	10.5
I. WF	450	15	150	15	* AG	1939	4.9	.0	15.0
J. WA	150	15	0	15	* AG	854	7.2	.0	13.5
K. WD	0	15	-150	15	* AG	854	5.2	.0	9.9
L. WE	-150	15	-450	15	* AG	854	4.9	.0	15.0
M. EF	-450	-21	-150	-21	* AG	523	4.9	.0	15.0
N. EA	-150	-21	0	0	* AG	523	7.2	.0	9.9
O. ED	0	0	150	3	* AG	944	5.3	.0	9.9
P. EE	150	3	450	3	* AG	944	4.9	.0	15.0
Q. NL	0	-570	0	-540	* AG	0	11.4	.0	9.9
R. SL	0	-570	0	-540	* AG	0	11.4	.0	9.9
S. WL	-43	12	150	15	* AG	1085	7.4	.0	9.9
T. EL	0	-570	0	-540	* AG	0	7.0	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	* X	* Y	* Z
1. NE3	45	26	1.8
2. SE3	-27	-24	1.8
3. SW3	-52	-24	1.8
4. NW3	25	23	1.8
5. NE7	49	30	1.8
6. SE7	-23	-28	1.8
7. SW7	-56	-28	1.8
8. NW7	21	27	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	* B	* C	* D	* E	* F	* G	* H
1. NE3	249.	1.7	.0	.0	.0	.0	.0	.0	.3	.0
2. SE3	191.	2.1	.0	1.0	.0	.0	.0	.0	1.0	.0
3. SW3	170.	2.3	.0	.4	.0	.0	.0	.0	1.7	.0
4. NW3	96.	2.3	.0	.0	.0	.0	.0	.0	.0	.0
5. NE7	244.	1.5	.0	.1	.0	.0	.0	.0	.3	.0
6. SE7	193.	1.6	.0	.7	.0	.0	.0	.0	.8	.0
7. SW7	75.	1.9	.0	.3	.0	.0	.0	.0	.7	.0
8. NW7	98.	1.6	.0	.0	.0	.0	.0	.0	.0	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	* J	* K	* L	* M	* N	* O	* P	* Q	* R	* S	* T
1. NE3	.0	.5	.0	.0	.0	.3	.0	.0	.0	.0	.6	.0
2. SE3	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0
3. SW3	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0
4. NW3	.3	.9	.0	.0	.0	.0	.0	.3	.0	.0	.7	.0
5. NE7	.0	.4	.0	.0	.0	.2	.0	.0	.0	.0	.5	.0
6. SE7	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0
7. SW7	.0	.2	.0	.0	.0	.0	.3	.0	.0	.0	.3	.0
8. NW7	.2	.6	.0	.0	.0	.0	.0	.3	.0	.0	.6	.0

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JENAPMNP.txt

JOB: Jefferson Boulevard and National Boulevard PM NP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S ZO= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGTH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VP	EF (G/MI)	H (M)	W (M)
A. NF	-34	-450	-34	-150	* AG	993	4.9	.0	15.0
B. NA	-34	-150	-34	-5	* AG	993	12.2	.0	9.9
C. ND	37	3	37	150	* AG	0	6.0	.0	9.9
D. NE	37	150	37	450	* AG	0	4.9	.0	15.0
E. SF	31	450	31	150	* AG	0	4.9	.0	10.5
F. SA	31	150	31	15	* AG	0	9.9	.0	9.9
G. SD	-43	15	-43	-150	* AG	1025	12.2	.0	9.9
H. SE	-43	-150	-43	-450	* AG	1025	4.9	.0	10.5
I. WF	450	15	150	15	* AG	972	4.9	.0	15.0
J. WA	150	15	0	15	* AG	330	7.0	.0	13.5
K. WD	0	15	-150	15	* AG	330	5.2	.0	9.9
L. WE	-150	15	-450	15	* AG	330	4.9	.0	15.0
M. EF	-450	-21	-150	-21	* AG	1445	4.9	.0	15.0
N. EA	-150	-21	0	0	* AG	1445	8.2	.0	9.9
O. ED	0	0	150	3	* AG	2055	6.1	.0	9.9
P. EE	150	3	450	3	* AG	2055	4.9	.0	15.0
Q. NL	0	-570	0	-540	* AG	0	9.9	.0	9.9
R. SL	0	-570	0	-540	* AG	0	9.9	.0	9.9
S. WL	-43	12	150	15	* AG	642	7.2	.0	9.9
T. EL	0	-570	0	-540	* AG	0	7.0	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	* X	* Y	* Z
1. NE3	45	26	1.8
2. SE3	-27	-24	1.8
3. SW3	-52	-24	1.8
4. NW3	25	23	1.8
5. NE7	49	30	1.8
6. SE7	-23	-28	1.8
7. SW7	-56	-28	1.8
8. NW7	21	27	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	* B	* C	CONC/LINK (PPM)								
						D	E	F	G	H				
1. NE3	246.	1.6	.0	.2	.0	.0	.0	.0	.2	.0				
2. SE3	189.	2.5	.0	1.6	.0	.0	.0	.0	.7	.1				
3. SW3	77.	2.1	.0	.5	.0	.0	.0	.0	.7	.0				
4. NW3	241.	1.7	.0	.2	.0	.0	.0	.0	.3	.0				
5. NE7	244.	1.4	.0	.2	.0	.0	.0	.0	.2	.0				
6. SE7	323.	1.8	.0	.8	.0	.0	.0	.0	.6	.0				
7. SW7	76.	1.9	.0	.4	.0	.0	.0	.0	.6	.0				
8. NW7	235.	1.5	.0	.3	.0	.0	.0	.0	.3	.0				

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	* J	* K	* L	* M	CONC/LINK (PPM)									
						N	O	P	Q	R	S	T			
1. NE3	.0	.2	.0	.0	.0	.6	.0	.0	.0	.0	.3	.0			
2. SE3	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0			
3. SW3	.0	.1	.0	.0	.0	.6	.0	.0	.0	.0	.2	.0			
4. NW3	.0	.2	.0	.0	.0	.6	.0	.0	.0	.0	.4	.0			
5. NE7	.0	.2	.0	.0	.0	.5	.0	.0	.0	.0	.3	.0			
6. SE7	.0	.0	.0	.0	.0	.4	.0	.0	.0	.0	.0	.0			
7. SW7	.0	.0	.0	.0	.0	.0	.5	.0	.0	.0	.2	.0			
8. NW7	.0	.1	.0	.0	.0	.5	.0	.0	.0	.0	.3	.0			

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JENAPMWP.txt

JOB: Jefferson Boulevard and National Boulevard PM WP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	Y1	X2	Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	-34	-450	-34	-150	* AG	1006	4.9	.0	15.0
B. NA	-34	-150	-34	-5	* AG	1006	12.2	.0	9.9
C. ND	37	3	37	150	* AG	0	6.0	.0	9.9
D. NE	37	150	37	450	* AG	0	4.9	.0	15.0
E. SF	31	450	31	150	* AG	0	4.9	.0	10.5
F. SA	31	150	31	15	* AG	0	9.9	.0	9.9
G. SD	-43	15	-43	-150	* AG	1098	12.2	.0	9.9
H. SE	-43	-150	-43	-450	* AG	1098	4.9	.0	10.5
I. WF	450	15	150	15	* AG	1044	4.9	.0	15.0
J. WA	150	15	0	15	* AG	330	7.0	.0	13.5
K. WD	0	15	-150	15	* AG	330	5.2	.0	9.9
L. WE	-150	15	-450	15	* AG	330	4.9	.0	15.0
M. EF	-450	-21	-150	-21	* AG	1446	4.9	.0	15.0
N. EA	-150	-21	0	0	* AG	1446	8.2	.0	9.9
O. ED	0	0	150	3	* AG	2068	6.1	.0	9.9
P. EE	150	3	450	3	* AG	2068	4.9	.0	15.0
Q. NL	0	-570	0	-540	* AG	0	9.9	.0	9.9
R. SL	0	-570	0	-540	* AG	0	9.9	.0	9.9
S. WL	-43	12	150	15	* AG	714	7.2	.0	9.9
T. EL	0	-570	0	-540	* AG	0	7.0	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	* X	Y	Z
1. NE3	45	26	1.8
2. SE3	-27	-24	1.8
3. SW3	-52	-24	1.8
4. NW3	25	23	1.8
5. NE7	49	30	1.8
6. SE7	-23	-28	1.8
7. SW7	-56	-28	1.8
8. NW7	21	27	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	A	B	C	D	E	F	G	H
1. NE3	246.	1.7	.0	.2	.0	.0	.0	.0	.2	.0
2. SE3	189.	2.5	.0	1.6	.0	.0	.0	.0	.7	.1
3. SW3	77.	2.2	.0	.5	.0	.0	.0	.0	.8	.0
4. NW3	252.	1.7	.0	.0	.0	.0	.0	.0	.3	.0
5. NE7	244.	1.5	.0	.2	.0	.0	.0	.0	.2	.0
6. SE7	323.	1.8	.0	.8	.0	.0	.0	.0	.6	.0
7. SW7	76.	1.9	.0	.4	.0	.0	.0	.0	.6	.0
8. NW7	235.	1.6	.0	.3	.0	.0	.0	.0	.3	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	J	K	L	M	N	O	P	Q	R	S	T
1. NE3	.0	.2	.0	.0	.0	.6	.0	.0	.0	.0	.4	.0
2. SE3	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0
3. SW3	.0	.1	.0	.0	.0	.0	.6	.0	.0	.0	.2	.0
4. NW3	.0	.2	.0	.0	.0	.7	.0	.0	.0	.0	.5	.0
5. NE7	.0	.2	.0	.0	.0	.5	.0	.0	.0	.0	.3	.0
6. SE7	.0	.0	.0	.0	.0	.4	.0	.0	.0	.0	.0	.0
7. SW7	.0	.0	.0	.0	.0	.0	.5	.0	.0	.0	.2	.0
8. NW7	.0	.1	.0	.0	.0	.5	.0	.0	.0	.0	.3	.0

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JEROAMNP.txt

JOB: Jefferson Boulevard and Rodeo Road AM NP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	8	-450	8	-150	* AG	664	4.9	.0	15.0
B. NA	8	-150	8	0	* AG	583	8.8	.0	13.5
C. ND	6	0	6	150	* AG	647	5.7	.0	9.9
D. NE	6	150	6	450	* AG	647	4.9	.0	15.0
E. SF	-8	450	-8	150	* AG	1222	4.9	.0	15.0
F. SA	-8	150	-8	0	* AG	1060	9.5	.0	13.5
G. SD	-9	0	-9	-150	* AG	2077	11.4	.0	9.9
H. SE	-9	-150	-9	-450	* AG	2077	4.9	.0	15.0
I. WF	450	8	150	8	* AG	2149	4.9	.0	10.5
J. WA	150	8	0	8	* AG	1065	8.8	.0	13.5
K. WD	0	8	-150	2	* AG	1166	9.2	.0	9.9
L. WE	-150	2	-450	2	* AG	1166	4.9	.0	10.5
M. EF	-450	-8	-150	-8	* AG	106	4.9	.0	15.0
N. EA	-150	-8	0	-8	* AG	100	8.2	.0	13.5
O. ED	0	-8	150	-6	* AG	251	5.5	.0	9.9
P. EE	150	-6	450	-6	* AG	251	4.9	.0	15.0
Q. NL	0	0	4	-150	* AG	81	8.8	.0	9.9
R. SL	0	0	-4	150	* AG	162	8.8	.0	9.9
S. WL	0	0	150	5	* AG	1084	8.8	.0	9.9
T. EL	0	0	-150	-5	* AG	6	8.2	.0	9.9

III. RECEPTOR LOCATIONS

RECEPTOR	* X	* Y	* Z
1. NE3	16	16	1.8
2. SE3	16	-12	1.8
3. SW3	-16	-17	1.8
4. NW3	-16	16	1.8
5. NE7	20	20	1.8
6. SE7	20	-16	1.8
7. SW7	-20	-21	1.8
8. NW7	-20	20	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* CONC (PPM)	* A	* B	* C	* D	* E	* F	* G	* H
1. NE3	191.	2.8	.0	.6	.0	.0	.0	.0	.9	.1
2. SE3	348.	2.2	.0	.1	.4	.0	.0	.6	.0	.0
3. SW3	173.	3.5	.2	.0	.0	.0	.0	.0	3.0	.1
4. NW3	174.	4.2	.2	.1	.0	.0	.0	.1	2.9	.1
5. NE7	193.	2.4	.0	.5	.0	.0	.0	.0	.9	.0
6. SE7	347.	1.8	.0	.0	.3	.0	.0	.5	.0	.0
7. SW7	77.	2.6	.0	.2	.0	.0	.0	.0	1.2	.0
8. NW7	171.	2.9	.1	.2	.0	.0	.0	.0	2.0	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	* J	* K	* L	* M	* N	* O	* P	* Q	* R	* S	* T
1. NE3	.0	.6	.0	.0	.0	.0	.0	.0	.0	.0	.4	.0
2. SE3	.0	.4	.0	.0	.0	.0	.0	.0	.0	.1	.5	.0
3. SW3	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0
4. NW3	.0	.0	.6	.0	.0	.0	.0	.0	.0	.0	.0	.0
5. NE7	.0	.5	.0	.0	.0	.0	.0	.0	.0	.0	.4	.0
6. SE7	.0	.3	.0	.0	.0	.0	.0	.0	.0	.1	.4	.0
7. SW7	.0	.5	.0	.0	.0	.0	.1	.0	.0	.0	.6	.0
8. NW7	.0	.0	.5	.0	.0	.0	.0	.0	.0	.0	.0	.0

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JEROAMWP.txt

JOB: Jefferson Boulevard and Rodeo Road AM WP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VPH	EP (G/MI)	H (M)	W (M)
A. NF	8	-450	8	-150	* AG	667	4.9	.0	15.0
B. NA	8	-150	8	0	* AG	586	8.8	.0	13.5
C. ND	6	0	6	150	* AG	659	5.7	.0	9.9
D. NE	6	150	6	450	* AG	659	4.9	.0	15.0
E. SF	-8	450	-8	150	* AG	1239	4.9	.0	15.0
F. SA	-8	150	-8	0	* AG	1066	9.5	.0	13.5
G. SD	-9	0	-9	-150	* AG	2083	11.4	.0	9.9
H. SE	-9	-150	-9	-450	* AG	2083	4.9	.0	15.0
I. WF	450	8	150	8	* AG	2158	4.9	.0	10.5
J. WA	150	8	0	8	* AG	1074	8.8	.0	13.5
K. WD	0	8	-150	2	* AG	1166	9.2	.0	9.9
L. WE	-150	2	-450	2	* AG	1166	4.9	.0	10.5
M. EF	-450	-8	-150	-8	* AG	106	4.9	.0	15.0
N. EA	-150	-8	0	-8	* AG	100	8.2	.0	13.5
O. ED	0	-8	150	-6	* AG	262	5.5	.0	9.9
P. EE	150	-6	450	-6	* AG	262	4.9	.0	15.0
Q. NL	4	-150	0	0	* AG	81	8.8	.0	9.9
R. SL	-4	150	0	0	* AG	173	8.8	.0	9.9
S. WL	150	0	0	0	* AG	1084	8.8	.0	9.9
T. EL	-150	-5	0	0	* AG	6	8.2	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	* X	* Y	* Z
1. NE3	16	16	1.8
2. SE3	16	-12	1.8
3. SW3	-16	-17	1.8
4. NW3	-16	16	1.8
5. NE7	20	20	1.8
6. SE7	20	-16	1.8
7. SW7	-20	-21	1.8
8. NW7	-20	20	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	* B	* C	* D	* E	* F	* G	* H
1. NE3	191.	2.8	.0	.6	.0	.0	.0	.0	.9	.1
2. SE3	348.	2.2	.0	.1	.4	.0	.0	.6	.0	.0
3. SW3	173.	3.5	.2	.0	.0	.0	.0	.0	3.0	.1
4. NW3	174.	4.2	.2	.1	.0	.0	.0	.1	2.9	.1
5. NE7	193.	2.4	.0	.5	.0	.0	.0	.0	.9	.0
6. SE7	347.	1.8	.0	.0	.3	.0	.0	.5	.0	.0
7. SW7	79.	2.6	.0	.2	.0	.0	.0	.0	1.2	.0
8. NW7	171.	2.9	.1	.2	.0	.0	.0	.0	2.0	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	* J	* K	* L	* M	* N	* O	* P	* Q	* R	* S	* T
1. NE3	.0	.6	.0	.0	.0	.0	.0	.0	.0	.0	.4	.0
2. SE3	.0	.4	.0	.0	.0	.0	.0	.0	.0	.2	.5	.0
3. SW3	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0	.0
4. NW3	.0	.0	.6	.0	.0	.0	.0	.0	.0	.0	.0	.0
5. NE7	.0	.5	.0	.0	.0	.0	.0	.0	.0	.0	.4	.0
6. SE7	.0	.3	.0	.0	.0	.0	.0	.0	.0	.1	.4	.0
7. SW7	.1	.4	.0	.0	.0	.0	.2	.0	.0	.0	.6	.0
8. NW7	.0	.0	.5	.0	.0	.0	.0	.0	.0	.0	.0	.0

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JEROPMNP.txt

JOB: Jefferson Boulevard and Rodeo Road PM NP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	X1	Y1	X2	Y2	TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	8	-450	8	-150	AG	801	4.9	.0	15.0
B. NA	8	-150	8	0	AG	751	8.2	.0	13.5
C. ND	6	0	6	150	AG	828	5.5	.0	9.9
D. NE	6	150	6	450	AG	828	4.9	.0	15.0
E. SP	-8	450	-8	150	AG	1218	4.9	.0	15.0
F. SA	-8	150	-8	0	AG	782	8.2	.0	13.5
G. SD	-9	0	-9	-150	AG	1476	6.1	.0	9.9
H. SE	-9	-150	-9	-450	AG	1476	4.9	.0	15.0
I. WF	450	8	150	8	AG	1181	4.9	.0	10.5
J. WA	150	8	0	8	AG	528	8.8	.0	13.5
K. WD	0	8	-150	2	AG	569	6.6	.0	9.9
L. WE	-150	2	-450	2	AG	569	4.9	.0	10.5
M. EF	-450	-8	-150	-8	AG	475	4.9	.0	15.0
N. EA	-150	-8	0	-8	AG	438	8.8	.0	13.5
O. ED	0	-8	150	-6	AG	802	5.7	.0	9.9
P. EE	150	-6	450	-6	AG	802	4.9	.0	15.0
Q. NL	0	0	4	-150	AG	50	8.2	.0	9.9
R. SL	0	0	-4	150	AG	436	8.5	.0	9.9
S. WL	0	0	150	5	AG	653	9.2	.0	9.9
T. EL	0	0	-150	-5	AG	37	8.8	.0	9.9

II. RECEPTOR LOCATIONS

RECEPTOR	X	Y	Z
1. NE3	16	16	1.8
2. SE3	16	-12	1.8
3. SW3	-16	-17	1.8
4. NW3	-16	16	1.8
5. NE7	20	20	1.8
6. SE7	20	-16	1.8
7. SW7	-20	-21	1.8
8. NW7	-20	20	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	BRG (DEG)	PRED CONC (PPM)	A	B	C	D	E	F	G	H
1. NE3	186.	2.2	.0	.9	.0	.0	.0	.0	.1	.4
2. SE3	348.	2.2	.0	.1	.5	.0	.0	.4	.0	.0
3. SW3	80.	2.3	.0	.2	.0	.0	.0	.0	.6	.0
4. NW3	96.	2.2	.0	.0	.2	.0	.0	.4	.0	.0
5. NE7	188.	1.8	.0	.6	.0	.0	.0	.0	.1	.3
6. SE7	349.	1.7	.0	.0	.4	.0	.1	.3	.0	.0
7. SW7	79.	1.8	.0	.2	.0	.0	.0	.0	.4	.0
8. NW7	98.	1.8	.0	.0	.1	.0	.0	.3	.0	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	I	J	K	L	M	N	O	P	Q	R	S	T
1. NE3	.0	.3	.0	.0	.0	.0	.2	.0	.0	.0	.3	.0
2. SE3	.0	.2	.0	.0	.0	.0	.3	.0	.0	.3	.3	.0
3. SW3	.1	.2	.0	.0	.0	.0	.6	.0	.0	.0	.4	.0
4. NW3	.0	.7	.0	.0	.0	.0	.1	.2	.0	.2	.4	.0
5. NE7	.0	.2	.0	.0	.0	.0	.1	.0	.0	.0	.2	.0
6. SE7	.0	.2	.0	.0	.0	.0	.3	.0	.0	.3	.3	.0
7. SW7	.0	.2	.0	.0	.0	.0	.4	.0	.0	.0	.4	.0
8. NW7	.0	.5	.0	.0	.0	.0	.1	.2	.0	.1	.4	.0

II. Corrections and Additions to the Draft EIR

CALINE4: CALIFORNIA LINE SOURCE DISPERSION MODEL
JUNE 1989 VERSION
PAGE 1

JEROPMWP.txt

JOB: Jefferson Boulevard and Rodeo Road PM WP
RUN: Hour 1 (WORST CASE ANGLE)
POLLUTANT: Carbon Monoxide

I. SITE VARIABLES

U= .5 M/S Z0= 100. CM ALT= 0. (M)
BRG= WORST CASE VD= .0 CM/S
CLAS= 7 (G) VS= .0 CM/S
MIXH= 1000. M AMB= .0 PPM
SIGH= 5. DEGREES TEMP= 15.6 DEGREE (C)

II. LINK VARIABLES

LINK DESCRIPTION	* X1	* Y1	* X2	* Y2	* TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. NF	8	-450	8	-150	AG	802	4.9	.0	15.0
B. NA	8	-150	8	0	AG	752	8.2	.0	13.5
C. ND	6	0	6	150	AG	834	5.5	.0	9.9
D. NE	6	150	6	450	AG	834	4.9	.0	15.0
E. SF	-8	450	-8	150	AG	1231	4.9	.0	15.0
F. SA	-8	150	-8	0	AG	786	8.2	.0	13.5
G. SD	-9	0	-9	-150	AG	1480	6.1	.0	9.9
H. SE	-9	-150	-9	-450	AG	1480	4.9	.0	15.0
I. WF	450	8	150	8	AG	1186	4.9	.0	10.5
J. WA	150	8	0	8	AG	533	8.8	.0	13.5
K. WD	0	8	-150	2	AG	569	6.6	.0	9.9
L. WE	-150	2	-450	2	AG	569	4.9	.0	10.5
M. EF	-450	-8	-150	-8	AG	475	4.9	.0	15.0
N. EA	-150	-8	0	-8	AG	438	8.8	.0	13.5
O. ED	0	-8	150	-6	AG	811	5.7	.0	9.9
P. EE	150	-6	450	-6	AG	811	4.9	.0	15.0
Q. NL	0	0	4	-150	AG	50	8.2	.0	9.9
R. SL	0	0	-4	150	AG	445	8.5	.0	9.9
S. WL	0	0	150	5	AG	653	9.2	.0	9.9
T. EL	0	0	-150	-5	AG	37	8.8	.0	9.9

III. RECEPTOR LOCATIONS

RECEPTOR	* X	* Y	* Z
1. NE3	16	16	1.8
2. SE3	16	-12	1.8
3. SW3	-16	-17	1.8
4. NW3	-16	16	1.8
5. NE7	20	20	1.8
6. SE7	20	-16	1.8
7. SW7	-20	-21	1.8
8. NW7	-20	20	1.8

IV. MODEL RESULTS (WORST CASE WIND ANGLE)

RECEPTOR	* BRG (DEG)	* PRED CONC (PPM)	* A	* B	* C	* D	* E	* F	* G	* H
1. NE3	186.	2.2	.0	.9	.0	.0	.0	.0	.1	.4
2. SE3	348.	2.2	.0	.1	.5	.0	.0	.4	.0	.0
3. SW3	80.	2.3	.0	.2	.0	.0	.0	.0	.6	.0
4. NW3	96.	2.3	.0	.0	.2	.0	.0	.4	.0	.0
5. NE7	188.	1.8	.0	.6	.0	.0	.0	.0	.1	.3
6. SE7	349.	1.8	.0	.0	.4	.0	.1	.3	.0	.0
7. SW7	79.	1.8	.0	.2	.0	.0	.0	.0	.4	.0
8. NW7	98.	1.9	.0	.0	.1	.0	.0	.3	.0	.0

IV. MODEL RESULTS (WORST CASE WIND ANGLE) (CONT.)

RECEPTOR	* I	* J	* K	* L	* M	* N	* O	* P	* Q	* R	* S	* T
1. NE3	.0	.3	.0	.0	.0	.0	.2	.0	.0	.0	.3	.0
2. SE3	.0	.2	.0	.0	.0	.0	.3	.0	.0	.3	.3	.0
3. SW3	.1	.2	.0	.0	.0	.0	.6	.0	.0	.0	.4	.0
4. NW3	.0	.7	.0	.0	.0	.0	.1	.2	.0	.2	.4	.0
5. NE7	.0	.2	.0	.0	.0	.0	.1	.0	.0	.0	.2	.0
6. SE7	.0	.2	.0	.0	.0	.0	.3	.0	.0	.3	.3	.0
7. SW7	.0	.2	.0	.0	.0	.0	.4	.0	.0	.0	.4	.0
8. NW7	.0	.5	.0	.0	.0	.0	.1	.2	.0	.1	.4	.0

APPENDIX F—TRANSPORTATION:**West Los Angeles Transportation Facility**

App.(5) Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, Appendix B, revise the first paragraph as follows:

The West End segment of the Light Rail line is defined as the alignment between La Cienega and Venice/~~Roberston~~ Robertson Boulevards. The LRT would use an elevated bridge structure to cross over La Cienega Boulevard at Jefferson Boulevard. The elevated LRT alignment would return to ground level at a point just east of La Cienega Place within the City of Los Angeles. ~~with other~~ Other design options ~~that~~ extend the bridge over Jefferson Boulevard and Ballona Creek. The Jefferson/National Boulevard intersection would then be realigned and reconfigured under the elevated bridge structure. ~~The elevated LRT alignment would return to ground level at a point just east of La Cienega Place within the City of Los Angeles.~~

Sunset Avenue Project

App.(6) Volume IV, Appendix F, F2—Sunset Avenue Project, Traffic Study, page 6, second paragraph, revise the third sentence as follows and remove the fifth sentence:

The nearest regional facility serving the site is Lincoln Boulevard (State Route 1), with the Santa Monica Freeway (Interstate 10) located approximately 2 miles to the north and the Marina Freeway (State Highway 90) ~~which is located on the east end of Marina del Rey~~ approximately 1.25 mile east of the project site 2 miles to the south. This east-west freeway/expressway provides direct access to Lincoln Boulevard and provides 2 to 3 lanes in each direction. ~~Located to the north approximately 1.5 miles is the Santa Monica Freeway (Interstate 10).~~



III. RESPONSE TO WRITTEN COMMENTS

III. RESPONSES TO WRITTEN COMMENTS

A. INTRODUCTION

CEQA Guidelines Section 15088(a) states, “The 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 noticed comment period and any extensions and may respond to late comments.” The purpose of each response to a comment on the Draft EIR is to address the significant environmental issue(s) raised by each comment. Specifically, Section 15088(b) of the CEQA Guidelines requires that the written response to comments describe the nature of significant environmental issues raised. When the lead agency’s position conflicts with recommendations and objections raised in the comments, the environmental issues must be addressed in detail giving reason why specific comments and suggestions were not accepted. There must be a good faith, reasoned analysis in response. In accordance with these requirements, this Section of the Final EIR provides responses to each of the written comments received regarding the Draft EIR.

The Los Angeles Metropolitan Transportation Authority (Metro), as the lead-agency for the West Los Angeles Transportation Facility, and the City of Los Angeles Department of City Planning, as co-lead agency with Metro for the Sunset Avenue Project, received a total of 35 comment letters regarding the Draft EIR during the extended 60-day public review period beginning from October 21, 2004, through December 21, 2004. A total of six letters were received after the close of the comment period. A matrix listing each of the Commentors by the project(s) they commented on and with the issues that they raised is presented in Table 1 on pages 142 through 149. Each comment letter has been assigned a corresponding number, and comments within each comment letter have been separated to respond to the specific issues raised and also numbered. For example, comment letter “2” is from the Department of Conservation. The comments in this letter are numbered “2-1,” “2-2,” and “2-3.” Each of the comment letters has been scanned and broken into individual comments in order to provide written responses that follow each of the specific issues raised. Following Table 1 are the 41 comment letters with responses to each of the specific comments. The original comment letters are provided in Appendix A of this Final EIR.

Written comments may include opinions or preferences relevant to project approval or disapproval. Such statements of opinion or preference are outside the purview of an EIR. In addition, written comments may provide general information regarding a subject that does not introduce new environmental information or directly challenge information presented in the Draft EIR. Thus, within the response to comments provided below, the response “This comment is acknowledged” has been used. These comments, together with all of the other written comments presented in this Final EIR, will be forwarded to the City’s decision-makers (the Metro Board and the City of Los Angeles) for review and consideration.

Table 1
Written Comments Summary

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	A. AESTHETICS	B. AIR QUALITY	C. HISTORIC RESOURCES	D. GEOLOGY/SEISMIC HAZARDS	E. HAZARDOUS MATERIALS	F. WATER QUALITY	G. LAND USE	H. NOISE	I. TRANSPORTATION & CIRCULATION	J. PARKING	K.1. WATER	K.2. WASTEWATER	ALTERNATIVES	OTHER
BOTH PROJECTS																
STATE AGENCIES																
1	State Clearinghouse and Planning Unit 1400 Tenth Street Sacramento, CA 95812-3044															Procedural/ Miscellaneous
2	Department of Conservation 5816 Corporate Avenue, Suite 200 Cypress, CA 90630-4731															Procedural/ Miscellaneous
3	California Coastal Commission 200 Oceangate, Suite 1000 Long Beach, CA 90802-4302		●					●	●						●	Procedural/ Miscellaneous
REGIONAL AGENCIES																
4	Southern California Association of Governments 818 West Seventh Street, 12th Floor Los Angeles, CA 90017-3435															Procedural/ Miscellaneous
5	South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765-4178			●			●									Procedural/ Miscellaneous

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	A. AESTHETICS	B. AIR QUALITY	C. HISTORIC RESOURCES	D. GEOLOGY/SEISMIC HAZARDS	E. HAZARDOUS MATERIALS	F. WATER QUALITY	G. LAND USE	H. NOISE	I. TRANSPORTATION & CIRCULATION	J. PARKING	K.1. WATER	K.2. WASTEWATER	ALTERNATIVES	OTHER
CITY OF LOS ANGELES																
6	Bernard Parks Los Angeles City Councilman 200 North Spring Street, Room 460 Los Angeles, CA 90012-4873			•		•				•	•					Opposition, Environmental Justice
INDIVIDUALS																
7	Ira Koslow 33 Park Avenue Venice, CA 90291-9036		•						•	•	•	•				Opposition
8	James Murez 804 Main Street Venice, CA 90291-3218	•	•	•	•		•		•	•	•	•			•	Procedural/ Miscellaneous
WEST LOS ANGELES TRANSPORTATION FACILITY																
CITY OF LOS ANGELES																
9	City of Los Angeles, Department of Public Works Orlando Nova Division Manager, Bureau of Street Lighting 600 South Spring Street, 14th Floor Los Angeles, CA 90014-1960		•	•		•	•	•		•	•					Procedural/ Miscellaneous

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	A. AESTHETICS	B. AIR QUALITY	C. HISTORIC RESOURCES	D. GEOLOGY/SEISMIC HAZARDS	E. HAZARDOUS MATERIALS	F. WATER QUALITY	G. LAND USE	H. NOISE	I. TRANSPORTATION & CIRCULATION	J. PARKING	K.1. WATER	K.2. WASTEWATER	ALTERNATIVES	OTHER
OTHER CITIES AND AGENCIES																
10	Culver City Community Development Department Mark Wardlaw Deputy Community Development Director 9770 Culver Boulevard Culver City, CA 90232-0507	•	•	•			•	•	•	•	•					Related Projects, Procedural/ Miscellaneous
ORGANIZATIONS																
11	Baldwin Neighborhood Homeowners' Association Carol Tucker P.O. Box 781329 Los Angeles, CA 90016-9329			•			•			•	•					Procedural/ Miscellaneous
12	Blair Hills Association Mary Ann Greene Culver City, CA 90232	•	•						•							Procedural/ Miscellaneous
INDIVIDUALS																
13	Eugene Barbie 3625 Kalsman Drive, Unit 2 Los Angeles, CA 90016-4438			•						•	•					Opposition
14	Walter N. Marks, Inc. Wally Marks III 8758 Venice Boulevard Los Angeles, CA 90034-3224															Support

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	A. AESTHETICS	B. AIR QUALITY	C. HISTORIC RESOURCES	D. GEOLOGY/SEISMIC HAZARDS	E. HAZARDOUS MATERIALS	F. WATER QUALITY	G. LAND USE	H. NOISE	I. TRANSPORTATION & CIRCULATION	J. PARKING	K.1. WATER	K.2. WASTEWATER	ALTERNATIVES	OTHER
15	Jackie McCain 4135 LaFayette Pl. Culver City, CA 90232-2817							•		•	•					Procedural/ Miscellaneous
16	Darren Starks					•		•			•				•	Procedural/ Miscellaneous, Opposition
SUNSET AVENUE PROJECT																
CITY OF LOS ANGELES																
17	City of Los Angeles, Department of Public Works Orlando Nova Division Manager, Bureau of Street Lighting 600 South Spring Street, 14th Floor Los Angeles, CA 90014-1960		•	•		•	•			•	•					Procedural/ Miscellaneous
OTHER CITIES AND AGENCIES																
18	Los Angeles Unified School District Raymond E. Dippel, Assistant Environmental Planning Specialist 333 S. Beaudry Ave. 20th Floor Los Angeles, CA 90017-5113										•					Procedural/ Miscellaneous

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	A. AESTHETICS	B. AIR QUALITY	C. HISTORIC RESOURCES	D. GEOLOGY/SEISMIC HAZARDS	E. HAZARDOUS MATERIALS	F. WATER QUALITY	G. LAND USE	H. NOISE	I. TRANSPORTATION & CIRCULATION	J. PARKING	K.1. WATER	K.2. WASTEWATER	ALTERNATIVES	OTHER
ORGANIZATIONS																
19	41 Sunset Avenue Condominium Association Brian W. Kasell 41 Sunset Avenue, #301 Venice, CA 90291-2597		•	•	•						•	•			•	Opposition
INDIVIDUALS																
20	Kathryn Alice 22 Thornton Ave. Venice, CA 90291-2518															Procedural/ Miscellaneous
21	Amy Armstrong								•							Opposition
22	Carol V. Beck															Procedural/ Miscellaneous
23	Dr. Jason Seth and Bernice Cohen 12 Paloma Ave. Venice, CA 90291-2404											•				
24	Naomi Glauberman 32 Breeze Avenue Venice, CA 90291-3225								•							Opposition

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	A. AESTHETICS	B. AIR QUALITY	C. HISTORIC RESOURCES	D. GEOLOGY/SEISMIC HAZARDS	E. HAZARDOUS MATERIALS	F. WATER QUALITY	G. LAND USE	H. NOISE	I. TRANSPORTATION & CIRCULATION	J. PARKING	K.1. WATER	K.2. WASTEWATER	ALTERNATIVES	OTHER
25	Ellie and Alice Goldstein 3 Thornton Avenue Venice, CA 90291-2518		•	•						•	•	•				Procedural/ Miscellaneous, Opposition
26	Neil A. Greco 115 Park Place Venice, CA 90291-3284		•						•							Opposition
27	Lori LeBoy 117 Park Place Venice, CA 90291-3284		•						•		•					Opposition
28	Erik Mankin 41 Paloma Avenue Venice, CA 90291-2404		•						•		•				•	Opposition
29	Ian McIlvaine, AIA 601 Rose Avenue Venice, CA 90291-2708								•			•				
30	John Okulick 604 Hampton Drive Venice, CA 90291-2626						•		•	•	•					Opposition, Procedural/ Miscellaneous
31	Jason Popieniuck 49B Sunset Ave. Venice, CA 90291-2516	•										•				

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	A. AESTHETICS	B. AIR QUALITY	C. HISTORIC RESOURCES	D. GEOLOGY/SEISMIC HAZARDS	E. HAZARDOUS MATERIALS	F. WATER QUALITY	G. LAND USE	H. NOISE	I. TRANSPORTATION & CIRCULATION	J. PARKING	K.1. WATER	K.2. WASTEWATER	ALTERNATIVES	OTHER
32	Stephen Pouliot 122 Thornton Avenue Venice, CA 90291-2519		•						•							Opposition, Procedural/ Miscellaneous
33	Gail Rogers	•		•						•	•					
34	Helen Hood Scheer 132 Park Place Venice, CA 90291-3223	•	•	•					•	•	•	•			•	Opposition, Procedural/ Miscellaneous
35	James Schley 18 Park Ave. Venice, CA 90291-3222											•				Opposition
LATE LETTERS—WEST LOS ANGELES TRANSPORTATION FACILITY																
CITY OF LOS ANGELES																
36	City of Los Angeles Fire Department Alfred B. Hernandez, Assistant Fire Marshall 200 North Main Street Los Angeles, CA 90012-4123						•							•		Fire Protection, Procedural/ Miscellaneous
LATE LETTERS—SUNSET AVENUE PROJECT																
ORGANIZATIONS																
37	Grassroots Venice Neighborhood Council Land Use and Planning Committee Venice, CA	•	•		•				•		•				•	Procedural/ Miscellaneous, Related Projects

Letter No.	SUMMARY OF WRITTEN COMMENTS	PROJECT DESCRIPTION	A. AESTHETICS	B. AIR QUALITY	C. HISTORIC RESOURCES	D. GEOLOGY/SEISMIC HAZARDS	E. HAZARDOUS MATERIALS	F. WATER QUALITY	G. LAND USE	H. NOISE	I. TRANSPORTATION & CIRCULATION	J. PARKING	K.1. WATER	K.2. WASTEWATER	ALTERNATIVES	OTHER
INDIVIDUALS																
38	Craig Ochikubo 615 Hampton Drive, #D302 Venice, CA 90291-2798		•													
39	Helen Hood Scheer 132 Park Place Venice, CA 90291-3223	•										•				Procedural/ Miscellaneous
40	Melvin I. Scheer, M.D. 31 Park Avenue Venice, CA 90291-9036		•						•							Opposition
41	Bill Loiterman 113 Sunset Avenue Venice, CA 90291-2573		•													

LETTER NO. 1

State Clearinghouse and Planning Unit
Scott Morgan, Senior Planner
1400 Tenth Street
Sacramento, CA 95812-3044

COMMENT 1-1

Stamped copy of Notice of Completion and Environmental Documentation Transmittal. [Note: This is an attachment from the State Clearinghouse. Please refer to Appendix A of this Final EIR for a copy of this attachment.]

RESPONSE 1-1

This comment is an attachment acknowledging that the State Office of Planning and Research has received the Notice of Completion and the Draft EIR for the proposed project. Therefore, no response is required.

COMMENT 1-2

Stamped copy of Notice of Extended Public Review Period. [Note: This is an attachment from the State Clearinghouse. Please refer to Appendix A of this Final EIR for a copy of this attachment.]

RESPONSE 1-2

This comment is an attachment acknowledging that the State Office of Planning and Research has received the Notice of Extended Public Review Period for the proposed project. The comment period for the project was an extended 60-day review period, as opposed to the 30-day review period as required by CEQA.

COMMENT 1-3

Memo from OPR to All Reviewing Agencies re: extended Review Period. [Note: This is an attachment from the State Clearinghouse. Please refer to Appendix A of this Final EIR for a copy of this attachment.]

RESPONSE 1-3

This comment is an attachment from the State Office of Planning and Research to all state agencies regarding the extension of the public review period for the Draft EIR. As indicated above, the review period for the Draft EIR was an extended 60-day review period.

LETTER NO. 2

Department of Conservation
Paul Frost, Associate Oil & Gas Engineer
5816 Corporate Avenue, Suite 200
Cypress, CA 90630-4731

COMMENT 2-1

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California.

The proposed project is located in proximity to the administrative boundaries of the Venice Beach oil or gas field. There are no oil, gas, or injection wells within the boundaries of the project. However, if excavation or grading operations uncovers a previously unrecorded well, the Division district office in Cypress must be notified, as the discovery of any unrecorded well may require remedial operations.

Thank you for the opportunity to comment on the Draft Environmental Impact Report. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

RESPONSE 2-1

As stated in the comment above, there are no oil, gas, or injection wells on the proposed Sunset Avenue Project site. In the event that a well is discovered during construction of the project, the appropriate authorities will be notified. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 3

California Coastal Commission
Charles R. Posner, Coastal Program Analyst
200 OceanGate, Suite 1000
Long Beach, CA 90802-4302

COMMENT 3-1

The Commission staff has reviewed the above-referenced document and appreciates the opportunity to submit the following comments. The proposed Sunset Avenue project, as described in the October 2004 Draft EIR, involves the demolition of existing development on an industrial site currently occupied by the Los Angeles County MTA bus maintenance yard, remediation of site contamination, and construction of 225 residential units (including affordable units), 10,000 sq. ft. of commercial area, and approximately 676 parking spaces.

As stated in our prior letter dated April 30, 2004 addressing the proposed development, the project site is located entirely within the Venice coastal zone and thus must obtain a coastal development permit prior to proceeding with any demolition or other development. The standard of review for the coastal development permit is the Chapter 3 policies of the Coastal Act, although the Commission-certified City of Los Angeles Land Use Plan for Venice (Venice LUP) provides specific guidance for interpreting the Chapter 3 policies.

RESPONSE 3-1

This comment provides a general description of the proposed Sunset Avenue project. As discussed on page 78 in Volume I, Section II, Project Description, of the Draft EIR, the Applicant is applying for a Coastal Development Permit. Approval by the City of the requested entitlements upon the basis of the required findings will necessarily require review of the project for consistency with applicable land use plans and policies. Specifically, the project's consistency with the Coastal Act and the Venice Local Coastal Program Land Use Plan is analyzed in Volume I on pages 271–276 of Section IV.G, Land Use, and pages 112–119 of Section IV.A, Aesthetics, of the Draft EIR. Please see Response to Comment Nos. 3-2, 3-4, and 3-7 for further discussion regarding the Sunset Avenue Project's consistency with the Coastal Act and Venice Local Coastal Program Land Use Plan.

COMMENT 3-2

Our first comment is that the certified Venice LUP designates the project site as a “Limited Industry” land use (LUP Exhibit 10a) and also identifies the project site as a potential public parking site (LUP Exhibit 17a & LUP Policies I.C.7 & II.A.2). The final EIR should include an

analysis of all of the project site's allowable and preferred land uses set forth by the City's Land Use Plan as alternative projects. Of course, the provision of additional public parking as a component of each alternative should also be considered.

RESPONSE 3-2

The Venice Local Coastal Program Land Use Plan designates the project site for Limited Industry land uses as stated by the comment. The land use designation for the project site in the Venice Community Plan is Limited Manufacturing, which is consistent with the Local Coastal Program designation. In addition, the current zoning designation for the project site is M1, which is consistent with the Community Plan designation. As discussed in detail in Volume I, Section IV.G, Land Use, of the Draft EIR, the Applicant is applying to change the zoning designation of the site from M1 to CM, which is also consistent with the Venice Coastal Specific Plan zoning as well as the Venice Community Plan and Venice Local Coastal Program industrial land use designations which permit residential and commercial uses. The project also complies with Policy I.C.7 of the Local Coastal Program, which contemplates development of a mixed-use residential and commercial project on the project site. Therefore, the proposed uses are fully consistent with the uses designated in the LUP.

With regard to public parking, the project would include 71 parking spaces for public use in accordance with Beach Impact Zone provisions as well as an additional 44 spaces that could provide fee parking for surrounding uses. As discussed in Section IV.G, Land Use, the provision of such parking would serve to further policies regarding parking that are set forth in the Local Coastal Program Land Use Plan and would adhere to the Specific Plan requirements related to parking.

Pursuant to CEQA Guidelines Section 15126.6(a): "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly accomplish most of the basic objectives of the project but would avoid or substantially lessen one or more of the significant effects.... An EIR need not consider every conceivable alternative to a project." As discussed in detail in the Draft EIR, implementation of the Sunset Avenue project would result in potentially significant impacts associated with aesthetic character as defined by a threshold of significance addressing the potential for a project to detract from the existing style or image of the area due to density, height, bulk, or setbacks; a short-term significant air quality impact associated with NO_x emissions during construction; and a short-term significant noise impact during construction. Based on these potentially significant environmental impacts, the objectives established for the project as well as consideration of the General Plan Designations and zoning applicable to the project site, alternatives to the Sunset Avenue project that were evaluated included: Alternative E: No Project/No Build; Alternative F: Alternative Use/Commercial; Alternative G: Reduced Density; and Alternative H: Reduced Height. As significant impacts associated with consistency with land use plans would not result

from the project, the alternatives analysis was not required to focus on all of the project site's allowable and preferred land uses set forth by the City's Land Use Plan as suggested by the comment. Nonetheless, Alternative F, which would include approximately 102,250 square feet of commercial area, was developed to specifically include a project that would be in accord with the plans and would provide a notable contrast with the proposed project for purposes of evaluating the impacts of varied uses.

In addition, Volume I, Section V.J of the Draft EIR sets forth alternatives to the Sunset Avenue Project that were considered, but rejected from further analysis. Use of the project site for industrial use was rejected based on incompatibility with surrounding residential uses and inconsistency with the intended direction set forth in the Venice Community Plan and Policy I.C.7 of the Local Coastal Program. In addition, other mixed-use projects were noted in Section V.J to be too similar to the project to allow for meaningful comparison. An active or passive open space alternative was also considered for this site. No public or private entity has expressed interest in acquisition of this site for open space and, as such, an active or passive open space use would not be feasible. Development of the site with only a public parking structure would also not be feasible for these same reasons and would also not meet the project objectives. Furthermore, with the exception of the potentially significant aesthetic impact associated with the project, all of the potentially significant and unavoidable impacts associated with the Sunset Avenue are associated with construction. Such short-term impacts would also be expected of most alternative development scenarios for the site. Thus, development of the site with an alternative use other than the uses set forth in the Reduced Intensity and Alternative Use Alternative was also rejected from further analysis on this basis.

COMMENT 3-3

Secondly, we strongly encourage the proposed development to provide public sidewalks through the project site in order to improve public access to Venice Beach. The project should conform with and complement the existing pattern of pedestrian access (i.e., walk streets) in the neighborhood by providing new connections between the area inland of the project site to the Sunset Avenue and Thornton Avenue walk streets that currently provide public pedestrian access from the project area to the Venice Boardwalk and shoreline. The walk streets in the project should provide continuous walkways between Main Street and Pacific Avenue. The subdivision should not be gated.

RESPONSE 3-3

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation

Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. Neither of the east-west street segments adjacent to the project site, Sunset Avenue and Thornton Place is designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a).

COMMENT 3-4

In regards to the scale of the proposed development, we support the project alternative with building heights that conform with the height of surrounding development and comply with the height limit for the property set forth by the certified Venice LUP. The certified Venice LUP (LUP Exhibit 14a) limits building heights on the project site to 30 feet for flat roofs or 35 feet for varied or steeped back rooflines. Development along walk streets is subject to a 28-foot maximum height limit. A building's height is measured from the fronting right-of-way. The 56-foot high buildings being considered are not in character with the surrounding community and do not conform with the height limits set forth by the certified Venice LUP.

RESPONSE 3-4

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The Venice Coastal Zone Specific Plan, which implements the policies of the Local Coastal Program, provides that for through lots, height shall be measured from the centerline of whichever adjacent front street is the lowest in elevation. Thornton Avenue is the front street adjacent to the project site that is lowest in elevation. In accordance with the specific plan, heights have therefore been measured from the centerline of Thornton Avenue. Heights relative to other adjoining rights-of-way are therefore generally less. The greater building heights are concentrated in the center of the project, and setbacks are provided along the adjacent residential development across Thornton Avenue, Sunset Avenue, and Pacific Avenue. The Applicant is applying for exceptions to the maximum height restrictions set forth in the Specific Plan and is also applying for a Coastal Development Permit. Approval by the City of the requested entitlements upon the basis of the required findings will necessarily imply consistency with applicable land use plans and policies. In addition, the Reduced Height Alternative does provide reduced heights along the frontage of Thornton Place and Sunset Avenue and heights along street frontages that would be similar to the height requirements of the Specific Plan. However, heights of interior buildings may be greater than indicated under the Specific Plan.

None of the streets adjacent to the project site are designated as walk streets by City plans. Thus, none of the provisions relating to walk streets, including the 28-foot maximum height limit, apply to the project site. Consistency of the project with additional policies and implementation strategies of the Local Coastal Program are addressed in detail in Volume I, Section IV.G, Land Use, of the Draft EIR.

COMMENT 3-5

Structures as high as 56 feet would require 35-foot wide paved public roadways to provide fire access, with very limited planting.

RESPONSE 3-5

As discussed in Volume I, Section IV.I, Transportation and Circulation, pages 329–330, and Technical Appendix F, Transportation, Pages 49–51, Highway Deductions and Street Sections of the Draft EIR, three of the four abutting roadways (Main Street, Pacific Avenue and Sunset Avenue) exceed 35 feet in width upon completion of the proposed project. Fire access to the buildings located within the project site will be available from these adjacent streets. Limited fire access is provided from Thorton Place which is currently 16 to 20 feet in width. The project is not proposing to widen Thorton Place but rather retain its current alley type configuration as it does not connect to Pacific Avenue.

COMMENT 3-6

Residential structures in Venice commonly have reduced front and sideyard setbacks, but this is provided within the content of the walk streets, which consist of a public sidewalk surrounded by an often privately landscaped strip.

RESPONSE 3-6

As indicated on pages 116–117 of Volume I, Section IV.A., Aesthetics, of the Draft EIR, the project setbacks meet or exceed all requirements of the Venice Specific Plan. Setbacks would be 5 feet on Main Street and 8 feet (from the relocated property line) along Pacific Avenue after a 17.5-foot right-of-way dedication. Front yard setbacks along Sunset Avenue and Thornton Place would vary from approximately 5 feet to 50 feet, substantially exceeding the Specific Plan requirements. These setbacks are illustrated in Figure II-4 on page 73, Figure II-8 on page 77, and Figure IV.A-8 on page 115 of the Draft EIR. (Figure IV.A-8 has been included in Section II, Corrections and Additions, of this Final EIR, with additional information incorporated into the graphic.)

COMMENT 3-7

The certified Venice LUP includes several additional policies and implementation strategies that are applicable to the design and location of the proposed development. We recommend that the final EIR be amended to fully address the proposed project’s consistency with policies set forth by the certified Venice LUP and the Coastal Act.

RESPONSE 3-7

The Draft EIR addresses those policies that were specifically mentioned in the Commentor's comments submitted in response to the NOP. The Venice LUP is described in detail in Volume I, Section IV.G, Land Use of the Draft EIR. Applicable coastal policies are described starting on page 262 of the Regulatory Setting Subsection, and a discussion of project compliance with the applicable policies is provided in the Analysis of Project Impacts Subsection on page 274. Also, Section 30251 of Chapter 3 of the California Coastal Act is addressed in Volume I, Section IV.A, Aesthetics, on pages 106, 118, and 119. As indicated on page 275 of the Draft EIR: "Many of the policies are intended to control development uses that vary from those of the proposed project or environmental settings that are different than those of the proposed project site. Coastal zone impacts at the project site are somewhat limited due to the site's location. Specifically, the project is located on an urbanized in-fill site. In addition, while the project site is proximal to the coastline, it is located somewhat inland, east of Pacific Avenue. It is also not immediately adjacent to coastal recreation facilities, marine resources or environmentally sensitive habitat areas." The remainder of this response addresses additional LUP policies. Amendments have been made to Volume I, Section IV, Aesthetics, and Section IV.G., Land Use, to reflect this discussion. Please refer to Section II. Corrections and Additions to the Draft EIR, of the Final EIR.

The following provides a discussion of the project's consistency with additional LUP policies regarding the location of development.

- Policies I.A.1, Residential Development; I.B.2, Mixed-Use Development; I.B.1, Commercial Intensity; and I.B.7, Commercial Development Standards address site uses, densities, and other development regulations. These policies are all implemented through the Venice Specific Plan. Therefore, the discussion of the Specific Plan in the Draft EIR indirectly addresses all of these policies. As indicated in the Draft EIR, the project includes exceptions to the Specific Plan with regard to height and floor area ratio. The exceptions are requested pursuant to Policy I.A.13 regarding Density Bonus Applications, and would be consistent with the qualifying conditions of Policy I.A.13.
- Policy I.C.2 Coastal Industry, states: "Boat building, servicing, supply, and marine support industry, as they are considered a coastal-related use and are particularly suitable for the industrially designated lands in the Venice Coastal Zone, shall be encouraged." As the project site is currently designated for industrial use, this policy has some applicability. However, while this policy encourages coastal-related uses for industrially designated lands, Policy I.C.7 which applies to the site specifically, states that "...priority uses for the site include affordable housing, which may be a

mixed use project, and public parking structure.” As indicated above, the project would implement this site specific policy.

- Policy I.B.12 Parking Structures, Policy II.A.2, Expansion of Public Beach Parking, Policy II.A.2, Expansion of Public Beach Parking Supply, and Policy II.A.4, Parking Requirements in the Beach Impact Zone (BIZ), are policies regarding parking for project uses and beach impact zone parking. These policies are implemented through the Venice Specific Plan. Policy II.A.2 is specifically mentioned in the analysis of the project’s supply of, and impacts on parking. The remaining policies are indirectly addressed through the discussion of the project’s compliance with the parking provisions of the Venice Specific Plan. The provision of parking is addressed in Section IV.G, Land Use, and Section IV.J, Parking. As indicated therein, the project is providing sufficient parking to meet the project needs pursuant to the Specific Plan (and therefore the Land Use Plan policies). It is also providing parking pursuant to the beach impact zone requirements, through the provision of on-site parking, rather than in-lieu fees. In additions, the project is providing an excess of 44 additional parking spaces that could provide fee parking for adjacent residences, alleviating existing parking conditions. The project would also result in a net increase of five on-street parking spaces. Therefore, the project would implement each of these parking policies.
- Policy III.A.1 General (Recreational Opportunities) states: “New recreational opportunities should be provided, and existing recreational areas, shown on Exhibits 19a through 21b, shall be protected, maintained and enhanced for a variety of recreational opportunities for both residents and visitors including passive recreational and educational activities, as well as active recreational uses....” The project site is not identified on Exhibit 20a as containing a recreation or visitor serving facility, and therefore this policy is not specifically applicable to the project. However, the introduction to Policy Group III, Recreation and Visitor-Serving Facilities, states the following: “Private business such as retail shops, restaurants and vendors along Ocean Front Walk and Main Street are also an attraction and service for residents and visitors alike.” As described in the Draft EIR, the project would include a commercial component that faces Main Street, and that would support Main Street as an attractive retail location. Thus, the project would support the policies.

The following provides a discussion of the project’s consistency with additional LUP regarding design or development.

- Policy I.E.1, General, states: Venice’s unique social and architectural diversity should be protected as a Special Coastal Community pursuant to Chapter 3 of the California Coastal Act of 1976. Policy I.E.2, Scale, states: “New development

- within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer, and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods....” Policy I.E.3, Architecture, is an implementation strategy which is to be implemented through the Venice Specific Plan. This policy states: “Varied styles of architecture are encouraged with building facades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.” The proposed project includes many features that support these policies. The project facades along Sunset Avenue and Thornton Place contain a series of stepped-back planes, with landscaped setbacks that greatly exceed Specific Plan requirements. The frontage along Pacific Avenue has variation through multiple buildings with varied heights, and spaces between buildings in a pattern that is visually similar to existing development along Pacific Avenue. The project’s varied heights with the tallest heights in the center of the project would create vertical variation. Further, the project would contribute to the diversity of the area with a type of development that does occur at interspersed locations within the Coastal Zone. At the same time, as described in the analysis, the building heights along Sunset Avenue and Thornton Place, taller than nearby buildings, would cause a contrasting transition in building heights across Sunset Avenue and Thornton Place, causing a contrast with the existing features that embody the area’s valued aesthetic character, resulting in the significant impact discussed in Section IV.A, Aesthetics. This project feature would not be supportive of those portions of Policies I.E.2 and I.E.3 that relate to building heights and massing, supporting the conclusions regarding the project’s significant impact on aesthetics.
- Policy I.D.3, Views of Natural and Coastal Recreation Resources, states: “The scale of development shall comply with height limits, setbacks and standards for building massing specified in Policy Groups I.A and I.B, Residential and Commercial Land Use and Development Standards, of this LUP, in order to protect public views of highly scenic coastal areas and vista points, including, but not limited to, the canals, lagoon, jetty, pier, Ocean Front Walk, walk streets and pedestrian oriented communities.” As discussed in Section IV.A, Aesthetics, the project would exceed the recommended height limits in the Policies, however potential impact on views of coastal resources, per policies of the California Coastal Act, would not be adverse. Rather, view impacts would be limited to a few private locations, and would not notably affect views of the cited resources. The one notable view resource, the Pacific Ocean, lies outside of the project’s viewshed, and the project would not obstruct existing views of that resource. Thus, while the project would exceed the height limits set forth by the specific plan, the policy would generally be consistent with the intent of Policy I.D.3 and Section 3025 of the California Coastal Act.

- Policy I.D.4, Signs, states: “Roof top signs and billboards are prohibited in all land use categories. Business identification signs shall comply with the height limits and development standards specified in the LUP to ensure they do not adversely affect view sheds and view corridors.” The project does not propose roof top signs and billboards. In addition, signage for the commercial uses along Main Street would comply with the requirements and standards of the LUP. Thus, the project would be consistent with this policy.

Based on the above, additional discussion has been added to the EIR to provide further information regarding additional policies in the Venice Local Coastal Program Land Use Plan. Specifically, additional discussion regarding policies related to the location of development has been added to Section IV.G, Land Use, and additional discussion regarding design has been added to Section IV.A, Aesthetics, of the Draft EIR. Please refer to Section II, Corrections and Additions, of this Final EIR.

COMMENT 3-8

In regards to the proposed West Los Angeles Transportation Facility, we note that while it is not located in the coastal zone, there is an interagency effort to improve water quality and habitat along Ballona Creek near the project site. Therefore, the project provides an excellent opportunity to incorporate plants consistent with habitat restoration into the project landscaping along Jefferson Boulevard. Because of the sensitivity of downstream habitat, we would encourage the MTA to incorporate state-of-the-art Best Management Practices to reduce pollution impacts that could be caused by the proposed project. Please call me if you have any questions.

RESPONSE 3-8

As set forth in Volume I, Section IV.F, Water Quality, of the Draft EIR, the West Los Angeles Transportation Facility will comply with all applicable water quality requirements with respect to Ballona Creek.

LETTER NO. 4

Southern California Association of Governments
Jeffrey M. Smith, AICP
Senior Regional Planner, Intergovernmental Review
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

COMMENT 4-1

Thank you for submitting the Metropolitan Transportation West Los Angeles Transportation Facility and Sunset Avenue Project for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the Metropolitan Transportation West Los Angeles Transportation Facility and Sunset Avenue Project, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's October 16-31, 2004 Intergovernmental Review Clearinghouse Report for public for review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator: If you have any questions, please contact me at (213) 236-1867. Thank you.

RESPONSE 4-1

This comment describes SCAG's responsibilities as they relate to the proposed project. This comment also indicates that SCAG does not consider the proposed project to be regionally significant per SCAG Intergovernmental Review Criteria and CEQA Guidelines Section 15206. As suggested by this comment, a Notice of Completion will be sent to SCAG indicating the completion of the Final EIR.

LETTER NO. 5

South Coast Air Quality Management District
Steve Smith, Ph.D.
Program Supervisor, CEQA Section
21865 Copley Drive
Diamond Bar, CA 91765-4178

COMMENT 5-1

Draft Environmental Impact Report (DEIR) for MTA West Los Angeles Transportation Facility and Sunset Avenue Project

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist—CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

RESPONSE 5-1

Pursuant to Section 15088 of the CEQA Guidelines, written responses to the comments provided in this letter and others have been prepared and incorporated in this Final EIR. Additionally, pursuant to Section 15089, the SCAQMD has been added in the mailing list to receive the Final EIR prior to approval of the proposed project. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 5-2

Draft Environmental Impact Report (DEIR) for MTA West Los Angeles Transportation Facility and Sunset Avenue Project

1. The air quality analysis in the DEIR includes an analysis of localized air quality impacts, which, although recommended, is currently a voluntary analysis. The SCAQMD commends the lead agency for taking a leadership role in performing the localized air quality analysis.

RESPONSE 5-2

This comment commends the Lead Agency for taking a leadership role in performing a localized air quality analysis. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 5-3**A. Air Toxic Impacts & Project Emissions**

2. The lead agency states on pages 148 and 149 of the DEIR that since the buses that would be operating from the facility “would be fueled with CNG or another alternative fuel rather than diesel, ... no health risk assessment is required and no health risk impacts would be anticipated to occur as a result of the project. Project-related air toxic impacts would be less than significant.”

The basis for this statement appears to be that one of the goals of the project is to convert the 175-bus fleet to 100 percent CNG by 2013 (page 65). The Draft EIR, however, provides no information on the composition of the existing fleet (diesel versus CNG) or if funding is currently available to convert diesel buses to CNG. Given the fact that diesel engines have a life cycle of ten years or more and, if no funding is currently secured for converting all 175 buses to CNG, operation of a substantial number of diesel-powered buses could continue well past the year 2013.

Based on the foregoing, it is recommended that the lead agency specifically identify the number of diesel buses in the existing fleet and identify the number of buses that can be converted to CNG based on current funding levels. If it appears that a substantial number of buses will continue to operate in the foreseeable future, preparation of a risk assessment for mobile sources may be warranted. If a mobile source health risk assessment is performed, the SCAQMD recommends that the lead agency consider requiring one or more of the following are mitigation measures.

- Accelerate conversion of buses to CNG
- If diesel buses continue to be used, require the use of particulate filters, oxidation catalysts and low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.

RESPONSE 5-3

The new Transportation Facility would have no diesel fueling capabilities, and, as such, no diesel-fueled buses would operate out of the new facility. The bus fleet to operate out of the

new Transportation Facility would be 100 percent compressed natural gas (CNG)–fueled. In addition, Metro has adopted a policy to move its entire fleet from diesel to clean-fuel CNG. It is expected that by 2010, 99 percent of Metro’s fleet will be fueled by CNG. Metro already has the CNG–fueled buses that would operate out of the new facility. Therefore, there is no funding requirement to convert any existing diesel-fueled buses to CNG.

The proposed project would include installation and operation of a diesel-fired generator for emergency power generation. Unless a power blackout occurs, this generator would be operated only for routine testing and maintenance purposes. The project Applicant would be required to obtain a permit to construct and a permit to operate this standby generator under SCAQMD Rules 201, 202 and 203. Under SCAQMD Regulation XIII (New Source Review [NSR]), the generator would meet Best Available Control Technology (BACT) requirements to minimize emissions of CO, VOC, NO_x, and PM₁₀. BACT standards for diesel-fired emergency generators specify a maximum allowable emissions rate of 8.5 grams of carbon monoxide per horsepower-hour (hp-hr), 1.0 gram of VOC per hp-hr, 6.9 grams of NO_x per hp-hr, and 0.38 gram of PM₁₀ per hp-hr. Sulfur dioxide emissions would be minor since the sulfur content of the diesel fuel would be limited to 0.05 percent by weight under SCAQMD Rule 431.2 (Sulfur Content of Liquid Fuels). In addition to BACT, NSR typically requires offsets if a new source would emit greater than specified quantities of pollutants after implementation of BACT; however, offsets are not required under SCAQMD Rule 1304 (Exemptions) for equipment used exclusively as emergency standby equipment for nonutility electrical power generation provided that the equipment does not operate more than 200 hours per year. Since the use of the generator would be infrequent, and emergency use of such equipment would comply with all relevant SCAQMD requirements, short-term impacts would be negligible. Re-fueling of the generators would be conducted on-site in accordance with manufacturers’ specifications and in compliance with applicable standards and regulations.

Based on the foregoing, the new transportation center does not warrant a diesel particulate health risk assessment (HRA). As set forth in the Draft EIR, no health risk impacts are anticipated to occur as a result of the project, and, as such, project-related air toxic impacts would be less than significant.

COMMENT 5-4

3. Comparing the URBEMIS 2002 construction output data for the MTA-Jefferson site with Table IV.B-4 on page 145 of the DEIR shows some minor inconsistencies for construction phase VOC emissions (this includes accounting for the 28 pound per day VOC emission increase noted in footnote a). Please explain or correct this apparent discrepancy.

RESPONSE 5-4

The Commentor correctly identifies a minor mathematical error. This error has been corrected, and Table IV.B-4 on page 145 of the Draft EIR has been revised as necessary. Please refer to Section II, Corrections and Additions, of this Final EIR for this revision. Based on the revised emissions inventory, NO_x daily emissions would continue to exceed the SCAQMD significance threshold of 100 pounds per day, as disclosed in the Draft EIR. Similarly, CO, PM₁₀, ROC, and SO_x daily emissions would continue to remain below their respective SCAQMD significance thresholds, as disclosed in the Draft EIR.

COMMENT 5-5

4. To minimize potential adverse air quality impacts in the event of gaseous leaks from the CNG storage tanks and dispensing equipment, it is recommended that methane detectors be installed as part of the project.

RESPONSE 5-5

Installation of the CNG tanks and other underground storage tanks (USTs) would include leak detection systems that alert the operators of gaseous and/or liquid leaks of stored hazardous materials. Such detection systems are required by Federal regulations. Further, the development of the Transportation Facility would comply with all applicable regulations for USTs including regulations and guidelines set forth by the Los Angeles Regional Water Quality Control Board and the City of Los Angeles Fire Department.

COMMENT 5-6

5. In calculating operational emissions the lead agency takes credit for emission reductions from reduced non-revenue vehicle miles traveled per day. On page 147 it is stated that non-revenue vehicle miles traveled would be reduced by 2.5 miles per trip. There is no basis for this number except to say that the facility would be more centrally located in the service area. Although there is a possibility of a reduction in non-revenue miles traveled per day for some buses, compared to the existing situation, some buses may have to travel greater distances to their respective bus routes. As a result, it is possible that there would be no net change in non-revenue vehicle miles traveled per day. It is recommended that the lead agency provide additional information supporting the 2.5-mile per day reduction or eliminate this factor.

RESPONSE 5-6

A more refined analysis of the regional mass emissions reductions that would be realized due to non-revenue mile efficiency gains has been conducted. Based on this analysis, the non-revenue miles would be reduced by a minimum of 73,168 miles annually (200 mile per day average) as a result of the proposed project. The average reduction in CO and NO_x regional

mass emissions would amount to 29 pounds per day and 4 pounds per day, respectively. Daily average reductions in ROG, SO_x, and PM₁₀ regional mass emissions would be negligible. Tables IV.B-5 on page 149, IV.B-10 on page 156, and IV.B-11 on page 157 of the Draft EIR have been revised as necessary to reflect this updated information. Please refer to Section II, Corrections and Additions, of this Final EIR for these revisions. The foregoing revisions do not result in the change of any significance conclusion disclosed in the Draft EIR.

COMMENT 5-7

6. Related to comment #3, Table IV.B-5 on page 149 of the DEIR shows emission reductions associated with a reduction in non-revenue vehicle miles traveled per day. The emission reduction estimates in Table IV.B-5 do not appear to correlate to any numbers identified in Appendix B. Therefore, it is not clear how these numbers were generated. Assuming the lead agency can document the 2.5-mile per day reduction in non-revenue vehicle miles traveled per day, documentation should be provided in the Final EIR showing how the emission reductions were calculated. Documentation should include emission factors used, total vehicle miles reduced, assumptions, calculations, etc.

RESPONSE 5-7

The CNG bus-related mass emissions calculation datasheet was inadvertently excluded from Appendix B, Volume 2 of the Draft EIR. This datasheet, which shows how the emission reduction estimates were derived, has been provided in Section II, Corrections and Additions, of this Final EIR. Please refer to Response to Comment No. 5-6 for a discussion of the more refined analysis of the regional mass emissions reductions that would be realized due to non-revenue mile efficiency gains associated with the project.

COMMENT 5-8

7. CALINE4 modeled temperature, 0.5 degree Celsius, does not reflect regional low temperatures in West LA or the Basin in general. The value is conservative, but unusual. The SCAQMD prefers that the regional low temperature for the specific area or Basin in general be used for CO hotspots analysis.

RESPONSE 5-8

The Commentor correctly identifies a discrepancy with one of the CALINE4 input parameters, where an ambient temperature of 0.5 C (33 F) was inadvertently used for the model runs. This discrepancy has been corrected, and each of the modeling run scenarios now uses 15.6 C (60 F), as recommended by the SCAQMD (SCAQMD *CEQA Air Quality Handbook*, page A9-31). Table IV.B-6 on page 150 of the Draft EIR has been revised as necessary. The revised CO analysis concluded that localized CO concentrations would not exceed SCAQMD

significance criteria as concluded in the Draft EIR. The revised CALINE4 printout sheets are provided in Section II, Corrections and Additions, of this Final EIR.

COMMENT 5-9

8. The Air Quality Analysis in the Draft EIR presented CALINE4 modeling for the future without project and the future with project plus mitigation. The Final EIR should also include future project without mitigation for comparison. Mitigation should be presented in detail and the impacts from the mitigation on CO concentrations should be discussed in detail.

RESPONSE 5-9

The Commentor correctly identifies this analytical oversight. This oversight has been corrected, and Table IV.B-6 on page 150 of the Draft EIR has been revised as necessary. Based on the revised CO dispersion modeling outputs, all 1-hour and 8-hour CO concentrations would continue to remain below State ambient air quality standards of 20 parts per million (1-hour standard) and 9.0 parts per million (8-hour standard), respectively, as disclosed in the Draft EIR. The revised CALINE4 printout sheets are provided in Section II, Corrections and Additions, of this Final EIR.

COMMENT 5-10

9. The road widths presented in the CALINE4 modeling files for Jefferson Boulevard and La Cienega Boulevard, and Jefferson Boulevard and National Boulevard do not match the road widths in Figures 6 and 17 through 20 in the MTA Bus Maintenance Facility Traffic Impact Study. The project proponent should verify that all road widths used in the Air Quality Analysis are consistent with the Traffic Studies. The CALINE4 modeling files in the Final EIR should be consistent with road widths presented in the Traffic Studies.

10. The geometry (road widths) in the CALINE4 modeling files for Jefferson Boulevard and La Cienega Boulevard are the same for the without project and project model runs. The MTA Bus Maintenance Facility Traffic Impact Study presents various proposed geometries for the project Figures 18 through 20. No discussion of the impact of different proposed mitigated geometries on air quality was found in the Air Quality Analysis in Appendix B or else where in the Draft EIR. The Final EIR should discuss the proposed mitigated geometries and their impact upon CO concentrations at Jefferson Boulevard and La Cienega Boulevard. The CALINE4 modeling files or related discussion should clearly detail which geometry (existing, or specific mitigated geometry) was used for the analysis. The discussions in the Final EIR should also clearly delineate between air quality mitigation and street width mitigation for bus traffic so that the reader is not confused and can clearly understand which is being discussed.

RESPONSE 5-10

The Commentor is correct in identifying these analytical oversights. All such oversights have been corrected (i.e., roadway geometry inputs for the CALINE4 dispersion modeling are consistent with the intersections presented in the MTA Bus Maintenance Facility Traffic Impact Study, and the correct buildout geometries are used when modeling “no project” and “with project” conditions). Table IV.B-6 on page 150 of the Draft EIR has been revised as necessary. Please refer to Section II, Corrections and Additions, of this Final EIR. Based on the revised CO dispersion modeling assumptions, all 1-hour and 8-hour CO concentrations would continue to remain below State ambient air quality standards of 20 parts per million (1-hour standard) and 9.0 parts per million (8-hour standard), respectively, as disclosed in the Draft EIR. The revised CALINE4 printout sheets are provided Section II, Corrections and Additions to this Final EIR.

COMMENT 5-11

11. A generalized discussion on the development of the EMFAC2002 emission factors and the EMFAC2002 modeling output are presented in the Air Quality Analysis in Appendix B of the Draft EIR. The emissions factors used in the modeling appear to be consistent with the ALL category in the EMFAC2002 modeling output. No discussion is provided on emission factors from CNG or alternative fueled buses. The Final EIR should include a detailed discussion of how the emission factors were developed for the CO hotspots analysis, especially focused on how the emission factors were weighted in the project analysis to include the increased non-diesel fueled bus traffic.

RESPONSE 5-11

EMFAC2002 does not provide CNG urban bus emissions factors. As such, the CNG urban bus emissions factors used in the Draft EIR were derived by applying adjustment factors to the EMFAC2002 default urban bus emission factors. Adjustment factors were based on the 2002 Harvard University study, “Diesel and CNG Heavy-Duty Transit Bus Emissions Over Multiple Driving Schedules: Regulated Pollutants and Project Overview.” The emissions calculation worksheet is provided in Appendix B-2 of this EIR.

As detailed in the Traffic Impact Analysis for the proposed Transportation Facility that is provided in Volume IV, Appendix F, of the Draft EIR, project-related bus traffic would represent 0.9 percent and 1.0 percent of the A.M. and P.M. peak-hour intersection volumes, respectively, at the Jefferson Boulevard/National Boulevard intersection. At the La Cienega Boulevard/Jefferson Boulevard intersection, project-related bus volumes would represent 0.4 percent and 0.7 percent of the A.M. and P.M. peak-hour intersection volumes, respectively. There were no A.M. and P.M. peak-hour project-related bus volumes added to any of the remaining analyzed intersections. Due to these negligible vehicle fleet mix weightings, an exercise to develop refined emissions factors was not warranted.

Furthermore, based on SCAQMD evaluation criteria, the foregoing intersections did not warrant a CO hot-spot analysis from the beginning. The SCAQMD recommends a hot-spot evaluation of potential localized CO impacts when volume-to-capacity (V/C) ratios are increased by 2 percent at intersections with a level of service (LOS) of D or worse. As detailed in the above-mentioned Traffic Impact Analysis, a comparison of critical vehicular movements for the “no project” and “with project” scenarios indicates that the maximum V/C increase associated with project traffic at intersections with LOS D or worse would be less than 2 percent. Nevertheless, localized CO impacts were evaluated at each of the three roadway intersections that were evaluated in the Traffic Impact Analysis in order to provide the general public a better understanding of project impacts.

LETTER NO. 6

Los Angeles City Council
Bernard Parks, Councilmember
200 North Spring Street, Room 460
Los Angeles, CA 90012-4873

COMMENT 6-1

The following are comments on behalf of residents of the Baldwin Hills–Leimert–West Adams Community, regarding the Draft Environmental Impact Statement/Environmental Impact Report (“DEIR”) for the MTA West Los Angeles Transportation Facility and the Sunset Avenue Project. Residents are extremely concerned about development plans for the West Los Angeles Transportation Facility, which would bring 175 buses to an area immediately adjacent to residential homes and in an already congested corridor of the City of Los Angeles.

In general, we believe the Project, relocates an undesirable use away from the Venice Beach community to the Baldwin Hills–Leimert–West Adams area. The developer of the Sunset Avenue project, who will develop approximately 225 condominiums, stands to make significant profit from the sale of beach adjacent homes, which are sure to sell in the millions of dollars. At the same time, the bus maintenance yard brings additional noise, traffic and pollution to a predominantly African American neighborhood already plagued by more than its fair share of these problems.

RESPONSE 6-1

The Transportation Facility in Venice is not an undesirable use nor would it be undesirable on the proposed site. Rather, in Venice, it is located in a very undesirable location immediately adjacent to (that is, less than 30 feet) existing residences. The relocation of the Transportation Facility moves the facility from that location to a more desirable location in a light industrial area surrounded by similar light industrial and commercial uses with good arterial access. This comment is not correct in suggesting that the Transportation Facility would be immediately adjacent to residential homes in its proposed location. In fact, the nearest residential uses are located more than 700 feet south of the proposed site. Within the Division 6 service area, few sites are available that have more separation from existing residential uses than this site.

The decision to move the Transportation Facility from the Venice community was independent of the decision to locate it to its proposed location. Specifically, the site selection for the Transportation Facility was based on its central locality within the Division 6 service

area, its potential for improving public transit, and its potential for reducing operating costs. The proposed location for the Transportation Facility is the result of a 20-year effort by Metro to find an appropriate and feasible relocation site within the service area. The Transportation Facility would be beneficial to the Baldwin Hills-Leimert-West Adams area by supporting public transportation services within the area and, as a result, by helping to relieve future traffic in a “congested corridor” within the City of Los Angeles. While all developments cause some change, these aspects of this project should be considered environmentally desirable.

As noted by the Commentor and as analyzed in the Draft EIR, the project would incrementally increase noise levels, traffic volumes, and pollutant emissions. However, based on the City’s significance thresholds, which apply uniformly to all members of the population regardless of race, socio-economic status, age or gender, impacts associated with such changes would be less than significant with incorporation of mitigation measures. This means that no local residents, including those living closest to the site, will experience significant adverse impacts. Therefore, the project would not expose any particular segment of the population to disproportionate and significant impacts with respect to noise, traffic, or air quality. Additionally, the proposed Transportation Facility’s substantial separation from residential uses would, by its very nature, mitigate construction and operational impacts of the project. Please refer to Volume I, Section IV.H, Noise; Section IV.I, Transportation and Circulation; and Section IV.B, Air Quality, of the Draft EIR for a further discussion of noise, traffic, and air quality impacts.

Demographics were not considered in the site selection process for the Transportation Facility. The proposed site was selected based on its central locality and potential for improving public transit and reducing operating costs. Specifically, buses at the facility would provide service on lines operated by the Metro in the Westside/Central Service Sector area. This area encompasses much of the “core” area of Los Angeles stretching roughly from downtown Los Angeles to the Pacific Ocean and Mulholland Drive to Slauson Avenue. Included in the service area are the communities of Baldwin Hills, Crenshaw, Culver City, Mid-City, West Adams, and others. Whenever possible, Metro endeavors to provide service from the closest operating facility so as to reduce dead-head costs. Metro has committed to continue to engage the community and address local concerns throughout the final stages of the project’s planning process.

COMMENT 6-2

In addition, the buses to be serviced within the West Los Angeles Transportation Facility (the “Facility”), will service the areas of Venice, Santa Monica, Malibu, Culver City, Beverly Hills and West Hollywood, and not the local area surrounding the Facility.

RESPONSE 6-2

Buses at the facility could be used to provide enhanced service on lines operated by the Metro in the Westside/Central Service Sector area including some of its busiest routes along Vermont, Western, Crenshaw, La Cienega/Rodeo/Vernon, Florence, Slauson, La Brea, and Venice Boulevard. This Service Sector encompasses much of the “core” area of Los Angeles stretching roughly from Downtown Los Angeles to the Pacific Ocean, and Mulholland Drive to Slauson. In addition to the communities mentioned above, it includes communities closer to the proposed facility including Baldwin Hills, Crenshaw, Culver City, Mid-City, West Adams and others. Whenever possible, Metro endeavors to provide service from its closest operating facility so as to reduce dead-head costs. While such savings are shared by everyone in Los Angeles County, local residents are the immediate beneficiaries.

COMMENT 6-3

On behalf of Baldwin Hills–Leimert–West Adams communities, I oppose this project.

RESPONSE 6-3

The Commentor’s opposition is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 6-4

My perspective on this DEIR is entirely concerned with the health, safety, and quality of life issues that this Project presents to low-income people of color—our members who live and work in the area surrounding the proposed Project. Following careful analysis of the DEIR, I believe that environmental health, safety and environmental justice have not been adequately evaluated by MTA and RAD Jefferson in the DEIR for this Project. Specifically, (1) the low-income, minority community members who will be impacted by construction and operations of the Facility were ignored by both the MTA and RAD Jefferson in their scoping and planning; (2) the DEIR fails to properly analyze the significant environmental impacts inherent in the construction and operation of the Facility; and (3) the significant noise, vibration and traffic impacts generated by operation of the Facility will disproportionately impact minority residents in Central Los Angeles.

RESPONSE 6-4

The Commentor’s appropriate concern for the health, safety, and quality of life of those who live and work in areas surrounding the proposed Transportation Facility site is acknowledged and will be forwarded to the decision-makers for review and consideration. However, it is not appropriate to say that these issues have not been adequately analyzed in the Draft EIR. Environmental health and safety associated with the Project are carefully analyzed in

the Draft EIR. Specifically, health-related impacts are addressed in Volume I, Section IV.B, Air Quality, of the Draft EIR, safety-related impacts are addressed in Volume I, Sections IV.D, Geologic/Seismic Hazards, and IV.E, Hazardous Materials. Other potential impacts regarding health and safety, (e.g., wildfire hazards, flooding, etc.) were evaluated in the Initial Study for the Transportation Facility and were also determined to fall below the thresholds for further consideration in the Draft EIR.

The Draft EIR addressed project impacts to all populations that would be affected. As the project does not cause significant impacts on any population, it follows that there can be no such impacts borne by a particular population. In contrast, it may be noted that the proposed redevelopment at the Sunset Avenue site, as analyzed with the same significance thresholds as development at the Transportation Facility site, would result in significant impacts on local residents there associated with aesthetics, as well as short-term significant impacts on air quality and noise during construction.

Further, members of the local community were not ignored in the scoping and planning process for the proposed project. In accordance with CEQA, several opportunities for public input regarding the Draft EIR for the West Los Angeles Transportation Facility were provided. Specifically, a Notice of Preparation (NOP) requesting input regarding the scope and content of the Draft EIR was distributed to the public in December 2003. In addition, a public scoping meeting regarding the Draft EIR for the project was held on December 16, 2003. The NOP and the notice of public scoping meeting were distributed to numerous agencies, area residents and various organizations. Community comments received during the NOP comment period and scoping meeting were incorporated into the preparation of the Draft EIR and are provided in Appendix A, of the Draft EIR.

Metro's Community outreach activities began in Spring 2003 and have continued throughout. Initially, one-on-one meetings took place with individuals from the closest residential areas and with nearby businesses. As this number grew, it also expanded over time to include meetings or briefings for residential/homeowner associations, neighborhood councils, and business and community associations. Metro staff returned subsequently to formally brief homeowners associations on more than one occasion in Cameo Woods, Blair Hills, Baldwin Hills Gardens and East Culver City. Presentations or briefings have also been provided to a variety of other groups including the Baldwin Hills Village Community in Action Group, West Adams Neighborhood Council, Baldwin Hills Coalition, 100 Black Men of Los Angeles, Los Angeles Urban League, Greater Los Angeles African American Chamber of Commerce, NAACP, Empowerment Congress West Neighborhood Council, and the Culver City Council. In addition, Metro staff met with representatives from numerous businesses in the area. These businesses have been kept informed of the project as it has progressed.

Metro staff also produced four fact sheets to keep the community informed of progress on the proposed project. These fact sheets were widely distributed to the growing database that staff maintains. In Spring 2004, Metro also sponsored a community fair that was held in the parking lot of the adjacent Target Store. New and vintage Metro buses and service vehicles were available for the public to see, as well as information about this project, the Exposition LRT, Metro job and contracting opportunities, and other Metro information. The fair was widely publicized and well attended. Informal contact has taken place on an ongoing basis to keep community leaders informed of specific issues of interest to them.

In the Fall of 2004, Metro took several area representatives on a tour of a facility operated by Long Beach Transit. The intent of this activity was to show the appearance of a newer, modern operating division. Representatives from each of the closest residential associations were invited, along with members of the Community Design Review Committee, leaders of neighborhood councils and members of the Westside/Central Sector Governance Council. Metro has committed to continue to engage the community and address local concerns throughout the final stages of the project's planning process.

With respect to the issue of environmental justice (specifically, impacts on low-income and/or minority residents) raised by the Commentor, there may be some confusion regarding the Draft EIR. In Comment 6-1, the Commentor referred to the document as a Draft Environmental Impact Statement/Draft Environmental Impact Report," (Draft EIS/Draft EIR), which would be a joint document pursuant to both the National Environmental Policy Act and the California Environmental Quality Act. In fact, there is no federal jurisdiction associated with this project and a Draft EIS was neither needed nor required. This distinction is appropriate as environmental justice is an issue under federal law but it generally is not under California law. CEQA Section 15064(d) requires that a Draft EIR analyze the "physical changes in the environment which may be caused by the project." This Draft EIR has analyzed such physical changes irrespective of the demographic character of those who may be affected. As discussed in Response to Comment No. 6-1 above, the project would not have a disproportionate and significant impact on any particular segment of the population. The Draft EIR determined that the project would incrementally increase noise levels and traffic volumes during construction and operation, and that the project would also implement mitigation measures to ensure that such increases would not result in significant impacts to noise (including vibration) and traffic. Mitigation Measures WLA-H.1 through WLA-H.3 would reduce noise levels associated with the Transportation Facility and minimize impacts to sensitive uses (i.e., residences). Additionally, Mitigation Measure WLA-I.1 would require that Work Area Traffic Control Plans be prepared to reduce construction-related traffic impacts. With incorporation of the above mitigation measures, the project would not exceed the City's significance thresholds for noise or traffic. Therefore, project impacts with respect to noise and traffic would be less than significant for all members of the population regardless of race, socio-economic status, and age. Please refer to

Volume I, Section IV.H, Noise and Section IV.I, Transportation and Circulation, of the Draft EIR for a further discussion of noise and traffic.

COMMENT 6-5

As a result of these deficiencies, we request that the construction and operations of the Facility at its currently proposed location not go forward, and further request that all alternatives suggested in these comments be fully explored by MTA staff and consultants.

RESPONSE 6-5

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Specific comments on the Draft EIR and their respective responses are provided below.

COMMENT 6-6

I. MTA and RAD Jefferson Failed to Properly Consider Environmental Justice Issues As They Relate to the Construction and Operation of the West Los Angeles Transportation Facility

Both the California Environmental Quality Act (CEQA) and the South Coast Air Quality Management Board (AQMD) require analysis of the cumulative and disproportionate impacts of a project on neighborhoods with already existing air pollution sources. Second, CEQA explicitly states that an agency must mitigate the social and economic effects of a project with significant environmental impacts. While an analysis of AQMD/AQMP consistency is included within the DEIR, no discussion or analysis of disproportionate impacts occurs. The DEIR indicates that the project would not result in an increase, nor decrease, in mobile emissions to the overall South Coast Air Basin. However, the DEIR admits that, “the project would have the potential to create new, or worsen existing, localized air quality impacts.” Even so, no health risk assessment is to be performed in connection with the construction and operation of the Facility.

RESPONSE 6-6

As noted in Response to Comment No. 6-4 above, the Draft EIR did thoroughly and accurately evaluate the project’s potential impacts on the local population. These assessments took into consideration the cumulative implications of other local projects in addition to the proposed Transportation Facility and employed the City of Los Angeles’ significance thresholds which are applied uniformly across the entire City without regard to the race, color, creed, gender, or age of potentially-affected people. With regard to air quality, all appropriate methodologies and criteria advocated by the South Coast Air Quality Management District were utilized. The Draft EIR concluded that this project would not have unmitigated significant adverse impacts on any local residents or community constituency. An environmental justice issue only arises where significant impacts do occur and are disproportionately distributed

among disadvantaged sections of the general population. Since the project does not have significant impacts upon any population, it cannot have a significant impact on a particular population, and an environmental justice issue cannot arise. A Draft EIR need not analyze economic or social changes resulting from a project, except in such cases where a physical change is caused by economic or social effect of a project. This project represents a physical change that should be expected to have favorable economic and social effects through improved transit service and associated local mobility. These favorable effects are not expected to generate significant adverse physical effects of any kind in turn.

Furthermore, with respect to disclosure of potential health effects of project-related air pollutant emissions, the Commentor has partially quoted the first sentence of the second complete paragraph that appears on page 148 of the Draft EIR. The full quotation is as follows: “During the operational phase of the project, mobile-source air pollutant emissions would have a potential to create new, or worsen existing, localized air quality impacts.” This sentence was included in order to provide the reader with rationale as to why it is necessary to analyze the effect of mobile source emissions on localized air quality. Consistent with methodology recommended by the United States Environmental Protection Agency, California Air Resources Board, South Coast Air Quality Management District, and City of Los Angeles (as documented in the *LA CEQA Thresholds Guide*) mobile-source emissions (i.e. emissions from vehicles associated with the project) were evaluated by analyzing local area carbon monoxide (CO) concentrations at the three roadway intersections that would be most affected by project-related traffic volumes, as CO is considered to be the best indicator for changes in pollutant concentrations attributable to mobile sources. As shown in Table IV.B-6 on page 150 of the Draft EIR, project-generated traffic volumes would have no substantial effect on localized CO concentrations. As such, impacts related to mobile-source CO emissions would be less than significant.

The potential for localized impacts with respect to toxic air contaminant (TAC) emissions were also evaluated in the Draft EIR. As discussed starting in the last paragraph on page 148 of the Draft EIR, a bus depot would generally be the type of facility that would require a health risk assessment (HRA) as a result of diesel particulate matter emissions. However, the new Transportation Facility would have no diesel-fueling capabilities, and, as such, no diesel-fueled buses would operate out of the new facility. Rather, the bus fleet to operate out of the new Transportation Facility would be 100 percent compressed natural gas (CNG) fueled. In addition, Metro has recently adopted a policy to move the entire fleet operating from all of its divisions from diesel to clean-fuel CNG. Metro projects that by 2010, 99 percent of its fleet of approximately 2,500 buses will be fueled by CNG.

The proposed project would include installation and operation of an on-site diesel-fired generator for emergency power generation. Unless a blackout occurs, this generator would be

operated for routine testing and maintenance purposes. The project Applicant would be required to obtain a permit to construct and a permit to operate this standby generator under SCAQMD Rules 201, 202 and 203. Under SCAQMD Regulation XIII (New Source Review [NSR]), the generator would meet Best Available Control Technology (BACT) requirements to minimize emissions of CO, VOC, NO_x, and PM₁₀. BACT standards for diesel-fired emergency generators specify a maximum allowable emissions rate of 8.5 grams of carbon monoxide per horsepower-hour (hp-hr), 1.0 gram of VOC per hp-hr, 6.9 grams of NO_x per hp-hr, and 0.38 gram of PM₁₀ per hp-hr. Sulfur dioxide emissions would be minor since the sulfur content of the diesel fuel would be limited to 0.05 percent by weight under SCAQMD Rule 431.2 (Sulfur Content of Liquid Fuels). In addition to BACT, NSR typically requires offsets if a new source would emit greater than specified quantities of pollutants after implementation of BACT; however, offsets are not required under SCAQMD Rule 1304 (Exemptions) for equipment used exclusively as emergency standby equipment for nonutility electrical power generation provided that the equipment does not operate more the 200 hours per year. Since the use of generator would be infrequent and emergency use of such equipment would comply with all relevant SCAQMD requirements, short-term impacts would be negligible. Re-fueling of the generators would be conducted on-site in accordance with manufacturers' specifications and in compliance with applicable standards and regulations.

Therefore, the new Transportation Facility does not warrant a diesel particulate HRA. No health risk impacts are anticipated to occur as a result of the project, and, as such, project-related air toxic impacts would be less than significant.

Localized impacts were also evaluated with respect to construction-period criteria pollutant and TAC emissions. As discussed on pages 145 and 146 of the Draft EIR, these potential impacts were also concluded to be less than significant. Worst-case maximum on-site emissions for all criteria pollutants would remain below their respective SCAQMD Localized Significance Threshold, and given the relatively short-term construction schedule of 13 months, the project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions and corresponding individual cancer risk. Nevertheless, the Commentor's concern about these issues is respectfully appreciated.

COMMENT 6-7

We have health, safety and other concerns about the proposed Facility. The proposed Facility is directly adjacent to several residential neighborhoods—in close proximity to our backyards, where our children and families reside and play. We believe it would be dangerous and a health risk to build a bus maintenance yard so close to our homes. During construction of the line, our families would have to suffer from the noise, traffic, and air quality problems inherent in any large project. During what is sure to be a long construction period, we would have to breathe in the toxins released by the construction materials, as well as the increased emissions from dust

and diesel vehicles. Once the Facility is built, the daily lives of our families would be altered by having to worry about daily noise, traffic and increased emissions from 175 additional buses in the neighborhood. The accompanying noise and shaking of windows and house structures caused by the buses would destroy our quality of life, and make it impossible for us to enjoy peace and quiet in our own homes.

RESPONSE 6-7

To clarify again, the proposed Transportation Facility is not directly adjacent to several residential neighborhoods but is located no nearer than approximately 700 feet to residential uses, or roughly 35 times further away than the existing Division 6 facility is from its closest residential neighbors. As discussed in Volume I, Section IV.I, Transportation and Circulation, pages 336–339 of the Draft EIR, short-term construction impacts have been analyzed and defined. The analysis of construction related traffic does not reveal new significant traffic impacts, or more severe significant impacts than were discussed in the Draft EIR. In addition, as discussed in Section IV.I.4, Mitigation Measures, pages 353–354, mitigation measures have been recommended to address the construction effects not found to be significant. The proposed project would prepare a Work Area Traffic Control Plan incorporating construction mitigation measures that would be approved by the local agencies prior to the issuance of any construction permits.

Operational traffic impacts were analyzed pursuant to the City of Los Angeles Department of Transportation intersection thresholds, Section IV.I.2, pages 339–344. The intersection capacity analysis does identify several congested intersections during the peak hours; however, the proposed project generates its heaviest traffic flow off peak. Thus, the project's peak-hour traffic volume and associated traffic impacts generated by the proposed facility is less than significant, as defined by the City of Los Angeles' traffic impact criterion. However, a bus routing impact has been identified and discussed on page 354. A mitigation measure for the potential routing impact is to widen Jefferson Boulevard along the south side west of La Cienega Boulevard to accommodate the turning movements of bus traffic and improve the operation of the intersection.

Please refer to Response to Comment No. 6-6, above, for discussion of air quality and health risk impacts during project construction and operations. As discussed therein, and described in detail in Section IV.B, Air Quality, of the Draft EIR, such impacts would be less than significant.

Potential noise impacts due to bus travel along the proposed bus route were evaluated using roadway noise prediction procedures employed by the U.S. Department of Transportation, Federal Highway Administration (FHWA), and Caltrans. Based on City of Los Angeles and City of Culver City significance criteria, potential noise level increases were found to be less

than significant. Please refer to the discussion of roadway noise impacts relative to the proposed West Los Angeles Transportation Facility is provided on pages 308–311 of the Draft EIR.

The potential for ground-borne vibration impacts were evaluated in the Draft EIR on page 313. As stated therein, rubber-tire vehicles, such as transit buses, rarely create ground-borne vibration problems unless there is a discontinuity or bump in the road that causes the vibration. Project-related transit buses would travel along the same roadways (i.e., Jefferson Boulevard and La Cienega Boulevard) that a large volume of heavy-duty vehicles (e.g., 18-wheel commercial trucks, refuse trucks, school buses, transit buses, etc.) already travel every day. If structures along the proposed transit bus route do not currently experience ground-borne vibration impacts due to heavy-duty vehicles that currently travel along Jefferson Boulevard and La Cienega Boulevard, then it is unlikely that they would experience such impacts due to project-related transit bus trips.

COMMENT 6-8

The surrounding neighborhood is predominately low-income and minority. According to new 2000 Census information, our community is 30% African-American and over 47% Latino, with 62% of residents earning under \$50,000 per year. In light of the environmental and community impacts of this project, the failure on the part of the MTA and RAD Jefferson to adequately consider or address these issues is unacceptable. In contrast to our neighborhood, the west side area where the Sunset Avenue portion of the project is to occur has an 68% White population nearly 60% of residents earning \$50,000 or more per year. As a result of this obvious disparity in Project impacts, we feel that the MTA and RAD Jefferson have failed to comply with the requirements of CEQA or AQMD. The draft EIR contains no environmental justice analysis and no discussion of the demographics of who will benefit and who will be burdened by the proposed project.

RESPONSE 6-8

Please refer to Response to Comment 6-6 regarding the relationship of the Transportation Center, its impacts and environmental justice. This comment indicates that the residents living in the greater vicinity of the proposed Transportation Facility have a higher proportion of minority representation and lower average income than their counterparts residing in proximity to the existing Division 6 facility in Venice. However, as indicated in the Draft EIR, no significant impacts associated with the proposed Transportation Facility have been identified.

COMMENT 6-9

II. The DEIR Fails to Properly Analyze the Significant Environmental Impacts Inherent in the Construction and Operation of the West Los Angeles Transportation Facility

Although MTA and RAD Jefferson included noise and traffic evaluation within the DEIR, we do not think that the analysis is adequate or accurate. In spite of the lengthy DEIR MTA prepared for this Project, MTA has not included sufficient analysis of the accompanying noise, vibration, pedestrian safety, or other negative impacts of the proposed non-revenue connector line on our community and our lives.

RESPONSE 6-9

As described in the responses to the previous comments, the Draft EIR provides a thorough and accurate analysis of the potential environmental impacts associated with the proposed West Los Angeles Transportation Facility, pursuant to CEQA and the CEQA Guidelines. Specifically, Chapter IV, Environmental Impact Analysis, of the Draft EIR provides an analysis of each of the potential environmental impacts that were identified in the Initial Study (presented in Appendix A of the Draft EIR).

The noise and traffic analyses, presented in Volume I, Section IV.H, Noise, and Section IV.I, Transportation and Circulation, of the Draft EIR, are adequate and accurate. The noise analysis was based on data collected at the four measurement locations. Potential noise and vibration impacts due to bus travel along the proposed bus route were evaluated using roadway noise prediction procedures employed by the U.S. Department of Transportation, Federal Highway Administration (FHWA), and Caltrans. Based on City of Los Angeles and City of Culver City significance criteria, potential noise level and vibration increases were found to be less than significant.

COMMENT 6-10

It is estimated that the project would generate an average of 1,666 additional vehicular trips per day with 107 morning trips and 103 afternoon trips. Even so, the DEIR indicates that these additional trips will have “no significant impact” on traffic or circulation in this already congested area of Los Angeles. We believe that this analysis is not only inaccurate, but also fails to consider the disproportionate impact of such additional trips on this middle to low income minority community. In spite of these legal requirements, MTA has failed to fulfill its obligations as it relates to the Facility. The Facility, described by MTA as “necessary” in the DEIR, results in unacceptable noise, traffic and pollution to the surrounding neighborhood and creates disproportionate health, safety and welfare risks to surrounding residents.

In addition, this Facility would disrupt our community during what will be a lengthy construction process and as operations commence. None of our construction-related concerns regarding air quality impacts from fugitive dust, diesel truck and machinery traffic have been addressed, nor have operational noise, vibration, public safety and ongoing health risk concerns of the connector line been adequately addressed as part of this DEIR.

RESPONSE 6-10

The traffic analysis is accurate and is based on data derived from the traffic study conducted by Overland Traffic Consultants, a fully registered professional firm. As indicated by the Commentor and as shown in Table IV.I-7 in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR, based on the data collected, the West Los Angeles Transportation Facility would generate 1,666 daily trips with 107 A.M. peak hour trips and 103 P.M. peak hour trips. As stated in the Draft EIR, the determination of whether this increase in trips would have a significant impact on traffic was based upon the significance threshold set forth in the City of Los Angeles *CEQA Thresholds Guide*. This threshold, which was developed by the Department of Transportation, is widely used in the City's environmental review process to assess a project's impacts on traffic. Based on this threshold, the project would not have a significant traffic impact. Therefore, no particular segment of the community (including middle to low income, minority) would be significantly and disproportionately impacted.

Furthermore, the project includes mitigation measures which would be implemented for the project. These mitigation measures would minimize potential noise, traffic, and air quality impacts to the surrounding neighborhood. For example, Mitigation Measure WLA-I.1, which would require the preparation of Work Area Traffic Control Plans, would minimize traffic disruption and impacts during construction of the Transportation Facility. Additionally, as further discussed below, mitigation measures are proposed to reduce air and noise impacts. With implementation of the project's mitigation measures, impacts to the surrounding community would be minimized and less than significant. Please see Section IV., Mitigation Monitoring and Reporting Program, of this Final EIR for the mitigation measures.

Pursuant to CEQA and the CEQA Guidelines, the Draft EIR provides a description of the project, including a discussion on why the project is proposed. However, the Draft EIR does not declare that the project is "necessary." Such determination is made by the appropriate decision-makers during the environmental review process.

With regard to the Commentor's statement that "none of our construction-related concerns regarding air quality impacts from fugitive dust, diesel truck and machinery traffic have been addressed...." as shown in Appendix A, Volume I of the Draft EIR (Notice of Preparation, NOP Comments, and Initial Study), no NOP Comment Letter or Written Comment Form was submitted by the Commentor that expressed such concerns. In addition, the Commentor/Commentor's Office provided no public testimony at the Scoping Meeting held on Tuesday, December 16, 2003. Nevertheless, construction-period impacts on air quality associated with development of the Transportation Facility were fully discussed on pages 144–146, and 162–164 of Section IV.B, Air Quality, of the Draft EIR. The impact analysis specifically addressed fugitive dust emissions, diesel haul-truck emissions, and diesel-powered on-site heavy machinery emissions, among other emissions sources. In addition, Mitigation Measures WLA-B.1 through

WLA-B.4 are prescribed to reduce emission levels and minimize impacts on the surrounding community. With implementation of these mitigation measures, construction-period air quality impacts would be less than significant, based on SCAQMD and City of Los Angeles (as documented in the *LA CEQA Thresholds Guide*) evaluation criteria. Nonetheless, it should be noted that the facility would be completely surrounded with block and QUILITE walls on the north, west, and south, and would be bounded by the building on the east side. This wall would reduce potential sound and dust impacts.

In addition, operational noise, ground-borne vibration, public safety, and ongoing health risk concerns of the connector line were adequately addressed in the Draft EIR. Potential noise impacts due to bus travel along the proposed bus route were evaluated on pages 308–311 of Section IV.H, Noise, of the Draft EIR using roadway noise prediction procedures employed by the U.S. Department of Transportation, Federal Highway Administration (FHWA), and Caltrans. Based on City of Los Angeles and City of Culver City significance criteria, potential noise level increases were found to be less than significant. While no significant impacts were identified, the project does include mitigation measures as requested in the Motion by Supervisor Yvonne B. Burke and approved by the Metro Board of Directors (this Motion has been included as Appendix H-1 in the Draft EIR).

Please refer to Response to Comment No. 6-7, above, for discussion of ground-borne vibration impacts during long-term project operations.

With respect to ongoing health risk concerns, the potential for localized impacts due to toxic air contaminant (TAC) emissions was also evaluated in the Draft EIR. As discussed, starting in the last paragraph on page 148 of the Draft EIR, a bus depot would generally be the type of facility that would require a health risk assessment (HRA) as a result of diesel particulate matter (DPM) emissions. However, the new Transportation Facility would have no diesel fueling capabilities, and, as such, no diesel-fueled buses would operate out of the new facility. The bus fleet to operate out of the new Transportation Facility would be 100 percent compressed natural gas (CNG) fueled. In addition, Metro has recently adopted a policy to move the entire fleet from diesel to clean-fuel CNG. Metro projects that by 2010, 99 percent of its fleet of approximately 2,500 buses will be fueled by CNG. As such, the new Transportation Facility does not warrant a diesel particulate HRA. No health risk impacts are anticipated to occur as a result of the project, and as such, project-related air toxic impacts would be less than significant.

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 6-11**A. The Noise, Vibration and Traffic Impacts on the Surrounding Neighborhoods Have Not Been Sufficiently Analyzed**

We find the noise mitigation proposed in the DEIR completely inadequate because of the increased dangers that the proposed Project presents to the health of local residents, particularly children. Also, we note that the projected decibel levels are highest in that same area. As required by federal law and DOT regulations, we request further clarification and demographic analysis, including racial and ethnic data of residents as well as median household income, of who would be negatively impacted by operation of the Facility. We look forward to reviewing such information in the final environmental impact report.

RESPONSE 6-11

Noise (including vibration) and traffic impacts have been adequately and accurately analyzed in the Draft EIR. As indicated in Response to Comment No. 6-9, above, the noise analysis was based on data collected at the four measurement locations. Potential noise and vibration impacts due to bus travel along the proposed bus route were evaluated using roadway noise prediction procedures employed by the U.S. Department of Transportation, Federal Highway Administration (FHWA), and Caltrans. Based on City of Los Angeles and City of Culver City significance criteria, potential noise level and vibration increases were found to be less than significant.

The traffic analysis was also adequate and based on data derived from the traffic study conducted by Overland Traffic Consultants, a fully registered professional firm. As shown in Table IV.I-7 in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR, based on the data collected, the West Los Angeles Transportation Facility would generate 1,666 daily trips with 107 A.M. peak hour trips and 103 P.M. peak hour trips. As stated in the Draft EIR, the determination of whether this increase in trips would have a significant impact on traffic was based upon the significance threshold set forth in the City of Los Angeles *CEQA Thresholds Guide*. This threshold, which was developed by the Department of Transportation, is widely used in the City's environmental review process to assess a project's impacts on traffic.

In addition, no significant noise impacts were identified relative to the proposed West Los Angeles Transportation Facility (point-source noise) or the proposed bus route (mobile-source noise) along Jefferson Boulevard, National Boulevard, and La Cienega Boulevard. As such, project-generated noise levels would pose no danger to the health of local residents.

Please refer to Response to Comment No. 6-7, above, for discussion of ground-borne vibration impacts during long-term project operations. Also, please refer to Responses to

Comments 6-7 and 6-6 regarding the issue of environmental justice. Metro has committed to continue to engage the community and address local concerns throughout the final stages of the project's planning process.

COMMENT 6-12

V. Conclusion

We believe that under environmental justice and environmental quality laws, MTA and RAD Jefferson have failed to adequately analyze or address the impacts of this project. In spite of our comments, some may argue that because the homes at issue here are located near an industrial area, the residents nearby have somehow acquiesced to a more polluted environment. Such an argument is simplistic and unfair. Simply because the residents affected here are low-income and minority populations, living where housing is affordable, does not mean that they have implicitly waived their right to the environmental quality of their communities. In fact, the demographics and location of the affected population near the Facility argue otherwise. Because such populations have for years been denied the opportunities to impact the decisions that affect their day-to-day quality of life, their environmental and economic vitality should be protected that much more fiercely. This is a classic case environmental injustice wherein undesirable uses are being transferred away from predominantly white and wealthy communities to predominantly middle and low-income communities of color.

RESPONSE 6-12

The Commentor's deeply held convictions expressed in this comment regarding the rights of low-income and minority populations to environmental quality in their communities are recognized and affirmed. However, those widely held convictions do not mean that the proposed Transportation Facility will have impacts that the Draft EIR did not identify. The environmental impacts associated with the project were adequately addressed and analyzed in the Draft EIR. The environmental analysis presented throughout Chapter IV, Environmental Impact Analysis, were based on the City's significance thresholds, which apply to all members of the population regardless of race, socio-economic status, gender, and age. As analyzed therein, the project's environmental impacts were each determined to be less than significant, in some instances with incorporation of the mitigation measures as provided in Section IV., Mitigation Monitoring and Reporting Program, of this Final EIR. Therefore, the project will not expose any particular segment of the population to disproportionate and significant impacts.

As discussed in Response to Comment No. 6-1 above, demographics were not considered in the site selection process for the Transportation Facility. The proposed site was selected based on its central locality, potential for improving public transit, and reduced operating costs.

However, Metro will continue to engage the community and address local concerns throughout the final stages of the project's planning process.

COMMENT 6-13

We expect and hope that the MTA and cooperating federal agencies will hold this Project to the highest environmental justice standards.

RESPONSE 6-13

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Please refer to Response to Comment Nos. 6-4, 6-6, and 6-12, above, regarding federal requirements and their relationship to the proposed project.

LETTER NO. 7

Ira Koslow
33 Park Avenue
Venice, CA 90069

COMMENT 7-1

I have to strongly disagree with most of the conclusions of the EIR as summarized in the October 21, 2004 Notice of Completion and Availability of Draft EIR No. ENV-2004-1407-EIR. Diluting the impact of this enormous gated community down to a problem of aesthetics is ridiculous. This summary completely ignores the long-term impact of 225 units plus 10,000 feet of commercial use space plus parking for 676 cars on acreage that currently supports 85 units on adjacent streets, on the traffic patterns and parking conditions in Venice.

RESPONSE 7-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The Sunset Avenue Project's potential impacts have been thoroughly analyzed in Volume I, Chapter IV, Environmental Impact Analysis, of the Draft EIR. Specifically, Section IV.I, Transportation and Circulation, analyzes the project's impacts on traffic through the year 2006. As discussed therein, on weekdays, the project would generate 1,168 net new daily trips and would significantly impact two intersections during the P.M. peak hours: (1) Main Street and Rose Avenue; and (2) Main Street and Sunset Avenues. On Saturdays, the project would generate 1,417 net new daily trips and would significantly impact one intersection: Rose Avenue and Lincoln Boulevard. However, with implementation of mitigation measures, impacts would be reduced to less than significant. Section IV.J, Parking, analyzes the project's impacts on parking. With the construction of the subterranean parking garage and the dedication of on-street parking along Sunset Avenue, the project would not have a significant impact on parking.

COMMENT 7-2

There are no major east/west thoroughfares now and with the proposed Pioneer bakery expansion on Rose Avenue, that street is going to be completely unavailable with the completion of that project. Did anyone bother to drive down Pacific Avenue after 3:30 P.M. on any day of the week? This new traffic jam caused by the spillover from Playa Vista was never clearly researched for that project and now traffic problems are being completely ignored again.

RESPONSE 7-2

Field checks and investigations were conducted in the study area as part of the preparation of the traffic study. The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 7-3

I will now go through my objections to the report itself:

Volume I

Page 10 - E.1.a.2. "Aesthetic character" The main aspect that a gated community is being plopped down in an area of individual residences is completely ignored. Also RAD has already built aluminum looking monstrosities (excuse me "artists lofts") on Main Street south of Sunset. These buildings reflect sunlight with an awful glare and magnify greatly any sounds on the street.

RESPONSE 7-3

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. With regard to the reference to the project as a "gated community," the project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access.

As discussed in Volume I, Section IV.A, Aesthetics, page 119, of the Draft EIR, the Sunset Avenue project would not use highly reflective materials that would cause unusual glare, and buildings would be fronted with landscaping that would further reduce potential glare. Therefore, impacts relating to illumination, and noise would be less than significant.

COMMENT 7-4

When a motorcycle passes, the noise is deafening. This lack of respect for the environment is appalling and to allow this type of construction, which is an assault on the senses, is inexcusable.

RESPONSE 7-4

This comment does not introduce new environmental information or directly challenge information presented in the Draft EIR. Therefore, further response is not necessary. The

comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 7-5

The height requirements are in place for a very good reason especially on coastal areas. Rescinding these requirements will make for an awful skyline. We now can look from the beach to the mountains and this change will do away with this outlook completely. To destroy our scenic views for the profit of a few is not aesthetically pleasing to the residents of Venice.

RESPONSE 7-5

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As discussed in Volume I, Section IV.A, Aesthetics, of the Draft EIR, the project would exceed the recommended height limits set forth by the Specific Plan. However, potential impacts on scenic views would be less than significant. Specifically, the one notable view resource, the Pacific Ocean, lies outside of the project's viewshed, and the project would not obstruct existing views of that resource. In addition, as discussed in Section IV.A, Aesthetics, of the Draft EIR, views over the project site from private vantages are limited due to level terrain, intervening development, and low elevations of surrounding buildings from which views may be accessible. A few private locations that are elevated can see over the site to the urban setting beyond. Project impacts on views from private locations as may occur would be limited to a few locations and would be of a type that regularly occurs with infill development in an urban setting where one private party's "view" is through the buildable space of another private party's property.

COMMENT 7-6

The current bus yard has no pedestrian traffic allowed and all beach goers have to go around the bus yard to and from the beach. The residents of the gated community will be coming out their gates and walking down our streets. There is no community traffic allowed in the gated community. We will all have to walk around their community to go to Main Street as we do now. How about mitigation that opens walk streets through the project so the community can share in the experience of their life style as they share in ours.

RESPONSE 7-6

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As discussed in Response to Comment No. 7-3, no adverse environmental impacts will result with respect to pedestrian circulation as the project is currently not fully accessible for pedestrian access. Neither of the street segments adjacent to the project site, Sunset Avenue and Thornton Place is designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a).

COMMENT 7-7

Pages 36-42 – Land Use – The Specific Plan adopted in Venice reduced the residential density on the North Beach area of Venice. This was done to increase access to the beach area for residents of the entire city. This reduction in density was also a life style decision of the community. To now allow RAD to more than triple the density and take profit from a decision made by the Venice community is deplorable. The formulas used in the report starting with some high figure of 171 units and then increasing by 10% and 25% to arrive at 231 units is a farce. The current adjacent walk-street housing count for an area slightly larger than the bus yard is 85 single-family dwellings. Adding 10,000 feet of commercial space and 600+ parking spots to the 231 units makes the conclusion of the report, that there is no significant land use problem, a farce.

RESPONSE 7-7

The Sunset Avenue Project site is currently zoned M1 by the City of Los Angeles Municipal Code. The Applicant is applying to change the zoning designation from M1 to CM consistent with the Venice Local Coastal Specific Plan. Section 10.F.2.b of the Venice Local Coastal Specific Plan provides that the residential density on any commercially zoned lot in the North Venice Subarea shall not exceed the residential density permitted in the R3 zone. Section 12.10C.4 of the City of Los Angeles Municipal Code provides that the minimum lot area per dwelling unit in the R3 zone shall be 800 square feet. The lot area of the Sunset Avenue Project site is 136,618 square feet. Thus, the maximum allowable residential density that can be developed on the site as a matter of right is 171 units. Section 12.22A.25 of the Los Angeles Municipal Code provides that housing developments that provide either 10 percent of the number of dwelling units for very low income households or 20 percent of the dwelling units for low income households and which are located within 1,500 feet of a bus stop along a major bus route are eligible for a density bonus of up to 35 percent as a matter of right. The Applicant proposes to provide 10 percent of the dwelling units as affordable to very low income families. Moreover, Main Street and Pacific Avenue are both major bus routes with bus stops located within 1,500 feet of the project site. The project is therefore eligible for a density bonus of up to 35 percent as a matter of right, increasing the allowable number of dwelling units on the project site to 231 units. The project is not proposing more than triple the permitted density as suggested by the Commentor.

COMMENT 7-8

Page 42 – Noise – You address only construction noise in the report. Once again the specifics of the RAD aesthetic are being ignored. Their structures on Main Street currently amplify the noise on the street to unbearable levels. Your report talks in the abstract, there is a specific model to look at on Main Street south of Sunset, on the east side of the street.

RESPONSE 7-8

The Commentor's statement that only construction noise is addressed in the Draft EIR is incorrect. The Draft EIR addresses existing (baseline) noise levels, future "no project" noise levels, and future "with project" noise levels at both the Sunset Avenue and Jefferson Boulevard project site locations. The Commentor's assertion that noise is analyzed in the "abstract" is also not correct. As discussed on pages 291 through 294 in the Draft EIR, the baseline noise levels established in the Draft EIR were based on ambient noise monitoring conducted on and around the proposed project site. Any acoustic characteristics that may relate to the aesthetics of structures located on Main Street south of Sunset Avenue, on the east side of the street are included in the noise measurement data collected at measurement location R1 (see Figure IV.H-4 on page 293 of the Draft EIR). A summary of the ambient noise measurement data collected at measurement locations R1 through R4, as depicted in Figure IV.H-4, is provided in Table IV.H-4 on page 295 of the Draft EIR. As discussed in detail in Section IV.H, Noise, of the Draft EIR, noise impacts associated with operation of the Sunset Avenue Project would be less than significant.

COMMENT 7-9

Pages 46-52 – Transportation and Circulation – The report completely ignores the increased traffic generated from the increased density of the land use. All of the mitigations deal with repainting intersections to allow for left turn lanes. What about the increase in general traffic that will back these left turn lanes into the general flow of traffic? There are no major east/west streets near the Sunset/Thornton/Main/Pacific rectangle. All the increased traffic will flow down Rose or Brooks, which are both narrow two lane streets. Adding a left and a right turn lane on Rose will have no mitigation of any traffic problem now encountered, or the drastic problem in the future when the Pioneer Bakery property is turned into a mini-mall with residential units.

RESPONSE 7-9

The report does not ignore increased traffic. As set forth in Volume I, Section VI.1, Transportation and Circulation, of the Draft EIR, the project would generate approximately 1,168 net new daily trips on weekdays and 1,417 net new daily trips on Saturdays. As discussed on pages 358–359 of the Draft EIR, the mitigation measures for the project consist of restriping intersections, installing smart pedestrian crossings, driveway turn-restrictions, monetary contributions to transit improvements along Lincoln Boulevard and the payment of the Transportation Impact Assessment Fee pursuant to the Coastal Transportation Corridor Specific Plan. The cumulative impact analysis includes the proposed Pioneer Bakery project located on Rose west of Lincoln Boulevard (related project number 21). The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 7-10

The EIR for that project will also be a developer's dream that ignores all the real problems by putting mitigations in place that look good on paper but are useless in real life. Another neglected problem is the traffic on Pacific that has recently turned into a nightmare with the completion of Phase I of Playa Vista. After Sawtelle filled up, then Centinela filled up, then Lincoln filled up, Pacific became the last natural mitigation for the overflow. With the Sunset Avenue Project traffic added in, the situation will become impossible.

RESPONSE 7-10

The comments are acknowledged and will be forwarded to the decision-makers for review and consideration. The traffic analysis for the project, presented in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR and Appendix F, Traffic Study, includes traffic that would be generated by related projects in the area, as well as traffic that would occur due to the cumulative effect of small projects, unknown projects at the time of the issuance of the NOP and for the growth due to large projects located outside of the study area. The related projects list is shown on Table III-2 and Figure III-2 on pages 92 and 94 of Volume I of the Draft EIR. The Playa Vista projects are included in the list and were considered in the analysis of traffic impacts.

COMMENT 7-11

It is practically impossible to make a southbound turn onto Pacific from Sunset now. Is it suggested that the egress on Sunset only be allowed to go north as well as the egress from Main Street only allowed to go south.

RESPONSE 7-11

Left-turns from Sunset Avenue may be difficult at peak time periods when cross traffic flows are heavy but adjacent traffic signals provide gaps in traffic flow for left-turn movements. Left-turn access restrictions are usually installed at high volume locations where excessive delays are created. The proposed residential project is not a high volume traffic generator that warrants left-turn restrictions. Numerous access points along the major streets in this area allow left-turns which can be easily negotiated during off peak hours.

COMMENT 7-12

Who is going to enforce these rules? Are the police now going to waste their time on the traffic jams created by poor planning and over development?

RESPONSE 7-12

The Mitigation Monitoring and Reporting Program (MMRP), which is included in Section IV of this Final EIR, identifies the enforcement agency(ies) for each mitigation measure proposed in the Draft EIR. As shown, Mitigation Measures WLA-I.1, WLA-I-2, and Sunset-I.1 through Sunset-I.8, which address traffic impacts, would be enforced by the City of Los Angeles Department of Transportation and Department of Public Works.

COMMENT 7-13

The left or right turn only signs are routinely disobeyed and the resulting horn honking is another noise problem ignored in the report.

RESPONSE 7-13

Any horn honking that may currently take place as a result of disobeyed left or right turn only signs would be considered part of the existing baseline noise environment, and noise from such activity would have influenced the baseline ambient noise measurement data that was collected on and around the proposed project site. Please refer to Response to Comment No. 7-8, above, for discussion of baseline ambient noise measurements. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 7-14

The only mitigation for this problem is to limit the project to the current density of the given acreage, 85 units with included walk streets and alley ingress and egress.

RESPONSE 7-14

This comment is addressed in Response to Comment Nos. 7-7 and 7-13, above. As indicated therein, the permitted density of 231 units has been calculated in accordance with the requirements of the City of Los Angeles Municipal Code. Additional mitigation for project impacts associated with density is not required.

COMMENT 7-15

Page 53-56 "Parking" The parking that the project will provide for the residences and commercial space seems adequate but what of the street parking. The claim is that only 4 spaces will be lost on Rose Avenue. This does not take into account the lost spaces on Main Street on the west side of the street due to the ingress and egress from the project. Has the report looked at the driveways and entrance lanes necessary to keep traffic flowing smoothly. What of the spaces on Pacific? With the added traffic flow from Sunset and the newly reopened Thornton, are we guaranteed continued parking on Pacific from 8:00 P.M. to 8:00 A.M.? Will the developers

demand an after the fact discontinuation of this free parking when they realize that their poor planning has wreaked havoc on the traffic flow into and out of their gated community.

RESPONSE 7-15

The project does not propose changing the free on-street parking by the installation of parking meters. The project can not guarantee that the on-street parking will remain free. The City of Los Angeles conducts studies and determines where and when parking meters are to be installed upon the approval of the City Council. The description of existing street parking on page 367 of Volume I of the Draft EIR has been revised to indicate that the project would cause the loss of nine existing street parking spaces (rather than seven) and would result in a net benefit of five street parking spaces (rather than seven). Please refer to Section II, Corrections and Additions, of this Final EIR for the revision.

COMMENT 7-16

I have lived in Venice for 35 years and lived in the same house on Park Avenue for 32 of those years in peaceful coexistence with the bus yard. I look at the Sunset Avenue Project as an all out assault on my lifestyle and the lifestyle of all my neighbors in Venice. The developers have seen a Golden Goose here and are trying to take advantage of an environment that has been carefully created and maintained over the years by the Venice community. To place a 56-foot high gated community in the middle of this community is criminal. The fact that the MTA is willing to give this gift to a private development company does not mean that we have to idly stand by and let ourselves be ripped off of our community values. No amount of mitigation can make up for this type of loss.

RESPONSE 7-16

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As described in Section IV.A, Aesthetics, of the Draft EIR, maximum building heights would range from 31 to 56 feet, with the taller buildings oriented toward the interior of the project site.

COMMENT 7-17

P.S. I am a teacher at LACES, which is very near the proposed West Los Angeles Transit Facility, and I frequently travel on La Cienega Boulevard south of Venice. The traffic is so horrible on that street that I can't imagine anyone in his or her right mind putting a bus depot there. Whatever the report says and whatever mitigations are put in place, this is a horrible mistake that will make itself obvious if the project is approved.

RESPONSE 7-17

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 8

James Murez
804 Main Street
Venice, CA 90291

COMMENT 8-1

The comments contained herein were based on the published Acrobat PDF file located at <http://cityplanning.lacity.org/EIR/MTAWestLASunset/DEIR/issues/>. Because of the tremendous amount of material that was presented in the four volumes and the very small amount of time provided to review the material, I was unable to comment on the entire document.

All of these comments to date were made in reference to the first volume “vol_I.pdf”. The page numbers called out in my comments reflect the numbers Acrobat assigned to the published document and not those contained on the pages if they were printed themselves.

Furthermore, I would like to mention that all of the published Acrobat files were password protected. This caused a great deal more work on my part to be able to comment on the material. The entire process of commenting with the tool used to present the material was disabled as a result of the password protected mode. This meant that I was unable to highlight, copy and paste sections into my comments but instead had to re-type the material or create incomplete sentences in order to save the time to re-type the entire thought. This is not how Adobe who created the Acrobat tool intended it to be used when the original document is published for comment.

RESPONSE 8-1

The electronic posting of the Draft EIR is not required by the California Environmental Quality Act (CEQA). Posting of the Draft EIR on the City’s website was voluntary and provided as a convenience for the public. In addition, the website also disclosed that the official Draft EIR was made available at the following locations: City of Los Angeles Department of Planning, 200 North Spring Street, Room 763, and 14 local libraries. Furthermore, as with many pdfs published on the Web, the electronic version of the Draft EIR was intended for public viewing, not editing. Certain protections must be included so that the content of the document cannot be altered and to protect the integrity of the document. The Draft EIR page numbers are printed within each page, as it is displayed on the website.

COMMENT 8-2

Alternate location for the WLA MTA is the end Marina Freeway (90) on State owned land that is designated for transportation uses. This site is located at the end of a freeway which would give

MTA easy access to cross town locations. It is also located along Lincoln Blvd (US #1) on the west end and Culver Blvd on the east end. Both of these major boulevards would greatly increase access to major bus routes without impacting and residential neighborhoods. This location is currently considered excess land by Caltrans. The site is approximately 10 acres. Furthermore, this site would allow MTA to jointly use the site for a bus terminal and also a bus maintenance yard. This site would fit into a much larger plan that would server the general public in a regional beneficial way far greater that the site on Jefferson. It could not only house a [sic] these uses, there is enough space to also provide a huge Park-N-Ride use.

Finely, [sic] if these reasons are not compelling enough to use this alternate site, consider that the Exposition Blvd right-of-way connects to Culver Blvd at Roberson Blvd and at this intersection the MTA is planning to build a light rail terminal. From that terminal it is only logical to connect the airport (GreenLine) by traveling down Culver Blvd to Lincoln, past Marina Del Rey and Playa Vista and LAX. This alternate site would be exactly in the path of this route and therefore be a very logical location for a major MTA site. And if for no other reason, consider the cost impact to the MTA who could aquire this land from the State at a fraction of the cost of the Jefferson Blvd Site.

RESPONSE 8-2

Pursuant to CEQA Guidelines Section 15126.6(a): “An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly accomplish most of the basic objectives of the project but would avoid or substantially lessen one or more of the significant effects.... An EIR need not consider every conceivable alternative to a project.” Project development at the above referenced site is speculative and therefore, does not warrant its own analysis within the Draft EIR. Furthermore, locating the project at the above referenced site would not meet the project objective of expanding Metro service from a centralized location.

Metro is looking to the proposed facility and site to support service within the Westside/Central Service Sector area encompassing much of the core of Los Angeles stretching roughly from downtown to the Pacific Ocean, and from Mulholland Drive to Slauson. The site proposed in this comment is even further south and west than the facility in Venice that Metro is seeking to leave in part because it is located too much on the edge of the service area. The Jefferson site is more centrally located in the service sector territory and closer to numerous heavily traveled bus routes. The comment provides no information as to the actual cost of the land by the Marina Freeway however, this would only be part of the calculation. Metro must also consider the long-term operational costs of any new facility. The Jefferson site, due to its more-central location, should have lower overall operating costs as it is closer to service lines.

It is true that the Metro is currently planning to construct the Exposition Light Rail Line not far from the Jefferson facility. Metro is also evaluating options for enhanced transit options along Crenshaw. However, Metro's currently adopted long range and short range plans do not include any dedicated alignment along the Culver/Lincoln route mentioned in the comment.

COMMENT 8-3

2. Alternate F. Pg 21 Assumes the entire site as commercial would result in a negative impact on the surrounding community and an increased traffic. This is not true but depends on the commercial use. Example, the site is zoned M1 and therefore could also house a boat yard which generates far less impact than any of the suggested uses. A boat yard just two blocks would meet coastal access needs. A multi-story parking garage with a recreational park on the top story and commercial shops on the Main Street side would also generate less daily traffic and provide far more coastal access.

RESPONSE 8-3

As described in Volume I, Chapter V, Alternatives, of the Draft EIR, the Alternative F: Alternative Use/Commercial Development alternative assumes that the site would be developed with a variety of commercial uses, the majority of which would likely be retail. This alternative is based on a reasonable commercial development scenario that would likely be developed. The retail uses under this Alternative would generate an increase in traffic when compared to the proposed Sunset Avenue Project.

As indicated in Response to Comment No. 8-2, CEQA Guidelines Section 15126.6 states that "an EIR need not consider every conceivable alternative to a project." Development of the site for use as a boatyard is highly speculative and therefore, does not warrant its own analysis within the Draft EIR. Furthermore, while the site is located within the coastal zone, the site is not readily accessible to marine facilities. Therefore, the site is not considered a preferred site for a boatyard. In addition, development of a public parking structure is similar to the active or passive open space alternative described in Section V.J, Other Alternatives Considered, which was considered and rejected since no public or private entity has expressed an interest in acquisition of the site for such a use. Furthermore, neither of the alternatives proposed within this comment would meet the basic objectives of the proposed project.

COMMENT 8-4

Further this alternate describes how it would not conform to surrounding uses nor maintain the historic character of the neighborhood. This could not be farther from the truth. This site as far back the [sic] as the 1800's has always been used for commercial uses and now proposing that it should become residential is changing the very zoning mix that makes Venice such a unique place.

The properties along Sunset and Thornton have always been impacted by a commercial use on this site. Any new development should be sensitive to the residents on these two abutting streets.

Having a commercial use on this site employs people. There are very few sites in Venice that have the ability to create subterranean parking and therefore accommodate commercial uses.

RESPONSE 8-4

As discussed in Response to Comment No. 8-3, above, use of the site for solely commercial uses was evaluated as part of the alternatives analysis within the Draft EIR. As discussed in Volume I, Section IV.G, Land Use, page 277, of the Draft EIR, the mix of residential and commercial uses for the Sunset Avenue Project is intended to be consistent with the existing development patterns in the vicinity. Specifically, the project would include approximately 10,000 square feet of ground-floor commercial uses along the Main Street frontage, consistent with the existing commercial uses which line this street. In addition, along the Pacific Avenue frontage, the project's residential uses would extend the residential land use pattern currently existing on this street. In addition, a subterranean parking facility would be constructed on-site to provide 676 parking spaces to meet the project's parking needs. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-5

3. Alternate G. pg 23 Assumes the developer must make as much money as possible to make this project feasible. This is not true and very out of character for a public entity like the MTA who is a joint partner in this project. If at the end of the day both sites were created and no profit was generated other than serving the communities in which these projects exist, I for one would be much happier.

RESPONSE 8-5

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. An objective of the project is to maximize the value of the property. As such, this objective was appropriately considered in the alternatives analysis in accordance with CEQA Guidelines Section 15126.6.

COMMENT 8-6

4. Of the alternates explore none for the Sunset project on pages 20 through 23, consider the existing uses along Main Street between Rose Ave. and Brooks. Although this developer has just completed a project directly across the street on Main St. called the Venice Art Lofts, this project was a CUP down zoning a M1 site to a mixed-use project which has only 3000 sq. ft. of commercial and 40+ residential units. The Art Lofts site is about 40,000 square feet. The prior

use of this site before the Art Lofts project was a small movie production studio. Located at 615 Main St. which is also across the street and next door to the Art Lofts site, the same developer was recently permitted to down zone M1 to again all residential uses another site which is about 40,000 square feet. The prior business on this site was a lumber yard and a parking lot. The combined reduction of commercial or light industrial uses in this area by this developer has been huge already. In just these two projects the commercial space along main street has decreased by 97.25 percent. If the reduction in commercial area from this project is considered in addition the total combined area from Rose to Brooks those numbers would be even greater.

The Venice Local Coastal Program, Land Use Plan (LUP) describes the project site as the North Venice Area (exhibit 2a). The LUP defines the entire area of Venice includes approximately 53 areas of industrial land. This site consists of 9.4% of the total in light industrial land Venice and reducing the zoning from M1 to R3 within the North Venice area will have a tremendous [sic] effect on the overall land mix. This will also be very inconsistent with the guidelines of the LUP or the LA City General Plan.

Preservation of existing industrial land uses and employment opportunities, appropriate use of railroad right-of-ways

RESPONSE 8-6

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As discussed in Volume I, Section IV.G, Land Use, of the Draft EIR, Policy I.C.7 of the Local Coastal Program Land Use Plan indicates that priority uses for future development of the site include affordable housing, which may be a mixed-use residential-commercial project, and public parking structure as a measure to improve public access. The proposed Sunset Avenue Project would be consistent with this policy by providing a mix of uses including 225 residential units, 17 of which would be affordable housing units, 10,000 square feet of commercial use, as well as the provision of 561 parking spaces for the proposed residential and commercial uses in accordance with LAMC requirements and 71 parking spaces required by Beach Impact Zone regulations. In addition, approximately 44 parking spaces could be used to provide fee parking for surrounding uses.

With regard to zoning, project implementation would require the redesignation of the existing zoning for the site from M1 (limited manufacturing) to CM-1 (commercial use) consistent with the Specific Plan. The project's proposed CM-1 zoning would still allow a range of commercial and limited manufacturing uses, but would also allow residential uses on the site.

COMMENT 8-7

Section E on pg 24 Describes the west Los Angeles Transportation Facility. It is incorrectly described because it use is the same as that which is now in Venice which has long been referred to as the Bus Maintenance Yard. A transportation facility implies that it is a place of transportation where people can obtain a ride to another place. So unless I'm missing something big, this site is going to be closed to the general public and the only transportation use that is going to exist is when the bus drivers enter and exit the maintenance facility.

It is a waste of resources to build a single use facility. A transportation facility should not be located in some remote location but rather in the hart [sic] of things. It should allow people to ride local forms of transportation to it where they can change to higher speed and less local forms of transportation. It should also provide a home where MTA workers can service the buses as needed.

RESPONSE 8-7

The West Los Angeles Transportation Facility is proposed as a component within the overall framework of facilities and transportation centers within Metro's overall system for public transportation. The facility has not been designed as a facility for public use, and will only be used for storage, maintenance, and operation of Metro buses by Metro personnel. Such facilities are not open to the public for safety reasons. No consideration for a customer service center or ticket vending location has been designed into the project, as there are already several locations and methods available for purchase of fare media, lost and found, customer information, etc., within the project vicinity. Therefore, the addition of customer service functions at the proposed facility would be duplicative and unnecessary. Specifically, Metro already has six customer service centers throughout Los Angeles County, two of which are located within the project vicinity (5301 Wilshire Boulevard and 3650 Martin Luther King Boulevard). At these locations, customers can receive general information, bus schedules, purchase fare media, check lost and found, as well as other customer service functions required. Metro also maintains a network of 850 fare media providers across the county, in locations such as Ralphs, Cash it Here, Nix Check Cashing, Money Mart, and various other businesses. Eight of these locations are located within the immediate vicinity of the proposed Transportation Facility, and directions/addresses can be obtained on the Metro website. Passes and other fare media can also be purchased through the Metro website and directly through the mail. Customer information for bus and rail transit usage, such as routes and schedules, can be obtained through the Metro website, 1-800-COMMUTE, or the Customer Service centers.

As described in the Draft EIR, the Exposition Light Rail Transit system will pass nearby to the proposed project and will include a station at Jefferson Boulevard. That project is listed as a related project in Section III.B of the Draft EIR, (pages 90 and 91) and discussed in the cumulative impacts analyses within Chapter IV, of the Draft EIR.

As described more fully in Response to Comment No. 8-2, the project site is not located at a remote location, but rather centrally within the area to be served.

COMMENT 8-8

pg 25 heights must conform with the sight lines of the neighboring walk streets on Thornton and Sunset sides. The Pacific side of the project should conform with the height requirements of the Walk Streets between Sunset and Thornton on the west side of Pacific Ave. Any additional allowance in height should only be allowed to fall below the sightline from the opposite side of the street which a measurement is being taken from. This should include roof top patios, mechanical structures and roof top access points. There is a reference document included in the LUP that describes sightline and was the foundation on which the LUP based it [sic] guidelines.

The concept of measuring the height of the buildings within this project from a datum point will be very unfair to all surrounding properties. Since the datum point describes one point within the entire project from which all height measurements are to be derived, the site topography is not being considered. Take for instance, the intersection of Pacific Ave at Sunset Ave, it is nearly 10 feet higher than the corner of Thornton Ave at Main Street. In effect if this project is measured from just one datum point as described in this section then a building on Main at Thornton could be 40 feet in height if measured from the centerline of Main Street as all other projects are in Venice are required to do.

RESPONSE 8-8

As indicated on Exhibit 16a of the Venice Specific Plan, (Exhibit 19a. Of the LUP) neither Sunset Avenue nor Thornton Place (Thornton Court) adjacent to the project site are designated as a Walk Street, and therefore Walk Street requirements are not applicable to the proposed project. Rather, as a project with a varied roofline, the maximum building heights, under Section 10.F.3 of the Venice Local Coastal Specific Plan would be 35 feet, exclusive of roof access structures.

The use of the datum point for measuring project heights is consistent with Section 9.B.3 of the Venice Local Coastal Specific Plan, and has been applied in a manner that is consistent with other development provided under the auspices of the Venice Local Coastal Specific Plan. Specifically, as described in Section 9.B.3 of the Specific Plan, heights are to be measured from centerline of the lot frontage. For through lots, height is measured from the centerline of whichever adjacent street is the lowest in elevation. Thornton Place (Thornton Court) and Sunset Avenue are both front streets per the provisions of Section 12.03 of the Los Angeles Municipal Code. Thornton Place (Thornton Court) is the front street adjacent to the project site that is lowest in elevation. Heights have therefore been measured from the centerline of

Thornton Place, consistent with the requirements of the Specific Plan, providing a conservative approach with regard to measurement of building heights.

In most situations, the use of datum points will result in maximum building heights that are slightly greater than or less than those included in the regulations, at one point or another. While maximum building heights measured from Main Street may slightly exceed the 35-foot designation in some places, the maximum building heights on Pacific Avenue would be less than the 35-foot designation. Such slight variations are illustrated on the revised Figure IV.A-8 that is included in Section II, Corrections and Additions, of this Final EIR. In addition, it may be noted that the buildings along Main Street are lower than the maximum height would allow, thus partially offsetting any small increases in heights beyond 35 feet that might occur due to the measurement methodology.

COMMENT 8-9

It would be very inconsistent in Venice to allow a project that is 45 times the size of a normal lot (2700 sq. ft.) be considered in the same light when it comes determining which side of the site is considered the front and how this impacts the height and setback requirements. The intent of the LUP when it describes height with a flat roof vs. a varied roof line was concerned with line-of-site from the pedestrians point of view. This assumed the pedestrian would be standing on the street looking up at the roof. Side yard views were not considered because they were not visible from the street which is the public's perception point. Therefore on a project which is exposed to more than one street along its sides; it only can be assumed that the front yard view shall apply along those sides that abut a street.

Several items have been stated incorrectly including building heights. The LUP states and shows in its map Exhibit 19a Thornton is considered a Walk Street (also see pg 3-28 LUP, Policy II.C.7.). Therefore the height on this side of the project is limited to 28 feet. All other building heights are limited to 30 unless they have a varied roof line. The plan also makes it clear where the height will be measured from and it is not as stated in this DEIR.

I think it is unfair to the community to think of this site as only having one street frontage and therefore having to only conform to setbacks and other regulations that apply to a normal (30' x 90') lot in Venice. Because this site impacts the four surrounding streets, is proposed for two hundred plus residences plus commercial, I feel it should be considered as fronting on all four of these streets. This would allow the project to respect neighboring properties and in some ways maintain the character of the existing scale. In contrast as the project is now proposed, it could claim that Sunset and Thornton are side yards and then install high fences, five foot setbacks, high limit of 35 feet or more and offer no entry ways into the units along these streets. In effect this would make these side streets into dark feeling alley like ways for the existing properties across the street.

To further maintain the character of the abutting community entry points into and out of this project must be consistent with the surrounding properties. Without entries every thirty to sixty feet along the Sunset and Thornton sides, this project will in effect be a gated community sitting behind a solid wall (something that is not permitted in the LCP or LUP for commercial uses). The areas around the outside of the walls weather landscaped or not will be locations of little pedestrian traffic and therefore become neglected over time. The LUC and LCP both refer to ground floor entry points which must exist from the front of all projects. To comply with the intent of these documents this project must create ingress and egress points around the entire perimeter at intervals in scale with the properties across each of the four abutting streets.

RESPONSE 8-9

The height limit information is presented correctly in the Draft EIR. Policy II.C.7 (page III.21) and exhibit 19.a indicate that Thornton Place is listed as a Walk Street on the west side of Pacific Avenue only. The portion of Thornton Place (designated as Thornton Court) along the southern portion of the project site is not so designated and therefore Walk Street regulations are not applicable to the proposed project. The Draft EIR describes the heights and setbacks along all four of the streets that the project faces, and describes aesthetic impacts along each face.

As described on page 113, the setbacks on Sunset Avenue and Thornton Place would vary from between five feet and approximately fifty feet. As is clear in the Site Plan presented in Figure II-4 on page 73, the minimum setback on these streets occurs in only limited locations, and overall the setbacks greatly exceed setback requirements. As described on page 117: “Upon completion, project buildings will be 50 to 60 feet away from the existing structures opposite Sunset Avenue and 25 to 50 feet from the existing residences along Thornton Place. As described in the Draft EIR, buildings located along Sunset Avenue and Thornton Place would exceed 35 feet in height. The analysis of the project impacts on aesthetics identifies the maximum project heights as resulting in a significant impact. As noted on pages 117–118: “Notwithstanding, for purposes of aesthetics it should be noted that the height and FAR regulations presented in the Specific Plan are placed in the Plan, in part, to limit potential aesthetic impacts.... As such, the project would contrast with the existing features that embody the area’s valued aesthetic image. Further, these impacts would occur due to project heights that exceed the limitation expressed in the Specific Plan. Therefore, impacts regarding aesthetic character would be significant.”

The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility.

COMMENT 8-10

Pg 27 Views - this talks about private party views from level ground area and go on to state that is no impact on other properties in the area. This is not true. Since this project is asking for a height increase over what any other project can build with exceptions, all other projects will have their views encroached into. It will limit everyone else from having a roof top patio and being able to see the surrounding views weather they be the mountains or the ocean. It is not clear if the heights are absolutes or allows for mechanical and roof top access structures in addition to the height numbers called out. On two prior projects this developer has built across the street, they have shown on their plans maximum heights within the limits and then build roof top access houses that occupy more than 50 percent of the rooftop area. These additional structures completely block the view of the mountains from my building which complies to the 30 foot height limit.

RESPONSE 8-10

As discussed in Volume I, Section IV.A, Aesthetics, of the Draft EIR, the project would exceed the recommended height limits set forth by the Specific Plan. However, potential impacts on scenic views would be less than significant. Specifically, the one notable coastal view resource, the Pacific Ocean, lies outside of the project's viewshed, and the project would not obstruct existing views of that resource. In addition, as discussed in Section IV.A, Aesthetics, of the Draft EIR, views over the project site from private vantages are limited due to level terrain, intervening development, and low elevations of surrounding buildings from which views may be accessible. A few private locations that are elevated can see over the site to the urban setting beyond. Project impacts on views from private locations as may occur would be limited to a few locations and would be of a type that regularly occurs with infill development in an urban setting where one private party's "view" is through the buildable space of another private party's property.

The project's roof-top structures, which are used for rooftop access, are shown on Figure IV.A-8 on page 115 of the Draft EIR. An enhanced version of Figure IV.A-8 that more clearly indicates the project heights for the habitable building areas, as well as roof-top structures is included in Section II, Corrections and Additions, of this Final EIR. The Specific Plan allows additional height for roof-top structures, pursuant to limitations described in Section 9.C.

COMMENT 8-11

Pg 28 Illumination: This builder showed a model of the site where the exterior was covered with an metal siding and was described in the public meeting to be the same as the Art Lofts building across the street. Assuming they spoke the truth and showed correct information, than this material is very reflective to neighboring properties. My building is about five hundred away

from the Art Lofts project and we see a very strong light source of light at night reflecting from that building to ours. The Art Lofts building has a very highly reflective building.

RESPONSE 8-11

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. While the final building materials have not been selected, the project Applicant is proposing to use materials that are not highly reflective.

COMMENT 8-12

Pg 29 Mitigation Measures Sunset Av A1 - I have already commented that I think the site needs to be considered as fronting on four streets. But this section does not consider that Thornton is a specified walk street with a height limit of 28 feet not does it describe that the project is being described to consider these streets are being considered as side yards in terms of height requirements. This is very wrong and out of scale with the existing homes along these streets.

RESPONSE 8-12

Section 12.03 of the Los Angeles Municipal Code defines a front yard as a yard extending across the full width of a lot, the depth of which is the minimum horizontal distance from the front lot line. Section 12.03 of the Los Angeles Municipal Code defines a side yard as a yard more than 6 inches in width between the main building and the side lot line, extending from the front yard to the rear yard. Section 12.03 of the Los Angeles Municipal Code defines a front lot line as a line separating the narrowest street frontage of the lot from the street. In addition, Section 12.03 of the Los Angeles Municipal Code defines a front lot line as a lot boundary line which is not a front lot line or a rear lot line. The street frontages of the Sunset Avenue Project site adjacent to Thornton Place and Sunset Avenue are the narrowest street frontages of the site. Sunset Avenue and Thornton Place also face the front yards of existing residential units located across the street. The Main Street and Pacific Avenue frontages of the project site are longer than the Thornton Place and Sunset Avenue frontages and do not face the front yards of existing uses on the opposite side of the street. The Sunset Avenue and Thornton Place frontages have accordingly been designated as front lot lines, and the Main Street and Pacific Avenue frontages have accordingly been designated as side lot lines.

According to the Venice Local Coastal Program Land Use Plan and the Venice Coastal Zone Specific Plan, Thornton Place adjacent to the project site is not designated as a walk street. None of the provisions relating to walk streets therefore apply to Thornton Place adjacent to the project site.

Section 9.B.3 of the Venice Local Coastal Specific Plan provides that for through lots, height shall be measured from the centerline of whichever adjacent street is the lowest in

elevation. Thornton Place is the street adjacent to the project site that is lowest in elevation. Heights have therefore been measured from the centerline of Thornton Place.

As proposed, the Sunset Avenue project will consist of a single ground lot and individual residential condominium air space lots. There are therefore no internal lot lines on the site from which setbacks can be established.

COMMENT 8-13

Pg 30 Air Quality - These projects have clearly identified how they will be build will address the SCAQMD requirements but have left out the part about cleaning the air through the planting of trees. The City has a landscaping ordinance that describes planting trees to reduce polienats in the air and create shade for paved and built up areas. In the project this same developer just completed across the street they left out the opportunity to plant trees that would someday shade the buildings. Their reasoning as I was told by the owner is because they had to build their parking garage from lot line to lot line and that did not allow for any large trees to be included in the design. This is very wrong and should not be allowed at either the WLA or Sunset sites. Larges trees should be required and there must be a requirement for the trees to be of a matchure [sic] size after ten years (none of this stuff where the developer plants some small trees and then walks away only to let the trees die and the holes be paved over). This should be recorded on each of the properties.

RESPONSE 8-13

As disclosed in the Draft EIR, construction-period air quality impacts for the Sunset Avenue Project would be significant and unavoidable, but air quality impacts during long-term project operations would be less than significant. While it is not feasible to plant trees on an active construction site, even if practicable, such a measure would not reduce construction-period air pollutant emissions to less-than-significant levels. The proposed project's impact on local and regional air quality during long-term operations would be less than significant, and, as such, no mitigation measures are required.

Planting of new trees would occur in compliance with City of Los Angeles Street Tree regulations and the City Landscape Ordinance. Further, the project applicant would be required to provide a landscaping plan, for plan review by the City. This comment regarding the trees is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-14

Pg 34 Historic Resources - The only item being talked about in this report is less than ten years old. However this site has been a transportation site since the inception of City of Venice in the 1900's. The caricell [sic] that was once located on this site, prior to the bus yard taking over, had

a major impact on the development of this entire region. It would be nice if some sort of public art could be created at the site that described just how the railroad fit into the community back then, how it transformed into a bus line with overhead electric trolley cables into Division 6 as it is today. This history should not be lost and it should be shown on site as a point of interest to visitors.

RESPONSE 8-14

The project site and its association with the area's local transportation history was duly noted in Volume I, Section IV.C, Historic Resources, pages 168-173 of the Draft EIR. However, due to the site's compromised integrity it was found ineligible for federal, state, and local designation, and was not deemed a historical resource for the purposes of CEQA compliance. Therefore, mitigation measures were not required for the development of the project site or removal of the associated buildings on the site. Nonetheless, the comment regarding the incorporation of a public art piece associated with this history into the project site is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-15

Pg 44 Geology / Seismic Hazards This report is very brief. We know the site was a train turn-around and maintenance yard for many years. We also know the present topography of the site is much higher than it was prior to the bus yard being constructed in the 1950's. Prior to that the trains entered the site on the Thornton / Main Street elevation. This elevation is fifteen lower than the site is at present. We must assume that once the site excavation starts several old oil dump wells will be uncovered. These soils conditions must be considered. Point of case, the building just up the street by one property had a soil condition that was left behind from the old days of Venice that was so contaminated the site had to be cleaned over a six or seven year period.

RESPONSE 8-15

As summarized in Volume I, Section IV.E, Hazardous Materials, and documented in the three supporting technical studies presented in Volumes III and IV of the Draft EIR, the Sunset Avenue site has been extensively evaluated with regard to hazardous materials. In total, approximately 127 soil samples, borings, and groundwater samples have been performed on the site between 1988 and 2004. Of these, approximately 83 were soil borings that reached maximum depth ranges of 20 to 40 feet below ground surface (bgs).

For the results of what was found present in the soils from the soil borings, please refer to Section IV.E, Hazardous Materials, beginning on page 206. Old oil dump wells were not discovered through these borings. In addition, since the excavation for the subterranean parking facility is proposed to reach a maximum depth of 25 feet bgs, soil conditions expected as a result

of excavation activities have been identified through the borings that have been completed. Furthermore, as discussed in the Section IV.E, Hazardous Materials, of the Draft EIR, based upon the Phase II Environmental Site Assessment and the Streamlined Risk Assessment prepared for the project, no significant human health risk impacts associated with construction or operation of the project site would occur. In addition, the Los Angeles Regional Water Quality Control Board has recently granted an environmental case closure for the property (Underground Storage Tank Case Closure, Division 6, August 10, 2004). This means that no further site investigations and corrective actions are to be carried out and any previous activities to remove any contaminants of concern are sufficient to protect human health and the environment.

COMMENT 8-16

Pg 44 Soil analysis does not include monitoring and reevaluation of conditions as they excavate. Because this site was once a train station of sorts, and a repair barn for over thirty years, I believe the contaminates that were found are only the tip of the problem. Therefore a program to monitor the soil material and a plan to remove any problems needs to be included in this project.

RESPONSE 8-16

As discussed above in Response to Comment No. 8-15, soil conditions within the site have been extensively evaluated. In addition, based upon the Phase II Environmental Site Assessment and the Streamlined Risk Assessment prepared for the project, no significant human health risk impacts associated with construction or operation of the project site would occur. Nevertheless, due to the nature of the use of the site, the potential exists that near surface petroleum hydrocarbons are present in certain areas underlying the pavement. As stated in Volume IV, Appendix D7, of the Draft EIR, soil grading and excavation for property development shall be performed using a soil excavation plan. This soil excavation plan is to be prepared along with the developer's excavation specifications. The soil excavation plan will discuss proper handling of petroleum-impacted soils that can potentially be encountered. Any excavation of contaminated soil and export for off-site disposal or treatment would occur in compliance with federal, state, and local requirements related to hazardous materials, including those requirements set forth by DTSC, OSHA, and Cal/OSHA as identified in Section VI.E, Potential Secondary Effects, of the Draft EIR. Reference to the soil excavation plan has been included in Section II, Corrections and Additions, of this Final EIR.

COMMENT 8-17

Furthermore, because the water table is above the bottom of their parking garages, additional measures should be taken to prevent the water from being contaminated during construction. The movement of subsurface soils will release a lot of contaminates into the water which will spread throughout the community.

The polluted ground water will then spread to the trees and plants in the surrounding area, which will feed on this water. Although some of the trees may die from the contaminants the greater risk to the general public will be as these trees grow from this water they will carry the pollutants into their leaves. Then as the leaves drop to the ground the pollutants that have been buried for many years will exist on the surface where people and animals will come in contact with them.

RESPONSE 8-17

There should be a distinction made between the movement of contaminated soil during construction and potential existence of residual contamination found in the soil.

As discussed in Response to Comment No. 8-16, above, any contaminated soil that might be encountered during excavation would be handled through a soil excavation plan. As part of that plan, any potentially contaminated soil would be segregated, analyzed, and disposed of accordingly in an appropriate off-site facility. In addition, any excavation of contaminated soil and export for off-site disposal or treatment would occur in compliance with federal, state, and local requirements related to hazardous materials, including those requirements set forth by DTSC, OSHA and Cal-OSHA.

As discussed in Volume I, Section IV.E, Hazardous Materials, of the Draft EIR, based on numerous technical studies, it was determined that residual contamination that may exist at this site would not result in significant human health risk impacts during construction or operation of the project site. In addition, migration mechanisms of contaminants from potential subsurface sources are much more complicated than the way that they are described in the comment. Contaminant migration is a function of the type of contaminant, the type of soil, the availability of moisture to carry contaminants, and a host of other physico-chemical and microbiological factors. Any residual contamination that may be encountered at this property is relatively immobile and is not normally taken up by plants. Therefore, the concern in the comment regarding transport of contaminants from the groundwater through plant uptake would not be realized.

COMMENT 8-18

Pg 51 The LCP and LUP specify uses for this site but do not suggest the proportions of residential to commercial uses. These documents do suggest however that industrial zoned lots as this are very limited in the Venice area. Because this project is so heavily weighted as residential, I believe this is out of conformance with the intent of these documents.

This site is very unique to Venice because of its size. To build it out as mostly residential the community is losing the chance to have more local business located here which translates into

the loss of local jobs in the community. The net effect is more people having to commute longer distances to get to work which has an even greater effect on the environment and quality of life.

RESPONSE 8-18

As described in Volume I, Section IV.G, Land Use, on page 262 of the Draft EIR, Policy I.C.7 of the Venice Coastal Program Land Use Plan provides a specific recommendation for development of the proposed project site: “Bus Yard Redevelopment. Should the site become available, priority uses for its future redevelopment include affordable housing, which may be a mixed-use residential-commercial project, and a public parking structure as a measure to improve public access.” As the Commentor notes, this policy does not specify the proportion of residential to commercial uses. The proportion proposed by the project would be one interpretation that would be fully consistent with the general guidelines of the plan. While the plan does also include policies for the preservation of industrial sites (e.g., Policy I.C.1 on page II-24), Policy I.C.7 clearly indicates that industrial development is not the preferred land use for the proposed project site. Further, Policy I.C.1 which addresses the availability of industrial land use states that “Commercial use of industrially designated land shall be restricted.” Furthermore, as discussed in Volume I, Section V. Alternatives, of the Draft EIR, use of the project site for a commercial use would result in greater environmental impacts when compared with the proposed project. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-19

Pg 54 Mitigating measures... This plan is assuming that the existing site complies by making statements like the new use would be no greater of an impact on the community than that which is present. This is flawed because the existing site has never complied with LA City zoning and building codes. If this site was to first comply and then the project impacts were compared the determinations of mitigating measures would be much different. It is wrong to base the findings on a use that does not comply at present. This is like enforcing traffic laws by the cars that exceed the speed limit!

The coastal impacts of this project should not be based on what is being provided but rather that which is not talked about. Industrial/Commercial land near the ocean is very limited. Because of the size of this lot will accommodate the parking requirements of such uses (where most similar zoned lots in Venice can't), the loss to the coastal access will stem from lack of visitor servicing uses that this project has incorporated into it's [sic] design.

Other ground floor uses that require a lot of this size to exist include a grocery store, entertainment center, retail stores or a hotel.

RESPONSE 8-19

The baseline against which project impacts are measured is that required under the State CEQA Guidelines Section 15125(a). As indicated therein, “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 or, if not notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant...” Based on this direction, all of the impacts of the project are generally based on a comparison with the conditions that existed around March 2004, the timeframe that the Notice of Preparation for the project was circulated. Therefore the project impacts identified in the Draft EIR reflect the impacts of implementing this project on the community. The Draft EIR describes and analyzes the impacts of an alternative project that would be commercial in nature with the analysis Alternative F, beginning on page 434 of the Draft EIR. As indicated in that analysis, such an alternative could avoid the proposed project’s significant impacts associated with building heights, but could generate impacts that are greater than the proposed project (e.g. impacts on traffic). The Draft EIR also evaluates the project’s impacts on Coastal Resources in Section IV.G Land Use (pages 274 through 277), and addresses Sections 30222, 30223, 30250.a, and 30253.(5) of the California Coastal Act that identify priority uses (e.g. visitor-serving commercial recreational facilities, and accommodation of non-priority uses). The analysis concludes that project impact would be less than significant with regard to impacts on the proposed use mix in the Coastal Zone. The analysis notes that the proposed project includes uses that are consistent with Policy I.C.7 of the certified Coastal LUP. Such uses would consist of infill development amidst existing residential development and that would be somewhat inland of the beach and associated attractions and would not interfere with existing coastal-dependent uses or activities. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-20

Pg 55 The statement that reads, “It would not alter any land use patterns in the area” is just a plain lie. The site is being converted from a industrial bus yard to a mostly residential project. This has a huge effect on land use patterns and must be considered on a community wide level. This site accounts for over 9.4% of the industrial land in Venice.

RESPONSE 8-20

The citation page, and therefore context of the statement is not clear. Volume I, Section I, Summary, of the Draft EIR includes on page 39 the following statement: “While the site character and activity would change, the project would not alter the general land use relationships in the area.” This statement is discussed further in Section IV.G, Land Use on page 277. The discussion on pages 39 and 277 of the Draft EIR acknowledges the conversion of

the existing site use. The discussion indicates that in the context of impacts regarding the significance threshold, that the site is currently fenced and unavailable to the public. Thus, proposed development would not affect community travel patterns or accessibility except by virtue of enhanced local parking capability. Surrounding roadways would continue to exist and serve their functions. Specifically, Main Street frontage would continue a pattern of mixed residential and commercial uses, and the Pacific Avenue frontage would see an infill and extension of the existing residential land use pattern. The analysis concludes that the project would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses, and the project impacts regarding surrounding uses would be less than significant. With regard to the loss of industrial land, please refer to Response to Comment No. 8-18.

COMMENT 8-21

Pg 58 H.1 The allowed hours of operation seems to always be an issue with some contractors. It needs to be made clear that equipment and trucks that arrive at the site one hour or two before or after these limits are creating an impact on the community and are a breach of this EIR. This should also extend to the workers who arrive or leave the site early or late when parked through the neighborhood. These impacts are very real and must not be allowed to exist.

Pg 60 Truck loads per day is scheduled to be 100 as stated. Based on the start time of 7AM and an end time of 6PM that gives the developer 11 hours per day to run the 100 trips. When converted into trips per hour that comes out to 9.n trips or put another way about one round trip every six minutes. Keeping in mind each of these trips is an in and out of one truck that means that about every 3 minutes another truck is going to pass my home. This rate exceeds the traffic flow during many hours of the day that is described as their work schedule. This will mean that several trucks per hour will be waiting in traffic if the scheduled described will be maintained. This will have a huge impact on all traveled streets.

Without knowing the exact amount the 100 trucks per day will carry, I can only guess at the period of time it will take the developer to move the 125,000 cubic yards of dirt. But based on what I know about dump trucks I will take a guess that these trucks (without over loading the local streets from weight or size) can carry 12 yards per trip. In doing the math assuming all goes as planned, the excavation period will last for 10,416 trips or 104 week days (20 weeks).

Although this number on paper may not seem like much, to have these double trailer trucks driving back and forth for nearly a half year does create a very large short-term impact. When the accumulated effect of this with the trucks that will be waiting in traffic on the 3 minute interval occurs the impact will be even greater. Therefore the trips per day should be greatly reduced (perhaps to 35 during non peak hours) even though it will mean it takes longer to dig the hole.

RESPONSE 8-21

As discussed in Volume I, Section IV.I, Transportation and Circulation, pages 345–346 of the Draft EIR, the construction impacts have been identified. The calculation for the time duration is presented on page 345 of the Draft EIR. As indicated therein, “Assuming each truck would have a capacity of 12 cubic yards, this operation would occur for 104 days, or approximately five months.” This equates to approximately 26 trips per each peak hour, a number less than that required to result in a significant impact. The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-22

Pg 63, 64 Mitigating measures... Workers must park at remote sites and should not be allowed to enter the job site by other than the remote shuttle which will only service the remote parking lot. This is the only way to control the construction workers from parking in the neighborhood and removing the limited public parking that exists today.

Furthermore no barricades, construction fences or other means of street closures should be allowed that remove street parking from Main Street or Pacific Ave. In the event that new curbs, gutters and sidewalks are to be created along these streets, the work done here must try to limit any required inconveniences to the local community. This work should only be allowed to start once the underground parking structures are complete and could be offered as temporary replacement parking.

Parking in the North Venice area is very limited and every public parking space is always utilized.

RESPONSE 8-22

As discussed in Volume I, Section IV.I, Transportation and Circulation, pages 357–358 of the Draft EIR, construction mitigation measures have been identified for the proposed project. The measures require that a Work Area Traffic Control Plan be implemented. Numerous mechanisms for reducing construction impacts are listed, including provision of off-street parking for construction workers. The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-23

Pg 64 2.I.2 Right turn restriction will only cause people to break the law or make U-turns at the next possible interesection[sic]. Going south from the project the next place to turn-a-round will be a U-turn at Brooks Ave which would cause traffic problems for the cars turning north from Abbot Kinney to Main Street or a left turn into the private driveway of 796 Main St. and then backing out onto Main. There is no other logical way for cars to leave the property exiting on

Main. This option will cause lots of problems and should not be considered. Adding a traffic light at Thornton Ave would make a lot more sense since it would also provide for pedestrian crossing. The light would need to be timed with Brooks and Rose.

RESPONSE 8-23

As discussed in Volume IV, Appendix F2, Sunset Avenue Project, Project Description, page 3 of the Draft EIR, the access to the project site is defined. U-turns may be legally made along Main Street and/or Pacific Avenue as allowed by the California Vehicle Code. The project identifies those turns permitted at the project's access location on Main Street and Sunset Avenue. Thornton Place is a "T"-type intersection which does not have sufficient traffic volume to warrant a traffic signal. An enhanced crosswalk is proposed by the project at Main Street and Sunset Avenue, see Mitigation Measure Sunset I-5, Volume I, Section IV.I, Transportation and Circulation, page 358 of the Draft EIR.

COMMENT 8-24

Pg 64 2.I.3 Re-striping Rose causing the loss of 4 public parking spaces should not be allowed. If this project is going to remove public parking than it needs to be scaled back to reduce the impact or it needs to create additional parking on Sunset or Thornton Ave. to replace that which they are removing. Under no circumstances should re-striping be permitted if any loss of parking will occur.

Pg 64 2.I.4 For reasons given above no parking should be allowed to be removed. Furthermore, the re-striping of sound bound [sic] traffic to provide a left and right dedicated turn lanes will cause the street to lose one of the two existing southbound traffic lanes. This will cause many traffic problems and cause more traffic onto neighboring residential streets.

The corner of Sunset and Main should be required to have a traffic light installed. A controlled crosswalk is very needed at this intersection since the next crossing point is very far away and because Sunset is a through street to the Oakwood neighborhood where a lot of pedestrians come from that travel to the beach.

In prior years an underground tunnel existed at this intersection. The tunnel allowed the hundreds of beach traveler's safe passage without having to stop traffic on Main Street. In the early 1990's the tunnel was closed on both ends because homeless had made it to [sic] dirty and the City did not want to maintain it any longer.

This intersection if equipped with a traffic light control would not only allow safer access to this site and provide safer travels to coastal visitors, it would also create a traffic break that could be tied into migrating the right turn only item called out in 2.I.2 above.

RESPONSE 8-24

As discussed in Volume I, Section IV.J, Parking, pages 366–367 of the Draft EIR, the parking impacts have been analyzed. The proposed project would not only meet the parking demand, it would provide increased parking opportunities (including 71 spaces pursuant to Beach Impact Zone requirements and 44 additional spaces) in a parking-deficient neighborhood, with the provision of on-site parking. Further, the project would result in a net increase of five street parking spaces. Parking Impacts would be less than significant. The project is proposed to install a controlled pedestrian crossing at the intersection of Main Street and Sunset Avenue, as well as at the intersection of Pacific Avenue and Sunset Avenue. See Mitigation Measure Sunset I-5, Volume I, Section IV.I, Transportation and Circulation, page 358 of the Draft EIR.

COMMENT 8-25

Pg 65 2.I.5 This flashing light will not solve cross traffic problems that already exist. Furthermore, it will not improve the egress from the project exit on Sunset for cars that want to travel northbound on Main St.

RESPONSE 8-25

As discussed in Volume I, Section IV.I, Transportation and Circulation, page 358 of the Draft EIR, a traffic mitigation measure for the project consists of installing smart pedestrian crossings on Main Street at Sunset Avenue and on Pacific Avenue at Sunset Avenue. The flashing light system is to provide a protected pedestrian crossing not to assign the right-of-way for vehicle crossing. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration

COMMENT 8-26

Pg 68 J.1 This measure assumes there is a parking lot one block north of the project site that is not in use at present. This is a false assumption. The lot is owned by the City and is used at night by local residents and during the day by beach visitors and for overflow street parking and for the local businesses on Main and on Rose.

Furthermore, by allowing the construction workers to arrive to the jobsite on foot, the contractor has no way to ensure the workers did not take street parking. The project should not allow any worker to arrive on foot. The only way for workers that don't park on site to arrive should be by contractor sponsored shuttle. The parking lots for the shuttle should be located outside the beach impact area at a remote lot east of Lincoln Blvd. No exception to this recommendation should be permitted. This should not preclude onsite parking within the property lines of this project.

RESPONSE 8-26

As discussed in Volume I, Section IV.I, Transportation and Circulation, pages 345–346 of the Draft EIR, the construction impacts have been identified with construction mitigation listed on pages 357–358 of the Draft EIR. Mitigation Measure Sunset-I.1 requires the following: “Provision of off-street parking capacity for construction workers with sufficient capacity for those who cannot park on-site during the demolition, grading, and parking structure construction phases, with shuttle services as necessary.” The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-27

Pg 121 talks about the Goal 2 Chapter 3... What the writer has left out is the accumulation effect that this developer has brought to the area. This will [be] their third project on this block. The first project was building that is now called Art Lofts which took an industrial site that was used as a movie studio for nearly thirty years and down zoned it to 44 artist-in-residences. The second project is scheduled to begin any day now. It is also across the street from the existing MTA site. It is a one acre M1 and C2 zoned lot that up to a few years ago was a lumber yard and then a parking lot. The project that is being built on this lot is again 35 (or 38) condos. Now comes the MTA Division 6 site. It is zoned M1 and could support commercial uses but again the site is being down zoned to build more residential units for the most part. This is not following the intent of the Goal 2 nor the General Plan Framework. We do not want our commercial areas turned into high priced condos. The ratio of commercial to residential is very out of balance given what has been done and that which is being proposed here.

RESPONSE 8-27

Volume I, Section III.B, Related Projects, of the Draft EIR includes a list of related projects. The two projects mentioned in this comment are listed on Table III-2 on page 92 and the locations are illustrated on Figure III-2 on page 94. The two projects have been considered, as appropriate, within the cumulative analysis of each environmental analysis in Volume I, Chapter IV of the Draft EIR. Both projects are specifically mentioned in the cumulative analysis provided in Section IV.G. Land Use, on page 279. Please also refer to Response to Comment No. 8-18 regarding the proposed use of the project site which is currently zoned for M1 uses.

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-28

Pg 123, 10.F.3.a Describes the height limits of the LCP however stop short to describe how to interpret them when the project fronts on all sides nor does the writer describe where the property line of the internal Condos will be considered. Since the internal buildings are all

condos and each owner will have title to their portion of the overall project then it seems to me that those boundaries should apply to the height and setback laws as well. To think that a project of this size should be allowed to call Thornton Ave (which in the LUP is described as a Walk Street) a side yard and therefore exceed the height of the front yard maximum by over fifteen feet is outrageous.

Let me also point out that the height limit does not prevent roof top access structures and as anyone can now see the project across the street that this developer just completed (Art Lofts) has not one roof top structure that everyone can use but one for every unit which has effectively added another entire story to their building. Also these rooftop structures are a lot larger than is required to bring a stairway to the roof. None of this is described in the DEIR and should not be allowed. The maximum height limit described in this document should include everything including all mechanical and roof access structures.

RESPONSE 8-28

Please refer to Response to Comment No. 8-12 regarding the calculation of building height and setbacks. As noted in Response to Comment No. 10, The Venice Coastal Zone Specific Plan, Section C, allows for roof structures to exceed maximum height limits, per requirements listed therein, and in Section 12.21.1 B 3 of the Los Angeles Municipal Code. The project would be required to comply with those requirements. The roof top structures are illustrated on Figure IV.A-8. Please refer to the enhanced version of Figure IV.A-8 in Section II, Corrections and Additions, of this Final EIR. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-29

The project site needs to be considered to have four fronts with respect to setbacks and any conditions that should apply to a property frontage. To consider this project as having just front, two sides and one rear is just not right. No other site in Venice comes even close to the size of this lot. To allow this project to have the side height exceed that which would be allowed across the street on Pacific, Sunset or Thornton where front heights must be preserved is totally wrong and out of character with the neighborhood.

RESPONSE 8-29

Please refer to Response to Comment No. 8-12 regarding the calculation of building heights and setbacks.

COMMENT 8-30

It does not conform to the current zoning codes ("Q" conditions) and should not be allowed to move forward until those conditions are first met (at least on paper). The existing conditions

require the site to provide 75 parking spaces to the general public. These would be considered replacement spaces at the present time by the coastal commission and would be required in addition to the parking being offered at present.

RESPONSE 8-30

According to the City of Los Angeles Municipal Code, the Sunset Avenue Project site is currently zoned M1. The Applicant is applying to change the zoning designation from M1 to CM. There are no existing [T] or [Q] conditions currently applicable to the project site. As discussed above, proposed parking will comply with the requirements of the Specific Plan, including Beach Impact Zone parking requirements and will provide additional parking spaces that could provide fee parking for surrounding uses.

COMMENT 8-31

No mention is made about under grounding overhead power and communication services. The power service to the MTA lot was increased about ten fold a little over a year ago. The larger service required three very large transformers be located on Thornton Ave. The service was so large that many new poles had to be installed along Electric Ave. all the way back to Venice Blvd. This service upgrade impacted many properties with the new bigger and more frequent power poles. Since the proposed use will not need this tremendous service (described by one DWP supervisor as enough electricity to power a small city), the contractor should not only locate these transformers inside the underground area of their site, I think the poles that are no longer going to be required for the MTA power plant should be removed or the service put underground all the way back to Venice Blvd.

The artist rendering of the project (figure II-7) is looking at the south east corner where Thornton intersects to Main Street. Also located at this intersection and not shown in the drawing is a electrical service box that is part of the Thornton Ave Storm Water Pumping Station. The drawing nor any of the text describes what will become of this service nor how it will receive it's electrical power once the project is constructed.

RESPONSE 8-31

The comment addresses existing conditions in the project area, which for the most part, occur off-site. The proposed project would not have adverse effects with regard to the existing conditions. The project applicant would be responsible for providing electrical connections at the project site, with linkages to existing infrastructure, in a manner required by the DWP. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 8-32

Given the eight months the developer had to prepare this document using several teams of writers, it seems unfair to not extend a longer period of time for the community to respond. What a way to spend the pre-holiday season! I just wonder who is going to read any of the comments prior to next year.

RESPONSE 8-32

Section 15105 of the CEQA Guidelines requires that a Draft EIR be submitted for a public review period for no less than 30 days nor longer than 60 days except in unusual circumstances. When a Draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review shall not be less than 45 days, unless a shorter period, not less than 30 days, is approved by the State Clearinghouse. In response to public requests, the Draft EIR for the proposed project was circulated for an extended 60-day review period, rather than the 45-day review period required by CEQA.

LETTER NO. 9

City of Los Angeles, Department of Public Works
Orlando Nova, Division Manager
Bureau of Street Lighting
600 South Spring Street, 14th Floor
Los Angeles, CA 90014

COMMENT 9-1

SUBJECT: METROPOLITAN TRANSPORTATION AUTHORITY WEST LOS ANGELES
TRANSPORTATION FACILITY

Our office has completed reviewing the subject draft EIR prepared by MTA's consultants. The following are our comments to the subject project:

RESPONSE 9-1

This comment acknowledges that the Los Angeles Department of Public Works has reviewed the Draft EIR for the proposed project. Specific comments on the Draft EIR and their respective responses are provided below.

COMMENT 9-2

1. New roadway realignment or roadway widening improvements initiated by the project will require new street lighting systems. Bureau of Street Lighting will determine (sic) if existing lighting equipment can be replaced or relocated, or if a new lighting system is needed WLA-1.2. Page 354.

2. Streets adjacent to a proposed Transportation Facility stations will require lighting improvements per City's standards. Page 355 and 356

Create a sub section called "Lighting Improvement and Proposition 218 Process":

1. In general, any street/pedestrian lighting improvements that create new assessments or increase existing assessments to property owners will require the Proposition 218 process to take effect. This process not only requires community participation but also their approval throughout a ballot process.

2. Depending on the classification of this project (private or public road and facility), the jurisdiction and lighting standards of this Bureau may only apply to portions of the project. Proposition 218 does not impact improvements to private facilities.

3. Complete information of the Proposition 218 process is available at BSL. This process typically takes about 6 months to complete. The lighting assessment is paid by property owners through the County Property Tax Bill. Assessments must be confirmed by City Council before construction of the system starts.

RESPONSE 9-2

It is not anticipated that the street/pedestrian lighting improvements associated with the project will create new assessments or increase existing assessments to property owners. However, to the extent that any street/pedestrian lighting improvements associated with the project create new assessments or increase existing assessments to property owners, the Applicant will cooperate in the Proposition 218 process. An addition has been made to the Draft EIR to reflect this information, as well as provide background on Proposition 218. Please refer to Section II, Corrections and Additions, of this Final EIR.

COMMENT 9-3

Utility Protection/Relocation: The draft report needs to include hazard and construction impacts and it needs to address street lighting impacts and temporary street lighting needs during construction.

RESPONSE 9-3

The Draft EIR addresses potential hazard, construction and street lighting impacts for the West Los Angeles Transportation Facility throughout the Draft EIR. In particular, Volume I, Sections IV.B, Air Quality; IV.D, Geology/Seismic Hazards; IV.E, Hazardous Materials; IV.F, Water Quality; IV.H, Noise; and IV.I, Transportation and Circulation, include subsections that address construction impacts and recommend mitigation measures for the public health and safety. Volume I, Section IV.A, Aesthetics, includes a discussion of impacts on street lighting. As indicated, the project would comply with all City regulations regarding lighting, including the required submission of plans for approval by the Bureau of Street Lighting, per Chapter 1, Article 7, Section 17.08C of the Municipal Code. As described in the EIR, with the implementation of the mitigation measures, and compliance with City regulations, impacts regarding construction and lighting at the West Los Angeles Transportation Facility would be less than significant.

COMMENT 9-4

Add in this section: All street lighting systems within the City of Los Angeles that are part of the project will be designed to meet the IESNA/ANSI RP-8-00 as adopted by the City of Los Angeles.

RESPONSE 9-4

All street lighting systems within the City of Los Angeles that are part of the project will be required to comply with all applicable standards adopted by the City of Los Angeles. The Draft EIR cites the required compliance for the West Los Angeles Transportation Facility in on page 112 of Volume I, Section IV.A, Aesthetics, of the Draft EIR. The statement on page 112 has been elaborated upon in Section II, Corrections and Additions, of this Final EIR.

COMMENT 9-5

Mitigation Measures WLA-1.2: Intersection modifications, such as street widening at the intersection of Jefferson and La Cienega Boulevards to alleviate the right-turn may require more street lights or an upgrade to the existing street lights to meet our standard adopted illumination level.

Should there be any questions, I may be contacted at (213) 485-1377

RESPONSE 9-5

Failure of existing street lights to meet standard adopted illumination levels is not an impact created by the project and is not therefore required to be mitigated pursuant to CEQA. The Applicant may be required as a condition of approval to the project to provide more street lights or upgrade existing street lights to meet standard adopted illumination levels in connection with the widening of the intersection of Jefferson and La Cienega Boulevards. The recommended street widening along Jefferson Boulevard will be processed through the City of Los Angeles B-permit plan check review which includes the Bureau of Street Lighting. At that time the Bureau of Street Lighting will determine the street lighting requirements associated with any mitigation measure which may require street lighting upgrades.

LETTER NO. 10

Culver City Community Development Department
Mark Wardlaw, Deputy Community Development Director
9770 Culver Boulevard
Culver City, CA 90232-0507

COMMENT 10-1

Re:City of Culver City Comments on the October 2004 Draft Environmental Impact Report for the MTA West Los Angeles Transportation Facility; State Clearing House No. 2003121036

Dear Mr. Lindholm:

Thank you for the opportunity to review and comment on the October 2004 Draft Environmental Impact Report (Draft EIR) for the proposed Metropolitan Transportation Authority (MTA) West Los Angeles Transportation Facility.

This letter transmits the City of Culver City's (the City) comments on the Draft EIR which are provided in Resolution No. 2004-R090, including Exhibit A, which the City Council approved on Monday, November 22, 2004.

The City appreciates the time and effort the MTA spent preparing the 2004 Draft EIR. However, there are several issues which are of concern to Culver City regarding the 2004 Draft EIR.

The City sincerely hopes and looks forward to working together with MTA to accomplish our mutual goal of better services to the community.

RESPONSE 10-1

This comment indicates that the City of Culver City has reviewed the Draft EIR for the proposed project. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Specific comments on the Draft EIR and their respective responses are provided below.

COMMENT 10-2

RESOLUTION NO. 2004-R090

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, TRANSMITTING THE OFFICIAL CITY RESPONSE TO THE OCTOBER 2004 DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED MTA TRANSPORTATION FACILITY LOCATED AT 3475 SOUTH LA CIENEGA BOULEVARD:

WHEREAS, the Metropolitan Transportation Authority (“the MTA”) is proposing to operate a new bus maintenance and operation facility (“the Transportation Facility”) located at 3475 South La Cienega Boulevard; and,

WHEREAS, the proposed Transportation Facility will operate a fleet of up to 175 Compressed Natural Gas (CNG) powered buses on a 4.66 acre site in the City of Los Angeles, immediately adjacent to the eastern boundaries of Culver City; and,

WHEREAS, the proposed Transportation Facility consists of approximately 53,120 square feet of office and maintenance area that will include 14 high bays. Auxiliary areas include a CNG fueling area, bus washing area, and an inspection bay area. The facility Provides 175 surface level bus parking spaces and up to 240 employee parking spaces on a grade separated parking deck; and,

WHEREAS, on January 2, 2004, Culver City provided written comments to the Notice of Preparation of a Draft Environmental Impact Report (Draft EIR), which in addition to other comments, requested that issues related to traffic and circulation, aesthetics, parking, lighting, and cumulative impacts be analyzed in the Draft EIR; and,

WHEREAS, the MTA has prepared a Draft EIR dated October 2004 to analyze the potential environmental impacts caused by the proposed Transportation Facility, which was released for public review and comment on October 21, 2004; and,

WHEREAS, a City staff team, consisting of various City Departments and consultants was established to evaluate and comment on the adequacy of the Draft EIR in addressing potential impacts to Culver City; and,

WHEREAS, the City Council of the City of Culver City, accepted public comments and considered the Draft EIR at public meetings on November 8, 2004 and November 22, 2004.

NOW, THEREFORE, the City Council of the City of Culver City, California, DOES HEREBY RESOLVE as follows:

1. Establishes that this Resolution, including attached Exhibit A, constitutes the City of Culver City's official comments on the October 2004 Draft EIR that was prepared for the proposed MTA Transportation Facility.
2. Directs and authorizes staff to transmit comments of the City of Culver City on the Draft EIR to the Metropolitan Transportation Authority.

RESPONSE 10-2

This comment includes the City of Culver City's resolutions on the description of the West Los Angeles Transportation Facility project and the Draft EIR. This comment does not introduce new environmental information or does it directly challenge information presented in the Draft EIR. Therefore, no response is required. Specific comments on the Draft EIR and their respective responses are provided below.

COMMENT 10-3

- 1 There is no analysis of the consideration of a customer service center (i.e. lost and found; sale of bus passes, customer call center) at the proposed project.

RESPONSE 10-3

The West Los Angeles Transportation Facility is proposed as a component within the overall framework of facilities and transportation centers within Metro's overall system for public transportation. The facility has not been designed as a facility for public use, and will only be used for storage, maintenance, and operation of Metro buses by Metro personnel. Such facilities are not open to the public for safety reasons. No consideration for a customer service center or ticket vending location has been designed into the project, as there are already several locations and methods available for purchase of fare media, lost and found, customer information, etc. Therefore, the addition of customer service functions at the proposed facility would be duplicative and unnecessary. Metro already has six customer service centers throughout Los Angeles County, two of which are located within the project vicinity (5301 Wilshire Boulevard and 3650 Martin Luther King Boulevard). At these locations, customers can receive general information, bus schedules, purchase fare media, check lost and found, as well as other customer service functions required. Metro also maintains a network of 850 fare media providers across the county, in locations such as Ralphs, Cash it Here, Nix Check Cashing, Money Mart, and various other businesses. Eight of these locations are located within the immediate vicinity of the proposed Transportation Facility, and directions/addresses can be obtained on the metro website. Passes and other fare media can also be purchased through the Metro website and directly through the mail. Customer information for bus and rail transit usage, such as routes and schedules, can be obtained through the Metro website, 1-800-COMMUTE, or the Customer Service centers.

COMMENT 10-4

2. Page 322, Section 4 (“Mitigation Measures”), Part (a), “Motion by, Supervisor Yvonne Burke” is referenced as an Exhibit to the EIR. However, in the summary portion of the EIR, on page 44, under “(c) “Mitigation Measures” The Motion by Supervisor Yvonne Burke” is mentioned, but no reference is made to the “Motion” attached as an exhibit. For consistency, any reference made to the “Motion by Yvonne Burke” should include a reference to the attached Exhibit as well.

3. Page 324; Section 5 (“Level of Significance”), part (a) “West L.A. Transportation Facility”, states that no significant impacts associated with the construction or operation of the Facility was identified. However, on page 322, under Section 4 (“Mitigation Measures”), part (a) “West L.A. Transportation Facility”, the Draft EIR states that although no significant impacts were identified, a list of mitigation measures are identified to implement the measures requested pursuant to “Motion by Supervisor Yvonne Burke”. For consistency, these should again be identified and explained how the measures would reduce any impacts in Section 5, on page 324.

RESPONSE 10-4

In response to this comment, the text in Volume I, Section I, Summary, page 44, of the Draft EIR has been revised to specifically reference the Motion’s inclusion as an appendix to the Draft EIR. Generally, the reference is provided throughout the Draft EIR.

With regard to the comment concerning Volume I, Section IV.H, Noise, page 324, of the Draft EIR, it is not necessary to reiterate the proposed mitigation measures for the West Los Angeles Transportation Facility. The mitigation measures are already identified under Subsection 4, Mitigation Measures. Subsection 5, Level of Significance after Mitigation, is intended to focus the discussion on the level of significance following implementation of mitigation measures. As stated in the Draft EIR, no significant impacts would occur as a result of the project. Nonetheless, in response to this comment, the text on page 324 is revised to indicate that although no significant impacts are identified, mitigation measures are proposed in accordance with the request made by Supervisor Yvonne Burke. Please see Section II, Corrections and Additions, of this Final EIR for the revision to the text.

COMMENT 10-5

4. Page 423, V. (“Alternatives”), Section 2 (“Environmental Impacts”), in the previous analysis of the Alternatives (page 405), the “Environmental Impacts” Section is broken down into subsections such as: aesthetics, air quality, historic resources, geology/seismic hazards, hazardous materials, water quality, land use, noise, transportation/circulation, parking and utilities. These subsections are not specifically identified in this Alternatives discussion on page 423, although most of those same issues are briefly discussed. For consistency and easier

reading, this section should include those same subsections (which are also included in all the Alternatives analysis).

RESPONSE 10-5

Volume I, Section V.E, of the Draft EIR did not include subheadings since this section did not identify a specific alternate site. The analyses provide on pages 423–425 was intended to provide a general discussion of the topics in relation to finding an alternate site.

COMMENT 10-6

5. Please explain how the project will accommodate articulated buses and how much room for articulated buses will be provided.

RESPONSE 10-6

The 4.66-acre West Los Angeles Transportation Facility would provide surface parking for up to 175 40-foot buses. The facility has been designated to accommodate, operate and maintain 60-foot articulated coaches in addition to standard 40 and 45-foot coaches. However, if some or all of the fleet assigned to the facility includes buses larger than 40 feet, the total number of coaches at the facility will decrease. Additionally, as discussed in Volume I, Section IV.I, Transportation and Circulation, pages 342–343 and 345, of the Draft EIR, recommendations have been included to accommodate the bus movements off-site. The evaluation of the bus movements at the intersection of Jefferson Boulevard and La Cienega Boulevard indicates that Jefferson Boulevard should be widened along the south side west of La Cienega Boulevard to accommodate bus turning movements at that intersection. At the project site, an existing left-turn median exists for left-turn movements into the site. Figure 6 provided in Volume IV, Technical Appendix F, page 14 illustrates the routing for the bus movements to and from the maintenance facility along Jefferson Boulevard and through intersection of Jefferson Boulevard and La Cienega Boulevard. The turning movements for articulated buses at Jefferson Boulevard and La Cienega is also illustrated on Figure IV.I-7, on page 356 of Volume I of the Draft EIR.

COMMENT 10-7

6. The DEIR states (p. 112) that “Placement of wall and/or pole mounted lighting, foot candle levels, and use of hoods or shields (to avoid light backwash) would comply with applicable City regulatory provisions to ensure that adjoining properties are not adversely affected. These regulations address lighting intensity, and the avoidance of off-site glare from direct lighting sources, where sensitive uses may be affected.” The DEIR does not identify the specific lighting regulations that the project will be subject to so that readers can understand how potential glare impacts will be avoided.

In order to ensure that no adverse light and glare impacts occur at this facility, especially as it is proposed to be an 24 hour a day operation, a condition of approval or mitigation measure reflecting the above should be incorporated into the project.

RESPONSE 10-7

The Draft EIR discusses illumination in Volume I, Section IV.A. Aesthetics. The regulatory discussion on page 104 cites two sections of the Los Angeles Municipal Code that apply to the project. These Code sections require that all lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and any adjacent premises (Chapter 1, Article 2,, Sec. 12.21 A5(k)) and require plans for street lighting systems be submitted to the Bureau of Street Lighting for review. Generally speaking, lighting in the City is designed to meet national lighting levels that provide visibility and reduce sky glow and glare. More specifically, the City conforms to the standards included in the “Recommended Practice for Roadway Lighting (RP-8) of the Illuminating Engineering Society of North America,” and implements practices recommended by the Dark-Sky association. Lighting is controlled through such features as cut off distribution (encased fixtures) and directed lighting, and types of lights. The light standards on the project site are expected to be no higher than 16 feet. Compliance with these standards would result in less than significant impacts associated with lighting. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 10-8

7. The conceptual rendering in Figure II-3 on page 70 of the DEIR shows a fortress type building that seems to lack windows or any line of sight to Jefferson Boulevard. In the interest of being good neighbors, Culver City strongly recommends a design that strengthens the Division’s connection (perceived or not) to Culver City, instead of severing it. A total inability to provide opportunities for “eyes on the street” is not neighborly.

RESPONSE 10-8

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Final design of the facility is in the process of being completed. Final design decisions are being worked on with a community design review committee that was formed to work with Metro on the external visual appearance of the facility. This committee was set up as requested in a Motion by Supervisor Yvonne B. Burke and approved by the Metro Board of Directors and includes four residential and two business representatives of the community. The committee began meeting in summer 2004, and has met several times since. Work of the committee has focused on the appearance of the facility from the street, for vehicles and pedestrians going by, from neighboring hillsides, and along the property lines for adjacent property owners; materials to be used on the exterior of the building; set-back from the street;

amount, type and variety of landscaping; and environmental/LEED characteristics of the design. As work of the committee proceeds, the final design will become formalized.

COMMENT 10-9

8. Regarding air emissions from busses traveling to and from the maintenance and storage facility to their routes, the DEIR notes (p.147) that “a quantitative non-revenue miles analysis has not been conducted since it is unknown exactly how bus maintenance and overnight parking assignments would change”. Given that this is a Project EIR, this type of analysis should be performed in the EIR and well before the project is approved so that air quality impacts can be fully understood prior to a decision. While the total non-revenue miles and emissions may be reduced as a result of the facility relocation, localized air pollution levels could increase along the new routes to and from the new maintenance facility.

RESPONSE 10-9

A more refined analysis of the regional mass emissions reductions that would be realized due to non-revenue mile efficiency gains has been conducted. As detailed in Section II, Corrections and Additions, of this Final EIR, non-revenue miles would be reduced by a minimum of 73,168 miles annually (200 mile per day average) as a result of the proposed project. The average reduction in CO and NO_x regional mass emissions would amount to 29 pounds per day and 4 pounds per day, respectively. Daily average reductions in ROG, SO_x, and PM₁₀ regional mass emissions would be negligible. Tables IV.B-5 on page 149, IV.B-10 on page 156, and IV.B-11 on page 157 of the Draft EIR have been revised as necessary to reflect this updated information. The foregoing revisions did not result in the change of any significance conclusion disclosed in the Draft EIR.

Localized air pollution impacts were evaluated in the Draft EIR. Mobile-source emissions were evaluated by analyzing local area carbon monoxide (CO) concentrations at the three roadway intersections that would be most affected by project-related traffic volumes, as CO is considered to be the best indicator for changes in pollutant concentrations attributable to mobile sources. As shown in Table IV.B-6 on page 150 of the Draft EIR, project-generated traffic volumes would have no substantial effect on localized CO concentrations. As such, impacts related to mobile-source CO emissions would be less than significant.

The potential for localized impacts with respect to toxic air contaminant (TAC) emissions were also evaluated in the Draft EIR. As discussed starting in the last paragraph on page 148 of the Draft EIR, a bus depot would generally be the type of facility that would require a health risk assessment (HRA) as a result of diesel particulate matter emissions. However, the new Transportation Facility would have no diesel fueling capabilities, and as such, no diesel-fueled buses would operate out of the new facility. The bus fleet to operate out of the new

Transportation Facility would be 100 percent compressed natural gas (CNG) fueled. As such, the new Transportation Facility does not warrant a diesel particulate HRA. No health risk impacts are anticipated to occur as a result of the project, and, as such, project-related air toxic impacts would be less than significant.

COMMENT 10-10

9. The project will use approved City of Los Angeles haul routes. Culver City haul routes and schedules should be followed if traffic passes through City limits.

RESPONSE 10-10

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. It should be noted that this project only includes a small amount of remedial grading, thus limiting the amount of hauling required. Any such hauling would be in addition to the demolition and removal of the three structures, and some asphalt and concrete related to those structures.

COMMENT 10-11

10. A sound and/or dust barrier should be built around the project site.

RESPONSE 10-11

As disclosed in the Draft EIR, project construction would not result in significant noise (Draft EIR page 306) or localized PM₁₀ (Draft EIR pages 145 and 146) impacts. As such, a sound and/or dust barrier to mitigate significant impacts is not required. Nonetheless, it should be noted that the facility would be completely surrounded with block and QUILTE walls on the north, west, and south, and would be bounded by the building on the east side. This wall would reduce potential sound and dust impacts. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 10-12

11. It is unclear as to whether or not the project site will contain diesel fueling capabilities. If so, additional air quality impacts may occur that appear not to have been analyzed.

RESPONSE 10-12

The new Transportation Facility would have no diesel fueling capabilities, and, as such, no diesel-fueled buses would operate out of the new facility. As described in the Draft EIR, the bus fleet to operate out of the new Transportation Facility would be 100 percent compressed natural gas (CNG). However, emergency back-up generators, which would be diesel-powered, would be located on-site. The use of such equipment would be limited only to power black-outs

and required maintenance and testing. Therefore, the impacts would be infrequent, short-term and negligible. As such, the new Transportation Facility does not warrant a diesel particulate health risk analysis. Please refer to Response to Comment No. 5-3 for further discussion of diesel-related air quality impacts.

COMMENT 10-13

12. The cumulative impacts on air quality during the operational phase of Division 6 in conjunction with construction of the Sunset Avenue project will be significant and unavoidable. Culver City would suggest that all SCAQMD Rule 403 Best Available Control Measures and Rule 1166 General Mitigation Plans Requirements be applied to this project to reduce air quality impacts on surrounding communities and in the Los Angeles Basin in general. Syd Kronenthal Park and the Turning Point School are sensitive receptors located only 750 feet from the project site.

RESPONSE 10-13

As stated throughout Volume I, Section IV.B, Air Quality, in the Draft EIR, the proposed projects would implement SCAQMD Rule 403 and Rule 1166 requirements. The complete listing of SCAQMD Rule 403 and Rule 1166 requirements were provided in Appendix B-1, Volume II, of the Draft EIR. The potential for localized impacts during construction were evaluated in the Draft EIR. As shown in Table IV.B-4 on page 145, the worst-case estimate of on-site NO_x, CO, and PM₁₀ mass daily emissions would remain below SCAQMD localized significance thresholds for sensitive receptors that are located 200 meters (656 feet) or more away from the project construction site. The Syd Kronenthal Park and Turning Point School are located approximately 750 feet and 1,150 feet, respectively, from the proposed project construction site. As such, localized air quality impacts during construction at these sensitive receptor locations would be less than significant.

COMMENT 10-14

13. The DEIR notes that the site contains contamination from TRPHs which can either be removed or treated on-site. Mitigation Measure WLA-E.1 states that impacted soils “shall be excavated during the grading for the proposed project” but does not discuss where contaminated soils will be disposed or the haul route if on-site treatment is not feasible. Potential impacts related to the removal, transport and disposal of contaminated soils should be discussed. CEQA requires an analysis of all impacts, including those related to mitigation measures.

RESPONSE 10-14

Mitigation Measure WLA-E.1 (on page 233) states that “soils impacted with TRPH concentrations of 1,000 mg/Kg or greater shall be excavated during the grading of the proposed project.” As discussed on page 209 of the Draft EIR, soils exhibiting these concentration levels

where isolated to two feet below ground surface in the central portion of the former maintenance garage and in the general location of the underground outfall sewer. Any excavation of contaminated soil and export for off-site disposal or treatment would occur in compliance with federal, state, and local requirements related to hazardous materials, including those requirements set forth by DTSC, OSHA and Cal/OSHA as identified in Volume I, Section VI.E, Potential Secondary Effects, of the Draft EIR. The haul route for any such disposal would be consistent with that identified in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR. As indicated therein, based on current plans, the haul route identified for site excavation and soil movement would direct traffic to travel north and east on Jefferson Boulevard, north on La Cienega Boulevard to the I-10 Interstate Freeway. Return trips will travel the same route. In addition, flagmen would be used to control traffic movement during the ingress and egress of trucks and heavy equipment.

COMMENT 10-15

14. On p.280, the DEIR states that “the Transportation Facility Project would not conflict with any applicable land use plan, policy or regulation”. However, on p.269-270 the DEIR in the discussion of the project’s conformance with zoning regulations it states that the required front yard setback in this district is 15 feet but that “compliance with the full front yard setback “... would require Metro to reduce the proposed number of bus parking spaces, thereby decreasing Metro’s ability to effectively serve the central and western portions of its service area”. This section goes on to say that “Metro would provide the maximum feasible setback along Jefferson Boulevard consistent with Metro’s ability to achieve project objectives.” From this discussion it appears that Metro does not intend to comply with the required front yard setback for this zoning district, but the DEIR concludes that this is not a significant impact. These two sections of the document appear to be inconsistent.

RESPONSE 10-15

The Draft EIR analyzes the project’s consistency with all policies that are applicable to the proposed project. As described in Volume I, Section IV.G, Land Use, on page 259, Metro is not required to comply with the City Zoning ordinance, pursuant to Section 53090 et. seq. of the California Government Code. The non-applicability of the zoning is also described in the paragraph on pages 269–270 that is cited in this comment. The conclusion that the impacts are not significant is based on a comparison of the project features to policies that are applicable to this project.

The additional discussion that compares this project with the non-applicable zoning provisions is provided for public information. As indicated in Section IV.G, Land Use, the project design would conform to the all of the non-applicable standards, (e.g. site use, density, height, etc.), with the exception of setbacks along Jefferson Boulevard, thus providing a project that is substantially typical of similar developments within the area. It may also be noted, that

encroachment within the setback area would be for the decorative wall that would front Jefferson Boulevard. The project's taller structural elements, would be located in the interior portions of the project site, with the approximately 40-foot buildings located at the back of the site. Thus, the massing of the taller buildings would have less of an impact than would be permitted under the zoning regulations, if they were applicable. The project's appearance, inclusive of the proposed setbacks, is analyzed in Volume I, Section IV.A, Aesthetics, of the Draft EIR. As described therein, impacts associated with aesthetics would be less than significant.

COMMENT 10-16

15. Page 321, IV.H. ("Noise"), Section 3 ("Cumulative Impacts"), reference is made to the Mid-City/Westside Transit Draft EIS/EIR. Are these studies incorporated into the EIR or made available for review?

RESPONSE 10-16

The Mid-City/Westside Transit Draft EIS/EIR and other referenced materials are available for public review at the Metropolitan Transportation Authority offices. Additionally, the Mid-City/Westside Transit Draft EIS/EIR is available electronically at the Metro's website at http://www.metro.net/projects_plans/midcity/default.htm.

COMMENT 10-17

16. Despite Culver City bordering the project site on three sides, not one Culver City intersection has been analyzed in the Traffic Study. Furthermore, there is no explanation of how the three intersections studied were selected beyond a cursory explanation that LADOT staff was consulted. Culver City's Traffic Engineer was not consulted.

RESPONSE 10-17

The study area was selected based on the traffic generation of the project, the project distribution, the street network and the significant traffic impact thresholds used by the Cities of Culver City and Los Angeles. As provided in Volume IV, Appendix F, F1 – West Los Angeles Transportation Facility, Traffic Study, of the Draft EIR, the assignment of project traffic is illustrated on Figures 6–9, on pages 15–17. As shown, less than 10 vehicles per hour would be traveling on Culver City streets during the peak hours. The buses will travel on streets between the maintenance facility and La Cienega Boulevard and therefore would not use the Culver City streets. Furthermore, the City of Culver City's intersection threshold of significance for congested intersections operating at a level of service E or F is a 2 percent increase in the volume-to-capacity ratio where as the City of Los Angeles threshold is a 1 percent increase. Based on the Culver City significance thresholds and the low volume of project traffic using the Culver City streets it has been determined that the project would not present a potentially

significant traffic impact on any Culver City streets or intersections and, as such, were not included in the traffic analysis.

COMMENT 10-18

17. Culver City finds it impossible to assess the validity of the proposed mitigation measure WLA-1.2 Jefferson Blvd. widening and re-striping) without knowing the alignment of the Light Rail line. This mitigation measure seems to assume an aerial LRT alignment over Jefferson, but without knowing for sure, Culver City cannot evaluate this proposed mitigation.

RESPONSE 10-18

As discussed in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, Appendix B, of the Draft EIR, the alignment of the Light Rail Line at the La Cienega Station is provided (Figure 2-28) along with cross section Q that illustrates the aerial platform located along the south side of Jefferson Boulevard with a sufficient set back to provide for the recommended 7 feet of street widening. Several design options for the La Cienega Station are being considered by the MTA Board for final design. Those options include a long aerial bridge spanning over La Cienega to west of Jefferson/Ballona Creek. Other options include shorter bridge spans over La Cienega Boulevard to east of La Cienega Boulevard. The aerial structure may be along the south side of Jefferson Boulevard or in the center of the street. The source of this information is the Mid-City/Exposition LRT project Final EIS/EIR as cited. Mitigation Measure WLA-I.2 requires coordination for compatibility between the project's improvement at La Cienega Boulevard and Jefferson Boulevard, and the LRT facility.

COMMENT 10-19

18. The timing of the Jefferson Boulevard widening mitigation is not clear. Its construction will be tied to the development of the Light Rail line where groundbreaking is expected to occur in 2007. However, Division 6 should be completed by then. A safety impact will occur if the street widening is not put into place before Division 6 becomes operational. Therefore, the proposed widening of Jefferson Blvd., at La Cienega must be completed before the new MTA Division 6 Transportation Facility is operational.

RESPONSE 10-19

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. A Mitigation Monitoring and Reporting Program has been prepared for the project and has been included as Section IV. of the Final EIR. As indicated on pages 372 and 373, implementation of Mitigation Measure WLA-I.2, which provides for the Jefferson Boulevard widening in coordination with the Light Rail improvements, would be monitored at plan check review and final inspection. In addition, the issuance of building permits and a Certificate of Occupancy are the actions indicating compliance with the measure.

COMMENT 10-20

19. Please explain the following sentence from Traffic Study Appendix B regarding the Exposition Light Rail line: “The elevated LRT alignment would return to ground level at a point just east of La Cienega Place within the City of Los Angeles.” This is in direct opposition to other statements throughout the document that assume the LRT will cross Jefferson Blvd. at National with an aerial alignment in order to implement the widening mitigation.

RESPONSE 10-20

A correction has been added to the Draft EIR. Please refer to Section II, Corrections and Additions, of this Final EIR. As indicated in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR, the West End segment of the Light Rail line is defined as the alignment between La Cienega and Venice/Robertson Boulevards. The LRT would use an elevated bridge structure to cross over La Cienega Boulevard at Jefferson Boulevard. The elevated LRT alignment would return to ground level at a point just east of La Cienega Place within the City of Los Angeles. Other design options extend the bridge over Jefferson Boulevard and Ballona Creek. The Jefferson/National Boulevard intersection would then be realigned and reconfigured under the elevated bridge structure.

COMMENT 10-21

20. At present; there is no pedestrian access to/from the project site from points westward: where is no pedestrian crossing at Jefferson/National and no connection from west of the creek to the site. Any improvements to the Jefferson/National intersection must include walkable access to and from Culver City.

RESPONSE 10-21

The bus maintenance project is not proposing any changes to the Jefferson Boulevard and National Boulevard intersection. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. However, walkable access may be provided as part of the Exposition bikeway project determined to be a companion project to the LRT project.

COMMENT 10-22

21. The following statement can be found on page 5 of the Traffic Study: “Three - of the stations on the proposed alignment are within the Plan Area, namely: (1) Exposition/Crenshaw Boulevards; (2) La Brea Avenue/Exposition, Boulevard; and (3) La Cienega/Jefferson Boulevards. Culver City feels that this is a very unusual “Plan Area” because both the proposed Crenshaw and La Brea Stations are actually slightly farther from the site area than the future Venice/Robertson station. Please explain this omission and the reasoning behind including these two, more distant, proposed LRT stations.

RESPONSE 10-22

As discussed in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, page 5, the Plan Area being discussed is the City of Los Angeles Community Plan Area of West Adams–Baldwin Hills–Leimert and those LRT stations located within that Community Plan Area.

COMMENT 10-23

22. The Traffic Study provides no analysis of impacts on the local transit system.

RESPONSE 10-23

As discussed in Volume I, Section II, Project Description, pages 67–71, of the Draft EIR, the project is a new administration/maintenance facility being relocated from the Venice area. Relocating these ongoing support functions such as repairs, fueling, washing and dispatch to the new facility will only serve to improve the local transit system in terms of reducing the deadhead travel times. While Metro is constantly evaluating transit routes for improvement, no changes to the scheduled transit routes are planned specifically as a result of the new bus maintenance facility.

COMMENT 10-24

23. Page 1 of the Traffic Study states that “...proposed bus routing assignments within the- study area associated with the facility, have been reviewed and approved by the MTA for use in this study.” Culver City would also like the opportunity to comment upon proposed bus routing assignments.

RESPONSE 10-24

As discussed in Volume I, Section II, Project Description, pages 67–71, and page 13 of Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, of the Draft EIR, the analysis of the peak-hour bus routing will follow a set circulation pattern to begin and end their respective transit routes. Pursuant to the MTA staff, these buses not in service will begin and end their routes at the bus maintenance facility. Bus routing assignments to and from the maintenance facility are required to use the La Cienega Boulevard to/from Jefferson Boulevard route. As discussed on page 71, it is important to note that the on-site activity will be highest between 4 A.M. and 6 A.M. when the greatest number of bus operators can be expected to arrive at the facility to begin their shifts and pull buses out of the facility to go into service well before rush hour. Activity would again peak between 7:30 and 9:00 P.M. after rush hour, when buses return to the facility to be cleaned, fueled and readied for service the next day.

COMMENT 10-25

24. The DEIR includes no analysis of the impacts that left turns out of the facility may have on Jefferson traffic (both bus and non-bus).

RESPONSE 10-25

As discussed in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, bus traffic will not turn left out of the site, all buses will turn right and travel north along Jefferson (see Figure 6 Bus Travel Paths). Jefferson Boulevard adjacent to the site provides two lanes in each direction with a median left turn lane for left-turns into the facility. Some employee traffic, however, will turn left out of the site on to Jefferson Boulevard. It is estimated that 17 vehicles will turn left during the morning peak hour and 13 vehicles in the afternoon peak hour, per Figure 7 contained in the traffic study. This volume of left-turning traffic will not have an impact on Jefferson Boulevard traffic flow which has been measured between 600 to 900 vehicles per hour per direction.

COMMENT 10-26

25. As shown in the analysis of Division 10's traffic generation rates, the highest volume of non-bus trips to/from the facility occurs around 12:00 - 1:00 pm. Please provide additional information on how this off-peak traffic may impact surrounding streets which already experience some lunch hour traffic due to their industrial and commercial nature.

RESPONSE 10-26

As contained in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, the estimated number of project generated employee trips between the hours of 12 noon and 1:00 P.M. is 78 vehicles and 22 buses (44 PCE buses) for a total of 122 PCE vehicles per hour (vph), 15 vph more than the morning and 19 vph more than estimated in the afternoon peak hour. According to the traffic counts included in the traffic study, Jefferson Boulevard south of National Boulevard carries approximately 1,400 vph total during the morning peak hour and 1,600 vph total during the afternoon peak hour. The 12:00 to 1:00 P.M. traffic volume on Jefferson Boulevard is approximately 900 vph total or 500 vph less than the A.M. peak and 700 vph less than the P.M. peak. Daily traffic counts collected on La Cienega Boulevard at Jefferson boulevard by the City of Los Angeles (Sept. 18, 2002) shows that the lunch hour traffic volume (3,605 vph) is approximately 1,000 vph less than the peak hours with A.M. peak flows of 4,835 vph and 4,516 vph in the afternoon. This indicates that the lunch hour traffic conditions are significantly better than the peak hours with only a slight increase in project traffic. Also see Response to Comment No. 10-17 regarding the potential for project related traffic impacts.

COMMENT 10-27

26. Study Intersections: The DEIR analyzes only three study intersections for the West Los Angeles Transportation Facility. The study intersections are limited to those within the City of Los Angeles and those bordering the site. Further, the DEIR does not provide any information on deadheading to and from the yard by MTA buses. As such, it is unclear what routes buses will take and which other intersections in the surrounding area should be studied. The only information available applies to the Jefferson/La Cienega intersection, making it impossible to account for bus movements beyond this location. How can neighboring communities analyze the impacts of 175 buses when it is not clear where they will be run? Trips generated by the project would likely travel along Culver City streets. The potential traffic impacts within Culver City limits must be analyzed.

RESPONSE 10-27

Please see Responses to Comment Nos. 10-17, 10-23, and 10-24 regarding the potential for project related traffic impacts and bus routing.

COMMENT 10-28

27. Study Intersections: Recent traffic studies in the surrounding area show a number of intersections operating at poor or unacceptable levels of service. In order to accurately, assess project impacts on the surrounding area, the following study locations at the minimum should be analyzed:

- La Cienega Boulevard at Venice-Boulevard
- La Cienega Boulevard at Washington Boulevard
- La Cienega Boulevard at Fairfax Avenue
- Fairfax Avenue at Washington Boulevard
- National Boulevard at Venice Boulevard
- Robertson Boulevard at Venice Boulevard
- Jefferson Boulevard at Duquesne Avenue
- Jefferson Boulevard at Overland Avenue

RESPONSE 10-28

The low volume of peak hour traffic generated by the bus maintenance facility does not warrant expanding the study area past the three study intersections where the concentration of project related traffic is the highest. Project traffic's low peak-hour volume and direction distribution past the three study intersections will be spread to traffic levels that would not exceed the significant thresholds established by the City of Los Angeles and Culver City. Please see also Response to Comment No. 10-17.

COMMENT 10-29

28. Existing Traffic Counts: The traffic counts on National/Jefferson and La Cienega/Jefferson are questionable. A difference of 40% (approximately 450 vehicles during the AM peak and 250 vehicles during the PM peak) was found between the two study intersections even though the peak hours determined were both the same time (7:30-8:30 AM and 5:15-6:15 PM). The land uses on Jefferson between National and, La Cienega are mostly industrial and auto repair. Those land uses won't generate enough trips to make the difference in traffic volumes between the intersections.

RESPONSE 10-29

As discussed in the Impact Analysis provided within Appendix F of the Draft EIR, traffic volume data were based on traffic counts conducted by The Traffic Solution, an independent traffic data collection company. The AM and PM peak period counts were conducted manually from 7:00 AM to 10:00 AM and 4:00 PM to 7:00 PM in August 2003. All traffic counts were conducted by counting the number of vehicles at each of the 3 study intersections making each movement. The peak hour volume for each intersection was then determined by finding the four highest consecutive 15-minute volumes for all movements. As shown in the aerial Project Setting graphic contained in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, there are a significant number of large industrial/office business located between Jefferson/National and Jefferson/La Cienega and along La Cienega Place which also have access to Jefferson Boulevard. These land uses combined could easily generate the difference in peak hour traffic flows between the two intersections. Furthermore, any change in traffic volume due to variations in traffic flow would not change the findings of project impact significance; i.e., the Jefferson/La Cienega Boulevard intersection is reported to be operating at LOS F, and the westbound through volume at Jefferson/National does not affect the traffic movements through that intersection, since it is a free (uncontrolled) move.

COMMENT 10-30

29. Freeway and Street Characteristics: National Boulevard provides direct access from the I-10 Freeway to the project site. It is highly likely that any trips approaching the project site from the west would travel along National Boulevard. In addition to the additional intersections identified

in a previous comment, the impacts of the MTA facility on the Santa Monica Freeway/Robertson Boulevard Ramps should be analyzed..

RESPONSE 10-30

Please see Response to Comment Nos. 10-17, 10-24, and 10-28 regarding the potential for project related traffic impacts.

COMMENT 10-31

30. Bus traffic from the facility should be restricted from making left turns from northbound Jefferson to westbound National should future improvements to this intersection make this turning movement possible. In addition, inbound bus traffic should be prohibited from using eastbound National Blvd., to approach Jefferson Blvd. Supervisor Yvonne Brathwaite Burke made a motion which establishes certain restrictions on this facility. Culver City requests that the Supervisor add to her motion a restriction on buses turning left from Jefferson onto National in the event that future improvements to this intersection make this movement possible.

RESPONSE 10-31

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 10-32

31. Trip Generation: Trip generation data for the project was developed by surveying a “similar site”. It would seem logical to use the existing Division 6 facility as a model for analyzing the proposed one. Nevertheless, the Division 10 data was not provided in the Traffic Impact Analysis Report/EIR. The EIR’s traffic analysis shows the “adjusted” hourly traffic characteristics of the proposed site. An explanation of how the trip generation was derived should be included to understand the assumptions and/or methodologies applied in gathering-the data. Although it has been stated that surveys were conducted at a similar site, operations at Division 10 were not clearly described. How many driveways were surveyed? Are there separate driveways for employees and buses? Were there any adjustments made with the raw data collected? What is the operating hours and characteristics of the division surveyed? When do drivers, mechanics, and other personnel arrive/depart? How many deliveries do they get each day? The operating characteristics of the surveyed site and Division 10 should be discussed.

RESPONSE 10-32

As discussed in Volume I, Section IV.I, Transportation and Circulation, pages 340–341 of the Draft EIR, the database normally used to estimate traffic generation (i.e., the Institute of Transportation Engineers *Trip Generation Handbook*), does not contain traffic surveys of bus

maintenance facilities. Therefore ITE recommends using site specific surveys at a similar existing bus maintenance facility. Division 10 was selected by MTA staff as the most similar bus maintenance facility to what was being planned for the proposed facility. The Division 6 facility is old and does not represent what is being planned on the Jefferson maintenance facility site. MTA supplied the traffic survey data for three days which consisted of separate hourly driveway counts between 4 A.M. to 10 P.M. for bus and employee traffic entering and exiting the Division 10 site. No adjustments were made to the raw data, the raw data was averaged over the three day period and the adjustment factor based on the number of buses to be service (175/271) was applied based on the number of buses serviced at each facility. The Division 10 facility is discussed in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, Appendix D of the Traffic Study of the Draft EIR.

COMMENT 10-33

32. Traffic Generation: The number of employees in Division 10 compared to the proposed site was not mentioned in the report. Overall trip generation was derived using the proportion between the fleet sizes (271 vs. 175). That should only apply to the number of bus trips rather than employee trips. Since there's no mention of the number of employees in Division 10 and the proposed site, the proposed number of parking spaces for the employees suggests that the proportion number of employees on-the-proposed project site would be higher compared to Division 10. Division 10 has 295 parking spaces compared to the proposed 240 parking spaces. The ratio should be 0.81(240/295) rather than 0.65 (175/271) for the projected employee trips.

RESPONSE 10-33

Please refer to Response to Comment No. 10-32 above regarding trip generation for the proposed project. As stated therein, ITE recommends using site specific surveys at a similar existing bus maintenance facility. Division 10 was selected by MTA staff as most similar to what was being planned for the proposed facility. The Division 10 facility currently has 647 employees working in three shifts. Using the employee ratio results in the same adjustment factor of 0.64 (414/647). The Division 10 facility is discussed in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, Appendix D of the Traffic Study.

COMMENT 10-34

33. Traffic Assignment: Although the bus routes are defined as described in the report, what are the assumptions made on employee trip distribution? Were the Cities of Los Angeles and Culver City approached in determining employee trip distribution? Based on the employee traffic flow provided, only 10% of the employee trips are projected to originate from north/northwest of the protect site? The proposed site would replace the existing MTA bus maintenance facility located in Venice (Division 6) and relocate the existing employees. Thus, a large portion (greater than 10%) of the employee trips would primarily originate west of the proposed site.

RESPONSE 10-34

Employee traffic generated by the Transportation Facility would largely occur outside of peak hours. The majority of the employee traffic from the north and northwest would access the site from La Cienega Boulevard. Inbound traffic from the west was also assigned to National Boulevard and Jefferson Boulevard whereas outbound traffic from the west was assigned to Jefferson Boulevard because of the lack of a northbound left-turn lane at Jefferson and National Boulevard. The traffic assignment of the employee traffic reflects the existing street and intersection configurations and the limited number of streets that are available to serve the site. Physical limitations such as the lack of a northbound left-turn lane at Jefferson/National, the closure of Higuera Street to east-west through traffic and the limited roadway crossings of Ballona Creek shift the employee traffic to the other available roadways serving the site(i.e., La Cienega Boulevard, Jefferson Boulevard, and Rodeo Road). As discussed in detail in Section IV.I, Transportation and Circulation, traffic impacts from all sources, inclusive of employee traffic, would be less than significant. In addition, although such impacts would be less than significant, mitigation measures such as widening and restriping in the vicinity of the intersection of Jefferson and La Cienega have been proposed.

COMMENT 10-35

34. Traffic impacts: The EIR does not discuss traffic impacts within Culver City limits. Employee trips are expected to use Culver City street system to access the project site from the west/northwest. What are the potential impacts of the proposed project within Culver City? How is the potential for “cut-through” traffic within the residential streets going to be addressed?

RESPONSE 10-35

Please see Response to Comment Nos. 10-17, 10-24, and 10-34 regarding the potential for project related traffic impacts. Furthermore, because of the location of the project site and the low volume of employee traffic, there are no residential streets in Culver City that would be used as cut-through routes which would create significant traffic impacts. Residential traffic impacts are typically a result of congestion on major arterial streets. Because the bus maintenance facility employee traffic would occur in off peak shifts, traffic congestion should not be a factor during the early morning and late evening hours of travel to and from the project site. As with bus routings, the MTA can instruct and provide employees with suggested routes to work.

COMMENT 10-36

35. Page 343, discusses trip generation and -there is a statement that “Articulated Buses” would also utilize the proposed facility. However, the adjustment factor discussed on Page 342 does not seem to differentiate between conventional and “articulated” buses. The DEIR and FEIR should

clearly state whether there are actually 2 different adjustment factors used for the 2 different types of buses that will be using the proposed facility.

RESPONSE 10-36

As contained in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, page 11, the PCE adjustment factor of 2 was applied to account for all heavy vehicles (all buses) with more than 4 tires pursuant to the Highway Capacity Manual 2000, page 16-10.

COMMENT 10-37

36. On page 22 of the technical appendix, Volume IV, it states that ambient traffic growth is 4%. Does this represent 4% per year or the total growth from 2004 to 2006?

RESPONSE 10-37

The ambient traffic growth added to the intersection capacity calculations was 2 percent per year, or exactly 4.04 percent total.

COMMENT 10-38

37. On page 29 of the technical appendix, Volume IV, another column on Table 6 should be included at the end stating significant impact or not for the study intersections.

RESPONSE 10-38

As contained in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, pages 28 and 29, the first sentence on page 29 states that none of the study intersections would be impacted by the project. No further explanation is necessary.

COMMENT 10-39

38. On page 47 of Volume I in Footnote #12, the words “to continue southbound on La Cienega Boulevard” should be inserted in the second sentence after the words “...reroute the inbound buses”.

RESPONSE 10-39

In response to this comment, Footnote 12 of Volume I of the Draft EIR has been amended to include the suggested language.

COMMENT 10-40

39. The Related Projects section is inadequate and several projects within the site's immediate vicinity have been omitted. In fact, the MTA seems to have forgotten its own Light Rail station planned at Venice / Robertson, an end-of-the-line gateway station which will include 600 - 800 park-and-ride spaces and serve as a transfer point for thousands of travelers on a daily basis. By not including several important local developments in the project's immediate vicinity in the related projects list, the DEIR and Traffic Study fail to fully account for future traffic. As a result, the forecasted traffic impacts may be significantly lower than they will be when all surrounding- development is accounted for. The following additional related projects should be reflected in both the Traffic Study and the Cumulative Analysis section of the Draft EIR:

- Venice/Washington LRT Station.
- West Los Angeles College Master Plan 2004
- 8511 Warner Drive - Multiple use performing arts facility comprising of office, retail, and restaurants.
- Transit Oriented Development at the future Venice/Washington Station, including, housing and retail components (Sites A and B).
- The Baldwin Hills Scenic Overlook.
- The Culver City Transfer Station.
- The Culver City Dog Park.

RESPONSE 10-40

The City of Culver City Planning Department and the City of Los Angeles Department of Transportation were contacted for information during the preparation of the traffic impact study for development projects to be considered for inclusion in the traffic impact study. The NOP for the project was released in November 2003. The Culver City development list was provided in March 22, 2004 and the City of Los Angeles list was provided March 17, 2004. The Culver City list was provided by assistant planner Ali Farassati. Both development lists provided were checked in the field for inclusion in the traffic projects for the 2006 study year.

With regard to the projects mentioned in this comment:

- Venice/Washington LRT Station: This project was not included on the development list provided the City of Culver City after the release of the NOP. It seems unlikely that the LRT patrons would by-pass through the study area and past the La Cienega Station in route to the Venice/Washington Station. Traffic generated by the LRT project for the project study area will be that traffic associated with La Cienega Station which has been included in the related project list rather than the Venice/Washington Station. Furthermore, as documented in the Exposition Light Rail Transit Parkway EIS/EIR referenced in the traffic study, the Venice Robertson Station and the La Cienega Jefferson Station will not have a significant traffic impacts at any intersections adjacent to the station sites (refer to pages 3.1-61 through 3.1-64 of that document).
- West Los Angeles College Master Plan 2004: This project is listed as a related project (No. 9); see Table II-1 and Figure III-1 on pages 90 and 91 of the Draft EIR (also, Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, pages 23–25).
- 8511 Warner Drive: This project was not included on the development list provided after the release of the NOP nor was it included in the recently adopted FEIR's for the West Los Angeles College Facilities Master Plan (December 2004) SCH 2004051112 or the Symantec Office Development project (SCH No. 2004041065, also December 2004) by the City of Culver City. Furthermore, the 8511 Warner Drive site is owned by the City of Culver City, and the Culver City Redevelopment Agency is still conducting negotiations with potential developers.
- Transit Oriented Development at the future Venice/Washington Station: This project was not included on the development list provided after the release of the NOP nor was it included in the recently adopted Draft EIR for the Symantec Office Development project (SCH No. 2004041065) by the City of Culver City. As the name implies, this potential project would attract transit trips to the Venice/Washington Station not traffic through the project study area. However, the traffic study does include a mixed use project located at 9300 Culver Boulevard found during the field investigation with its traffic estimates based on information provided by the City of Culver City for the preparation of the WLA College Master Plan DEIR.

The Baldwin Hills Scenic Outlook, Culver City transfer Station and the Culver City Dog Park projects are all very small traffic generating projects. The traffic generated by these projects combined is included within the ambient traffic growth factor of 4 percent applied to all study intersections. Ambient growth factors are used to account for the cumulative effect of small projects such as the three listed above and for the growth due to large projects located outside the study area. Furthermore, the Scenic Outlook project was the only project listed on the related project development list provided by the City of Culver City that has been considered

as part of the ambient growth. The estimated peak hour traffic volume from the Scenic Outlook project is 3 morning trips and 12 afternoon trips per the Symantec Office Development Draft EIR. For comparison, the ambient growth added to the intersection of Jefferson Boulevard and La Cienega Boulevard (i.e., 277 and 251 vph for the morning and afternoon peak hour, respectively) certainly includes small projects of this magnitude.

COMMENT 10-41

40. Cumulative Impacts: The EIR indicates there are 11 cumulative projects within the study area. The latest cumulative project list for Culver City contains 27 projects and three projects in the surrounding area in the City of Los Angeles. Thus, the future without project and future with project traffic conditions and impacts may be understated. Furthermore, of the 11 related projects listed, 9 of them are in Culver City. Yet, the report does not study a single intersection in Culver City.

RESPONSE 10-41

Study intersections are determined based on the potential project related traffic impacts not based on the location and number of related project. For further discussions, see Response to Comment Nos. 10-17, 10-24, and 10-40. As indicated therein, cumulative growth has been properly accounted for.

COMMENT 10-42

41. Potential traffic impacts of construction worker trips during construction should be addressed. Construction worker traffic could potentially use residential streets within Culver City to access the project site. One of the mitigation measures that the FEIR should include is a requirement that Culver City must approve any haul route that includes any street in the City. Haul routes should be restricted to La Cienega Boulevard for both north bound and south bound connections to 1-405. Also, Culver City Engineering staff should be consulted and should have authority to approve the construction staging and vehicle storage and queuing areas, including construction worker parking, if they are in or immediately adjacent to Culver City.

RESPONSE 10-42

Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR includes an analysis of construction impacts, on pages 338 to 339, and proposed mitigation measures to reduce the impacts of construction traffic on pages 353 to 354. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 10-43

42. The DEIR only seems to indicate that construction worker parking would occur on adjacent streets. Most of the streets in the area have minimal or no parking. The closest area with street parking is the Hayden Tract which already has a high demand for on street parking. The FEIR should ensure that the project construction workers not park in the Hayden Tract or other residential areas in Culver City.

43. Page 353 of Volume I, Mitigation Measures: Simply providing an estimate for the number of truck trips is not mitigation. Coordination should be done with the City of Culver City's Engineering staff to discuss construction traffic staging.

44. Construction Mitigation Measures: Construction workers should be restricted from traveling along residential streets through Culver City.

RESPONSE 10-43

As described in Response to Comment No. 10-42, mitigation measures are proposed to reduce the impacts of construction traffic. Specifically, Mitigation Measure WLA-I.1 would require the project to prepare and implement Work Area Traffic Control Plans. A provision is included that requires "Prohibiting parking by construction workers on neighborhoods streets as determined in conjunction with city Staff." The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 10-44

45. Page 338, under IV.I ("Transportation and Circulation"), (c) "Analysis of Project Impacts", the EIR states that construction workers' trips would occur outside the morning and afternoon peak hours, and construction impacts from this type of traffic would be less than significant (hours being from 7am to 3 pm). It is highly unlikely that 7am to 3pm is in fact outside the "peak hours" for traffic.

RESPONSE 10-44

As discussed in Volume I, Section IV.I, Transportation and Circulation, page 338 of the Draft EIR, the construction hours in general are to occur between 7:00 A.M. to 3:00 P.M. In that case, the construction workers would arrive prior to 7:00 A.M. before the morning peak hour and leave shortly after 3:00 P.M. before the afternoon peak period, which starts at 4:00 P.M.

COMMENT 10-45

46. Construction mitigation measures and best management practices to minimize dust generated on the site as well as dirt tracked from the site should be employed including tire

shakes at the exit of the construction site. Also, all applicable storm water BMPs should be employed to prevent storm water contamination due to runoff from the construction site.

RESPONSE 10-45

As discussed in Volume I, Section IV.F Water Quality, on page 244 of the Draft EIR, the project shall prepare an SWPPP Prior to construction that will include BMPs from the City of Los Angeles' BMP Handbook Part A—Construction Activities. The project's SWPPP shall ultimately include BMPs from the six control categories, including: Erosion Control, Sediment Control, Tracking Control, Wind Erosion, Non-Stormwater Management Control, and Waste Management & Materials Pollution Control. Tire shakes, as mentioned in the comment, are just one type of Tracking Control measures that may be implemented into the construction phase. In addition, the project would implement SCAQMD Rule 403 requirements, the complete listing of which was provided in Volume 2, Appendix B-1, of the Draft EIR. Implementation of Rule 403 requirements would minimize the amount of dust generated on site, as well as "track out" dirt deposited off site to the greatest extent feasible.

LETTER NO. 11

Baldwin Neighborhood Homeowners' Association
Carol Tucker
P.O. Box 781329
Los Angeles, CA 90016

COMMENT 11-1

Please find attached comments and questions to the Draft EIR regarding the West Los Angeles Transportation Facility. Also, find attached copies of a petition signed by representatives of several Homeowner groups who are affected by the traffic on La Cienega Blvd. and the probable impact on traffic and noise as a result of this proposed MTA project. Those who have signed the petition object to the project and concur with the comments and questions being sent to you.

Responses should be sent to all individuals who have signed the petition and as well

The Baldwin Neighborhood Homeowners Association

RESPONSE 11-1

As analyzed in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR, the proposed West Los Angeles Transportation Facility would not have a significant impact on traffic. Based on the traffic study as provided in Appendix F, of the Draft EIR, the Transportation Facility would not impact any of the three study intersections analyzed. A significant impact on bus routing was identified. However, with incorporation of the mitigation measures, impacts would be less than significant .

Additionally, the Transportation Facility would not result in significant noise impacts. As discussed in Volume I, Section IV.H, Noise, of the Draft EIR, noise levels during construction and operation of the project would not exceed the 5-dBA significance criteria. Therefore, impacts would be less than significant.

Nonetheless, it should be noted that the facility would be completely surrounded with block and QUILITE walls on the north, west, and south, and would be bounded by the building on the east side. These walls would reduce potential sound and dust impacts. Specific comments on the Draft EIR and their respective responses are provided below. The California Environmental Quality Act (CEQA) does not require that the Final EIR, which include responses to comments, be sent to all Commentors. Due to the large scope of the project and the voluminous size of the document, delivery of the Final EIR to all Commentors would be both

costly and time consuming. However, copies of the Final EIR are available for public review on Metro's and the City of Los Angeles' websites and local public libraries. Additionally, all signatories to this comment letter have been placed on the mailing list to receive notices regarding the project.

COMMENT 11-2

Turn Radius at Jefferson and La Cienega.

The report indicates that the turn from La Cienega to Jefferson is very tight but could possibly be made.

- Former bus drivers have said to us that the turn could not be made without widening the street.
- Are there plans to widen Jefferson? If so how would it be done? Are there plans to purchase the property currently at that location?
- On the southside of Jefferson at La Cienega are MTA Rail tracks which would be the sight for the Light Rail crossing according to the Light Rail representatives from MTA. What effect will this have on the widening of Jefferson to accommodate buses turning on to that street?

RESPONSE 11-2

Mitigation Measure WLA-I-2 on page 354 of Volume I, Section IV.I, Transportation and Circulation, requires widening and restriping at the intersection of Jefferson Boulevard and La Cienega Boulevard. As described on page 354: "Widen Jefferson Boulevard along the south side of west of La Cienega Boulevard and shift the traffic lanes southerly providing a wider westbound curb lane for buses. Please see Responses to Comments Nos. 10-6 and 10-18 regarding the potential for bus routing impacts and the widening of Jefferson Boulevard and the Light Rail crossing. As indicated, the two improvements would be coordinated. It is recommended that Jefferson Boulevard be widened to accommodate the bus turning movements. It is further recommended that the widening be along the south side of Jefferson Boulevard west of La Cienega Boulevard on property currently owned by the MTA.

COMMENT 11-3

Buses Exiting at Jefferson and National.

- According to Light Rail representatives there will be an overpass at La Cienega and Jefferson. There needs to be about 500 feet of area to allow the train to descend to ground level after crossing La Cienega, It appears that Light Rail would be coming down to ground level at the

same area in which the buses would be exiting and returning at the intersection of Jefferson and National How can that be mitigated?

RESPONSE 11-3

Please see Response to Comment 10-18 regarding the potential for bus and LRT conflicts at the intersection of Jefferson Boulevard and National Boulevard. If the MTA Board adopts the long bridge span design option there will not be conflicts between the buses and LRT vehicles. If however, the short span bridge design option is adopted, the buses on Jefferson Boulevard will need to yield the right-of-way to the LRT vehicles at the intersection. Traffic signals will be redesigned to accommodate all at-grade crossings to minimize the interruptions to cross traffic.

COMMENT 11-4

- Officials of MTA stated that Light Rail would begin running at 4:00 A.M. and trains would be arriving within 5 minutes of another. What time would buses be leaving to avoid the trains? If buses are to be out of the area by 7:00 A.M., again, what time would they have to leave and how long will it take for all of the buses to leave from that location? What effect will Light Rail have on the buses returning to the maintenance yard in that Light Rail does not stop running until midnight and the buses, we are told, will return about 9:00 P.M.? How will you avoid a back-up of buses Departing and returning at the Jefferson and National Junction?

RESPONSE 11-4

Please see Responses to Comment Nos. 11-3 and 10-18 regarding the potential for bus and LRT conflicts at the intersection of Jefferson Boulevard and National Boulevard.

COMMENT 11-5

Departures of buses from Jefferson and Rodeo, Higuera and Jefferson.

- What will be the departure routes? What measures would there be to mitigate noise especially at Jefferson and Rodeo? How will the Higuera location be mitigated as there is not sufficient turn radius at that location?

RESPONSE 11-5

Please see Responses to Comment Nos. 10-24 and 10-25 regarding the bus routing to and from the proposed maintenance facility. As indicated therein, bus routing assignments to and from the maintenance facility are required to use the La Cienega Boulevard to/from Jefferson Boulevard route. As stated in Volume I, Section IV.I, Transportation and Circulation, page 354 and footnote 191, the proposed bus routing is along La Cienega Boulevard to Jefferson Boulevard and not south to Rodeo Road pursuant to Supervisor Burke's motion of September 25,

2003. However, as stated on page 37 of the traffic study as contained in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, if such a routine were to be followed, the intersection of Jefferson Boulevard and Rodeo Road/Higuera Street could accommodate the bus maneuvers (see also Traffic Study, Appendix C street plan illustration for the intersection of Jefferson Boulevard and Rodeo Road/Higuera Street.)

As per the Burke motion, the proposed transit bus route avoids the intersection of Jefferson Boulevard and Rodeo Road, and potential roadway noise impacts at and near that intersection would be less than significant. In addition, as discussed in Section IV.H, Noise, of the Draft EIR, noise impacts associated with operation of the Transportation Facility along all street segments in the project vicinity would be less than significant.

COMMENT 11-6

Buses returning after the morning rush hour and departing again for the afternoon rush hour.

- According to information in the MTA Land Swap Agreement there would be a portion of the buses returning to the Transportation Center after the Rush hour and departing again just prior to the late afternoon rush hour.

Traffic on La Cienega becomes very heavy by 7:00 A.M. and continues well into the night time hours, which means it doesn't lessen throughout the day.

- What routes will be taken to avoid traffic on La Cienega, and as well, Light Rail running along Jefferson to National as well as the very busy commercial area along Higuera at Hayden?

RESPONSE 11-6

Please see Response to Comment No. 11-5 regarding the bus routing to and from the proposed maintenance facility and Response to Comment No. 11-3 regarding the bus and LRT conflicts at Jefferson Boulevard and National Boulevard. Buses will be rerouted along Jefferson Boulevard, National Boulevard and La Cienega Boulevard. The traffic study analysis is based on the peak-hour, project-related traffic impacts along this route. The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 11-7

Presently, there are gasoline tanks underground which were previously used by Sparkletts Water Company. What measures will be taken to remove the gasoline tanks and the toxic waste caused by them?

RESPONSE 11-7

As discussed in Volume I, Section IV.E. Hazardous Materials, on page 210 of the Draft EIR, two remaining USTs on the Transportation Facility site were removed in September 1988 and March 1999. The residual concentration of petroleum hydrocarbons detected in soil and groundwater samples collected from the locations of the former USTs were acceptable to leave in place and consequently, the Los Angeles Regional Water Quality Control Board has granted case closure on both USTs. Please also refer to Appendix D1 (Volume III), page 14, for conclusions regarding the USTs that were removed.

COMMENT 11-8

Also we have received information regarding the need for upgrading the present sewage lines in the area of Jefferson and includes the property proposed for the WLA Transportation Center. Please describe measures being taken to clean up toxic waste from deteriorated sewage lines.

RESPONSE 11-8

Any upgrades to the wastewater system that might be necessary within the project area would be completed by the City of Los Angeles, Department of Public Works, Bureau of Sanitation. If contaminated soils were found as a result of such activities, excavation and export of such soils for off-site disposal or treatment would occur in compliance with federal, state, and local requirements related to hazardous materials, including those requirements set forth by DTSC, OSHA, and Cal/OSHA.

COMMENT 11-9

Newport-Inglewood Fault

The Draft EIR identifies the West Transportation Facility Site (the "Site") as within 680 feet of the Newport-Inglewood Fault; it also identifies the Site as within a liquefaction hazard zone. (See pages 187-191 of the Draft EIR.) Yet it does not identify or address any mitigation effort necessary to ameliorate the danger of locating underground fuel storage tanks within a fault zone. Besides the safety factor of potential fires or explosions, what would be the impact on Ballona Creek/Santa Monica Bay since Methane does not biodegrade, but is slightly water soluble?

RESPONSE 11-9

As discussed in Volume I, Section IV.D, Geology/Seismic Hazards, of the Draft EIR, construction of structures, including infrastructure and USTs, would be completed in accordance with Uniform Building Code (UBC) standards for Southern California Seismic Zone IV. As discussed in the geotechnical engineering study prepared for the Transportation Facility site (see

Volume II, Appendix C1, page 5 of the Draft EIR), the UBC requirements are based on ground motions. The computed peak acceleration rate for the site has been calculated to be 0.49 g (gravity). Therefore, this 0.49 g acceleration rate would be used for structural design purposes of the project.

With regard to liquefaction, design factors and structural design for stabilizing all project structures in the identified liquefaction zone are discussed on page 198 of Section IV.D, Geology/Seismic Hazards of the Draft EIR. As discussed in Section IV.D, Geology/Seismic Hazards, compliance with the requirements of the Alquist Priolo Earthquake Fault Zoning Act, UBC and California Geologic Survey (CGS), together with the proposed mitigation measures outlined beginning on page 201 of the Draft EIR, would ensure that potential impacts associated with seismic hazards would be less than significant. Further, any USTs on site would comply with all applicable regulations and guidelines set forth by the Los Angeles Regional Water Quality Control Board and the City of Los Angeles Fire Department. Such regulations require that leak detection systems and other devices be installed to prevent potential risks.

COMMENT 11-10

Impact on noise and traffic

The Draft EIR does not adequately address the impact of the Transit Station noise on the surrounding community. A more detailed noise assessment as noted in the manual “FTA, Transit Noise and Vibration Impact Assessment, 1995d” is required to obtain a more accurate assessment; especially in light of the impending potential noise impact from the proposed light-rail project in the same vicinity. Even the quote from the same manual noted on p. 313 of the DRAFT EIR is incomplete. The quote continues, “When buses cause effects such as rattling of windows, the source is almost always air-borne vibration.” It is unclear to readers of the DRAFT EIR what impact 1000 plus bus trips per day would have, within the time sensitive sleep-time hours of operation of the bus transit facility, on air-borne vibration noise within the community surrounding the transit facility.

RESPONSE 11-10

Chapter four (4) of the FTA Guidance Manual “Transit Noise and Vibration Impact Assessment (1995)” provides a noise screening procedure designed to identify locations where a project has little possibility of noise impact. If no noise-sensitive land uses are present within a defined area of project noise influence, then no further noise assessment is necessary. For a bus storage and maintenance center, the screening distance is 1,000 feet unobstructed view (500 feet with intervening buildings) measured from the center of noise generating activity. For a transit bus route, the screening distance is 500 feet unobstructed view (250 feet with intervening buildings) measured from the roadway centerline. With respect to the proposed project, the Syd

Kronenthal Park, Turning Point School, residential uses located immediately north/northwest of the Syd Kronenthal Park, and residential uses located east of La Cienega Boulevard (behind the commercial frontage) fell within the FTA-defined area of project noise influence. As such the noise impact assessment evaluated potential impacts to these, among other, noise-sensitive uses.

The Transportation Facility noise impacts on the surrounding community were adequately and completely addressed in the Draft EIR. The noise analysis evaluated the potential impacts attributable to all Transportation Facility-related noise sources (i.e., roadway bus volumes, idling buses (within the Transportation Facility compound), backup alarm beeps, bus washing, air compressor machines, and the roof-top employee parking area) on the surrounding community during the daytime and nighttime time periods. As fully discussed and demonstrated on pages 308 through 313 of Section IV.H, Noise, of the Draft EIR, noise level increases would not exceed the 5-dB significance criterion at any sensitive receptor location; and impacts related to on-site facility noise levels would be less than significant. Nonetheless, it should be noted that the facility would be completely surrounded with block and QUILITE walls on the north, west, and south, and would be bounded by the building on the east side. These walls would reduce potential sound and dust impacts.

In addition, the combined noise impact to areas along the proposed transit bus route (i.e., Jefferson Boulevard and La Cienega Boulevard) from bus trips and the proposed Mid-City/Exposition Light Rail Transit (LRT) alignment were also evaluated. As discussed in the second to last paragraph on page 321 of Section IV.H, Noise, of the Draft EIR, the overall cumulative impact (i.e., noise from project, related projects, and ambient growth traffic volumes, and noise from the LRT alignment) would not exceed the 5 dBA significance threshold. As such, cumulative noise impacts (from bus transit route and LRT alignment) would be less than significant.

Regarding the proposed project's potential to cause "air-borne" vibration and/or noise impacts, sound waves are nothing more than air-borne vibration. As such, the proposed project's potential for air-borne vibration-related noise impacts were discussed above. With respect to potential "physical" impacts from air-borne vibration, such as rattling window panes, these impacts are unlikely, since the proposed transit bus route would avoid residential streets, and buses would not encounter any elevation changes along the proposed route that would require "engine revving." Project-related transit buses would travel along the same roadways (i.e., Jefferson Boulevard and La Cienega Boulevard) that several dozen heavy-duty vehicles (e.g., 18-wheel commercial trucks, refuse trucks, school buses, transit buses, etc.) travel every day. In addition, there is no methodology to analyze effects from vehicle-related airborne vibration. Each building receiver location would respond differently, based construction materials, construction quality, and overall level of building maintenance and upkeep. If structures along the proposed transit bus route do not currently experience airborne vibration impacts due to

heavy-duty vehicles that currently travel along Jefferson Boulevard and La Cienega Boulevard, then it is unlikely that they would experience such impacts due to project-related transit bus trips.

COMMENT 11-11

The Air Quality Management District has indicated that the pollution within areas of South Central Los Angeles is at its' [sic] peak ; that increased traffic with further pollute the area. The DRAFT EIR also acknowledges that this proposed project will have an impact on noise and traffic and would require further EIR study. What will further studies show and what mitigation measures will there be to ameliorate a situation that is currently out of control.

RESPONSE 11-11

The Draft EIR has fully analyzed the project impacts on air quality, traffic, and noise in Volume I, Sections IV.B, Air Quality; IV.H, Noise; and IV.I, Transportation and Circulation. Mitigation measures were proposed within each of the sections. Those measures are repeated in Section I, Summary of the Final EIR. As indicated in the Draft EIR, project impacts associated with construction and operation for the West Los Angeles Transportation Facility would be less than significant with mitigation. At the Sunset Avenue project site location, there would be no significant air quality or noise impacts during the project's long-term operations period, but construction-period air quality and noise impacts would be significant and unavoidable, even after implementation of all feasible mitigation measures. The analyses performed used recognized and required methodologies including those required by CEQA, the City of Los Angeles Threshold Guide, and the Air Quality Management District. Further studies regarding the impacts of the proposed project are not proposed by the Draft EIR.

COMMENT 11-12

We the undersigned residents of the 10th Council District object to the construction of the MTA WEST LOS ANGELES DIVISION 6 TRANSPORTATION CENTER because of the major impact that this project would have on the environment within this community. The environmental impact being that of increased traffic congestion and noise in an area that is currently at its' [sic] peak in regards to pollution.

[Note: An attachment to this comment letter was included. Please refer to Appendix A of this Final EIR for a copy of this attachment.]

RESPONSE 11-12

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As analyzed in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR, the West Los Angeles Transportation Facility project would result in an increase of 1,666 daily trips. However, based on the traffic study provided in Volume IV, Appendix F, F1—

West Los Angeles Transportation Facility, Traffic Study, of the Draft EIR, these trips would not result in any significant impact to the study intersections. Therefore, the project would have a less than significant impact on traffic conditions. Additionally, as discussed in Volume I, Section IV.H, Noise, the project would result in an increase in noise level. However, this increase would not exceed the 5-dBA significance threshold for noise impacts, and thus impacts would be less than significant.

LETTER NO. 12

Blair Hills Association
Mary Ann Greene
Culver City, CA 90232

COMMENT 12-1

MEMBERS OF THE BLAIR HILLS ASSOCIATION HAVE REVIEWED THE E.I.R. AND THEIR COMMENTS FOLLOW AS INDIVIDUAL RESPONES [sic].

RESPONSE 12-1

This comment acknowledges that the Blair Hills Association has reviewed the Draft EIR. Specific comments on the Draft EIR and their respective responses are provided below.

COMMENT 12-2

I have the following comments on the EIR for the West L.A. Transit facility, which is to be built near the neighborhood in which I live.

RESPONSE 12-2

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Specific comments on the Draft EIR and their respective responses are provided below.

COMMENT 12-3

I am concerned about the availability of land for landscaping, which would greatly soften the stark, angular structure being presented. The report referenced the Restricted Industrial Zone ordinance of Los Angeles Municipal Code, specifying section D.1 which requires 15 foot front yard setbacks on lots in excess of 100 feet in depth, specifying that: "All front yards shall be suitably landscaped and maintained except for necessary driveways and walkways."

The report further states that the Los Angeles Metropolitan Transit Authority is not restricted by, nor required to abide by the L.A. Municipal Code. While this exemption gives the MTA the latitude it may need to create such a facility, and thus meet the ever increasing transportation demands of the region, it is prudent to give considerable attention to the value of landscaping. I would urge you to try and make more land available for landscaping on the perimeter of the building. Such landscaping would be in keeping with neighborhood associations' attempts to get civic bodies to "green" this area, and reduce the negative impact of poorly maintained and blight

ridden light industrial facilities in the area. This transit facility will be in place and in use for many, many years to come. It should help create better aesthetics in the area, thus contributing to better quality of life for area businesses, residents, and consumers, alike.

RESPONSE 12-3

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

The Draft EIR, on pages 110–111, provides an analysis of the impact of the West Los Angeles Transportation Facility on the aesthetics of the surrounding area. The analysis notes the following: project development would convert the site appearance from its degraded state to one with newly constructed, landscaped features; the project's functional and efficient structures, uses, heights and densities would be consistent with other structures in the area, and the project would be screened by a decorative perimeter wall with landscaping that will serve to soften the visual characteristics of structures and pavement that typifies the visual locale. Accordingly, it was concluded that the project would not cause the conversion of large areas of visible natural open space, or valued visual resources; or introduce substantial contrast between proposed project elements and existing features that embody the area's valued aesthetic image. Therefore, impacts would be less than significant.

Final design of the facility is in the process of being completed. Final design decisions are being worked on with a community design review committee that was formed to work with Metro on the external visual appearance of the facility. This committee was set up at the direction of Metro Director Burke and includes four residential and two business representatives of the community. The committee began meeting in summer 2004, and has met several times since. Work of the committee has focused on the appearance of the facility from the street, for vehicles and pedestrians going by, from neighboring hillsides, and along the property lines for adjacent property owners; materials to be used on the exterior of the building; setbacks from the street; amount, type and variety of landscaping; and environmental/LEED characteristics of the design. LEED (Leadership in Energy and Environmental Design) Green Building Rating System is a voluntary, consensus-based national standard for developing high-performance, sustainable buildings. The project is proposing design features that will qualify it for LEED certification pursuant to the December 4, 2003 motion of Mayor James Hahn (included in Volume IV of the Draft EIR as Appendix H2) and approved by the Metro Board of Directors. As work of the committee proceeds, the final design of the site, including landscaping, will be further formalized.

COMMENT 12-4

Lighting of the building is very important. The report indicates that lighting will be directed away from streets and any adjacent premises. The lighting design and mechanisms used to distribute the lighting should be aesthetically pleasing, too. It will be important that all efforts be made to discourage graffiti, through design processes. Therefore, lighting should also incorporate a design aimed at graffiti reduction.

RESPONSE 12-4

The Draft EIR discusses illumination in Volume I, Section IV.A. Aesthetics. The regulatory discussion on page 104 cites two sections of the Los Angeles Municipal Code that apply to the project. These Code sections require that all lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and any adjacent premises (Chapter 1, Article 2, Sec. 12.21 A5(k)) and require plans for street lighting systems be submitted to the Bureau of Street Lighting for review. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 12-5

“Greening” the rooftop is one measure that would solve the aesthetics issue of line of sight, and view angles from homes. It would also help improve air quality, since trees help increase oxygen.

RESPONSE 12-5

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As noted in the Response to Comment No. 12-3 there is a community design review committee reviewing design options, including LEED design options. Roof greening is one of the design options that is credited under the LEED certification program, and one of the options under consideration by Metro.

COMMENT 12-6

It would appear that the MTA has tried to take into consideration the concerns of residents through community Outreach efforts, an important part of building community partnerships.

RESPONSE 12-6

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 12-7

Jonathan D. Melvin
Resident of Blair Hills, Culver City
December 5, 2004

RESPONSE 12-7

This comment introduces the Commentor and does not provide new environmental information or directly challenge information presented in the Draft EIR. Therefore, no response is required.

COMMENT 12-8

Pages 43, 44, 57, 58, and 59 were missing. I printed them from the CD and added them. They need to be stapled in to the two copies provided.

RESPONSE 12-8

Metro and the City of Los Angeles, as co-lead agencies, for the project did not receive any other comments regarding missing pages in the Draft EIR. It is unknown as to why the copy received by the Commentor did not include the pages referenced. However, as noted by the Commentor, the Draft EIR was available electronically on a CD. In addition, the Draft EIR was available on-line on both the City of Los Angeles and the Metro websites for public viewing and printing.

COMMENT 12-9

1. Page 175 indicates that the MTA facility needs the full 175 bus capacity, notwithstanding what was said at our neighborhood meeting. If the capacity is not met, yet another facility would be needed with an overall negative impact on the region, thus supporting building it out to the full 175 bus capacity here. The only negative impact is that there will be a less than 15 foot set back on Jefferson. But the setback is not required for MTA projects (as opposed to other light industrial projects) and the area impacted is all industrial, so I do not consider this significant (see p 37),

RESPONSE 12-9

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. This statement is consistent with the conclusions of the Draft EIR regarding the applicability of the zoning set forth in the Los Angeles Municipal code to the proposed Metro project.

COMMENT 12-10

2. How will compliance with the mitigation measures on pp. 20, 23, 24, 27, 28, 36, 46, 47 be enforced?

RESPONSE 12-10

The Mitigation Monitoring and Reporting Program (MMRP), which is included in Section IV, of this Final EIR, identifies the enforcement agency(ies) for each mitigation measure proposed in the Draft EIR. In addition, the MMRP identifies the monitoring agencies and actions indicating compliance for each mitigation measure.

COMMENT 12-11

3. p31 - Geological report -- all information is from one geotechnical company (Environmental Support Technologies, Inc.). It would be good to get another opinion - I trust Exploration Technologies, Inc. in Houston, Texas. They gave a careful evaluation of the underground gas hazards for the Vista Pacifica project, for the city of Los Angeles.

4. p32 - hazardous waste -- it would be good to get an independent statement from CCFD. What do they really think of this project?

RESPONSE 12-11

The geological report for the proposed project was prepared by Advanced Geotechnical Services, Inc., a fully registered professional firm in the State. Therefore, the company meets all the standards and qualifications for providing technical reports as required by State law. CEQA does not require that a project obtain a "second opinion" for technical analyses. Therefore, it is not necessary to utilize a second geological consultant.

The Culver City Fire Department did not submit an individual comment letter during the public review period for the Draft EIR. As discussed in Volume I, Section IV.E, Hazardous Materials, of the Draft EIR, compliance with all applicable local, state, and federal regulations, would reduce project impacts related to hazardous materials to a less than significant level.

COMMENT 12-12

5. p47 -- mitigation of the turning space at La Cienega and Jefferson seems important to me. I am glad it is in the project.

RESPONSE 12-12

As indicated by the Commentor, the project does include a mitigation measure, Mitigation Measure WLA-I.2, to alleviate the tight right-turn at the intersection of La Cienega and Jefferson Boulevards. This comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 13

Eugene Barbie
3625 Kalsman Drive, Unit 2
Los Angeles, CA 90016-4438

COMMENT 13-1

Because of the increased traffic, noise, smog and decreased resulting property values in the area, I encourage you to consider an MTA location elsewhere.

RESPONSE 13-1

As analyzed in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR, the proposed West Los Angeles Transportation Facility would result in an increase in 1,666 daily (passenger car equivalent) vehicle trips. However, based on the traffic analysis, the increase in trips would not have significant impact on the study intersections. Therefore, impacts on traffic would be less than significant.

Additionally, as analyzed in Volume I, Sections IV.H, Noise, and IV.B, Air Quality, of the Draft EIR, the proposed West Los Angeles Transportation Facility would increase noise levels and air emissions during construction and operation of the project. However, these increases would fall below the significance thresholds as set forth in the City of Los Angeles CEQA Thresholds Guide. Therefore, project impacts with regard to noise and air quality would be less than significant. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

Regarding property values, the California Environmental Quality Act (CEQA) states that a Draft EIR need not analyze economic and social changes resulting from a project, except in such cases where a physical change is caused by economic or social effects of a project. Specifically, CEQA Section 15064(e) states that “economic and social changes resulting from a project shall not be treated as significant effects on the environment.” Therefore, property values is not considered a CEQA issue, and the analysis of such is not required in the Draft EIR.

The Draft EIR includes an analysis of Alternative sites in Volume I, Section V.E on pages 422 to 426. That discussion addresses the search for the project site, and the consideration of a considerable number of alternative sites over many years, as well the likely impacts that would be expected to occur at an alternative location. The conclusion of that discussion on page 426 is as follows: “Due to the extent of Metro’s search for a development site, the failure to find other appropriate sites over a many-year period, and the un-likelihood that any alternative location would reduce the environmental effects of the project, it is concluded that the Alternative Location alternative would not meet the Applicant’s objectives, nor address any of the project’s significant impacts, as intended by the CEQA Guidelines.”

LETTER NO. 14

Walter N. Marks, Inc.
Wally Marks III
8758 Venice Boulevard
Los Angeles, CA 90034

COMMENT 14-1

I operate a business in the area of the proposed Transportation Facility located at 3475 South La Cienega Bl.

I support the efforts of the MTA to locate a new facility at this location. I believe that the site will serve well.

I hope that the MTA includes in the construction of the facility Green Building Standards, including the installation of the photovoltaic cells, as a way to continue being the leader in progressive and innovated building choices.

The community watches how government, and the MTA, promotes progress.

RESPONSE 14-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

As indicated in Response to Comment No. 12-3, final design decisions are being worked on with a community design review committee that was formed to work with MTA on the external visual appearance of the facility. Work of the committee has focused on the appearance of the facility from the street, for vehicles and pedestrians going by, from neighboring hillsides, and along the property lines for adjacent property owners; materials to be used on the exterior of the building; set-back from the street; and amount, type and variety of landscaping. In addition, the project is proposing design features that will qualify it for LEED certification. Thus, various environmental or “green” characteristics of the design are being considered by the committee and Metro. As work of the committee proceeds, resolution/consensus is being reached on outstanding issues.

LETTER NO. 15

Jackie McCain
4135 LaFayette Pl.
Culver City, CA 90232

COMMENT 15-1

This facility has a La Cienega address in Los Angeles but the bus Entrance/Exit and Employ/Visitor [sic] Entrance/Exit are located on Jefferson Boulevard. The width of Jefferson at this point is not sufficient for a bus to navigate either in or out. This has to be mitigated, but how?

RESPONSE 15-1

As discussed in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, all buses will turn right out of the site and left from the median left-turn lane on Jefferson Boulevard, as shown in Figure 6, page 14, Bus Travel Paths. Jefferson Boulevard adjacent to the site provides two lanes in each direction with a median left turn lane for left-turns into the facility. No mitigation is necessary to provide left-turn access into the proposed bus maintenance facility. Routing impacts and required mitigation was summarized in Volume I, Section IV.I, Transportation and Circulation, page 342, of the Draft EIR.

COMMENT 15-2

The Light Rail Transit will be coming down Jefferson and National and has to cross Ballona Creek, so this will put all buses entering and exiting from the south which is not acceptable [sic, punctuation] There should be some way to have your entrance and exit for buses as well as employees on La Cienega. Closing the building completely on the Jefferson Boulevard side will eliminate a portion of your noise and traffic.

RESPONSE 15-2

Please see Response to Comment Nos. 10-18 and 11-3, regarding the LRT design alternatives for Jefferson Boulevard and National Boulevard. As indicated therein, conflicts between the proposed project with its mitigation at Jefferson Boulevard and La Cienega Boulevard would not conflict with the LRT facilities. The project site fronts on Jefferson Boulevard with private property abutting its easterly property line. Access from La Cienega Boulevard is not feasible.

COMMENT 15-3

This 4.66 acres needs an opening on La Cienega, more convenient for all concerned. The total for 175 Compressed Natural Gas buses and diesel buses will come in for repair. There is parking for the buses and an upper level for 240 employees to park and certainly shifts could overlap with another 200 employees on the way. They have building of 53,120 square feet, which is office and also maintenance, along with 14 bays. No comment on bays being closed so noise doesn't bounce around at all hours.

RESPONSE 15-3

Please refer to Response to Comment No. 15-2, above, for discussion of why La Cienega access to the proposed project site is not feasible.

Stationary-source noise impacts from sources such as employees and cars that enter and leave the parking deck during the late night and early morning hours, idling buses, backup alarm beeps, bus washing, and air compressor machine operations were evaluated on pages 311–313 in the Draft EIR. As demonstrated therein, noise impacts attributable to these noise sources would be less than significant.

COMMENT 15-4

The peak hours of operation 4:00 A.M. to 6:00 A.M. At 7:30 P.M. to 9:00 P.M. There are no charts on how many buses will use Culver City streets to and from their routes. Who will maintain our streets?

RESPONSE 15-4

As discussed in Volume IV, Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, all buses will turn right out of the site and left from the median left-turn lane on Jefferson Boulevard as shown in Figure 6, page 14, Bus Travel Paths. The buses will travel on streets between the maintenance facility and La Cienega Boulevard and therefore would not use the Culver City streets.

COMMENT 15-5

It seems there is a question on hazardous waste on the property. Underground tanks two or three, removed when and ground water tested? Nothing is said about recycling of wash water and where the filter and catch basin will be. The need for storm water to be drained without any oil or waste from the cleaning and maintenance of the buses.

RESPONSE 15-5

The comments regarding underground storage tanks (USTs) have been responded to under Hazardous Materials. Specifically, refer to Response to Comment No. 11-7 regarding removal of USTs from the Transportation Facility site.

In regards to recycling of wash water, it is stated under Volume I, Section IV.F Water Quality, page 246, of the Draft EIR, that "...a reclamation area would be located adjacent to the two bus washers that would recycle bus-washing waters to be reused on-site." Additionally, clarifiers and catch basins shall be incorporated into the plan, but as project designs are in a conceptual stage, exact locations of water quality infrastructure is not available at this time.

COMMENT 15-6

This DEIR in my opinion is not complete and where it contains two sites you find yourself suddenly on Main Street which is not the WLA Facility

RESPONSE 15-6

The Draft EIR was completed in accordance with the requirements set forth in CEQA and the CEQA Guidelines. The Draft EIR provides a thorough analysis of the potential impacts associated with both the proposed West Los Angeles Transportation Facility project and the Sunset Avenue Project. For example, each of the topical sections within Chapter IV, Environmental Impact Analysis, is divided into subsections, which provide separate and distinct discussions of the impacts associated with each project, as well as a discussion of the total impacts of the two projects combined.

LETTER NO. 16

Darren Starks

COMMENT 16-1

This email is in response to the proposed West LA Transportation Facility that MTA wants to build near Jefferson Bl. And National. There would be severe problems with run off during the rain that would drain in to the Balona Creek (wash) which would be directly across the street from the facility. Second, there are earthquake fault lines that run through that area which would cause great danger with the proposed underground tanks of natural gas that they plan to use to power the buses. And third, this would cause enormous traffic problems on an already busy street (La Cienega). The proposed route that this buses would use to exit and get to the freeway would be greatly impacted. Further more there is not enough room for these buses to make a safe turn when returning to the facility. With the MTA also proposing to have light rail running down Exposition, and having a station as well as a park and ride close by, this appears to be too much in this one area. This would cause extra pollution to and [sic] area that is already at its limit. It would cause noise beyond belief.

RESPONSE 16-1

As analyzed in Volume I, Section IV.F, Water Quality, of the Draft EIR, stormwater runoff from the proposed West Los Angeles Transportation Facility would not exceed the standards allowed by the NPDES permit or the Basin Plan. Construction of the project would occur in accordance with SWPPP guidelines and would employ Best Management Practices (BMPs). Additionally, during operation of the project, the project would comply with the NPDES permit, SWPPP, and the City of Los Angeles' Standard Urban Storm Water Mitigation Plan (SUSMP). Compliance with the above requirements would ensure that the project would not have a significant impact on water quality.

With regard to seismic hazards, as discussed in Volume I, Section IV.D, Geology/ Seismic Hazards, of the Draft EIR, the closest earthquake fault to the proposed West Los Angeles Transportation Facility is the Newport-Inglewood Fault, located approximately 680 feet southwest of the site. Additionally, the site is located within a delineated Alquist-Priolo Fault Hazard Zone. However, the project would abide to the policies and criteria set forth by the Alquist-Priolo Fault Zoning Act. In addition, the project would implement the mitigation measures provided on pages 201–203 to reduce the risk of seismic hazards. Therefore, the project would not expose people to substantial risk of injury, and impacts would be less than significant.

As discussed in Volume I, Section II, Project Description, pages 67–71, and page 13 of Appendix F, F1—West Los Angeles Transportation Facility, Traffic Study, of the Draft EIR, the analysis of the peak-hour bus routing will follow a set circulation pattern to begin and end their respective transit routes. Pursuant to the MTA staff, these buses not in service will begin and end their routes at the bus maintenance facility. Bus routing assignments to and from the maintenance facility are required to use the La Cienega Boulevard to/from Jefferson Boulevard route.

Additionally, as analyzed in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR, the proposed West Los Angeles Transportation Facility would not have a significant impact on traffic. Based on the traffic study as provided in Appendix F, of the Draft EIR, the Transportation Facility would not impact any of the three study intersections analyzed. A significant impact on bus routing was identified. However, with incorporation of the mitigation measures, impacts would be less than significant. Please see Response to Comment 10-18 regarding the potential for bus and LRT conflicts. As analyzed in Volume I, Sections IV.A, Air Quality, and IV.H, Noise, impacts associated with the West Los Angeles Transportation Facility would be less than significant.

COMMENT 16-2

It would also affect our property values and our quality of life.

RESPONSE 16-2

Quality of life is a general term and typically consists of a variety of factors including air quality, noise quality, transportation/congestion management, and availability of services (e.g., water, wastewater). For an analysis of an issue associated with quality of life, please see the appropriate section in Chapter IV, Environmental Impact Analysis of the Draft EIR.

Regarding property values, the California Environmental Quality Act (CEQA) states that a Draft EIR need not analyze economic and social changes resulting from a project, except in such cases where a physical change is caused by economic or social effects of a project. Specifically, CEQA Section 15064(e) states that “economic and social changes resulting from a project shall not be treated as significant effects on the environment.” Therefore, property values is not considered a CEQA issue, and the analysis of such is not required in the Draft EIR.

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 16-3

La Cienega is already a major route to those trying to get to LAX and with the proposed expansion of the airport the traffic will only get worse.

RESPONSE 16-3

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The assessment of the cumulative traffic impact has been accurately assessed by the inclusion of 23 related projects and the ambient traffic growth factor. Ambient growth factors are used to account for the cumulative effect of small projects, unknown projects at the time of the issuance of the NOP and for the growth due to large projects located outside of the study area. The LAX expansion project was not included on the development list provided by the City of Los Angeles after the release of the NOP. This project is located over 5 miles from the Transportation Facility study area. As such, any traffic growth due to the airport expansion by the study year 2006 is covered by the ambient growth factor.

COMMENT 16-4

MTA has been careless and has been unfair in their treatment of the neighbors that this project would impact. They never gave us any propose [sic] alternate sites not did they propose better use of the existing facilities that already exist. If there is to be light rail down Exposition, then there should be a lesser need for more buses there by eliminating the need for this facility. I feel that the proposed area where this facility to be built would be better served as a mixed use/light industrial site.

RESPONSE 16-4

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

As discussed in Volume I, Section V.C, Alternatives, of the Draft EIR, under Alternative D: West Los Angeles Transportation Facility Site Alternate Site, Metro currently does not own property that could serve as an alternative site for the proposed Transportation Facility. As stated therein, the search and acquisition of an appropriate development site has been difficult. The proposed site is the result of a 20 year long effort by Metro to secure a feasible site for the proposed Transportation Facility. Additionally, “better use” of the existing facilities would not allow Metro to achieve its objectives. The size and location of the existing Division 6 Bus Depot precludes Metro from provided expanded service from a centralized location.

As discussed in Volume I, Section V.A, Alternatives, under Alternative B: West Los Angeles Transportation Facility Site No Project/Community Plan, development of the proposed

site for light industrial uses would result in similar and, in some cases, greater environmental impacts when compared with the proposed project.

The Draft EIR includes an analysis of Alternative sites in Volume I, Section V.E on pages 422 to 426. That discussion addresses the search for the project site, and the consideration of a considerable number of alternative sites over many years, as well the likely impacts that would be expected to occur at an alternative location. The conclusion of that discussion on page 426 is as follows: “Due to the extent of Metro’s search for a development site, the failure to find other appropriate sites over a many-year period, and the un-likelihood that any alternative location would reduce the environmental effects of the project, it is concluded that the Alternative Location alternative would not meet the Applicant’s objectives, nor address any of the project’s significant impacts, as intended by the CEQA Guidelines.”

LETTER NO. 17

City of Los Angeles, Department of Public Works
Orlando Nova
Division Manager, Bureau of Street Lighting
600 South Spring Street, 14th Floor
Los Angeles, CA 90014

COMMENT 17-1

SUBJECT: METROPOLITAN TRANSPORTATION AUTHORITY SUNSET AVENUE PROJECT.

Our office has completed reviewing the subject draft EIR prepared by MTA's consultants. The following are our comments to the subject project:

RESPONSE 17-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The EIR is being prepared by Metro and the City of Los Angeles, which are co-lead agencies for the Sunset Avenue Project. Specific comments on the Draft EIR and their respective responses are provided below.

COMMENT 17-2

1. New roadway realignment or roadway widening improvements initiated by the project will require new street lighting systems. Bureau of Street Lighting will determine [sic] if existing lighting equipment can be replaced or relocated, or if a new lighting system is needed. Page 329
2. Streets adjacent to a proposed project that would construct 225 units will require lighting improvements per City's standards. Page 277

Create a sub section called "Lighting Improvement and Proposition 218 Process":

1. In general, any street/pedestrian lighting improvements that create new assessments or increase existing assessments to property owners will require the Proposition 278 process to take effect. This process not only requires community participation but also their approval throughout a ballot process.

2. Depending on the classification of this project (private or public road and facility), the jurisdiction and lighting standards of this Bureau may only apply to portions of the project. Proposition 218 does not impact improvements to private facilities.
3. Complete information of the Proposition 218 process is available at BSL. This process typically takes about 6 months to complete. The lighting assessment is paid by property owners through the County Property Tax Bill. Assessments must be confirmed by City Council before construction of the system starts.

RESPONSE 17-2

It is not anticipated that the street/pedestrian lighting improvements associated with the project would create new assessments or increase existing assessments to property owners. However, to the extent that any street/pedestrian lighting improvements associated with the project create new assessments or increase existing assessments to property owners, the Applicant would cooperate in the Proposition 218 process. An addition has been made to the Draft EIR to reflect this information, as well as provide background on Proposition 218. Please refer to Section II, Corrections and Additions, of this Final EIR.

COMMENT 17-3

Utility Protection/Relocation: The draft report needs to include hazard and construction impacts and it needs to address street lighting impacts and temporary street lighting needs during construction.

RESPONSE 17-3

The Draft EIR addresses potential hazard, construction and street lighting impacts for the Sunset Avenue Project throughout the Draft EIR. In particular, Volume I, Sections IV.B, Air Quality; IV.D, Geology/Seismic Hazards; IV.E, Hazardous Materials; IV.H, Noise; and IV.I, Transportation and Circulation, include subsections that address construction impacts, and recommend mitigation measures for the public health and safety. Volume I, Section IV.A, Aesthetics, includes a discussion of impacts on street lighting. As indicated, the project would comply with all City regulations regarding lighting, including the required submission of plans for approval by the Bureau of Street Lighting, per Chapter 1, Article 7, Section 17.08C of the Municipal Code. As described in the EIR, with the implementation of the mitigation measures, and compliance with City regulations, impacts regarding construction and lighting at the Sunset Avenue Project would be less than significant except for construction impacts associated with Air Quality and Noise.

COMMENT 17-4

Add in this section: All street lighting systems within the City of Los Angeles that are part of the project will be designed to meet the IESNA/ANSI RP-8-00 as adopted by the City of Los Angeles.

RESPONSE 17-4

All street lighting systems within the City of Los Angeles that are part of the project will be required to comply with all applicable standards adopted by the City of Los Angeles. The Draft EIR cites the required compliance for the Sunset Avenue Project on page 119 of Volume I, Section IV.A, Aesthetics of the Draft EIR. In response to this comment, the statement on page 119 has been elaborated upon in Section II, Corrections and Additions, of this Final EIR.

COMMENT 17-5

Mitigation Measures Sunset Avenue Project: Street widening along Main Street requires relocation of the existing streetlights or an upgrade of street lights to meet our standard adopted illumination level.

Mitigation Measures Sunset-1.3: We may have to upgrade the street lights at the intersection at Main Street and Sunset Avenue.

Mitigation Measures Sunset-1.5: We may have to upgrade the pedestrian crossings located across Main Street at Sunset Avenue and Pacific Avenue at Sunset Avenue.

Mitigation Intersections:

The draft Report reflects 13 signalized intersections to be impacted. They were evaluated to determine potential mitigation measures; Full Street lighting improvements will be required by the City/BSL at all Signalized Intersections. Page 331 and 332

Should there be any questions, I may be contacted at (213) 485-1377

RESPONSE 17-5

Street Lighting upgrades/improvements may be necessary at intersections identified as significantly impacted and along streets that require widening. Specifically, the intersections of Sunset Avenue and Main Street, and Pacific Avenue and Sunset Avenue may require street lighting upgrades as part of Mitigation Measure Sunset I-5, identified on page 358 of the Draft EIR. Street widenings along Main Street, Pacific Avenue, and Thornton Place are not

recommended, but street lighting upgrades/relocations may be necessary upon review by the Bureau of Street lighting through the City's B-permit process.

The traffic analysis prepared for the project included 13 intersections, however, street lighting mitigation is only required at the intersections identified as significantly impacted and those that require physical intersection improvements through the City's B-permit process. Study intersections that are not significantly impacted by project traffic are not required to submit improvement plans for street lighting upgrades.

LETTER NO. 18

Los Angeles Unified School District
Raymond E. Dippel
Assistant Environmental Planning Specialist
333 S. Beaudry Avenue, 20th Floor
Los Angeles, CA 90017

COMMENT 18-1

Thank you for giving the Los Angeles Unified School District (LAUSD) the opportunity to comment on the Subject project. This project is located on the Westminster Elementary School's Pacific Avenue Walk Route. Therefore, this project's impact on the school's students and staff must be considered.

The District has prepared the attached comments on the Westminster Elementary's, school traffic, student safety, and transportation issues. These comments describe the mitigation measures that will be necessary to protect the school's Pacific Avenue walk route during the project construction. The measures set forth in these comments should be adopted as conditions of project approval to offset unmitigated impacts on the affected school students and staff.

RESPONSE 18-1

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Please see Response to Comment Nos. 18-2 through 18-3 below for a further discussion of the project's impacts during construction on school traffic, student safety, and transportation.

COMMENT 18-2

ENVIRONMENTAL IMPACT RESPONSE

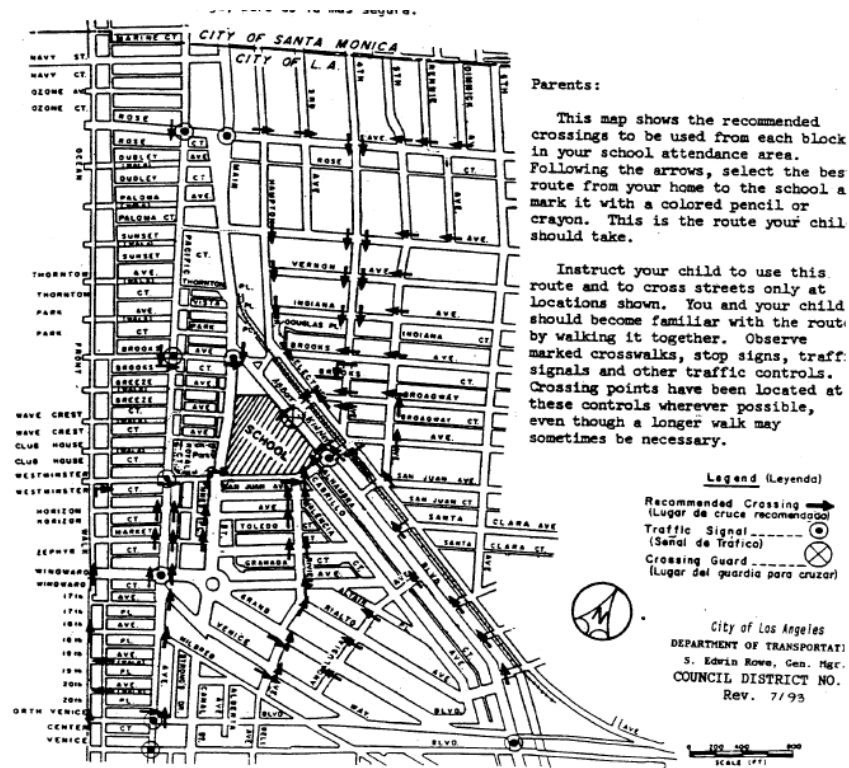
The following are environmental impact concerns and mitigation measures necessary to address school traffic, pedestrian routes and transportation safety issues.

- LAUSD Transportation Branch, (323) 342-1400, must be contacted regarding the potential impact, if any, upon existing school bus routes.
- School buses must have access to Westminster Elementary School

- During construction phase, truck traffic and construction vehicles may cause traffic delays for our transported students.
- During and after construction, changed traffic patterns, lane adjustment, traffic light patterns and altered bus stops may impact school bus-on-time performance and bus passenger safety.
- Because of provisions in the California Vehicle Code, other trucks and construction vehicles may encounter school buses using the red flashing lights and must stop
- The Project Manager or designee should notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic through the areas.
- Contractors must guarantee that a safe and convenient pedestrian route along the School's Pacific Avenue Walk Route to Westminster Elementary School is maintained. The "Pedestrian Routes to Westminster Elementary School" map will be provided upon request.
- Contractors must maintain ongoing communication with the administrator of Westminster Elementary School, providing sufficient notice to forewarn children and parents when existing pedestrian and vehicular routes to school will be impacted.
- Appropriate traffic controls (signs and signals) must be installed as needed to ensure pedestrian and vehicular safety.
- Haul routes are not to be routed past Westminster Elementary School's Pacific Avenue Walk Route, except when school is not in session.
- No staging or parking of construction vehicles, including vehicles to transport workers on streets adjacent to Westminster Elementary School.
- Funding for crossing guards to be provided when safety of children is compromised by construction-related activities at impacted crossings.
- Barriers must be constructed as needed to minimize trespassing, vandalism, and short-cut attractions and attractive nuisances.
- Security patrols should be funded and provided to minimize trespassing, vandalism, and short-cut attractions.
- Fencing should be installed to secure construction equipment to minimize trespassing, vandalism, and short-cut attractions.

RESPONSE 18-2

As discussed in Volume I, Section IV.I, Transportation and Circulation, pages 336, 337, and 345–346, of the Draft EIR, the construction related impacts have been evaluated. It has been determined that the project's construction impacts on traffic due to excavation are considered a potentially short-term impact prior to mitigation. Section IV.I.4, Mitigation Measures, on pages 357–358 identifies the necessary construction mitigation measure as the development of a Work Area Traffic Control Plan approved by the local agencies prior to the issuance of any building permits. This control plan is recommended to provide mitigation measures to address all the construction effects not found to be significant. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 18-3**PEDESTRIAN ROUTES TO WESTMINSTER AVENUE SCHOOL****RESPONSE 18-3**

The map illustrating the Pedestrian Routes to Westminister Avenue School does not include any school crossings directly abutting the project site. The nearest recommended route to school is along the west side of Pacific Avenue with no routes identified along Main Street, Sunset Avenue or Thornton Place adjacent to the project site. As discussed in Volume I, Section

IV.I, Transportation and Circulation, page 357, and in Technical Appendix F, F2—Transportation, page 46, of the Draft EIR, the Work Area Traffic Control Plan will include safety measures around the construction site to reduce the risk to all pedestrian traffic near the work area. This comment does not directly challenge information presented in the Draft EIR. Therefore, no additional response is required. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 19

41 Sunset Avenue Condominium Association
Brian W. Kasell
41 Sunset Avenue, #301
Venice, CA 90291

COMMENT 19-1

This is a short comment to the DEIR regarding the above-referenced project (Report No. ENV-2004-1407-EIR). It is submitted on behalf of the 41 Sunset Ave Condominium Association (the "Association") and its individual members.

After reviewing the DEIR, the Association stands by its original concerns, submitted to you by letter dated April 26, 2004. For your convenience, a copy of that letter is attached hereto. The proposed project will have significant adverse impact on the aesthetic quality of the area in which it is located, as well as dramatically increase traffic congestion, reduce parking availability, and adversely impact shading and air quality. We are opposed to the project in its present form.

RESPONSE 19-1

The comments provided within the above referenced letter dated April 26, 2004, were incorporated in the Draft EIR. A copy of that letter is provided within Appendix A of the Draft EIR and also within Appendix A of this Final EIR. Please refer to Response to Comment Nos. 19-4 through 19-8, below, for the responses to that letter.

As correctly indicated by the Commentor and as stated in Volume I, Section IV.A, Aesthetics, of the Draft EIR, the Sunset Avenue Project would have a significant impact on aesthetics due to the change in the site's current appearance and the proposed building heights. However, impacts on shading would be less than significant.

Also, as discussed in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR, the Sunset Avenue Project would result in an increase in vehicle trips. As stated therein, on weekdays, the project would generate 1,168 net new daily trips and would significantly impact two intersections during the P.M. peak hours: (1) Main Street and Rose Avenue; and (2) Main Street and Sunset Avenues. On Saturdays, the project would generate 1,417 net new daily trips and would significantly impact one intersection: Rose Avenue and Lincoln Boulevard. However, with implementation of mitigation measures, impacts would be reduced to less than significant. With regard to parking, as discussed in Section IV.J, Parking, the project would

provide 676 parking spaces, which exceeds the Municipal Code parking requirement by 44 spaces. Additionally, as discussed in Section IV.A, Air Quality, the project would result in an increase in emissions during construction and operation. Emission levels associated with operation of the project would result in a less than significant impact. However, even with incorporation of mitigation measures, construction of the project would result in a significant impact to regional air quality due to composite NOx emissions.

The Commentor's opposition is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 19-2

With that said, we nonetheless recognize that it is likely that the project, in one form or another, is likely to move forward. Accordingly, we note that, in our view, the most preferable of the several alternatives discussed in the DEIR are those presented in Section D.2 as Alternative G (Reduced Density) and Alternative H (Reduced Height). Of course, if the Reduced Density alternative also resulted in reduced height, it would be far more preferable than Alternative H.

RESPONSE 19-2

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As described in Volume I, Section V, Alternatives, of the Draft EIR, Alternative G: Reduced Density may reduce the height of the residential structures in proximity to the adjacent residential streets. Alternative H would result in reduced heights along the frontage of Thornton Place and Sunset Avenue and heights along street frontages that would be similar to the height requirements of the Specific Plan.

COMMENT 19-3

Finally, we note that the sponsors of the project (or their agents) have embarked on a program of directly contacting area residents to suggest that parking spaces at the new development might be made available (for a fee) to area residents to "ease parking problems specific to the neighborhood." Frankly, we view this activity by the sponsors as distasteful and highly disingenuous. Their offer of a few fee-based parking spaces is a thinly veiled attempt to obscure the fact that their project will dramatically worsen the already difficult task of parking in the area. Their tactics in this regard are nothing less than insulting to the area residents, and we mention them here so as to be sure the Department of Planning is aware of them.

RESPONSE 19-3

As discussed in Volume I, Section IV.J, Sunset Avenue Project, Parking, pages 366–367 of the Draft EIR, the parking impacts have been analyzed. The proposed project would not only meet the parking demand, it would provide increased parking opportunities in a parking-deficient

neighborhood. The project includes parking to meet the needs of on-site population, coastal parking per the beach impact zone parking requirements, plus the additional, non-required spaces noted in this comment. Parking impacts would be less than significant. Surplus parking provided by the project will be made available to those in the community at a fair market rate. The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 19-4

The members of the 41 Sunset Avenue Condominium Association (the “Association”), both individually and on behalf of the Association, write to you in connection with the above-identified proposed development project. Specifically, we wish to express our concerns over the proposed scope of the project and the adverse impact the project will undoubtedly have on the quality of life in our neighborhood.

RESPONSE 19-4

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Quality of life is a general term and typically consists of a variety of factors including air quality, noise quality, transportation/congestion management, and availability of services (e.g., water, wastewater). For an analysis of an issue associated with quality of life, please see the appropriate section in Chapter IV, Environmental Impact Analysis, of the Draft EIR.

COMMENT 19-5

As we are sure the City of Los Angeles and its Planning Department are aware, the Venice community, especially in the areas within a few blocks of the beach, is already one which suffers from extreme difficulties relating to parking. At certain times of the day, it is basically impossible to find a parking place on the street in the vicinity immediately surrounding the proposed project. These parking problems are greatly exacerbated both on weekends and during the warmer months when large numbers of visitors descend on Venice.

Further, traffic congestion is a perennial problem in the area. Pacific Avenue is, on a daily basis, so crammed with traffic (in both directions) that drivers seeking to enter the street must often wait for an extended period of time to do so (and usually are only able to get on the street through the courtesy of another driver who stops and lets them in). On weekends and warmer weather periods, the traffic congestion in the area is nothing short of overwhelming.

We believe that the proposed project presents an unacceptable risk of dramatically increasing the area’s parking and traffic problems. First, the project proposes to add, in a small and relatively restricted location, 225 residential condominiums, as well as 13,500 square feet of retail space.

The additional cars and traffic that will be generated by these numbers will have an immediate and highly negative impact on the area's parking and traffic problems.

More importantly, the location of the proposed project will enhance those problems. The block where the proposed project is to be located was never designed or intended for this kind of high-density residential dwelling or commercial use. The streets at the north and south boundary of the proposed project (i.e., Sunset Avenue and Thornton Place), which apparently will provide the only ways to enter and leave the development, are very small, one way streets that will simply not be able to handle the massive increase in traffic that will accompany the project.

RESPONSE 19-5

The Draft EIR includes an analysis of all traffic impacts in Volume I, Section IV.I, Transportation and Circulation, and Volume IV, Appendix F, F2—Sunset Avenue Project. The analysis is prepared pursuant to the requirements of the City of Los Angeles Department of Transportation. The traffic study presents the existing and future traffic conditions in the study area. Based on the weekday and summer data and analysis contained in the traffic study, the project traffic impacts were identified and mitigation measures were recommended and approved by LADOT. As indicated, traffic impacts would be less than significant. Comments relative to traffic and parking congestion are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 19-6

In short, we believe the present scope of the proposed project is overreaching and will have severe adverse impacts on our neighborhood and quality of life. We believe a smaller development, with a reduced number of residential units and a reduced amount of commercial space, would be a more appropriate use of the space that will be opened up upon the City's leaving the existing bus depot.

RESPONSE 19-6

The project's potential impacts are analyzed throughout Volume I, Chapter IV, Environmental Impact Analysis, of the Draft EIR. With regard to impacts on quality of life, please refer to Response to Comment No. 19-4 above.

The Draft EIR does analyze an alternative for reduced development on the Sunset Avenue Project site in Volume I, Section IV.H, Alternative G: Sunset Avenue Site Reduced Density project. As discussed therein, this alternative would not meet the project's primary objectives of the project to generate the land use and economic justification to relocate the Metro Division 6 bus operations and maintenance facility and to provide a mixed residential and commercial project, inclusive of affordable housing. In addition, this alternative would not

maximize the value of the property as it would reduce the amount of residential development developable thereon. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 19-7

Further, although we have focused on parking and traffic, there are other factors militating against the proposed project's present scope, including the aesthetic impact of the project on the traditional nature of the Venice community (which has an unusual history and occupies a unique place in the Los Angeles landscape), the quality of the air in the neighborhood (which will no doubt be significantly impacted), and even the fate of the Vietnam MIA Memorial which lines the Pacific Avenue side of the west wall of the existing bus depot.

RESPONSE 19-7

Volume I, Section IV.A, Aesthetics, of the Draft EIR analyzes the project's impacts with respect to aesthetics. As discussed therein, the proposed Sunset Avenue project would be in keeping with the existing uses and eclectic character of the area along and east of Main Street. Additionally, the project would extend the existing residential uses along Pacific Avenue. However, the project would result in a significant aesthetic impact, due to the proposed building heights along Thornton Place and Sunset Avenue and their contrast with the existing features that embody the area's valued aesthetic image.

With regard to air quality, as stated in Volume I, Section IV.B, Air Quality, the project would increase emissions during operation and construction of the project. Emission levels associated with operation of the project would result in a less than significant impact. However, even with incorporation of mitigation measures, construction of the project would result in a significant impact to regional air quality due to composite NOx emissions.

As discussed in Volume I, Section IV.C, Historic Resources, the project would necessitate the removal of the Vietnam POW/MIA Memorial Mural. Mitigation Measures Sunset-C.1 and Sunset-C.2, as discussed on page 182, would mitigate the potential impacts pursuant to CEQA guidelines. With implementation of these mitigation measures, the project's impacts on a potentially historic or cultural resource would be less than significant.

COMMENT 19-8

We are concerned about the quality of life in our neighborhood, and wish to be heard in connection with the proposed project, which we believe will adversely affect that quality of life in a number of ways. Accordingly, please keep us posted as to further meetings and/or decisions concerning the proposed development.

RESPONSE 19-8

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 20

Kathryn Alice
22 Thornton Ave.
Venice, CA 90291

COMMENT 20-1

We are very concerned that the parking lot at the end of Thornton Ave. has been closed for over a month, fenced in, with no work being done and no one being able to use it. Every minute that we can't use it is hard. We have a baby, no parking at our house, and parking several blocks away and having to get the baby home along with all gear, is unbelievable. How long until something happens or are you going to open the lot back up due to delays?

This is unbelievably inconvenient, and the lot is like a ghost town. Please advise. Thank you.

RESPONSE 20-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Impacts associated with the closure of an unrelated parking lot is outside the scope of this project's EIR. As discussed in Volume I, Section IV.J, Parking, of the Draft EIR, the project would provide 676 parking spaces, which would be sufficient meet the project's parking demand. Additionally, the project would also provide increased parking opportunities in an existing parking-deficient neighborhood.

LETTER NO. 21

Amy Armstrong

COMMENT 21-1

As a longtime Venice resident, I am writing to you to express my opposition to the Sunset Avenue Project in Venice, and to the Environmental Impact Report which seems to gloss over the project's numerous shortcomings.

RESPONSE 21-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The Draft EIR has been prepared in accordance with the specific requirements set forth in CEQA and the CEQA Guidelines. The Draft EIR provides analyses of the Sunset Avenue Project's potential impacts in Chapter IV, Environmental Impact Analysis. Pursuant to CEQA Section 15084, Metro and the City of Los Angeles, as co-lead agencies for the proposed project, reviewed the Draft EIR and have determined that the document meets the CEQA criteria for adequacy and objectivity.

COMMENT 21-2

I am particularly concerned about the notion of building a gated development in Venice. Historically, residents of this community have shared their proximity to the beach with residents of Los Angeles and innumerable tourists. The notion that a new group of residents will only feel safe if they can isolate themselves from other members of the community and its visitors is reprehensible. Just as the dwellers of the new project will be able to walk down neighboring streets to access the beach, so should others be able to walk through the new development.

The fact that a bus yard has been there for decades is no argument for continuing to block access to this area. The land on which the bus terminal stood should now be open to the public, not the private preserve of a developer.

RESPONSE 21-2

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. Neither of the street segments adjacent to the project site, Sunset Avenue and Thornton Place is designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a).

LETTER NO. 22

Carol V. Beck

COMMENT 22-1

As a resident of Venice, this project affects me. I believe the comment period should be extended to a minimum of 60 days, if not 90. The reason for this has to do with CEQA GUIDELINES, 15105 a and EIR #2004-14007 which states the public review period for draft EIR shall not be less than 30 days nor should it be longer than 60 days EXCEPT UNDER UNUSUAL CIRCUMSTANCES.

In my opinion, California has been “under unusual circumstances” since 9/11/01 and this must be addressed. Clearly, it is no longer appropriate to use the 30-60 day indicator because we are in a war situation with unknowable futurity. It might be more appropriate to utilize a 90 day indicator.

For that matter, it might be better to consider a moratorium for at least 6 months until the Venice community and our neighborhood council has had an appropriate opportunity to marshal proper resources to deal with the onslaught of war-inappropriate, luxury over-development taking place in this very small town.

Have a great weekend and a nice day, too!

RESPONSE 22-1

As indicated by the Commentor, CEQA Section 15105 states that the public review period for a Draft EIR should “not be less than 30 day nor longer than 60 days except in unusual circumstances.” The project’s initial 45-day review period was extended to 60 days at the request of the community. The Commentor’s opinion regarding a 90-day public review period and the project is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 23

Dr. Jason Seth and Bernic Cohen
102 Paloma Ave.
Venice, CA 90291

COMMENT 23-1

Good day to you and let us begin by saying we have read the DEIR at our local library, yet we are still left with our main concern; parking spaces for existing residents.

We have been residents of Venice for over 20 years and residents of Los Angeles since 1969. We are the owners of 102 Paloma Ave and 504 Pacific Avenue. We have watched the traffic increase and the parking availability decrease steadily to become the problematic state it is now in. There simply is not enough parking for the existing residents any more. We have neighbors (some of them elderly, some with small children and strollers) parking up to five blocks away having to carry their groceries over busy streets laden with speeding vehicles. Pacific Ave has become similar to a freeway with the majority of cars driving upwards of 45 mph and parking there is not allowed anymore from 8 am to 8 pm

We, along with our nine other tenants are very concerned that the proposed development will take away even more of the few parking spaces that are left.

Realistically, this is Los Angeles, not New York. People don't walk here, they drive everywhere they go. We understand that the proposed development will offer enough parking for their residents and their guests. But what happens when the 800 or so residents want to leave their condo and drive a few blocks away to get a burger or do their dry-cleaning or go to work-out etc. THEY will need parking in the surrounding areas too.

Rad has offered parking spots for a fee for a limited number of cars. However, most of the residents cannot afford additional elevated parking costs. Some of the existing residents have lived here forty years and it's not fair to put this burden on them.

We believe a remedy to this problem could be:

- A. If the proposed development goes through, then preferential parking permits for the existing residents should be created. Or

- B. If the proposed development goes through, then the existing parking lot on Main and Rose could be used as a preferential parking lot for existing residents.

Please take our concerns into consideration as we live in this neighborhood and these problems are very real to us.

Thank you for your time.

RESPONSE 23-1

Parking impacts have been analyzed in Volume I, Section IV.J, Parking, pages 366–367 of the Draft EIR. As discussed, the proposed project would not only meet the parking demand, it would provide increased parking opportunities in a parking-deficient neighborhood. Parking impacts would be less than significant. New land development projects are not required to provide additional parking for the surrounding commercial uses patronized by the future residents of the project. All land uses provide the necessary on-site parking required for their operations and may not rely on others to provide parking for their benefit.

These comments regarding traffic and parking congestion are acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 24

Naomi Glauberman
32 Breeze Avenue
Venice, CA 90291

COMMENT 24-1

I am writing to you once again to express my opposition to the Sunset Avenue Project in Venice, and to the Environmental Impact Report which seems to gloss over the project's numerous shortcomings.

RESPONSE 24-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The Draft EIR has been prepared in accordance with the specific requirements set forth in CEQA and the CEQA Guidelines. The Draft EIR provides analyses of the Sunset Avenue Project's potential impacts in Chapter IV, Environmental Impact Analysis. Pursuant to CEQA Section 15084, Metro and the City of Los Angeles, as co-lead agencies for the proposed project, reviewed the Draft EIR and has determined that the document meets the CEQA criteria for adequacy and objectivity.

COMMENT 24-2

I am particularly concerned about the notion of building a gated development in Venice. Historically, residents of this community have shared their proximity to the beach with residents of Los Angeles and innumerable tourists. The notion that a new group of residents will only feel safe if they can isolate themselves from other members of the community and its visitors is reprehensible. Just as the dwellers of the new project will be able to walk down neighboring streets to access the beach, so should others be able to walk through the new development.

The fact that a bus yard has been there for decades is no argument for continuing to block access to this area. The land on which the bus terminal stood should now be open to the public, not the private preserve of a developer.

Thank you so much for your consideration.

RESPONSE 24-2

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is

not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. Neither of the street segments adjacent to the project site, Sunset Avenue and Thornton Place is designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a).

LETTER NO. 25

Ellie and Alice Goldstein
30 Thornton Avenue
Venice, CA 90291

COMMENT 25-1

We would like to voice our strong opposition to the Sunset Avenue Project. We have lived in Venice since 1978 and on Thornton Avenue since 1981. This is a quiet “walk-street” area that attracts casual strollers to the Oceanfront and allows the inhabitants a relaxed lifestyle.

RESPONSE 25-1

This comment does not introduce new environmental information nor does it directly challenge information presented in the Draft EIR. Therefore, no response is required. However, the comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 25-2

While the EIR says there is only “short-term and unavoidable construction impacts,” **this is not the case.** The construction will impact negatively the neighborhood with its increase in size and height of the construction. The Venice plan calls for new construction to fit into the existing community. This project does not fit architecturally, is oversized, and its potential uses are at odds with the community. It will have a negative impact on beach access and increase crowding, as well as increase traffic and noise and debris. The detritus of the commercial buildings, their delivery trucks, the double parking and the noise from them will cause deterioration in the local community and its life style.

RESPONSE 25-2

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

The Draft EIR acknowledges that during construction of the project, short-term and unavoidable impacts with respect to noise and air quality would occur. Please refer to Volume I, Section IV.H, Noise; and IV.A, Air Quality; regarding noise and air quality, respectively.

The project’s impacts with respect to size and height of the proposed buildings are analyzed in Volume I, Section IV.A, Aesthetics, of the Draft EIR. As stated therein, the project would change the site’s current appearance and would result in building heights greater than

those existing along Sunset Avenue and Thornton Place. Therefore, “the project would contrast with the existing features that embody the area’s valued aesthetic image” and have a significant impact with regard to aesthetics.

With regard to the project’s proposed uses, the commercial component would be located along Main Street, and would be consistent with Main Street’s mixed-use/commercial uses. The residential uses would provide in-fill development within an existing residential area. Further, the project’s parking would meet the needs of the residential and commercial uses, would provide Beach Impact Zone parking and would provide additional parking that could be used to provide fee parking for surrounding residential uses. The density of these uses is analyzed in Section IV.B, Land Use. As described, therein, the project density is consistent with the Venice Local Coastal Program Land Use Plan, pursuant to Policies I.C.7 and I.A.13, that identifies suggested uses for the project site, and that allows increases in density for provision of affordable housing.

As discussed in Section IV.I, Transportation and Circulation, of the Draft EIR, the Sunset Avenue Project would result in an increase in vehicle trips. On weekdays, the project would generate 1,168 net new daily trips and would significantly impact two intersections during the P.M. peak hours: (1) Main Street and Rose Avenue; and (2) Main Street and Sunset Avenues. On Saturdays, the project would generate 1,417 net new daily trips and would significantly impact one intersection: Rose Avenue and Lincoln Boulevard. However, with implementation of mitigation measures, impacts would be reduced to less than significant.

As discussed in Sections IV.H, Noise, and IV.B, Air Quality, operation of the project would result in an increase in noise levels and air emission levels. However, these increases would fall below the significance criteria, and as such, no significant impact would occur during operation with respect to noise and air quality.

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 25-3

Under our current councilperson, Ms. Misakowski, development has run rampant in Venice, contrary to the ideals of the Venice Specific Plan. At the other end of Thornton Ave, there is another approved “mixed use project” and these two together amplify the effects of each other. The impact of “mixed use” is increasing the population density of an already overcrowded area. It’s a good thing that Misacowski can’t run for reelection due to term limits.

RESPONSE 25-3

It is unknown as to which “mixed-use” project the Commentor is referring to. The Draft EIR does include cumulative impact analyses for each of the topical environmental section in Volume I, Chapter IV, Environmental Impact Analysis, of the Draft EIR. The cumulative impact analyses do consider planned and foreseeable growth in the project vicinity, based on the list of related projects provided in Section III.B, Related Projects, of the Draft EIR. However, the comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 25-4

This project is not consistent with the neighborhood structures, existing architecture, the building heights, or the nature of the neighborhood.

RESPONSE 25-4

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Please refer to Volume I, Section IV.A, Aesthetics, of the Draft EIR for an analysis of the potential aesthetic impacts of the project and to Section IV.G, Land Use, for an analysis of the potential land uses impacts of the project. The aesthetics analysis identifies the increased heights as a significant impact, as “...the project would contrast with the existing features that embody the area’s valued aesthetic image.” In addition, the land use analysis determines that the project would not alter any land use patterns in the area.

COMMENT 25-5

We ask the Planning commission to perform their due diligence [instead of the usual rubber stamp of a councilpersons suggestions] and deny this project.

RESPONSE 25-5

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 26

Neil A. Greco
115 Park Place
Venice, CA 90291

COMMENT 26-1

My name is Neil A. Greco; I reside at 115 Park Place Venice, California. The current Adopted Venice Specific Plan Ordains that ALL proposed developments within Venice Coastal Zone comply with the various Ordinances Established. I would like to take this opportunity to voice my opposition to the referenced planned project with specific reference to the Section 2, Subsections A through F of the Venice Specific Plan:

RESPONSE 26-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Section 2 of the Venice Specific Plan defines the subareas of the Plan area and includes only a Subsection A; there are no Subsections B through F. Section 10, Subsection F provides the development regulations for the North Venice area in which the Sunset Avenue Project is located. More specific comments by this Commentor regarding the project, with respective responses, are provided below.

COMMENT 26-2

Public and costal pedestrian access would not be allowed pass through the project site because of the perimeter/security fencing proposed, this is a very large site with multiple dwellings proposed public access should be allowed this is not a single family dwelling site. What happened to adhering to Section 2, Subsection B provision that states to assure that public access to the coast and public recreation areas is to be provided as REQUIRED by the Costal [sic] Act and the LCP?

RESPONSE 26-2

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project site is not fully accessible for pedestrian access. Rather, existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. Furthermore, neither of the street segments adjacent to the project site, Sunset Avenue and

Thornton Place are designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a).

COMMENT 26-3

The proposed structures within the center of the site as stated by the developer are planned for 35 to 56 feet in height. The allowable building height within the Venice Coastal Zone, Sub area North Venice states the ALLOWABLE building height to be 35 feet. What happened to adhering to Section 2, Subsection F provision that states to REGULATE all DEVELOPMENT, including USE, HEIGHT, DENSITY, SETBACK, BUFFER ZONE and other FACTORS in order that it be COMPATABLE [sic] in CHARACTER [sic] with the EXISTING COMMUNITY and to provide for CONSIDERATION of AESTHETICS and SCENIC PRESERVATION and ENHANCEMENT?

The planned project as proposed DOES NOT ADHERE to the current Adopted Venice Specific Plan, Subarea North Venice for proposed developments within Venice Coastal Zone.

RESPONSE 26-3

The development regulations for the proposed project are found in Section 10, Subsection F of the Venice Specific Plan. The Draft EIR analyzes the project's impacts regarding the referenced regulations in Volume I, Section IV.G, Land Use, and Section IV.A, Aesthetics. The analysis identifies the increase in heights and density over those occurring in the regulations. The discussion notes that the increase is pursuant to City policy. Specifically, as described in Section IV.G., Land Use, on page 264 the Venice Local Coastal Program, Land Use Plan, Policy I.A.13 states: "...In order to encourage the provision of affordable housing units in the areas designated as "Multiple Family Residential" and in mixed-use developments, the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915,...." Therefore, City approval of an exception to the density and height limits in the Venice Specific Plan would be consistent with Policy I.A.13, provided the number of affordable and market uses is consistent with Government Code Section 65915, and related City provisions for affordable housing. As described on pages 272–274, the project would be consistent with such provisions. Further, Mitigation Measures Sunset-G.1 and Sunset-G.2, require such consistency.

While the Draft EIR concludes that the proposed project is consistent within the overall policy framework, the Draft EIR goes on to further analyze the increased height and density in Section IV.A, Aesthetics, and concludes that increasing the height limits would have a significant impact on aesthetics. As described on pages 117 and 118 of the Draft EIR: "...Notwithstanding, for purposes of aesthetics it should be noted that the height and FAR regulations presented in the Specific Plan are placed in the Plan, in part, to limit potential

aesthetic impacts. Allowing the greater heights and FAR would exercise a trade-off that is anticipated in the Plan, but would none-the-less facilitate the massing impacts cited above. As such, the project would contrast with the existing features that embody the area's valued aesthetic image. Further, these impacts would occur due to project heights that exceed the limitation expressed in the Specific Plan. Therefore, impacts regarding aesthetic character would be significant."

COMMENT 26-4

TIME after TIME various developers have been granted building variances to the Ordinances adopted in the Venice Specific Plan within the Subarea North Venice. The Department of City Planning has the OPPORTUNITY to ENACT and IMPLEMENT the Goals and Policies of the Coastal Act adopted in the Venice Specific Plan as they relate to the referenced project.

RESPONSE 26-4

The comment is acknowledged and forwarded to the decision-makers for review and consideration.

The project's consistency with the Venice Local Coastal Program Land Use Plan (LUP) and the Venice Coastal Zone Specific Plan, which includes policies pursuant to the California Coastal Act, is analyzed in Volume I, Section IV.G, Land Use, and Section IV.A, Aesthetics, of the Draft EIR. As indicated, the project would include an exception to the requirements of the Specific Plan, pursuant to Policy I.A.13 of the LUP, which encourages density bonuses for projects with affordable housing. Notwithstanding, the Draft EIR identified a significant impact that would occur to the area's aesthetic character, due to the increased heights along Sunset Avenue and Thornton Place.

LETTER NO. 27

Lori LeBoy
117 Park Place
Venice, CA 90291

COMMENT 27-1

My name is Lori LeBoy and I am a property owner in Venice. My primary address is 117 Park Place and I also own 1208 Abbot Kinney.

I am very distressed over the proposed project for 100 East Sunset Avenue. This neighborhood cannot tolerate the additional vehicles that 225 residential units and 10,000 square feet of commercial space would bring.

RESPONSE 27-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR analyzes the Sunset Avenue Project's impacts on traffic. As stated therein, on weekdays, the project would generate 1,168 net new daily trips and would significantly impact two intersections during the P.M. peak hours: (1) Main Street and Rose Avenue; and (2) Main Street and Sunset Avenues. On Saturdays, the project would generate 1,417 net new daily trips and would significantly impact one intersection: Rose Avenue and Lincoln Boulevard. However, with implementation of mitigation measures, impacts would be reduced to less than significant.

COMMENT 27-2

Traffic on Lincoln, Pacific, Main and Abbot Kinney is already congested. The east bound traffic on the 10 frwy west of the 405 is already crawling by 3:00 pm on week days. There seems to be no end to the new development that this city will allow.

RESPONSE 27-2

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 27-3

While small residential projects in my neighborhood are denied height variances to exceed the 28 ft restriction, the Sunset project proposes heights of 35 - 56 feet.

RESPONSE 27-3

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project actions include a proposed Specific Plan Exception for height and floor area ratio. The project heights and floor area ratio are fully analyzed in the Draft EIR. The analysis of project impacts in Volume I, Section IV.A, Aesthetics, of the Draft EIR identifies the increased heights as a significant impacts on aesthetics, as "...the project would contrast with the existing features that embody the area's valued aesthetic image."

COMMENT 27-4

I strongly urge you to reject the proposal for the 100 East Sunset Avenue Project.

Please let me know where and when I may appear, in person, to voice my dissent.

RESPONSE 27-4

This comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The Commentor has been included in the mailing list for the project and will receive all notices (including public hearing notices) regarding the proposed project.

LETTER NO. 28

Erik Mankin
41 Paloma Avenue
Venice, CA 90291

COMMENT 28-1

Attached to this are my comments on the above-referenced draft EIR. They focus on the impacts of the proposed Sunset Avenue Project, which is near my home.

RESPONSE 28-1

This comment does not present new environmental information or directly challenge information presented in the Draft EIR. Therefore, no response is required. Specific comments by this Commentor and their respective responses are provided below.

COMMENT 28-2**Pacific Avenue Traffic Impacts**

The analysis of traffic impact seems to be flawed by failing to take into account an important local condition in determining street capacity. The method used for determining level of service in Los Angeles is set by the LADOT and standard: Critical Movement Analysis, which first determines the capacity of an intersection given the architecture, determines traffic flow, and gives a numerical computation of how close to capacity the intersection is a peak hour. “The peak-hour traffic counts were used along with current intersection geometrics to determine the intersections operating condition.” (p. 328).

The problem with this application is a major north-south arterial serving the Sunset project area, Pacific Avenue, is one-lane until 8 A.M., that is, until well into the morning rush hour. The fact is noted in the description (p. 330), along with the fact that the street carries 1,300 vehicles northbound during peak morning rush hour—at least half of which falls in the period when Pacific is one-lane. The street and intersection geometry remains the same, but the flow to the intersection is drastically different. The calculations do not seem to have taken this circumstance into account, apparently assuming that Pacific remains a 4-lane thoroughfare through the rush hour.

RESPONSE 28-2

As discussed in Volume IV, Appendix F, F2—Sunset Avenue Project, Traffic Study, of the Draft EIR, the project’s traffic impact analysis is based on the traffic conditions during the

hour of highest traffic volume. The peak hour during the morning along Pacific Avenue is between 8 to 9 A.M. As shown on Figures 6(a) and (b), the project will generate very low peak-hour traffic volumes on Pacific Avenue because there is no site access proposed on Pacific Avenue, and Sunset Avenue is to remain a one-way street westbound. Therefore, project traffic may exit from Sunset Boulevard on to Pacific Avenue, but not enter from Pacific Avenue to Sunset Avenue. Limited project access to Pacific Avenue results in a very low level of project traffic (a non-significant volume of project traffic added to Pacific Avenue). Therefore, no significant project related traffic impacts were identified.

Based on the City's significance threshold, traffic impacts at intersections operating at levels of service (LOS A, B, or C) would not be considered significant unless the additional project traffic added is so substantial that the intersection degrades with a V/C change of 0.04 or more. The traffic impact has been calculated for the 7:00 to 8:00 A.M. non-peak hour. The results are as follows: at Pacific Avenue/Rose Avenue the V/C ratio = 0.757 (LOS C) with a project impact of +0.018; at Pacific/Sunset the V/C ratio = 0.858 (LOS D) with a project impact of +0.013; and at Pacific/Windward the V/C ratio = 0.636 (LOS B) with a project impact of +0.002. These capacity calculations show that the project would not create significant traffic impacts during the 7:00 to 8:00 A.M. non-peak hour of traffic.

Traffic capacity on Pacific Avenue prior to 8 A.M. is reduced when on-street parking is allowed and one lane is provided for traffic flow. A lane of traffic typically has a capacity value of 1,600 to 1,800 vehicles per hour per lane (VPHPL); the City of Los Angeles uses a conservative value of 1,500 vphpl. The hourly volume measured on Pacific Avenue during the 7:00 to 8:00 A.M. hour is approximately 900 vehicles per hour (i.e., 60 percent of the street capacity with one lane in each direction) vs. approximately 1,300 vph during the 8:00 to 9:00 A.M. hour.

It is important to note that intersections are measured as a whole; therefore, some intersection traffic will experience greater delays than others. For example, side street/alley traffic turning left has a much higher delay value than the through traffic on Pacific Avenue. To account for the effects of side street delays at non-signalized streets/alleys, the intersection capacity value has been reduced to 1,200 vph for non-signalized intersections, such as Sunset Avenue and Pacific Avenue.

Therefore, when intersections are assigned a Level of Service (LOS) value that grade is for the intersection as a whole. Low volume side street traffic may have long delays at intersections that have high volume of through traffic and an overall intersection LOS such as A, B, or C. Side street delays can be reduced by installing traffic signals or requesting the City to increase the capacity of Pacific Avenue during off-peak hours by extending the parking prohibitions on Pacific Avenue by one hour to 7:00 A.M. As determined by the traffic study and

approved by LADOT, the project does not have a significant impact to Pacific Avenue and therefore it is not recommended to extend the on-street parking prohibition to 7:00 A.M.

COMMENT 28-3

The CMA calculations indicate that such intersections as Sunset & Pacific and Rose and Pacific are now at A or B service during morning rush hour. This is not clear at the scene. As residents of the area know, it traffic flow along Pacific during the 7:30-8:00 hour is extremely dense, with motorists attempting enter the traffic flow northbound from the alleys that serve the walk street blocks west of Pacific having to wait substantial lengths of time for a break in the continuous stream of cars. Illegally parked cars that remain in the traffic lanes after the 8 A.M. deadline routinely complicate the picture more. An increase of 100 additional rush hour cars—predicted in the DEIR (p. 347) would put many of these cars on Pacific, the main commuter route to the north (Santa Monica) and east (greater Los Angeles). Though the volumes seem small the impact of the addition of this number of cars from a single output into a single lane of Pacific Avenue traffic does not seem to be directly addressed by the CMA analysis.

RESPONSE 28-3

Please see Response to Comment No. 28-2, regarding traffic flow on Pacific Avenue prior to 8:00 A.M.

COMMENT 28-4

Conceivably these effects could be mitigated by expanding the hours in which parking is not permitted on Pacific from 8 A.M. to 8 P.M., to 7 A.M. to 7 P.M. Doing so, however, would be a major inconvenience and a major impact. Consideration of such impacts should be part of the planning process.

RESPONSE 28-4

Please see Response to Comment No. 28-2, regarding traffic flow on Pacific Avenue prior to 8:00 A.M. The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 28-5**Truck traffic construction impacts**

The first phase of construction of the project will have large volumes (200 trips per day) of large trucks coming and going from the Main Street site over an extended period of time. This is a high number of heavy vehicles to be moving through any residential neighborhood, particularly

one characterized by development that “precedes the automobile as a shaper of urban forms.” (p. 251).

The initial discussion of this circumstance (p. 345) notes that “a substantial inconvenience may occur unless measures are taken to control such activities,” and a set of measures are subsequently suggested. (p. 357). While all of these measures seem well considered (putting out flagmen, finding a route, limiting lane closures, etc), the impact remains drastic: hundreds of heavy trucks a day through narrow streets in residential neighborhoods. Nevertheless, the conclusion reached (p. 359) is that “these measures would reduce potential impacts to less-than-significant levels.” No backup is provided for this assertion: it is simply presented as a matter of fact, and without more documentation, it is difficult to imagine most residents would agree.

RESPONSE 28-5

As indicated on pages 345–346 of Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR, the maximum number of trips during construction would be associated with grading and excavation activities that would occur within a three to five month time frame. Specifically, approximately 100 truckloads per day or 200 directional daily trips would be generated during this timeframe. The 200 daily directional truck trips convert to 26 trips during each peak hour. In addition, the construction workers would normally arrive at and leave the project site during non-peak hours. Thus, impacts associated with construction vehicle trip generation would be less than significant. However, without mitigation, a significant impact associated with a substantial inconvenience to travelers, residents, and/or commercial uses in the area from construction traffic during excavation may occur. As discussed in Volume I, Section IV.I, Transportation and Circulation, page 357 of the Draft EIR, the mitigation measures for the project construction impacts include the preparation of a Work Area Traffic Control Plan to be approved prior to the issuance of the construction permits. The minimum information to be contained in the plan is listed in that measure and includes requirements regarding identification of haul routes to be used by construction trucks, identification of traffic control procedures, identification of the on-site location of vehicle and equipment staging, limitation of lane closures, scheduling of construction materials during non-peak travel periods, and prohibition of parking by construction workers on neighborhood streets in coordination with City staff. Implementation of these requirements of the Work Area Traffic Control Plans would mitigate construction traffic impacts associated with substantial inconvenience to a less than significant level.

COMMENT 28-6**Pedestrian Access Easements**

Currently, the property is not at all accessible to the neighborhood, either as a destination, or as a passageway: it is a fenced compound, surrounded on all sides by wall, with access only at a corner.

Unhappily, the proposed plan seems—though the impact is not spelled out—to continue this situation, in a way that is out of keeping with the traditions and architecture of the surrounding community.

Venice, as the EIR notes, is a community in which “pedestrian-ways are emphasized, and parking is limited.” (p. 251) The development will provide parking but it will not contain public pedestrian ways. The view presented of the proposed Sunset development along Pacific Avenue shows a wall broken by two closed iron fences.

It is reasonable and likely to assume that residents who live in the complex, once built, will be able to cross those gates from the inside and make their way down the public walk streets (Sunset and Thornton) westward toward the beach. However, it seems also likely that residents of Sunset and Thornton, or other Venetians or beach goers will not be able to the other way—to pass directly eastward on a pedestrian walkway or walkways through the project down to Main Street. They will instead have to move around the project, as they now have to move around the busyard.

This seems inequitable, and also out of keeping with the architectural and historical fabric of Venice—the Venice in which “pedestrian ways are emphasized.”

Mitigation of this seems straightforward: provisions of pedestrian easements through the property. Security is a consideration—but homes along the walk streets deal with the same security problem. Easy access to the beach from the businesses proposed for the Main Street—and easy access to these businesses from the beach would also seem to be economically desirable.

To summarize: the aesthetic and historical nature of the North Venice community west of Main Street is defined by walk streets, pedestrian ways. For this or any other development to fit into this fabric, it should include pedestrian easements through it—ideally, one north and south, and two east and west.

RESPONSE 28-6

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. Neither of the street segments adjacent to the project site, Sunset Avenue and Thornton Place is designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a). With regard to aesthetics, the Draft EIR discusses the visual continuity of the project, with adjacent uses. As described on page 112, the site plan intersperses buildings and internal space in a manner that is intended to extend part of the character provided by the streets with openings between rows of small residential properties north and south of the site and west of Pacific Avenue.

COMMENT 28-7**Height Restriction Exemption**

The proposed project would be 56 feet high, 21 feet higher than the height limits duly adopted and in effect for the neighborhood, and in fact as much as 26 feet—the Venice Specific code provides that “the maximum height allowed is 30 feet, or 35 feet for projects with varied rooflines, provided that any portion that exceeds 30 feet is set back from the required front yard by a least one foot for every foot of height above 30 feet. But the artist’s rendering (p. 77) seems to show no setback at all for the higher buildings—flat roofed structures that rise straight up 55 feet.

The EIR states that the Mello Act (p. 264), provides that “in mixed use developments, the City may grant incentives such as reduced parking, additional height or increased density....” In fact, the Mello Act itself does not explicitly mention “additional height.” The language (GOVERNMENT CODE SECTION 65915(I)) reads “reduction [sic] in site development standards or a modification of zoning code requirements or architectural design requirements ... including, but not limited to, a reduction in setback and square footage requirements and in the ratio of vehicular parking spaces that would otherwise be required.” While the phrase “not limited to” may allow for height exemptions, the formulation in the EIR seems misleadingly explicit. Particularly, it seems a stretch to say that “it is reasonable to expect that such exceptions would parallel the density bonus provisions,” particularly if no effort is made to exhaust other alternatives before doing so.

RESPONSE 28-7

Figure II-8 on page 77 of the Draft EIR is a conceptual drawing showing project development along Pacific Avenue. The drawing, in fact, shows three story buildings along Pacific Avenue that would be located behind a setback. The figure also shows five-story buildings that would rise to approximately 56 feet; these buildings are clearly shown as being setback from the buildings facing Pacific Avenue and even further setback from Pacific Avenue. The project setbacks for the taller buildings are also illustrated on Cross-sections B and C on Figure IV.A-8 on page 115 of the Draft EIR. (Figure IV.A-8 has been enhanced to include the actual dimensions of the setbacks. Please refer to Section II, Correction and Additions, of this Final EIR). As indicated, the higher buildings would be setback from the existing edge of the project site by approximately 68.5 feet, and from the edge of the project after highway dedication by approximately 51 feet.

COMMENT 28-8

This is particularly to the point because the height limit for Venice development was not adopted hastily or frivolously, Venice is a historic community now under heavy development pressure as lot-owners near the beach attempt to provide ocean views as they redevelop older properties.

The EIR acknowledges, as is indeed undeniable, (p. 118) that “impacts regarding aesthetic character would be significant.” The report argues that the impact should be “weighed against the project’s potential to displace the existing on-site automotive maintenance facility, provide affordable housing, and provide beach impact zone parking.” (Page 125)

However, the first and third of these benefits would accrue with alternative projects not breaching the height limits, explored in “Alternatives” section, pp 444 & following)

Regarding the second, an alternative not explored for accommodating additional units without a height exemption is to use the lot area designated for commercial development for additional dwelling units. The request for height limit waiver seems an effort to have a commercial development cake and eat a residential development bonus too.

RESPONSE 28-8

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As indicated in Volume I, Chapter V, Alternatives, of the Draft EIR, both Alternative F and Alternative H would displace the existing Metro 6 Operations Facility and provide beach parking, as well as avoid the project’s significant aesthetic impacts arising from the project’s building heights, as suggested by this comment. Further, Alternative G, which addresses the affects of reducing project density without necessarily reducing the maximum project height, would also include an affordable housing component and reduced parking,

although such elements would be reduced as compared with the project. However, as discussed in Section V, Alternatives, Alternatives F, G, and H may not provide sufficient land use and economic justification to relocate the existing Division 6 facility.

As discussed in Volume I, Section IV.G, Land Use, page 277, of the Draft EIR, the mix of residential and commercial uses for the Sunset Avenue Project is intended to be consistent with the existing development patterns in the vicinity. The Main Street frontage would continue the existing commercial uses lining the street, and the Pacific Avenue frontage would see the extension of its residential land use pattern to the project site. The alternative proposed by the Commentor would not reflect this land use pattern.

As discussed on page 264 of the Draft EIR, Policy I.A.13 of the Venice Local Coastal Program Land Use Plan mentions “additional height” or “reduced parking” as a means of encouraging affordable housing. Therefore, the Draft EIR appropriately uses additional height as a factor when considering the provision of affordable housing within the project site.

COMMENT 28-9

And the bottom line justification provided for the more intensive development seems to be entirely out of keeping with the whole idea of Environmental Impact and planning process. After discussing less dense or less-high alternatives, the conclusion is “Finally, this alternative would not maximize the value of the property....” (p. 452). If the idea is simply to maximize value of the property, why have development regulations at all, but simply allow developers to do whatever they believe will maximize their profit. More to the point, such introduction of economic considerations regarding the development is not supposed to be part of the EIR process, which is explicitly aimed at discussing impacts of property, not their profitability.

RESPONSE 28-9

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. CEQA Guidelines Section 15126.6 states, “...The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” As described on page 67 in Volume I, Section II, Project Description, of the Draft EIR, one economic objective of the proposed Sunset Avenue project is to “maximize the value of the property....” Hence, the discussion of such objective was included in the alternatives analyses.

Furthermore, pursuant to CEQA Guidelines Section 15093, the lead agency must ultimately “balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project.”

LETTER NO. 29

Ian McIlvaine, AIA
601 Rose Avenue
Venice, CA 90291

COMMENT 29-1

One of my concerns with the proposed project at Sunset Avenue is that it not become a gated community. My understanding is that the developers are proposing walk streets similar to the ones to the north and south of the project, but that they plan to gate them for “security”. These pedestrian streets should not be gated. This is public property and the City should insist that the developers provide this very simple amenity to the community.

RESPONSE 29-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. Neither of the street segments adjacent to the project site, Sunset Avenue and Thornton Place is designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a).

COMMENT 29-2

I would also like to recommend that the developers be allowed a reduced parking requirement if they provide parking for some Flex cars (<http://www.flexcar.com/>), and provide a bicycle storage/rental facility like the Bike Station in Long Beach (<http://www.bikestation.org/longbeach/index.asp>)

RESPONSE 29-2

This comment regarding reduced project parking in lieu of providing parking for Flex cars and bike storage racks/lockers is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 30

John Okulick
604 Hampton Drive
Venice, CA 90291

COMMENT 30-1

I would like to voice my **opposition** to the development planed [sic] for the Sunset Ave Property now occupied by the MTA transportation facility.

RESPONSE 30-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 30-2

I feel any development at this property should make the developer and not the city pay for toxic waste removal and disposal. The public would like to know what contaminates are in the ground and what will be done to remove them. This was a swamp area at one time and these contaminates may have migrated to other adjoining properties. If so it should be remedied and paid for by the developer and not the city.

RESPONSE 30-2

The Los Angeles Regional Water Quality Control Board has recently granted an environmental case closure for the property (Underground Storage Tank Case Closure, Division 6, August 10, 2004). This means that no further site investigations and corrective actions are to be carried out and any previous activities to remove any contaminants of concern are sufficient to protect human health and the environment. However, if previously unknown contaminants are discovered during construction on the Sunset Avenue site, Metro is required by law to remediate, treat, and/or dispose of such contaminants in a legal manner. Metro is also required to fund such cleanup activities if required, since the contamination, if discovered at all, would be the result of Metro's and its predecessor agencies usage of the property.

COMMENT 30-3

I would also like to voice my opposition to the fact that this is a proposed private or gated development, which makes it an **“anti community”** development, which unlike the walk streets it surrounds is closed to the public. This like much of the recent approved development in the area provide higher profits for the people who built here and give the community absolutely

nothing in return but more density, traffic, noise, and complaints. The rich getting richer at the neighborhoods expense.

RESPONSE 30-3

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. Neither of the street segments adjacent to the project site, Sunset Avenue and Thornton Place is designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a).

Volume I, Sections IV.G, Land Use; IV.I, Transportation and Circulation; and IV.H, Noise, of the Draft EIR provide a discussion on density, traffic, and noise, respectively. As discussed in Section IV.G, Land Use, page 264, of the Draft EIR, the project's increase in density is pursuant to Policy I.A.13 of the Venice Local Coastal Program, Land Use Plan, which states: "...In order to encourage the provision of affordable housing units in the areas designated as "Multiple Family Residential" and in mixed-use developments, the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915,...." Mitigation Measure Sunset-G.1 requires that the project's density and affordable housing provision be consistent with Policy I.A.13 and Government Code Section 65915.

With regard to traffic, as discussed in Section IV.I, Transportation and Circulation, on weekdays, the project would generate 1,168 net new daily trips and would significantly impact two intersections during the p.m. peak hours: (1) Main Street and Rose Avenue; and (2) Main Street and Sunset Avenues. On Saturdays, the project would generate 1,417 net new daily trips and would significantly impact one intersection: Rose Avenue and Lincoln Boulevard. However, with implementation of mitigation measures, traffic impacts would be reduced to less than significant.

Additionally, as discussed in Section IV.H, Noise, the project would result in an increase in noise levels. However, this increase would fall below the 5 dBA significance criteria, and as such, no significant impact related to noise would occur.

COMMENT 30-4

I am tired of this repeated effort by the planning commission to undermine the community by letting political sway determine these projects. When will you start listening to the public who are being force [sic] out by higher property values and rents? As a result people who where born and raised here are force [sic] out. Is this your idea of progress?

Developers and politicians who sit in their Bel Air mansions could care less about who is affected by this. Politics as usual has got to stop. The amount of variances approved is corrupt as are the public relations firms hired to sedate the public. The payoff is for a worse quality of life at a higher price. We do not want private development dictating what will be done but responsible planning that looks at the impact this high density, obnoxious tall buildings (allowed variances, no setbacks, no landscaping), and over crowding bring to this area.

I am watching how the commissioners respond and will create a watch list that will be emailed to the community. This list will be rating the actions of the commissioners and from which political action will be requested. It is sad that sensitivity to peoples lives and life styles need to be controlled for profiteering gangsters.

RESPONSE 30-4

The Commentor's opinion is acknowledged and will be forwarded to the decision-makers for review and consideration. Please refer to Volume I, Section IV.A, Aesthetics, and Section IV.G, Land Use, of the Draft EIR regarding the proposed project's impacts on density and aesthetics (i.e., heights, setbacks, design), respectively.

LETTER NO. 31

Jason Popieniuck
49B Sunset Ave.
Venice, CA 90291-2516

COMMENT 31-1

I have lived in Venice for more than ten years. For the past five years I have lived at 49 Sunset Ave. Parking in this area is an enormous problem. There aren't enough spaces to accommodate the residents. On a regular week we have to park up to six city blocks away from our apartment. During the summer we actually end up paying to park our car in the \$8 lots because there isn't anywhere else to go. Since the increase in gym memberships at Gold's and the recent development [sic] of the art lofts and a few other commercial properties in the neighborhood it has been a noticeably more difficult to find parking. I often see people who appear to be residents of the art lofts parking on the street. It is my fear that this will happen with the proposed Sunset Ave. Project, but on an even greater scale especially with the addition of commercial space. RADManagement [sic] sent out letters offering to discuss renting assigned parking spaces to residents on a first come first serve basis. This is a real slap in the face since it will be their project which will cause the problem in the first place. So after they take our free spaces away they can charge us for more parking. Can you please let me know what other residents are saying and if there is a reasonable proposal to deal with the parking in this area.

RESPONSE 31-1

Parking impacts have been analyzed in Volume I, Section IV.J, Parking, pages 366–367 of the Draft EIR. As discussed therein, the Sunset Avenue Project would not only meet the parking demand, it would provide increased parking opportunities (including 71 spaces pursuant to Beach Impact Zone requirements and 44 additional spaces) in a parking-deficient neighborhood, with the provision of on-site parking. Further, the project would result in a net increase of five street parking spaces. Parking impacts would be less than significant. The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 32

Stephen Pouliot
122 Thornton Avenue
Venice, CA 90291

COMMENT 32-1

I wish first and foremost to register a vote against the proposed density and 56 foot height variance of the Sunset Avenue Project. Certainly a more imaginative “village” can be created for this gateway piece of land.

RESPONSE 32-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As discussed in Volume I, Section IV.G, Land Use, page 264, of the Draft EIR, the project’s increase in density is pursuant to Policy I.A.13 of the Venice Local Coastal Program, Land Use Plan, which states, “...In order to encourage the provision of affordable housing units in the areas designated as “Multiple Family Residential” and in mixed-use developments, the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915,....” Mitigation Measure Sunset-G.1 requires that the project’s density and affordable housing provision be consistent with Policy I.A.13 and Government Code Section 65915. With regard to project heights, as indicated by the Commentor, the Sunset Avenue Project would have a maximum height of 56 feet. Please refer to Volume I, Section IV.G, Land Use, and Section IV.A, Aesthetics, of the Draft EIR for a discussion of the Sunset Avenue Project’s impacts on density and height, respectively.

COMMENT 32-2

The project pretends to mirror the walk streets of Venice, but current plans describe the development as a gated environment—not accessible to the public—or as an avenue to the Pacific. It’s [sic] avenues and sidewalks will become part of a private enclave. The traditional walk streets of Venice are accessible to all—part of the spirit and charm that has defined this unique city by the sea for almost a century.

RESPONSE 32-2

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would

remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. Neither of the street segments adjacent to the project site, Sunset Avenue and Thornton Place is designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a).

COMMENT 32-3

The Sunset project needs to be scaled down. Generous landscaping should be included, especially as breaks between the existing housing on Sunset and Thornton Place. Perhaps part of the development could even include a much-needed pocket park or two to buffer it from Main Street.

RESPONSE 32-3

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As described in Volume I, Section IV.A, Aesthetics, of the Draft EIR, the proposed Sunset Avenue buildings would be approximately 50 to 60 feet away from existing structures across Sunset Avenue and 25 to 50 feet from existing structures across Thornton Place. Landscaping within the project site would be subject to the requirements of the Los Angeles Municipal Code.

COMMENT 32-4

Undoubtedly the development will add tax revenue for the city of Los Angeles, but outside of a minimum of affordable housing and retail space that will increase traffic far more than the bus station, how is a project this size and in this key site benefiting the Venice community? For example, instead of leasing all the retail space perhaps RAD can dedicate a space to a community meeting room—or offer a permanent home to house the Venice Historical Society.

RESPONSE 32-4

As discussed in Chapter II, Project Description, pages 66 through 67, of the Draft EIR, one objective of the proposed Sunset Avenue Project is to invest in the future of the Venice community by providing needed housing and community serving commercial uses on an underutilized parcel. Furthermore, the proposed commercial uses along Main Street would continue the revitalization of Main Street as an active retail corridor in accordance with the City's Framework Element designation of a Community Center in the vicinity of Abbot Kinney Boulevard.

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 32-5

I attended several community meetings on the Sunset Project—and heard no voice from the community that favored the project in its current form.

RESPONSE 32-5

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 33

Gail Rogers

COMMENT 33-1

Below are my comments on the above referenced DEIR:

In your letter dated October 21, 2004 in which you notified us of the availability of the DEIR, you seem to gloss over the “unavoidable impact....with regard to aesthetic character..” As a thirty-year resident and home-owner in Venice, the aesthetic character is one of the most important aspects of our life here. It is not something to be glossed over so lightly.

The developers are completely out of touch with the history and architectural fabric of Venice. For example, this summer, we received a flyer from RAD Associates, saying that they were a husband and wife team who have “lived and played in Venice for the past few years”. The flyer was publicizing a free shuttle service that would leave from Sunset and Main and give residents free rides to Abbot Kinney Blvd. and the Venice Library to alleviate traffic flow. If they were in touch with who we are, they would know that we do not drive to Abbot Kinney Blvd. One of my favorite walks is from my house on Park Avenue to the Venice Public Library. In fact, I walked there today to return a book and take out another. The people who will live in this gated community may fear contact with the locals and need this shuttle to keep their isolation complete. This is an increase in traffic [sic], not a decrease as purported in their flyer.

RESPONSE 33-1

The Notice of Availability for the Draft EIR was submitted pursuant to CEQA guidelines. Its intent was to notify the public agencies, neighbors, and interested parties that the Draft EIR was available for review, and disclose significant impacts identified by Draft EIR; e.g. the impact on aesthetics. As described in the Notice of Availability, the Draft EIR which presents the full analysis of the projects impact on aesthetics was available for review at 16 community libraries and on the City and Metro websites. The free shuttle program was provided by RAD Management during the summer of 2004 as a demonstration project to evaluate the feasibility of operating a local shuttle within the Venice community. The intent in operating a local shuttle is to reduce local vehicle trips and provide alternative transportation for all area residents who choose to ride. The shuttle is not a feature or a mitigation measure for the proposed project.

COMMENT 33-2

The other issues that have not been addressed to my satisfaction are the density and traffic problems. I can no longer drive into and out of my alley without having to wait at least fifteen

minutes for a break in traffic along Pacific Avenue. What will happen when there are over two hundred more residents?

RESPONSE 33-2

As discussed in Volume I, Section IV.I, Transportation and Circulation, pages 346–353 of the Draft EIR, the traffic impacts have been analyzed and reviewed by the City of Los Angeles Department of Transportation, whose methodologies were followed. All of the project’s expected trips were included in the analysis. The trip generation that would occur is presented in Table IV.I-8 on page 347. The trips reflect the traffic that would be generated by 225 residential units and 10,000 square feet of retail uses. Significant traffic impacts have been identified and traffic mitigation measures recommended listed on pages 358–359.

COMMENT 33-3

Lastly, I cannot imagine the construction impacts being “short-term” and would have to face years and years of noise and dirt.

I am calling for a moratorium on development. Leave the bus yard where it is.

RESPONSE 33-3

Construction impacts were evaluated based on a reasonable construction schedule, given the nature of the proposed project. Air quality and noise impacts during construction at the Sunset Avenue Project site were concluded to be significant and unavoidable, even after implementation of mitigation measures. As such, certification of the Final EIR will require the adoption of a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 34

Helen Hood Scheer
132 Park Place
Venice, CA 90291

COMMENT 34-1

Although I support having a mixed-use space development at 100 East Sunset Avenue in Venice and I am glad that the bus depot will be relocating, I strongly oppose current development plans. I have lived within a two-block radius of the Venice site for over 30 years and strongly believe that the DEIR cited above is a superficial propaganda piece in favor of the development proposal and it repeatedly lacks hard data, specifically in regards to the impact the development will have on traffic, parking, noise, aesthetics and community value.

RESPONSE 34-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

The Draft EIR was prepared in accordance with the requirements set forth in CEQA and CEQA Guidelines. Pursuant to Section 15084 of the CEQA Guidelines, Metro and the City of Los Angeles, as co-Lead Agencies for the proposed project, have determined that the Draft EIR meets the CEQA criteria for adequacy and objectivity. Furthermore, data for each of the topical analysis in Chapter IV, Environmental Impact Analysis, of the Draft EIR (including traffic, parking, noise, and aesthetics) are presented throughout the text and tables, as well as in the numerous technical reports included as appendices.

COMMENT 34-2

The traffic and parking analysis are flawed. The report does not take into account that Pacific Avenue is a one-lane street during peak morning rush-hour.

RESPONSE 34-2

Please see Response to Comment No. 28-2, regarding the Pacific Avenue morning traffic flow conditions. That response provides a detailed discussion of the operating conditions on Pacific Avenue, and explains why the methodology in the Draft EIR is correct.

COMMENT 34-3

The study also does adequately consider the impact on cross-traffic from the nearby allies. If a car needs to enter any given alley, traffic will slow significantly or completely halt.

RESPONSE 34-3

Issues regarding the side street/alley traffic impacts are also addressed in Response to Comment No. 28-2. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 34-4

If the project proceeds as planned, it is conceivable that the city will need to improve the traffic flow and this eventuality should be studied in the DEIR.

RESPONSE 34-4

The Draft EIR has fully analyzed the project impacts on traffic in Volume I, Section IV.I, Transportation and Circulation, and in Volume IV, Appendix F, F2—Sunset Avenue Project, Traffic Study. As indicated in the Draft EIR and Section I, Summary, project impacts for the Sunset Avenue Project would be less than significant with mitigation. The analyses performed used recognized and required methodologies including those of the Los Angeles Department of Transportation. Mitigation measures were recommended, that would be implemented by the project Applicant to mitigate its impacts. Included in the measures are payment of Transportation Impact Fees, pursuant to Section 6 of the Coastal Transportation Corridor Specific Plan. Those fees support continued improvements. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 34-5

One option for ameliorating what will be a big traffic slow-down would be turning the parking lane that is currently permitted between 8PM and 8AM back into a drive lane, or reducing the current hours of free parking along Pacific Avenue. However, this would be a major inconvenience with unforeseen impact on the community.

RESPONSE 34-5

As noted in Response to Comment No. 34-2, above, impacts regarding morning traffic flow conditions have been addressed in detail in Response to Comment No. 28-2. Project impacts would be less than significant. The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 34-6

The fee-based parking structure in the proposed development offers no significant advantage to the community, and the reduction in current free parking needs to be more thoroughly investigated.

RESPONSE 34-6

Volume I, Section IV.J, Parking, pages 366–367 of the Draft EIR, analyzes the parking impacts associated with the project. The proposed project would not only meet the parking demand, it would provide increased parking opportunities (including 71 spaces pursuant to Beach Impact Zone requirements and 44 additional spaces) in a parking-deficient neighborhood, with the provision of on-site parking. Further, the project would result in a net increase of five street parking spaces. Parking Impacts would be less than significant. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 34-7

The DEIR states that construction vehicles would make 200 trips to and from the site per day. This is a high number of heavy vehicles to be moving through any residential neighborhood, particularly one that is a walking-community and has increased traffic during the summer and most of Southern California’s beautiful weekends year-round. This large scale construction will be a noise and debris nuisance to our community and will also command our much-needed parking free parking. Again, the report offers no hard data to substantiate its claim that there would be “less-than-significant levels” of impact during the construction phases; this is flippant commentary that undermines the notion of unbiased analysis.

RESPONSE 34-7

The conclusion that the impacts from construction traffic would be less than significant after mitigation is based on the discussion on pages 345–346 and 359 of Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR. As indicated, the 200 truck trips converts to 26 trips during each peak hour, and the construction workers would normally arrive at and leave the project site during non-peak hours. This level of traffic would not exceed the significance threshold. As discussed in Volume I, Section IV.I, Transportation and Circulation, page 357 of the Draft EIR, the mitigation measures for the project’s construction impacts include a mitigation measure requiring the preparation of a Work Area Traffic Control Plan to be approved prior to the issuance of construction permits. The minimum information to be contained in the plan is listed in that measure and includes requirements regarding identification of haul routes to be used by construction trucks, identification of traffic control procedures, identification of the on-site location of vehicle and equipment staging, limitation of lane closures, and scheduling of construction materials during non-peak travel periods. Also included in the mitigation measure is a provision that requires off-street parking capacity for construction workers with sufficient

capacity for those who cannot park on site during construction, with shuttle services as necessary. Implementation of the measures set forth within the required work and Traffic Control Plan would mitigate construction traffic to a less than significant level. However, it should be noted, that the analysis does identify significant construction impacts with regard to Air Quality and Noise.

COMMENT 34-8

The proposed plan is essentially a gated community, closed into itself—just like the development already existing across the street. The new development should be constructed as walk streets, like the rest of the community. It is reasonable and likely to assume that residents who live in the proposed development, will be able to cross those gates from the inside and make their way down the public walk streets (Sunset and Thornton) westward toward the beach. However, it seems also likely that residents of or visitors to the surrounding area will not be able to the other way. This is inequitable, and also out of keeping with the architectural and historical fabric of Venice.. [sic] The fact that creating new walk streets in the development site—the most obvious way to keep in character with the neighborhood—is not studied or even mentioned in the DEIR is a huge oversight, again undermining any pretense of thorough and unbiased analysis.

RESPONSE 34-8

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project site is currently developed with Metro's Division 6 bus facility and is not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. None of the street segments adjacent to the project site, including Sunset Avenue and Thornton Place, are designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a).

COMMENT 34-9

The DEIR cites the development across the street as a precedent, which worries me, since it too is a gated community and fails to utilize the commercial space in manner that benefits the community. Similarly, the new commercial/living spaces on Abbot Kinney are cited as similar venues in the DEIR, when in fact these places seem to fall short of their zoning regulations (they are not offering significant commercial outlets). I am also concerned that trash and debris from food suppliers will litter the surrounding walk streets.

RESPONSE 34-9

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As discussed in Volume I, Section IV.G, Land Use, of the Draft EIR, Policy I.C.7 of the Local Coastal Program Land Use Plan discusses that the future use of the proposed site: "...include affordable housing, which may be a mixed-use residential-commercial project, and public parking structure as a measure to improve public access." Sunset Avenue Project is intended to be consistent with this policy by providing a mix of uses which include up to 225 residential units, 17 of which would be affordable housing units, and 10,000 square feet of commercial use, as well as the provision of 676 parking spaces.

With regard to zoning, project implementation would require the redesignation of the existing zoning for the site from M1 (limited manufacturing) to CM-1 (commercial use), consistent with the proposed designation in the Venice Coastal Zone Specific Plan. The project's proposed CM-1 zoning would still allow a range of commercial and limited manufacturing uses, but would also allow residential uses on the site.

COMMENT 34-10

Waiving the local height restrictions is absolutely unacceptable and has an unforeseeable negative impacts, including setting a precedence for similar height restriction waivers in a community now under heavy development pressure to offer residence with ocean views. This portion of the DEIR, particularly the discussion of the Mello Act, is misleading and false—the act does not include a height allowance. If height allowances are to be altered, the entire community (not the limited area you are polling) should be able to offer comments—the restrictions are in place for a reason in our costal areas and altering the laws affects more people than have been informed of the current proposal. The sole benefit of additional height seems to be increasing the number of rental units—and developer profit.

RESPONSE 34-10

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The discussion of height allowance provisions within the Draft EIR correctly cites City policies as the bases for its conclusions, not the Mello Act. Specifically, the discussion on page 264 of the Draft EIR cites Policy I.A.13 of the Venice Local Coastal Program Land Use Plan: "...In order to encourage the provision of affordable housing units in the areas designated as "Multiple Family Residential" and in mixed-use developments, the City may grant incentives such as reduced parking, additional height (emphasis added) or increased density...." Furthermore, the Draft EIR has been prepared, inclusive of public notifications, in accord with CEQA Guidelines. The public has had the opportunity to respond to the Notice of Preparation of the Draft EIR and the Draft EIR. Further, the public may participate in future hearings, and otherwise notify the decision-makers of their thoughts. Public notification of the Draft EIR

included published notices as well as notification letters to over 900 parties who live in the vicinity of the Sunset Avenue project, or otherwise have expressed and interest in the project. The Draft EIR has been available for review at 14 libraries and on the City and Metro websites.

COMMENT 34-11

The DEIR does not adequately consider the materials to be used in the proposed development. The developer's project across the street is problematic—it has created a sound bounce that is a public nuisance and light glare that bothersome and dangerous.

RESPONSE 34-11

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As described on page 112 of the Draft EIR: "In addition, the project would use standard, non-highly reflective building materials, typical of those used throughout the surrounding areas. Therefore, the project would not cause notable off site glare during daylight hours, and would not adversely affect sensitive off-site activities."

COMMENT 34-12

This proposed development offers no benefit to the surrounding community.

RESPONSE 34-12

The Commentor's opinion regarding the proposed project is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 34-13

In addition, the artists [sic] renderings shows no setback at all for the higher buildings.

RESPONSE 34-13

The artist's renderings on pages 74–77 of the Draft EIR are conceptual portrayals that provide a general sense of the project's appearance. The renderings do conceptually show the project setbacks. The project setbacks for the taller buildings are also illustrated in Cross-Sections on Figure IV.A-8 on page 115 of the Draft EIR. (Figure IV.A-8 has been enhanced to include the actual dimensions of the setbacks of the taller buildings. Please refer to Section II, Correction and Additions, of this Final EIR for the revised figure.) Project setbacks are also described in the aesthetics analysis on pages 112–118 of Volume I, Section IV.A, Aesthetics, of the Draft EIR. As indicated therein, the project setbacks at ground level vary from 5 feet to 50 feet. The tallest five-story buildings are centrally located within the project site with larger setbacks. The tallest buildings portrayed in the artist's renderings that are located along a street (buildings along Sunset Avenue) are the four story buildings on Sunset Avenue that are shown in

Figure II-6 on page 75. The setbacks of these buildings would range from approximately 20 feet to approximately 33 feet from the sidewalk (approximately 42 feet to 55 feet from the current property edge on Sunset Avenue).

COMMENT 34-14

As the map on page 263 show, this is a low population density community with 85 residential units in a [sic] the surrounding area of roughly the same size. The proposed development, with 225 units, violates the both the established scale and density. The map and discussion in the report fail to note the fact that even the “industry” areas across the street from the proposed development are extremely low density.

RESPONSE 34-14

The graphic on page 263 of Volume I, Section IV.G, Land Use, of the Draft EIR depicts a portion of the Land Use Designation Map from the Venice Local Coastal Program Land Use Plan. The plan also includes policies that are applicable to the proposed project site, including Policies I.C.7, Bus Yard Redevelopment, and I.A.13. These policies which specify suggested uses for the project site, and which allow increases in density for project with affordable housing, supplement the information on the graphic. These policies suggest that the project’s site could have a higher density than surrounding lots. As described in Section IV.G, Land Use, the project is consistent with these policies. The comment is acknowledged and will be forwarded to the decisionmakers for review and consideration.

COMMENT 34-15

The DEIR does not serve it’s [sic] purpose. The environmental concerns are not presented with data and alternatives (such as mimicking the walk street design) are not adequately considered. Instead, the report seems to be an opinion piece in favor of the development project, and the project is driven by profit motives. The primary developer has a track record of deceit and is a blight to our community. The lack of respect for the environment in the proposed plan is appalling and to allow this type of construction, which is an assault on the senses, is inexcusable.

Thank you for your time and attention. I want to be kept informed about future meetings.

RESPONSE 34-15

As discussed in Response to Comment No. 34-1, the Draft EIR was prepared in accordance with the requirements set forth in CEQA and CEQA Guidelines. Pursuant to Section 15084 of the CEQA Guidelines, Metro and the City of Los Angeles, as co-Lead Agencies for the Sunset Avenue Project, have determined that the Draft EIR meets the CEQA criteria for adequacy and objectivity.

Volume I, Chapter IV, Environmental Impact Analysis, of the Draft EIR provides a thorough and accurate analysis of the potential environmental impacts associated with the proposed project. Supporting data for the analyses are presented throughout each of the topical sections within Chapter IV, as well as in the numerous technical reports included as appendices.

In addition, the Draft EIR discusses and analyzes a range of alternatives for the proposed Sunset Avenue Project in Volume I, Sections V.F through V.K. Pursuant to Section 15126.6 of the CEQA Guidelines, an EIR need not consider every conceivable alternative to a project. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. As discussed in Section IV.A, Aesthetics, page 116, of the Draft EIR, the proposed project would not have a significant impact with regard to the existing walk street design in the project area. Currently, the residential structures west of Pacific Avenue from the site are oriented to the walk streets perpendicular to Pacific Avenue, presenting unadorned sideyard appearances to the street. The project's natural orientation toward Pacific Avenue and landscaping is thus intended to provide visual relief from this existing narrow and hard-edged visual character which typify this street. Thus, no significant impacts relating to this issue would occur, and thus, no discussion of an alternative for this issue is required.

However, the comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As requested, the Commentor has been placed on the mailing list to receive notices and updates for the proposed project.

LETTER NO. 35

James Schley
18 Park Ave.
Venice, CA 90291

COMMENT 35-1

Please be informed that I very strongly oppose the project under consideration at the bus facility on Sunset Ave. in Venice. If you lived in the immediate area you would understand that this is an impossible situation. When we were involved with dealing with the impact of the new project which will be built just a block away which took away a huge amount of community parking we were told of the possibility of moving the bus facility to provide very large number of spaces which we were to lose. Now to find that not only are we not going to get this much needed parking but yet another development [sic] is on the drawing board is too much to digest.

RESPONSE 35-1

As discussed in Volume I, Section IV.J, Parking, pages 366–367 of the Draft EIR, the parking impacts have been analyzed. The proposed project would not only meet the parking demand, it would provide increased parking opportunities (including 71 spaces pursuant to Beach Impact Zone requirements and 44 additional spaces) in a parking-deficient neighborhood, with the provision of on-site parking. Further, the project would result in a net increase of five street parking spaces. Parking impacts would be less than significant. The comments are acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 35-2

Every person to whom I have spoken has voiced their objection to this project. This property [sic] was part of our community and in a sense was owned by the people. What is happening is unconscionable.

Please use your influence to alter this project.

RESPONSE 35-2

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 36

City of Los Angeles Fire Department
Alfred B. Hernandez, Assistant Fire Marshal
200 North Main Street
Los Angeles, CA 90012

COMMENT 36-1

PROJECT LOCATION

3475 South La Cienega Boulevard. The project site is located in the West Adams-Baldwin Hills-Leimert Community in the City of Los Angeles on the east side of Jefferson Boulevard between Rodeo Boulevard and National Boulevard.

PROJECT DESCRIPTION

The proposed site is 4.66 acres and would provide expanded Metro maintenance, administrative facilities, CNG fueling facilities, and bus and employee parking. The project would include 53,120 square feet in a primary administration/maintenance building and approximately 18,800 square feet of auxiliary facilities.

The following comments are furnished in response to your request for this Department to review the proposed development:

RESPONSE 36-1

This comment provides a general description of the West Los Angeles Transportation Facility project. Specific comments on the Draft EIR and their respective responses are provided below.

COMMENT 36-2

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low Density Residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 6,000 to 9,000 G.P.M. from 4 fire hydrants flowing simultaneously.

Based on a required fire-flow of 6,000 to 9,000 G.P.M., the first-due Engine Company should be within 1 mile, the first-due Truck Company within 1 1/2 mile(s).

RESPONSE 36-2

As discussed in Volume I, Section IV.K.1, Water, of the Draft EIR, the project would meet adequate fire flow requirements. In addition, the project would comply with all applicable provisions of the City of Los Angeles Fire Code to ensure that adequate LAFD access, hydrants, and fire flow requirements would be provided. Therefore, no significant impacts related to fire safety or fire flow would occur.

COMMENT 36-3

B. Response Distance, Apparatus, and Personnel

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No.94
4470 Coliseum Street
Los Angeles. CA 90016
Task Force Truck and Engine Company
Paramedic Rescue Ambulance
Miles- 1.5
Staff- 12

Fire Station 43
10234 National Boulevard
Los Angeles, CA 90034
Single Engine Company
Paramedic Rescue Ambulance
Miles- 2.4
Staff- 6

Fire Station 58
1556 S. Robertson Blvd.
Los Angeles, CA 90035

Task Force Truck and Engine Company
Miles- 2.5
Staff- 10

The emergency response goal of the Los Angeles Fire Department is to respond to 90% of emergencies within 5 minutes.

Based on these criteria (response distance from existing fire stations), fire protection would be considered adequate.

The above distances were computed from 3475 S. La Cienega Boulevard.

RESPONSE 36-3

This comment indicates that the proposed West Los Angeles Transportation Facility would be adequately served by existing fire stations. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 36-4

C. Firefighting Access

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

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

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

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

RESPONSE 36-4

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As discussed in the Initial Study, which is presented in Appendix A of the Draft EIR, the proposed West Los Angeles Transportation Facility would be developed in compliance with local and State code requirements for "E" occupancies (including NFPA 101—State Fire Code). All project plans regarding site access and design, including the placement of fire hydrants and other fire protection systems, will be submitted to the City of Los Angeles Fire Department for review and approval.

COMMENT 36-5

Businesses that intend to handle hazardous materials may have to participate in the Unified Hazardous Waste and Hazardous Materials Management Program (Unified Program). Businesses are required to register with the Fire Department and complete a hazardous materials inventory if they handle hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases; or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR parts 30, 40 or 70. Businesses that operate underground storage tanks must apply for permits to install, modify, abandon or operate those tanks. Businesses that generate, treat, recycle or otherwise handle hazardous waste must register with the Unified Program Agency and receive a permit for these activities.

Businesses that intend to handle regulated substances (previously called extremely hazardous substances) which are listed in Section 2770.5 of the California Code of Regulations (CCR) Title 19, Division 2, Chapter 4.5 may be required to participate in the California Accidental Release prevention Program (CalARP). These businesses shall notify the Fire Department's Unified Program Agency in writing of their inclusion into the program.

Risk Management Plans involve all administrative and operational procedures of a business which are designed to prevent the accident risk of regulated substances, including, but not limited to programs which include design safety of new and existing equipment, standard operating procedures, preventative maintenance programs, operator training and accident investigation procedures, risk assessment for unit operations or operating alternatives, emergency response planning, and internal or external audit procedures to ensure that these programs are being executed as planned. Refer to CCR Title 19, Division 2, Chapter 4.5 and Federal regulations 40 CFR Part 68: "Chemical Accidental Prevention Provisions" for further information and requirements regarding this program. If a business is required to submit a Risk Management Plan, the plan shall be submitted to the Fire Department prior to the facility beginning operation.

RESPONSE 36-5

As discussed in Volume I, Section IV.E, Hazardous Materials, page 225, of the Draft EIR, the West Los Angeles Transportation Facility would comply with Los Angeles Regional Water Quality Control Board and City of Los Angeles Fire Department regulations and guidelines relating to the handling and storage of hazardous materials and waste, including the relevant requirements and guidelines described in this comment. Specifically, the Transportation Facility would obtain the appropriate permits required for the installation and operation of underground storage tanks (USTs) and above-ground storage tanks. In addition, an Accidental Risk Prevention Program would be filed with the City of Los Angeles Fire Department, which

would contain such information including a hazardous materials inventory, emergency contacts, and phone numbers.

COMMENT 36-6

For additional information regarding the Unified Program, please contact the Technical Section of the Fire Department at (213) 482-6543.

Submit plot plans indicating access road and turning area for Fire Department approval.

If demolition of any current structure(s) is necessary, the Fire Department access will remain clear and unobstructed.

The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

At present, there are no immediate plans to increase Fire Department staffing or resources in those areas, which will serve the proposed project

All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

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

The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.

Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.

Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.

No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.

RESPONSE 36-6

As indicated above, the project would comply with all applicable City of Los Angeles Fire Department requirements. In addition, all project plans regarding site access and design, including the placement of fire hydrants and other fire protection systems, would be submitted to the City of Los Angeles Fire Department for review and approval.

COMMENT 36-7

CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

For additional information, please contact inspector Kathleen White of the Construction Services Unit at (213) 482-6506.

RESPONSE 36-7

As discussed in the Initial Study for the proposed project, which is included as Appendix A of the Draft EIR, the project would include fire sprinklers, fire alarm devices, and other approved fire safety technologies in compliance with local and State requirements, including those set forth in the Fire Protection and Fire Prevention Plan and Safety Element. In addition, as discussed on page 225 of Volume I, Section IV.E, Hazardous Materials, the West

Los Angeles Transportation Facility would file an Accidental Risk Prevention Program with the LAFD. The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 37

Grassroots Venice Neighborhood Council
Land Use and Planning Committee

COMMENT 37-1

The Venice Land Use and Planning Committee (“LUPC”) has reviewed the Draft EIR issued for the Metropolitan Transportation Authority West Los Angeles Transportation Facility and Sunset Avenue Project (issued October 2004) (“DEIR”). The Sunset Avenue Project is located on a significant and important site within the Venice Community. The LUPC offers the following comments on the DEIR:

RESPONSE 37-1

This comment acknowledges that the Venice Land Use and Planning Committee has reviewed the Draft EIR for the proposed project. Specific comments on the Draft EIR and their respective responses are provided below.

COMMENT 37-2

1. Height

The Proposed Project would contain building heights of up to 56’. This height would exceed the greatest height allowed under the Venice Specific Plan (“VSP”) by 21’, an excess of 60%.

The DEIR correctly recognizes this proposed excess height as a significant environmental impact. Furthermore the DEIR studies a “Reduced Density” alternative, Alternative G (p.9), and a “Reduced Height” alternative, Alternative H (p.10). Alternative H is recognized in the DEIR as the Environmentally Superior Alternative (p.10).

RESPONSE 37-2

As correctly stated by the Commentor, Volume I, Section IV.A, Aesthetics, of the Draft EIR concludes that the proposed Sunset Avenue Project would have a maximum building height of up to 56 feet and would exceed the maximum height allowable under the Venice Specific Plan. Therefore, as acknowledged in the Draft EIR, the project would result in a significant impact on aesthetics.

Alternative G, Reduced Density, and Alternative H, Reduced Height, as indicated by the Commentor are analyzed in Sections V.H and V.I, respectively, of the Draft EIR. As concluded in the Draft EIR, Alternative H is considered the Environmentally Superior Alternative.

COMMENT 37-3

The impacts of the proposed building heights under both the Proposed Project and Alternative H are not, however, sufficiently defined and analyzed in the DEIR. It is unclear from the information provided exactly where the different building heights would occur on the site. For both the Proposed Project and Alternative H, a site plan showing the specific locations of the different maximum building heights and their distances from the site boundaries should be included. For example, a building height of 56' which is 5' from the northern property line has a significantly different environmental impact than an equally high 56' building height which is set back 100' from the property line. Plans must be included in the DEIR which make the impacts of the various proposed building heights explicit and comprehensible to the community, so the impacts can be properly evaluated.

For clarity's sake, the DEIR should include a table comparing features of the various proposed alternatives for the Sunset site. The table should include features such as maximum building height, number of units, number of affordable units, number of parking spaces (including beach impact spaces and excess spaces available for public use), whether or not the alternative complies with the VSP, and other features which vary between the different alternatives.

RESPONSE 37-3

The Draft EIR includes a site plan of the Sunset Avenue Project on Figure II-4 on page 73 of Volume I of the Draft EIR, and cross-sections of the project buildings on Figure IV.A-8 on page 115. The heights and their relationship to the surrounding roadways are also discussed on pages 113 through 117 in Volume I, Section IV.A, Aesthetics, of the Draft EIR. Figure IV.A-8 has been enhanced to include dimensions and a scale. Please refer to the revised Figure IV.A-8 in Section II, Corrections and Additions, of this Final EIR. As indicated, the tallest five story buildings, with heights of approximately 56 feet would be substantially setback from the surrounding roadways.

Alternative H, as discussed on pages 453 to 463 of Volume I, Section V.I, Alternatives, is a Reduced Height alternative that reduces the building heights of the four story buildings (approximately 45 feet high) that face Sunset Avenue and Thornton Place. Under Alternative H, those buildings would be reduced to three floors or approximately 35 feet. The setbacks of the four story buildings along Sunset Avenue, three floors under Alternative H, would range from approximately 20 feet to approximately 33 feet from the sidewalk (approximately 42 feet to 56 feet from the current property edge on Sunset Avenue). The setbacks of the four story buildings

along Thornton Place, three floors under Alternative H, would range from approximately 24 feet to approximately 49 feet from the property line.

For the most part, the information requested is included in the discussion of the project alternatives. However, it should be noted that the Alternatives have been defined in generally conceptual terms to address the potential for reducing specific project impacts, and comparing the relative impacts of the alternatives on the environmental topics addressed in the Draft EIR. Detailed designs were not prepared for each of Alternatives, and a range of final design solutions could be proposed within the parameters of the general definitions. Table V-1 on pages 395 and 396 provides a comparative summary of the project impacts of each of the alternatives, indicating which impacts would be significant or less than significant for each of the alternatives, and the relative impacts of the alternatives versus those of the proposed project. The discussion on pages 453 to 463 provides the information and bases upon which the conclusions shown in Table V-1 were based.

COMMENT 37-4

In addition to these site plans showing the different proposed building heights in plan view, the section views included on p.115 should show the proposed maximum heights of each building shown.

RESPONSE 37-4

In response to this comment, Figure IV.A-8, on page 115 has been enhanced to include building heights and setbacks. Please refer to Section II, Corrections and Additions, of this Final EIR.

COMMENT 37-5

The DEIR should also explicitly state whether or not Alternative H would comply with all height restrictions in the VSP.

RESPONSE 37-5

Alternative H would reduce the building heights along Thornton Place and Sunset Avenue to comply with the height restrictions in the Venice Specific Plan. However, the heights of buildings within the center of the project site, would not be reduced, and would exceed the 35-foot height limit, as would the proposed project. As was the case with the proposed project, this would be consistent with the proposed exception to the Venice Specific Plan, and Policy I.A.13 of the Venice Coastal Program Land Use Plan that encourages increases in project height and density for provisions for affordable housing. The discussion of Alternative H on page 457 of Volume I, Section V, Alternatives, has been edited for clarification. Please see Section II, Corrections and Additions, of this Final EIR.

COMMENT 37-6**2. Exceptions to the VSP**

The DEIR states that the Proposed Project would require exceptions for building height and FAR (p.14). The DEIR further states “Such exceptions are consistent with the overall intent of the plan to encourage affordable housing, and would exercise a trade-off that is anticipated in the Plan” (p.14). Please clarify specifically where such trade-offs are anticipated in the VSP and what language in the VSP supports such trade-offs.

The DEIR further claims that the Proposed Project “would be compatible with the overall aims of applicable plans and therefore considered not to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project would not be inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site” (p.280).

Please provide further justification for this statement. The DEIR specifically acknowledges that the Proposed Project would violate the density and height restrictions in the VSP. Because the Proposed Project may comply with other, less specific goals included in broader plans such as the General Plan, does that give the project carte blanche to ignore the requirements of the VSP or other applicable regulations? The DEIR seems to suggest this on p.280 as well as in other sections. Please clarify.

RESPONSE 37-6

As described in Volume I, Section IV.G, Land Use, on page 264 of the Draft EIR, the anticipated trade-off is stated in Venice Local Coastal Program, Land Use Plan. Specifically, Policy I.A.13 states: “...In order to encourage the provision of affordable housing units in the areas designated as “Multiple Family Residential” and in mixed-use developments, the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915, ...” Therefore, City approval of an exception to the density and height limits in the Venice Specific Plan would be consistent with Policy I.A.13, provided the number of affordable and market uses is consistent with Government Code Section 65915, and related City provisions for affordable housing. As described on pages 272 through 274, the project would be consistent with such provisions. Further, Mitigation Measures Sunset-G.1 and Sunset-G.2, require such consistency.

Further, the Draft EIR addresses the increased height and density, and the implications of the exceeding the limits in the VSP in Section IV.A, Aesthetics, and concludes that increasing the height limits would have a significant impact on aesthetics. As described on pages 117 and

118 of the Draft EIR: “.... Notwithstanding, for purposes of aesthetics it should be noted that the height and FAR regulations presented in the Specific Plan are placed in the Plan, in part, to limit potential aesthetic impacts. Allowing the greater heights and FAR would exercise a trade-off that is anticipated in the Plan, but would none-the-less facilitate the massing impacts cited above..... As such, the project would contrast with the existing features that embody the area’s valued aesthetic image. Further, these impacts would occur due to project heights that exceed the limitation expressed in the Specific Plan. Therefore, impacts regarding aesthetic character would be significant.”

COMMENT 37-7

3. Feasibility

The DEIR states in many areas that suggested mitigation measures and whether or not they should be required is dependent on the feasibility of the project and its “potential to displace the existing on-site automotive maintenance facility, provide affordable housing, and provide beach impact zone parking.” (p.16). Please clarify how the feasibility of mitigation measures, specifically complying with VSP height restrictions, will be evaluated. For example, if Alternative H is determined to be feasible only without excess public parking and/or affordable housing, please include the methodology by which this determination of infeasibility was reached.

RESPONSE 37-7

This comment refers to Mitigation Measure Sunset-A.1 on page 16 of the Draft EIR, which addresses the project’s significant impact on aesthetics by suggesting that building heights along Sunset Avenue and Thornton Place be reduced to 35 feet in accordance with the height limit identified in the Specific Plan. Alternative H: Reduced Height, analyzed in Volume I, Chapter V. Alternatives, of the Draft EIR, was included in the Draft EIR to provide an analysis of an alternative project that would incorporate Mitigation Measure Sunset-A.1 into its design. In accordance with CEQA, analysis of Alternative H provides a comparative evaluation of the alternative’s impacts versus those of the proposed project’s for all of the environmental topics evaluated in Chapter IV, Environmental Impact Analysis, of the Draft EIR, as well as a discussion of the alternative’s ability to meet the project’s basic objectives.

Final decisions regarding project design and the selection of mitigation measures will be made by the decision-makers. Alternative H was selected for analysis and inclusion in the Draft EIR in order to “... foster meaningful public participation and informed decision making” pursuant to Section 15126.6(f) of the CEQA Guidelines. In accordance with Section 15126.6(f)(1) of the State CEQA guidelines, feasibility is defined as follows:

“Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or site already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.”

COMMENT 37-8

4. Vietnam POW/MIA Memorial Mural (“Mural”)

The DEIR correctly recognizes the Mural as a cultural feature significant to the Venice community, and concludes that its retention in place is infeasible (p.21). Mitigation measure Sunset-C.2 is to evaluate the feasibility of relocation of the Mural, including “a determination of a reasonable and acceptable cost for the mural’s relocation [to] be established between the Applicant, Metro, and a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior’s Professional Qualification Standards for History, Architectural History or Architecture pursuant to 36 CFR 61.” (p.23).

- a. How is the “qualified architectural historian, historic architect, or historic preservation professional” to be selected? Is this person to be selected by the Applicant, Metro, or the City of Los Angeles Planning Department?
- b. Should the Mural’s relocation be determined to be infeasible, an alternative mitigation measure should be prescribed. Such an alternative mitigation measure could, for example, include payment of in-lieu funds in an amount comparable to the cost of relocation to the Vietnam Veterans Aid Foundation, the foundation which the Mural was originally created to raise funds for, or a comparable charitable organization.

RESPONSE 37-8

The Final EIR, specifically Mitigation Measure Sunset-C.1, has been revised to clarify those parties responsible for monitoring the implementation of Mitigation Measure Sunset-C.2. Please refer to Section II, Corrections and Additions, of this Final EIR for the revisions to Mitigation Measure Sunset-C.1. Additionally, the Mitigation Monitoring Reporting Program (MMRP) provided in Section IV of this Final EIR identifies responsible parties for each of the mitigation measures imposed for the project.

As discussed in Volume I, Section IV.C, Historic Resources, page 173 of the Draft EIR, evaluation of the “Mural” indicated that as a relatively recent work of art, the mural appears ineligible for listing in the National Register, California Register, or as a City of Los Angeles Historic-Cultural Monument under any criteria, although the mural should be given special consideration in the local planning process. However, in light of relevant federal, state and local laws and regulations concerning murals, the Vietnam POW/MIA Memorial Mural can be looked upon as a historic resource pursuant to Section 15064.5(a)(2) of the CEQA Guidelines. This identification of the mural as a historical resource pursuant to the CEQA Guidelines was made because of the mural’s aesthetic merit and artistic expression as a piece of artwork and not because of its content or association with any one organization or group. CEQA does not require the mitigation of impacts if such mitigation measures are infeasible. In addition, the Commentor’s suggested mitigation to donate the cost of relocating the Vietnam POW/MIA Memorial Mural to the Vietnam Veterans Aid Foundation should the relocation of the mural be infeasible will not mitigate the removal of the mural from the project site and therefore will not serve as an adequate mitigation measure under CEQA. Nonetheless, the comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 37-9

5. Affordable Housing

The Proposed Project includes 17 affordable units, to be “for-sale” to very low income persons. This represents 7.5% of the 225 units proposed for the site.

The project claims this meets the requirements of the Mello Act for affordable housing in the Coastal Zone, based on a requirement “between 10% and 20% of the base density” (p.72).

The “Mello Act Compliance Process for Coastal Zone Projects” issued by Con Howe, Director of Planning for the City of Los Angeles (issued October 16, 2001) states the following:

“New Housing Developments – Ten or more units. New housing developments of ten or more units must provide inclusionary residential units. Applicants have two options: (1) twenty percent of all units must be reserved for low income households; or (2) ten percent of all [emphasis added] units must be reserved for very low income households” (p.3)

The City of Los Angeles document states the requirement is 10% based on all units, not 10% of “base density”. Please provide further discussion of the Mello Act and the project’s compliance with it, including citing why 10% of base density is used rather than 10% of the total number of units.

RESPONSE 37-9

The City's Affordable Housing Incentives Guidelines, updated on September 9, 2004, provide that the number of units set aside as affordable is based on the maximum allowable density, which is defined as the maximum number of dwelling units permitted in the zone prior to the application of available density bonuses. The calculation of affordable dwelling units for the Sunset Avenue Project complies with the City's Affordable Housing Incentives Guidelines.

COMMENT 37-10**6. Walk Streets**

The Proposed Project is adjacent to walk streets on the west side of Pacific. Walk streets are a significant feature of the residential character of Venice, recognized prominently in the VSP. The walk streets, whether they be west of Pacific, in the Milwood area, or the Venice canals, provide interaction between public and private spaces which vitally enhances the character of the Venice community. As stated in the DEIR, in the existing land use patterns, "Pedestrian-ways are emphasized" (p.251).

While the project recognizes this critical feature of the community through its design to "extend part of the character provided by the streets with openings between rows of small residential properties north and south of the site and west of Pacific Avenue. Space between the individual structures would allow for **communal walkways** [emphasis added], common space recreation or garden areas, water features and landscaping" (p.112-113), it is unclear if this design element truly extends the walk street element of the Venice community. The Conceptual Design Concept and Venice Setting (p.114) shows gates blocking the walkways which continue the walk streets existing west of Pacific Ave. from public use. Should the entire 3.13 acre site (excepting the 10,000 sf of commercial area) be shut off from public access, then the Proposed Project clearly would not be properly incorporating the walk street element of the Venice community. Please clarify whether or not the "communal walkways" extending the walk streets west of Pacific will be accessible to the public or if they will be private space, thus effectively creating a "super-block" gated community on the site.

RESPONSE 37-10

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The descriptive material on pages 112 through 114 occurs in the discussion of the project's visual impacts. As described on page 112 of the Draft EIR, "This site plan is intended to extend part of the character provided by the streets with openings between rows of small residential properties north and south of the site and west of Pacific Avenue." This discussion pertains to the visual impacts, not to site access.

The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. Neither of the street segments adjacent to the project site, Sunset Avenue and Thornton Place is designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit 16a).

COMMENT 37-11**7. Related projects**

The draft EIR contains a list of 21 related projects. Omitted from this list are the following:

the Marina Point project

the LAX expansion

the 300-330 Washington Blvd. project

the Lincoln Place redevelopment project

the Daniel Freeman redevelopment project

the Trammell Crow project

the Chateau Marina apartment complex

There cannot be an accurate cumulative impact analysis if current and planned development is left out of the equation. This is especially true with regard to traffic impacts. The residents of Venice are repeatedly told that all traffic impacts will be mitigated to a level of insignificance as traffic worsens exponentially. Please recompute the traffic impacts, especially along Lincoln Boulevard between the Marina Freeway and the Santa Monica Freeway, factoring in all active and planned developments, with the list reflected above taken into consideration.

RESPONSE 37-11

As discussed in Volume I, Section III.B, Related Projects, pages 89, 92 – 94 of the Draft EIR, the City of Los Angeles Department of Transportation and City of Santa Monica

development lists were reviewed for information during the preparation of the traffic impact study for development projects to be considered. The NOP for the project was released in November 2003. The City of Los Angeles development list was provided in March 17, 2004 and the City of Santa Monica list was review during the same period. Both development lists provided were checked in the field along with the Playa Vista Village DEIR development list for related projects to be included in the traffic study for the 2009 study year.

With regard to projects mentioned in this comment:

- **Marina Point:** This project was not included on the development list provided by the City of Los Angeles after the release of the NOP and is outside the project study area. Nevertheless, the current project, which consists of 138 high rise condominium units, has been reviewed. The analysis of the small amount of added traffic does not change the findings of the Sunset Avenue Project traffic analysis contained in the Draft EIR. A high rise condominium development of 138 units generates 47 A.M. peak hour trips, 52 P.M. peak hour trips and 48 Saturday peak hour trips. Spreading these added trips across the street network does not add a measurable amount of hourly traffic on any individual study intersections on the major arterials like Lincoln Boulevard, Main Street or Pacific Avenue. For comparison, the ambient traffic growth added to the intersection of Rose Avenue and Lincoln Boulevard certainly includes small projects of this magnitude. The ambient growth (not including the related project traffic) was 204 and 203 vph for the A.M. and P.M. peak hour, respectively, and certainly includes small projects of this magnitude. For example, if 30 percent of this traffic was to and from the north along Lincoln Boulevard, it could add approximately 3 A.M. trips and 13 P.M. southbound trips per hour with 13 and 7 northbound afternoon trips per hour. This level of traffic volume spread over two lanes of traffic during a one hour period is covered by the ambient growth factor.
- **LAX expansion:** This project was not included on the development list provided by the City of Los Angeles after the release of the NOP because this project is located over 5 miles from the study area, any traffic growth due to the airport expansion is covered by the ambient growth factor.
- **300-330 Washington Boulevard:** This project is included in the related project list as project number 1.
- **Lincoln Place:** This project was not included on the development list provided by the City of Los Angeles after the release of the NOP. The original project planned for the site in the mid to early 90's was the replacement of the 795 garden style apartments with approximately 850 condominiums. The replacement of the apartments with condominiums would however generate less traffic as apartments generate more

traffic than condominiums per unit (795 apartments generate approximately 5,342 daily trips with 405 A.M. peak hour trips, 493 P.M. peak hour trips and 413 Saturday peak hour trips where as 850 condominiums generate 4,981 daily trips, 374 A.M. trips, 442 P.M. trips and 400 Saturday peak hour trips). The status of the Lincoln Place project is also uncertain with a recent ownership change. Furthermore, even when accounting for the apartments that may have been removed (approximately 10 percent) the traffic impact of the new condominium project would be negligible. Therefore, the Lincoln Place project as currently proposed would not change the findings of the Sunset Avenue Project traffic impact analysis contained in the Draft EIR because it generates less traffic.

- Daniel Freeman redevelopment: This project was not included on the development list provided by the City of Los Angeles after the release of the NOP and it has not been included in any recent environmental assessment for this area. The project has recently undergone a change of ownership and currently no specific proposal for development has been put forth. Consideration of this project at this time would be speculative.
- Trammel Crow: This project is included in the related project list as project number 6.
- Chateau Marina: This project was not included on the development list provided by the City of Los Angeles after the release of the NOP because this project has been completed. Therefore, traffic generated by the Chateau Marina development is included in the existing traffic counts collected for the proposed Sunset Avenue Project.

The assessment of the cumulative traffic impact has been accurately assessed by the inclusion of 21 related projects and the ambient traffic growth factor. Ambient growth factors are used to account for the cumulative effect of small projects, unknown projects at the time of the issuance of the NOP and for the growth due to large projects located outside of the study area.

COMMENT 37-12

8. Transportation/Circulation

a) A footnote 178 on page 330 states the assumption that traffic will flow down Abbot Kinney to Venice Blvd. and not along California to Lincoln Boulevard. If true, project traffic will impact the Abbot Kinney / California intersection which is already highly congested with both vehicles and pedestrians. No traffic counts [sic] were taken at this intersection. Absent this information the decision maker cannot determine traffic impacts at this intersection. the Abbot

Kinney/California intersection is especially important since California is the main street connecting Lincoln with Abbot Kinney between Rose and Venice.

- 1) What are the traffic counts of Abbot Kinney/California?
- 2) What impact will this project have on the L. O. S. at Abbot Kinney/California?

RESPONSE 37-12

As contained in Volume IV, Appendix F, F2—Sunset Avenue Project, Traffic Study, of the Draft EIR, directional peak hour traffic volume on Abbot Kinney Boulevard range between 600 to 750 vehicles per hour per lane (vphpl). Directional peak hour traffic volume on California Avenue range between 150 to 250 vphpl per City of Los Angeles traffic data. Therefore, total conflicting peak hour traffic volume at the Abbot Kinney Boulevard and California Avenue intersection would sum to 1,000 vphpl in a worst case scenario or a 0.67 V/C ratio (LOS B) for an intersection with the capacity of 1,500. Traffic impacts at intersections operating at levels of service (LOS A, B, or C) would not be considered significant unless the additional project traffic added is so substantial that the intersection degrades with a V/C change of 0.04 or more. Given the City's significance criteria, the project would need to add at a minimum of 60 vphpl to the critical movements at the intersection to create a significant impact. As shown in Figure 6(a) of the traffic study, the project will add only half that necessary to significantly impact the Abbott Kinney Boulevard and California Avenue intersection (estimated at 36 vphpl during the P.M. peak hour). The estimate volume of project traffic would not therefore be of sufficient magnitude to cause a significant impact at the intersection.

COMMENT 37-13

- b) The closest supermarket to the project is located at California and Lincoln. If residents do not travel east on California to the market, what other grocery store in the area can they use?

RESPONSE 37-13

Trips generated by residential land uses are generally broken down by work trips and non-work trips. Non-work trips consist of many types of trips other than shopping at a grocery store. Peak hour shopping trips are also often combined with other shopping or work related trips, in other words, residents of the proposed project already traveling on Lincoln Boulevard may stop at the grocery store on the way to or from another location. Direct peak hour trips from the site to the California/Lincoln grocery store would make a small portion of the total trips considering there are other grocery stores in the area. Residents of the proposed project will not only patronize the supermarket at California Avenue and Lincoln Boulevard but other markets which may often be located near work, along other major commercial arterials or near freeway entrances and exits. Other local markets likely to be used by the future residents of the project

include Costco and Albertson's near Lincoln Boulevard and Washington Boulevard, the Windward Farms market at Windward near Pacific Avenue (105 Windward Avenue) which sells organic food, and Ralph's located at Ocean Park Boulevard and Lincoln Boulevard. The direct routes to California/Lincoln to and from the site would either be via Main/Rose/Lincoln which is approximately 1.4 miles, via Main/Abbot Kinney/California which is 1.25 miles in length, or via Sunset/Lincoln/California which is approximately 1.04 miles in length.

COMMENT 37-14

c) The proposed Lincoln Center project at California and Lincoln is planned to be mixed use with a considerable increase of retail over the current conditions. What traffic routes do you anticipate the residents of your project will follow to access the new Lincoln Center when it is completed.

RESPONSE 37-14

Residents will likely travel along Lincoln Boulevard to the east-west streets such as Rose Avenue, Sunset Avenue, California Avenue depending on their orientation to and from the proposed project and the proposed mixed-use project.

COMMENT 37-15

d) Page 329 (a) Freeway and street characteristics suggest "Therefore, the city could asked for a 2 ft. widening along the main street frontage of the Sunset Ave. site. Peak hour traffic is approximately 900 VPH northbound in the morning and southbound in the afternoon."

RESPONSE 37-15

This comment does not introduce new environmental information or directly challenge information presented in the Draft EIR. Therefore, the comment will be forwarded to the decision-makers for consideration.

COMMENT 37-16

e) On page 328 the Marina Freeway (State Highway 90) is cited as the nearest regional transportation facility serving the Sunset project. Isn't State Highway one, Lincoln Boulevard, the closest? Also, Highway 10, the Santa Monica Freeway, is 2 miles away. Although this is located in the city of Santa Monica the traffic must flow through Venice streets to get their. What route to the Santa Monica Freeway are Sunset project residents anticipated to take?

RESPONSE 37-16

As contained in Volume IV, Appendix F2—Sunset Avenue Project, traffic study of the Draft EIR, directional peak hour traffic volume generated by the project are illustrated on

Figures 5(a) and (b) as approved by the City of Los Angeles Department of Transportation. Residents will likely travel along Pacific Avenue, Main Street and Lincoln Boulevard between the proposed project and the Santa Monica Freeway.

COMMENT 37-17

f) Traveling north on Main Street, east on Pico and north on Lincoln it is 2.0 mi. from the Sunset project to the entrance to the Santa Monica Freeway. Traveling south on Main, south east on Abbot Kinney , east on Venice and southbound on Lincoln to the Marina Freeway is 2.5 mi..

- 1) What route was taken to yield the of 1.25 mi. between the Sunset project and the Marina Freeway?
- 2). Why does the draft EIR credit the Marina Freeway with being the nearest regional transportation facility when clearly the Santa Monica Freeway is closer?
- 3) Since the only access to the Marina Freeway is via Lincoln Boulevard and since the Marina Freeway is identified as the nearest regional transportation facility why were no traffic counts done at Lincoln and Venice, the intersection most likely to be impacted as Sunset residents traveled to the Marina Freeway?
- 4) What is the anticipated route from the Sunset project to the Santa Monica Freeway and what are the traffic counts at the critical intersections?

RESPONSE 37-17

A correction has been added to the Draft EIR regarding access to regional routes (Please refer to Section II, Corrections and Additions, of this Final EIR.) The following information is now included:

The nearest regional facility serving the site is Lincoln Boulevard (State Route 1), with the Santa Monica Freeway (Interstate 10) located approximately 2 miles to the north and the Marin Freeway (State Highway 90) located approximately 2.5 miles to the southeast.

The routing of project traffic through the study area is addressed in the previous response, Response to Comment No. 37-16.

The study area was selected based on the traffic generation of the project, the project distribution, the street network and the significant traffic impact thresholds used by the Cities of Santa Monica and Los Angeles. Regional traffic generated by the project would predominately

consist of the residential traffic using both the Marina and Santa Monica Freeways whereas the small commercial uses are locally serving. Residents of the Sunset Avenue project traveling to and from the Marina Freeway will likely travel on two major routes: via Lincoln Boulevard, Venice Boulevard and Abbot Kinney Boulevard and via Lincoln Boulevard, Washington Boulevard and Abbot Kinney Boulevard. As provided in the Technical Appendix F2, the assignment of project traffic is illustrated on Figures 6(a) and (b) and in Appendix E exhibits for the individual uses. Using the City of Los Angeles significance thresholds for congested intersections (1% of the critical volume per hour per lane or a minimum of 13 vehicles per hour per critical lane) and applying the estimated project volume through the Venice Boulevard and Lincoln Boulevard intersection (less than 20 peak hour trips total per hour), a critical impact is not possible after distributing the project traffic traveling through the intersection of Venice Boulevard and Lincoln Boulevard to a per lane basis. For these reasons, it was determined during the scoping process with the City of Los Angeles Department of Transportation that the project would not present a potentially significant traffic impact on the intersection of Venice Boulevard and Lincoln Boulevard and, as such, was not included in the traffic analysis by the City of Los Angeles Department of Transportation.

COMMENT 37-18

g) Venice Beach is the largest tourist attractions Southern California. It attracts more visitors than Disneyland. To address the unique traffic problems during the tour season separate traffic counts were done as follows:

June 5, 2004-12 P.M. to 4 P.M.

In/As Main Street

E/W. Ocean Park

N/S. Main Street

E./W. Rose

N/S. Main Street

E./W. Thorton Place

N/S. Nielsen Way

E./W. Ocean Park Blvd.

N/S. Pacific Ave.

E./W. Rose Ave.

N/S. Lincoln Boulevard

E./W. Rose

June 12, 2004 12 P.M. to 4 P.M.

N/S. Main Street

E/W Abbot Kinney

N/S Venice Blvd.

E/W Abbott Kinney

N/S Pacific Ave.

E/ W Sunset Ave.

N/S Pacific Ave.

E/W Windward Avenue

N/S Pacific Ave.

E/W North Venice

N/S Pacific Ave.

E/W South Venice

July 3, 2004 12 P.M. to 4 P.M.

N/S Main Street

E/W Sunset Ave./MTA service driveway

With the exception of July 3, 2004 no other traffic counts were taken during the height of the tourist season.

1) How were traffic counts from June 5 and June 12 analyzed to draw conclusions about traffic conditions during the summer congestion period of July and August?

RESPONSE 37-18

The summer data collection during the month of June was conducted and analyzed to represent typical summer weekend conditions. The June weekend data collection was done during a busy June weekend with local temperatures exceeding 90 degrees. Separate traffic counts were not collected or required for each summer month for the weekend conditions analysis. In fact, the weekend summer conditions analysis was not required by the City of Los Angeles Department of Transportation for this project, but was collected on behalf of the project applicant.

COMMENT 37-19

h) The Playa Vista EIR calculates levels of service for the following intersections as follows:

Rose and Lincoln D.
Venice and Lincoln F.

This draft DEIR calculates levels of service at these two intersections as follows:

Rose and Lincoln C.
Venice and Lincoln no calculation was done

- 1) Please explain the discrepancy for the Rose and Lincoln level of service.
- 2) Why was no calculation done for Venice and Lincoln?

RESPONSE 37-19

Traffic counts collected months apart will vary and differences in the volume-to-capacity ratios (V/C) can be expected. The actual difference in the V/C ratios for the Lincoln/Rose intersection base capacity ratios is approximately one-half of a level of service (± 0.06). A variation in hourly traffic volume of 90 vphpl in the critical lanes can cause this change. For an intersection such as Rose/Lincoln which handles approximately 4,000 vph this variation is not unusual. The data and analysis for the Lincoln Boulevard and Rose Avenue for the proposed project traffic impact study was reviewed and approved by the City of Los Angeles Department of Transportation. Please see Response to Comment No. 37-17 regarding the Lincoln Boulevard and Venice Boulevard analysis.

COMMENT 37-20

9. Other Comments By Stakeholders

A) Craig Ochikubo

As a long time resident of the Santa Monica area and now living directly across from the proposed Sunset Ave project, I am concerned over the key point of the waiver of the height restriction on the development.

The current buildings in the surrounding area are all of similar height, and the significant increase in the height of the proposed Sunset Ave project would create a look and feel that is significantly different from the rest of the surrounding buildings. In addition, the added height would ultimately block the afternoon light and create/caste a shadow upon the buildings to the West of the Sunset Ave project.

My hope is that one of the key the goals of the planning committee would be to ensure that the communittee [sic] is maintained and that the development of these rare coastal areas is done in a way that enhances the area.

I would like to see that the current height restriction that is currently in place in the community be maintained and that the development meet that current requirement.

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RESPONSE 37-20

The comments attached to this letter by Craig Ochikubo were submitted separately. Please refer to Comment Letter No. 38 for responses to these comments.

COMMENT 37-21

B) Ira Koslow

I have to strongly disagree with most of the conclusions of the EIR as summarized in the October 21, 2004 Notice of Completion and Availability of Draft EIR No. ENV-2004-1407-EIR. Diluting the impact of this enormous gated community down to a problem of aesthetics is ridiculous. This summary completely ignores the long-term impact of 225 units plus 10,000 feet of commercial use space plus parking for 676 cars on acreage that currently supports 85 units on adjacent streets, on the traffic patterns and parking conditions in Venice. There are no major east/west thoroughfares now and with the proposed Pioneer bakery expansion on Rose Avenue, that street is going to be completely unavailable with the completion of that project. Did anyone bother to drive down Pacific Avenue after 3:30 P.M. on any day of the week? This new traffic jam caused by the spillover from Playa Vista was never clearly researched for that project and now traffic problems are being completely ignored again.

I will now go through my objections to the report itself:

Volume I Page 10 - E.1.a.2. "Aesthetic character" The main aspect that a gated community is being plopped down in an area of individual residences is completely ignored. Also RAD has already built aluminum looking monstrosities (excuse me "artists lofts") on Main Street south of Sunset. These buildings reflect sunlight with an awful glare and magnify greatly any sounds on the street. When a motorcycle passes, the noise is deafening. This lack of respect for the environment is appalling and to allow this type of construction, which is an assault on the senses,

is inexcusable. The height requirements are in place for a very good reason especially on coastal areas. Rescinding these requirements will make for an awful skyline. We now can look from the beach to the mountains and this change will do away with this outlook completely. To destroy our scenic views for the profit of a few is not aesthetically pleasing to the residents of Venice. The current bus yard has no pedestrian traffic allowed and all beach goers have to go around the bus yard to and from the beach. The residents of the gated community will be coming out their gates and walking down our streets. There is no community traffic allowed in the gated community. We will all have to walk around their community to go to Main Street as we do now. How about mitigation that opens walk streets through the project so the community can share in the experience of their life style as they share in ours.

Pages 36-42 “ Land Use”

The Specific Plan adopted in Venice reduced the residential density on the North Beach area of Venice. This was done to increase access to the beach area for residents of the entire city. This reduction in density was also a life style decision of the community. To now allow RAD to more than triple the density and take profit from a decision made by the Venice community is deplorable. The formulas used in the report starting with some high figure of 171 units and then increasing by 10% and 25% to arrive at 231 units is a farce. The current adjacent walk-street housing count for an area slightly larger than the bus yard is 85 single-family dwellings. Adding 10,000 feet of commercial space and 600+ parking spots to the 231 units makes the conclusion of the report, that there is no significant land use problem, a farce.

Page 42 “ Noise”

You address only construction noise in the report. Once again the specifics of the RAD aesthetic are being ignored. Their structures on Main Street currently amplify the noise on the street to unbearable levels. Your report talks in the abstract, there is a specific model to look at on Main Street south of Sunset, on the east side of the street.

Pages 46-52 “ Transportation and Circulation”

The report completely ignores the increased traffic generated from the increased density of the land use. All of the mitigations deal with repainting intersections to allow for left turn lanes. What about the increase in general traffic that will back these left turn lanes into the general flow of traffic? There are no major east/west streets near the Sunset/Thornton/Main/Pacific rectangle. All the increased traffic will flow down Rose or Brooks, which are both narrow two lane streets. Adding a left and a right turn lane on Rose will have no mitigation of any traffic problem now encountered, or the drastic problem in the future when the Pioneer Bakery property is turned into a mini-mall with residential units. The EIR for that project will also be a developer’s dream that

ignores all the real problems by putting mitigations in place that look good on paper but are useless in real life. Another neglected problem is the traffic on Pacific that has recently turned into a nightmare with the completion of Phase I of Playa Vista. After Sawtelle filled up, then Centinela filled up, then Lincoln filled up, Pacific became the last natural mitigation for the overflow. With the Sunset Avenue Project traffic added in, the situation will become impossible. It is practically impossible to make a southbound turn onto Pacific from Sunset now. Is it suggested that the egress on Sunset only be allowed to go north as well as the egress from Main Street only allowed to go south. Who is going to enforce these rules? Are the police now going to waste their time on the traffic jams created by poor planning and over development? The left or right turn only signs are routinely disobeyed and the resulting horn honking is another noise problem ignored in the report.

The only mitigation for this problem is to limit the project to the current density of the given acreage, 85 units with included walk streets and alley ingress and egress.

Page 53-56 “ Parking” The parking that the project will provide for the residences and commercial space seems adequate but what of the street parking. The claim is that only 4 spaces will be lost on Rose Avenue. This does not take into account the lost spaces on Main Street on the west side of the street due to the ingress and egress from the project. Has the report looked at the driveways and entrance lanes necessary to keep traffic flowing smoothly. What of the spaces on Pacific? With the added traffic flow from Sunset and the newly reopened Thornton, are we guaranteed continued parking on Pacific from 8:00 P.M. to 8:00 A.M.? Will the developers demand an after the fact discontinuation of this free parking when they realize that their poor planning has wreaked havoc on the traffic flow into and out of their gated community.

I have lived in Venice for 35 years and lived in the same house on Park Avenue for 32 of those years in peaceful coexistence with the bus yard. I look at the Sunset Avenue Project as an all out assault on my lifestyle and the lifestyle of all my neighbors in Venice. The developers have seen a Golden Goose here and are trying to take advantage of an environment that has been carefully created and maintained over the years by the Venice community. To place a 56-foot high gated community in the middle of this community is criminal. The fact that the MTA is willing to give this gift to a private development company does not mean that we have to idly stand by and let ourselves be ripped off of our community values. No amount of mitigation can make up for this type of loss.

Respectfully submitted,

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P.S. I am a teacher at LACES, which is very near the proposed West Los Angeles Transit Facility, and I frequently travel on La Cienega Boulevard south of Venice. The traffic is so horrible on that street that I can't imagine anyone in his or her right mind putting a bus depot there. Whatever the report says and whatever mitigations are put in place, this is a horrible mistake that will make itself obvious if the project is approved.

RESPONSE 37-21

The comments attached to this letter by Ira Koslow were submitted separately. Please refer to Comment Letter No. 7 for responses to these comments.

COMMENT 37-22

C) Eric Mankin

Pacific Avenue Traffic Impacts

The analysis of traffic impact seems to be flawed by failing to take into account an important local condition in determining street capacity. The method used for determining level of service in Los Angeles is set by the LADOT and standard: Critical Movement Analysis, which first determines the capacity of an intersection given the architecture, determines traffic flow, and gives a numerical computation of how close to capacity the intersection is a peak hour. "The peak-hour traffic counts were used along with current intersection geometrics to determine the intersections operating condition." (p. 328).

The problem with this application is a major north-south arterial serving the Sunset project area, Pacific Avenue, is one-lane until 8 A.M., that is, until well into the morning rush hour. The fact is noted in the description (p. 330), along with the fact that the street carries 1,300 vehicles northbound during peak morning rush hour -- at least half of which falls in the period when Pacific is one-lane. The street and intersection geometry remains the same, but the flow to the intersection is drastically different. The calculations do not seem to have taken this circumstance into account, apparently assuming that Pacific remains a 4-lane thoroughfare through the rush hour.

The CMA calculations indicate that such intersections as Sunset & Pacific and Rose and Pacific are now at A or B service during morning rush hour. This is not clear at the scene. As residents of the area know, it traffic flow along Pacific during the 7:30-8:00 hour is extremely dense, with motorists attempting enter the traffic flow northbound from the alleys that serve the walk street blocks west of Pacific having to wait substantial lengths of time for a break in the continuous stream of cars. Illegally parked cars that remain in the traffic lanes after the 8 A.M. deadline routinely complicate the picture more. An increase of 100 additional rush hour cars -- predicted

in the DEIR (p. 347) would put many of these cars on Pacific, the main commuter route to the north (Santa Monica) and east (greater Los Angeles). Though the volumes seem small the impact of the addition of this number of cars from a single output into a single lane of Pacific Avenue traffic does not seem to be directly addressed by the CMA analysis.

Conceivably these effects could be mitigated by expanding the hours in which parking is not permitted on Pacific from 8 A.M. to 8 P.M., to 7 A.M. to 7 P.M. Doing so, however, would be a major inconvenience and a major impact. Consideration of such impacts should be part of the planning process.

Truck traffic construction impacts

The first phase of construction of the project will have large volumes (200 trips per day) of large trucks coming and going from the Main Street site over an extended period of time. This is a high number of heavy vehicles to be moving through any residential neighborhood, particularly one characterized by development that “precedes the automobile as a shaper of urban forms.” (p. 251).

The initial discussion of this circumstance (p. 345) notes that “a substantial inconvenience may occur unless measures are taken to control such activities,” and a set of measures are subsequently suggested. (p. 357). While all of these measures seem well considered (putting out flagmen, finding a route, limiting lane closures, etc), the impact remains drastic: hundreds of heavy trucks a day through narrow streets in residential neighborhoods. Nevertheless, the conclusion reached (p. 359) is that “these measures would reduce potential impacts to less-than-significant levels.” No backup is provided for this assertion: it is simply presented as a matter of fact, and without more documentation, it is difficult to imagine most residents would agree.

Pedestrian Access Easements

Currently, the property is not at all accessible to the neighborhood, either as a destination, or as a passageway: it is a fenced compound, surrounded on all sides by wall, with access only at a corner.

Unhappily, the proposed plan seems — though the impact is not spelled out — to continue this situation, in a way that is out of keeping with the traditions and architecture of the surrounding community.

Venice, as the EIR notes, is a community in which “pedestrian-ways are emphasized, and parking is limited.” (p. 251) The development will provide parking but it will not contain public

pedestrian ways. The view presented of the proposed Sunset development along Pacific Avenue shows a wall broken by two closed iron fences.

It is reasonable and likely to assume that residents who live in the complex, once built, will be able to cross those gates from the inside and make their way down the public walk streets (Sunset and Thornton) westward toward the beach. However, it seems also likely that residents of Sunset and Thornton, or other Venetians or beach goers will not be able to the other way -- to pass directly eastward on a pedestrian walkway or walkways through the project down to Main Street. They will instead have to move around the project, as they now have to move around the busyard.

This seems inequitable, and also out of keeping with the architectural and historical fabric of Venice -- the Venice in which "pedestrian ways are emphasized."

Mitigation of this seems straightforward: provisions of pedestrian easements through the property. Security is a consideration -- but homes along the walk streets deal with the same security problem. Easy access to the beach from the businesses proposed for the Main Street -- and easy access to these businesses from the beach would also seem to be economically desirable.

To summarize: the aesthetic and historical nature of the North Venice community west of Main Street is defined by walk streets, pedestrian ways. For this or any other development to fit into this fabric, it should include pedestrian easements through it - ideally, one north and south, and two east and west.

Height Restriction Exemption

The proposed project would be 56 feet high, 21 feet higher than the height limits duly adopted and in effect for the neighborhood, and in fact as much as 26 feet -- the Venice Specific code provides that "the maximum height allowed is 30 feet, or 35 feet for projects with varied rooflines, provided that any portion that exceeds 30 feet is set back from the required front yard by a least one foot for every foot of height above 30 feet. But the artists rendering (p. 77) seems to show no setback at all for the higher buildings -- flat roofed structures that rise straight up 55 feet.

The EIR states that the Mello Act (p. 264), provides that "in mixed use developments, the City may grant incentives such as reduced parking, additional height or increased density...." In fact, the Mello Act itself does not explicitly mention "additional height." The language (GOVERNMENT CODE SECTION 65915(l)) reads " reduction [sic] in site development

standards or a modification of zoning code requirements or architectural design requirements ... including, but not limited to, a reduction in setback and square footage requirements and in the ratio of vehicular parking spaces that would otherwise be required.” While the phrase “not limited to” may allow for height exemptions, the formulation in the EIR seems misleadingly explicit. Particularly, it seems a stretch to say that “it is reasonable to expect that such exceptions would parallel the density bonus provisions,” particularly if no effort is made to exhaust other alternatives before doing so.

This is particularly to the point because the height limit for Venice development was not adopted hastily or frivolously, Venice is a historic community now under heavy development pressure as lot-owners near the beach attempt to provide ocean views as they redevelop older properties.

The EIR acknowledges, as is indeed undeniable, (p. 118) that “impacts regarding aesthetic character would be significant.” The report argues that the impact should be “weighed against the project’s potential to displace the existing on-site automotive maintenance facility, provide affordable housing, and provide beach impact zone parking.” (Page 125)

However, the first and third of these benefits would accrue with alternative projects not breaching the height limits, explored in “Alternatives” section, pp 444 & following)

Regarding the second, an alternative not explored for accommodating additional units without a height exemption is to use the lot area designated for commercial development for additional dwelling units. The request for height limit waiver seems an effort to have a commercial development cake and eat a residential development bonus too.

And the bottom line justification provided for the more intensive development seems to be entirely out of keeping with the whole idea of Environmental Impact and planning process. After discussing less dense or less-high alternatives, the conclusion is “Finally, this alternative would not maximize the value of the property....” (p. 452). If the idea is simply to maximize value of the property, why have development regulations at all, but simply allow developers to do whatever they believe will maximize their profit. More to the point, such introduction of economic considerations regarding the development is not supposed to be part of the EIR process, which is explicitly aimed at discussing impacts of property, not their profitability.

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RESPONSE 37-22

The comments attached to this letter by Eric Mankin were submitted separately. Please refer to Comment Letter No. 28 for responses to these comments.

LETTER NO. 38

Craig Ochikubo
615 Hampton Drive, #D302
Venice, CA 90291

COMMENT 38-1

As a long time resident of the Santa Monica area and now living directly across from the proposed Sunset Ave project, I am concerned over the key point of the waiver of the height restriction on the development.

The current buildings in the surrounding area are all of similar height, and the significant increase in the height of the proposed Sunset Ave project would create a look and feel that is significantly different from the rest of the surrounding buildings. In addition, the added height would ultimately block the afternoon light and create/caste a shadow upon the buildings to the West of the Sunset Ave project.

My hope is that one of the key the goals of the planning committee would be to ensure that the communittee [sic] is maintained and that the development of these rare coastal areas is done in a way that enhances the area.

I would like to see that the current height restriction that is currently in place in the community be maintained and that the development meet that current requirement.

RESPONSE 38-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project's height impacts on aesthetic character and shading are addressed beginning on pages 112 and 119 of Volume I, Section IV.A, Aesthetics, of the Draft EIR, respectively. The analysis of impacts on aesthetic character concludes that the project heights along Sunset Avenue and Thornton Place would contrast with adjacent development in a manner that would contrast with the existing features that embody the area's valued aesthetic image, and therefore have a significant impact on aesthetics. The analysis of shading impacts includes shading diagrams that reflect the project's potential shading patterns during the hours when daylight/sun-intensity is most prominent: 9:00 A.M. to 3:00 P.M. Pacific Standard Time between late October and early April, and 9:00 A.M. and 5:00 P.M. Pacific Daylight Time between early April and late October. As indicated in Figures IV.A-10 through IV.A-12, shading to the west during these hours would not extend beyond Pacific Avenue during any season. Impacts associated with shading would be less than significant.

LETTER NO. 39

Helen Hood Scheer
132 Park Place
Venice, CA 90291

COMMENT 39-1

Yesterday, I sent you the letter of opposition to the Sunset Avenue Project referenced above. I have 2 additional comments for the record.

First, I would like to request a revised Environmental Impact Report that addresses the concerns of our community as soon as possible. Until that time, there needs to be a moratorium on development.

RESPONSE 39-1

The preparation and circulation of a revised Environmental Impact Report (EIR) would not be appropriate nor necessary. The Draft EIR was prepared in accordance with the requirements set forth in the California Environmental Quality Act (CEQA) and CEQA Guidelines. Pursuant to Section 15084 of the CEQA Guidelines, Metro and the City of Los Angeles, as co-Lead Agencies for the proposed project, have determined that the Draft EIR meets the CEQA criteria for adequacy and objectivity. Additionally, CEQA Section 15088.5 states that recirculation of an EIR is required only when significant new information is added to the EIR after the public notice of availability but before certification. No new information or data regarding the project or environmental setting has been added. Therefore, a revised EIR is not necessary.

Public comment and concerns provided during the Notice of Preparation period were considered in preparing the Draft EIR. Additionally, comments received during the comment period for the Draft EIR are addressed within this Final EIR.

COMMENT 39-2

Second, I would like the new report to expand on the development project's plans for the commercial space. The DEIR states that the commercial development will provide "much needed services" and I would like to know what these are. We certainly do not need another health club (which is specifically cited in the current DEIR)—there is already space for three of them within a half mile radius of the project, two of which are currently operational. I also want to see a much more detailed description of the proposed food/restaurant/cafe venues and detailed analysis of their impact on the community, including smells that would be emitted, parking, and

trash clean up from our walk streets. There needs to be strict limits set as to what kind of food establishments can exist at the proposed development. Does the parking lot validate for the commercial spaces? Or will people who dine at the development be taking up street parking?

RESPONSE 39-2

Regarding the Commentor's odor concerns, it is not necessary to restrict the types of restaurants that may be allowed to occupy the proposed development. Any restaurant establishment would be required to comply with SCAQMD Rule 402 (Nuisance) which prohibits the discharge from any source (which includes restaurant establishments) quantities of air contaminants or other material which cause nuisance or annoyance to any considerable number of persons or to the public. Any prospective restaurant operator would be required to implement best available control technology (BACT) practices to meet SCAQMD Rule 402 requirements. Examples of potential BACT measures to eliminate restaurant odors include odor neutralizer solutions, emission control wet scrubbers, and water scrubbing ventilators, among other odor control measures. Compliance with Rule 402 requirements, through use of applicable BACT measures, would ensure that no significant odor impact occurs.

As discussed in Volume I, Section IV.J, Parking, pages 366–367 of the Draft EIR, the parking impacts have been analyzed. The proposed project would not only meet the parking demand, it would provide increased parking opportunities (including 71 spaces pursuant to Beach Impact Zone requirements and 44 additional spaces) in a parking-deficient neighborhood, with the provision of on-site parking. Further, the project would result in a net increase of five street parking spaces. Parking Impacts would be less than significant. The comment regarding parking provisions is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 40

Melvin I. Scheer, M.D.
31 Park Avenue
Venice, CA 90291

COMMENT 40-1

As a 35-yearresident [sic] and homeowner on Park Avenue, I am appalled at the plans for the Sunset Avenue Project.

RESPONSE 40-1

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

COMMENT 40-2

The project is out of character with the most attractive features of the community. The neighborhood is a low-density area with pedestrian access to the rest of Venice—its beach and shops. Most particularly, the traffic-free walk streets mark this part of Venice. The walk streets provide an oasis of quiet and neighborliness. A high-rise, gated community would be the antithesis of all that defines this area. I do not know what RAD likes about Venice if it misses this point.

The intended project's tenants can groove on their way through the walk streets as they make their way to the beach, but I cannot get to Main Street via their private reserve? For shame.

To set a gated community within a foot and bike traffic community violates reason as well as the aesthetic traditions that the designers were taught in architecture school.

RESPONSE 40-2

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. The project site is currently not accessible to the public. No adverse environmental impacts will therefore result with respect to pedestrian circulation if the project is not fully accessible for pedestrian access. Existing access adjacent to the project site would remain available for public accessibility. Further, the project includes Mitigation Measure Sunset-I.5, which requires upgrading of the existing Sunset Avenue pedestrian crossings across Main Street and Pacific Avenue, thus enhancing pedestrian access. Neither of the street segments adjacent to the project site, Sunset Avenue and Thornton Place is designated as a Walk Street in the LUP (Exhibit 19a, Coastal Access Map) or Venice Specific Plan (Exhibit16a).

COMMENT 40-3

No matter how much it is euphemized as “mitigated”, the high-rise nature of the proposed development, relative to the rest of Venice, speaks of bald, in-your-face greed. Like the standard to which its neighbors adhere, the height should be at maximum 35 feet on the commercial Pacific and Main Street sides and 28 feet where it faces the neighboring residential streets. Everyone living in the neighborhood and not reaping cash benefits from the project would see it as an imposing, light-stealing eyesore and blight. Allowing the project to proceed as currently proposed would also be a precedent for the dismemberment of height limits along Main and Pacific and possibly westward toward the beach as well. And RAD knows it.

RESPONSE 40-3

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration. As described in Volume I, Section IV.G., Land Use, on page 264 the Venice Local Coastal Program, Land Use Plan, Policy I.A.13 states, “...In order to encourage the provision of affordable housing units in the areas designated as “Multiple Family Residential” and in mixed-use developments, the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915,....” While the Draft EIR concludes that the proposed project is consistent within the overall policy framework, the Draft EIR goes on to further analyze the increased height and density in Section IV.A, Aesthetics, and concludes that increasing the height limits would have a significant impact on aesthetics since the project would contrast with the existing features that embody the area’s valued aesthetic image.

None of the streets adjacent to the project site are designated as walk streets by City plans. Thus, none of the provisions relating to walk streets, including the 28-foot maximum height limit mentioned in this comment, apply to the project site.

COMMENT 40-4

The human density of the project as proposed is also too high. Traffic on Pacific and Main Street is already too congested during rush hour. Again, greed would be the only reason to give the project so many residential units. This cash lollipop vision of future development and architectural work is shameful.

RESPONSE 40-4

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

The proposed Sunset Avenue Project’s impacts on density is thoroughly analyzed in Volume I, Section IV.G, Land Use, pages 272–274, of the Draft EIR. As discussed in

Section IV.G, Land Use, page 264, of the Draft EIR, the project's increase in density is pursuant to Policy I.A.13 of the Venice Local Coastal Program, Land Use Plan, which states, "...In order to encourage the provision of affordable housing units in the areas designated as "Multiple Family Residential" and in mixed-use developments, the City may grant incentives such as reduced parking, additional height or increased density consistent with Government Code Section 65915,...." Mitigation Measure Sunset-G.1 requires that the project's density and affordable housing provision be consistent with Policy I.A.13 and Government Code Section 65915.

Additionally, as discussed in Volume I, Section IV.I, Transportation and Circulation, of the Draft EIR, the Sunset Avenue Project would result in an increase in vehicle trips. On weekdays, the project would generate 1,168 net new daily trips and would significantly impact two intersections during the P.M. peak hours: (1) Main Street and Rose Avenue; and (2) Main Street and Sunset Avenues. On Saturdays, the project would generate 1,417 net new daily trips and would significantly impact one intersection: Rose Avenue and Lincoln Boulevard. However, with implementation of mitigation measures, impacts would be reduced to less than significant.

COMMENT 40-5

Sure change has its costs. However the hidden hands that arranged the bus yard land swap do not need to have their palms further greased with the destruction of this community's soul. Instead their fingers should take up pen (and computer), go back to the drawing boards and come back with a development plan that is more in character with this area.

I believe Los Angeles City Planning can do better than this.

RESPONSE 40-5

The comment is acknowledged and will be forwarded to the decision-makers for review and consideration.

LETTER NO. 41

Bill Loiterman
113 Sunset Avenue
Venice, CA 90291-2573

COMMENT 41-1

Is there a way to save (or to replace) the beautiful mature trees that presently [sic] border the WTA facility along Sunset Avenue?

They have given character to the neighborhood for over fifteen years.

RESPONSE 41-1

Should it be necessary to relocate trees, planting of new trees would occur in compliance with City of Los Angeles Street Tree regulations and the City Landscape Ordinance. Further, the project applicant would be required to provide a landscaping plan, for plan review by the City. This comment regarding the trees is acknowledged and will be forwarded to the decision-makers for review and consideration.



IV. MITIGATION MONITORING AND REPORTING PROGRAM

IV. MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires adoption of a MMRP for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects. The Lead Agency for the West Los Angeles Transportation Facility is the Metropolitan Transportation Authority, whereas, the City of Los Angeles Department of City Planning (City) and the Metropolitan Transportation Authority are the Co-Lead Agencies for the proposed Sunset Avenue Project. The Lead and Co-Lead Agencies are responsible for administering and implementing the MMRP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during project implementation prior to final approval of the proposed project. The primary purpose of the MMRP is to ensure that the mitigation measures identified in the EIR are implemented thereby minimizing identified environmental effects.

The MMRP for the proposed project will be in place through all phases of the project, including design (pre-construction), construction, and operation (post-construction both prior to and post-occupancy). The Metropolitan Transportation Authority will be responsible for implementing the mitigation measures which are applicable to the West Los Angeles Transportation Facility (i.e., noise mitigation measures) during post-occupancy. Otherwise, implementation of the mitigation program will be performed by the City of Los Angeles. The City shall be responsible for administering the MMRP activities to staff, other City departments (e.g., Department of Building and Safety, Department of Public Works, etc.), consultants, or contractors. The City will also ensure that monitoring is documented through reports and that deficiencies are promptly corrected. The designated environmental monitor (e.g., City building inspector, project contractor, certified professionals, etc., depending on the provisions specified below) will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems.

Each mitigation measure is categorized by impact area, with an accompanying identification of:

- The enforcement agency;
- The monitoring agency;
- The monitoring phase (i.e., the phase of the project during which the measure should be monitored);

- Pre-construction
- Construction
- Post-construction (prior to and post-occupancy)
- The monitoring frequency; and
- The action indicating compliance with the mitigation measure(s).

A. AESTHETICS

West Los Angeles Transportation Facility

This project has no significant adverse aesthetic impacts; therefore, no mitigation is required.

Sunset Avenue Project

The Draft EIR identified a significant impact on aesthetics. A potential mitigation measure that was discussed in the Draft EIR, reducing building heights to 35 feet along the Sunset Avenue and Thornton Place frontages, was also the basis of the Reduced Height Alternative in the Draft EIR. Should the decision-makers determine to reduce the proposed project's height, they will do so by approving the Reduced Height Alternative, not by imposing a height-reducing mitigation measure. Therefore, that mitigation measure has not been included in the MMRP.

B. AIR QUALITY

West Los Angeles Transportation Facility

Mitigation Measure WLA-B.1: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance report submitted by project contractor.

Mitigation Measure WLA-B.2: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would have their engines turned off when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance report submitted by project contractor.

Mitigation Measure WLA-B.3: Use electricity from power poles, rather than temporary diesel or gasoline powered generators if or where feasible.

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance report submitted by project contractor.

Mitigation Measure WLA-B.4: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance report submitted by project contractor.

Sunset Avenue Project

Mitigation Measure Sunset-B.1: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance report submitted by project contractor.

Mitigation Measure Sunset-B.2: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would have their engines turned off when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance report submitted by project contractor.

Mitigation Measure Sunset-B.3: Use electricity from power poles, rather than temporary diesel or gasoline powered generators if or where feasible.

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance report submitted by project contractor.

Mitigation Measure Sunset-B.4: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Throughout construction during field inspection

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance report submitted by project contractor.

C. HISTORIC RESOURCES

Metro Division 6—Venice Site and Associated Buildings

No mitigation measures regarding the buildings and structures located on this property are required to implement the proposed project because the property is not considered a historic resource for the purposes of CEQA.

Vietnam POW/MIA Memorial Mural

Mitigation Measure Sunset-C.1: Photography and Recordation. Prior to alteration, relocation, or demolition of the mural, a photographic documentation report shall be prepared by a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61. This report shall document the significance of the mural and its physical conditions, both historic and current through photographs and text. Photographic documentation should be taken utilizing 35-mm black and white film. The photographer should be familiar with the recordation of historic resources. Photographs should be prepared in a format consistent with the Historic American Buildings Survey (HABS) standards for field photography. Copies of the report shall be submitted to the California Office of Historic Preservation, the City of Los Angeles Planning Department, the Los Angeles Public Library (Main Branch), and the Los Angeles Conservancy.

Enforcement Agency: Los Angeles Department of City Planning

Monitoring Agency: Deputy Historic Preservation Officer of the Los Angeles Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Prior to alteration or relocation of the mural

Action Indicating Compliance with Mitigation Measure(s): Submittal of a photographic documentation report according to conditions set forth in this measure.

Mitigation Measure Sunset-C.2: Relocation. Prior to implementing any project related tasks associated with the west wall of the bus washing structure, the feasibility of relocating the mural to an off-site location should be explored by the Applicant to mitigate project impacts on this historic resource. The cost of such a feasibility assessment shall be financed by the Applicant and reviewed and approved by the Deputy Historic Preservation Officer of the City of Los Angeles' Planning Department²² (Historic Preservation Officer) and a qualified conservator, architectural historian, historic architect, or historic preservation professional. A determination of a reasonable and acceptable cost for the mural's relocation will be established between the Applicant, Metro, and the qualified conservator, architectural historian, historic architect, or historic preservation professional. The preservation consultant shall be selected and hired by the Applicant with the final approval by the Historic Preservation Officer and/or Metro. The consultant selected shall satisfy the Secretary of the Interior's Professional Qualification Standards for History, Architectural History, or Architecture pursuant to 36 CFR 61 or those qualifications as defined by the American Institute for Conservation of Historic & Artistic Works (AIC).²³ Relocation of the mural in whole to another publicly accessible location within the project area, if conducted in accordance with the guidelines recommended by the National Park Service that are outlined in the booklet "Moving Historic Buildings" by John Obed Curtis (1979), would fully mitigate the impact associated with this historic resource and the proposed project. Additionally, relocation of the mural off-site to a location with similar or compatible historical context (i.e. along a public roadway) would also fully mitigate the impact. However, prior to any relocation efforts the physical condition of the mural should be considered, assessed, and documented by a qualified conservator, historic architect and structural engineer. Additionally, the cost of relocation versus the overall historical and artistic value of the mural should be quantified in that assessment, to further evaluate relocation feasibility. A relocation plan for the mural shall also be financed by the Applicant and developed in conjunction with the qualified conservator, architectural historian, historic architect, or historic preservation professional. Additionally, the plan shall be reviewed and approved by the Historic Preservation Officer. Because this mitigation,

²² Effective July 1, 2004, the City Planning Department has taken over functions previously performed by the Cultural Affairs Department.

²³ Those qualifications and competency skills as outlined in "Defining the Conservator: Essential Competencies" by the American Institute for Conservation of Historic & Artistic Works, 2003.

with the recommended cost to Applicant limitation, would not directly or indirectly affect the objectives of the proposed project, it appears feasible.

Enforcement Agency: Los Angeles Department of City Planning

Monitoring Agency: Deputy Historic Preservation Officer of the Los Angeles Department of City Planning

Monitoring Phase: Pre-construction and construction

Monitoring Frequency: Once upon the determination of reasonable and acceptable cost for the mural's relocation and once upon the approval of a relocation plan

Action Indicating Compliance with Mitigation Measure(s): A determination of a reasonable and acceptable cost for the mural's relocation established between the Applicant, Metro, and the qualified conservator, architectural historian, historic architect, or historic preservation professional who satisfies the requirements set forth in this mitigation measure and approval of a relocation plan by the Historic Preservation Officer.

Accidental Discovery of Human Remains or Vertebrate Fossil Resources

West Los Angeles Transportation Facility Site

Mitigation Measure WLA-C.1: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less-than-significant levels.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: As needed during construction

Action Indicating Compliance with Mitigation Measure(s): If no vertebrate fossil resources are found, compliance certification report

from the project contractor; if vertebrate fossil resources are found, mitigation plan(s) by a qualified paleontologist.

Mitigation Measure WLA-C.2: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). With implementation of this measure, potential project impacts in this category would be reduced to less-than-significant levels.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: As needed during construction

Action Indicating Compliance with Mitigation Measure(s): If no unanticipated archaeological discoveries are found, compliance certification report from the project contractor; if unanticipated archaeological discoveries are found, mitigation plan(s) by a qualified archaeologist.

Sunset Avenue Site

Mitigation Measure Sunset-C.3: Should vertebrate fossil resources be encountered during construction of the proposed project, construction in the immediate area of the resource shall be suspended until the resource can be evaluated by a qualified paleontologist and recovery, if appropriate, can be completed. This measure shall include steps for appropriate conservation as may be merited by the resource. With implementation of this measure, potential impacts associated with encountering significant vertebrate fossil resources would be reduced to less-than-significant levels.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: As needed during construction

Action Indicating Compliance with Mitigation Measure(s): If no vertebrate fossil resources are found, compliance certification report from the project contractor; if vertebrate fossil resources are found, mitigation plan(s) by a qualified paleontologist.

Mitigation Measure Sunset-C.4: Within the project site, any traditional burial resources, which include archaeological sites, burial sites, ceremonial areas, gathering areas, or any other natural area important to a culture for religious or heritage reasons, would likely be associated with the Native American group known as the Gabrielino. No known traditional burial sites have been identified within the project site or in the vicinity. Nonetheless, any discovery of such resources would be treated in accordance with federal, state, and local regulations, including those outlined in the CEQA Guidelines Section 15064.5 (e). With implementation of this measure, potential project impacts in this category would be reduced to less-than-significant levels.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: As needed during construction

Action Indicating Compliance with Mitigation Measure(s): If no unanticipated archaeological discoveries are found, compliance certification report from the project contractor; if unanticipated archaeological discoveries are found, mitigation plan(s) by a qualified archaeologist.

D. GEOLOGY/SEISMIC HAZARDS

West Los Angeles Transportation Facility

Mitigation Measure WLA-D.1: Remove all loose soil and other deleterious materials, including old foundations, prior to fill placement.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure WLA-D.2: A minimum of three feet of soil should be removed and recompact as structural fill before support footings and slab-on-grade construction begins.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure WLA-D.3: The exposed bottom of removal areas should be scarified, mixed, and moisture conditioned to a minimum depth of eight inches.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure WLA-D.4: To reduce risk of foundation movement, it is recommended that footings be supported on structural fill or on deepened piles embedded into competent alluvium, not both.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure WLA-D.5: If the excavation to remove existing subsurface structures, pipelines, and loose fill soils extends below the minimum depth of over-excavation, it is recommended that all subsurface structures, utility lines, and uncontrolled fill extending below the over-excavation depth be removed to expose undisturbed, native soils across the entire building pad.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure WLA-D.6: All fill material should be placed in controlled, horizontal layers with optimum depth and moisture.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure WLA-D.7: Excavated soils, cleaned of deleterious materials (including rocks), can be re-used for fill.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure WLA-D.8: Each layer of fill under the building area within the upper 48 inches of the finished pad grade should be of similar composition to provide a relatively uniform expansion index beneath the building.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure WLA-D.9: Materials to be used as compacted fill should be analyzed by the Geotechnical Engineer to determine the physical properties of the materials.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure WLA-D.10: An evaluation of the consequences related to lateral settlement of the project's proposed structure is recommended.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure WLA-D.11: Prior to the start of the site preparation and/or construction. It is recommended that there be a meeting with the selected contractor and Advanced Geotechnical Services, Inc., to further discuss tasks related to the backfill of utility trenches, temporary excavations, foundation types and their installation, slab-on-grade, retaining wall design, drainage, structural pavement sections, and corrosive protection.²⁴

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to the start of the site preparation and/or construction

Action Indicating Compliance with Mitigation Measure(s): Meeting with the selected contractor and Advanced Geotechnical Services, Inc.

Sunset Avenue Project

Mitigation Measure Sunset-D.1: Remove all loose soil and other deleterious materials, including old foundations, prior to fill placement.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.2: In areas to receive fill or to support slab-on-grade construction, a minimum of eight feet of the existing soils should be removed and recompact as the structural fill in the proposed construction areas.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

²⁴ Advanced Geotechnical Services, Inc., *Geotechnical Engineering Study Proposed MTA Transportation Center*, October 23, 2003.

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.3: The exposed bottom of removal areas should be scarified, mixed, and moisture conditioned to a minimum depth of eight inches.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.4: If the excavation to remove existing subsurface structures, pipelines, and loose fill soils extends below the minimum depth of over-excavation, it is recommended that all subsurface structures, utility lines, and uncontrolled fill extending below the over-excavation depth be removed to expose undisturbed, native soils across the entire building pad.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.5: All fill material should be placed in controlled, horizontal layers with optimum depth and moisture.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.6: To reduce risk of foundation movement, it is recommended that footings be supported on structural fill, and that the thickness of structural fill beneath the footings and the slab area be relatively uniform.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.7: Due to the high moisture content, shallow groundwater, and high compressibility of the on-site native soil, additional stabilization methods may be required. Acceptable stabilization methods include: (1) float rock worked into the soft soils and covered with a filter fabric; (2) geofabric with a 24-inch-wide overlap between sheets; or (3) a combination of both.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.8: If construction delays or the weather result in the drying of the fill surface, the surface should be scarified and moisture conditioned before the next layer of fill is added. Each new layer of fill should be placed on a rough surface so planes of weakness are not created in the fill.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.9: Excavated soils, cleaned of deleterious materials (including rocks), can be re-used for fill.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.10: Each layer of fill under the building area within the upper 24 inches of the finished pad grade should be of similar composition to provide a relatively uniform expansion index beneath the building.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.11: Materials to be used as compacted fill should be analyzed by the Geotechnical Engineer to determine the physical properties of the materials.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.12: An evaluation of the consequences related to the potential for 0.1 to 0.2 inches of lateral settlement of the project's proposed structure is recommended.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection

Action Indicating Compliance with Mitigation Measure(s): Periodic field inspection sign off and quarterly compliance certification report by project contractor.

Mitigation Measure Sunset-D.13: Prior to the start of the site preparation and/or construction. It is recommended that there be a meeting with the selected contractor and Advanced Geotechnical Services, Inc., to further discuss tasks related to the backfill of utility trenches, temporary excavations, shallow foundations, slab-on-grade, retaining wall design, and drainage.²⁵

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to the start of the site preparation and/or construction

Action Indicating Compliance with Mitigation Measure(s): Meeting with the selected contractor and Advanced Geotechnical Services, Inc.

²⁵ Advanced Geotechnical Services, Inc., *Geotechnical Engineering Study Proposed Multi-Family Residential*, February 13, 2004.

E. HAZARDOUS MATERIALS

West Los Angeles Transportation Facility

Mitigation Measure WLA-E.1: Soils impacted with total recoverable petroleum hydrocarbon (TRPH) concentrations of 1,000 mg/Kg or greater shall be excavated during the grading for the proposed project.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Public Works

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at issuance of grading permit; monthly

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading permit, Monthly Statements of Compliance.

Sunset Avenue Project

Mitigation Measure Sunset-E.1: A Transportation Plan shall be developed for the hauling of soils and debris from the project site.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at issuance of grading permit and haul route permit

Action Indicating Compliance with Mitigation Measure(s): Issuance of grading permit and haul route permit.

F. WATER QUALITY

The proposed project would comply with all standards, guidelines, and requirements of the State NPDES Construction Activities and Industrial Permits, and City of Los Angeles requirements as part of these regulations. The SWPPP and a SUSMP would be developed specifically for the project site to address the individual characteristics of the site's needs to treat potential storm water contamination. Compliance with these requirements is mandated by law to ensure that impacts to surface and groundwater quality are reduced to less than significant levels.

As such, these permits, plans, and BMPs are not considered to be mitigation measure, but integral parts of the project design and operation. Therefore, no mitigation measures are required.

G. LAND USE

West Los Angeles Transportation Facility

With implementation of the West Los Angeles Transportation Facility, land use impacts would be less than significant and no mitigation measures would be required.

Sunset Avenue Project

Mitigation Measure Sunset-G.1: The total number of units and market/affordable mix shall be consistent with California Code Section 65915, as reflected in LUP Policy I.A.13(a).

Enforcement Agency: Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: Pre-Construction

Monitoring Frequency: Once at tract map approval

Action Indicating Compliance with Mitigation Measure(s): Tract map approval.

Mitigation Measure Sunset-G.2: Any number of units in addition to 214 shall only be allowed upon a certified LCP amendment, based on a finding that no adverse impacts on coastal resources would result per LUP Policy 1.A.13 (d).

Enforcement Agency: Los Angeles Department of City Planning, California Coastal Commission

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: Pre-Construction

Monitoring Frequency: Once at tract map approval

Action Indicating Compliance with Mitigation Measure(s): Tract map approval.

H. NOISE**West Los Angeles Transportation Facility**

Mitigation Measure WLA-H.1: The composite noise level emanating from the Transit Facility shall not exceed 84 dBA when measured at a distance of 25 feet from the site perimeter between the hours of 9:00 P.M. and 7:00 A.M.

Enforcement Agency: Metropolitan Transportation Authority

Monitoring Agency: Metropolitan Transportation Authority

Monitoring Phase: Post-Occupancy

Monitoring Frequency: Annually

Action Indicating Compliance with Mitigation Measure(s): Annual report on noise levels.

Mitigation Measure WLA-H.2: Employees shall not congregate in the roof-top parking area between the hours of 9:00 P.M. and 7:00 A.M. Signs stating such a message shall be posted conspicuously throughout the roof-top parking deck area.

Enforcement Agency: Metropolitan Transportation Authority

Monitoring Agency: Metropolitan Transportation Authority

Monitoring Phase: Post-Occupancy

Monitoring Frequency: Daily

Action Indicating Compliance with Mitigation Measure(s): Response to incidents, employee notification.

Mitigation Measure WLA-H.3: Employees shall not activate car alarms in the roof-top parking area between the hours of 9:00 P.M. and 7:00 A.M. Signs stating such a message shall be posted conspicuously throughout the roof-top parking facility area.

Enforcement Agency: Metropolitan Transportation Authority

Monitoring Agency: Metropolitan Transportation Authority

Monitoring Phase: Post-Occupancy

Monitoring Frequency: Daily

Action Indicating Compliance with Mitigation Measure(s): Response to incidents, daily notification.

Sunset Project

Mitigation Measure Sunset-H.1: Prior to the issuance of any grading, excavation, foundation, or building permits, the Applicant shall ensure that all construction documents require contractors to comply with Los Angeles Municipal Code Section 41.40 which requires all construction and demolition activity located within 500 feet of a residence to occur between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturday.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection throughout construction.

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification by the project contractor.

Mitigation Measure Sunset-H.2: In the event pile driving is required, pile drivers shall be equipped with noise control having a minimum quieting factor of 10 dBA.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection throughout construction.

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification by the project contractor.

Mitigation Measure Sunset-H.3: To the extent feasible, loading and staging areas must be located on site and away from noise-sensitive uses surrounding the project site.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at execution of grading or construction contract; once at issuance of grading or building permit

Action Indicating Compliance with Mitigation Measure(s): Execution of grading or construction contract with mitigation measure provisions; issuance of grading or building permits.

Mitigation Measure Sunset-H.4: Heavy-duty trucks shall utilize a City-approved haul route that avoids noise-sensitive land uses to the maximum extent feasible.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at execution of grading or construction contract; once at issuance of grading, haul route, or building permit

Action Indicating Compliance with Mitigation Measure(s): Execution of grading or construction contract with mitigation measure provisions; issuance of grading, haul route, or building permits.

Mitigation Measure Sunset-H.5: During periods of active construction activity, an eight-foot temporary sound barrier (e.g., wood fence) shall be erected around the site perimeter such that the “line of sight” between construction activity and adjacent residential properties is obstructed.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Quarterly throughout construction.

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report by the project contractor.

Mitigation Measure Sunset-H.6: All pile driving within 75 feet of any off-site adjacent structure shall be conducted with equipment such as sonic pile driver, or similar type of equipment, which generates a level of ground-borne that is less than 0.2-inch per second of peak particle velocity at a reference distance of 50 feet.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at execution of grading or construction contract; once at issuance of grading or building permit

Action Indicating Compliance with Mitigation Measure(s): Execution of grading or construction contract with mitigation measure provisions; issuance of grading or building permits.

Mitigation Measure Sunset-H.7: All exterior walls, floor-ceiling assemblies (unless within a unit) and windows having a line of sight (30 degrees measured from the horizontal plane) of Pacific Avenue or Main Street shall be constructed with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a Sound Transmission Class of 50 (45 if field tested) as defined in the UBC Standard No. 35-1, 1982 edition. City of Los Angeles sign-off shall be required prior to obtaining a building permit. The Applicant, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the City of Los Angeles which achieves a maximum interior noise of CNEL 45 (Residential).

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at issuance of building permit

Action Indicating Compliance with Mitigation Measure(s): Acoustical analysis; issuance of building permit; issuance of Certificate of Occupancy.

I. TRANSPORTATION AND CIRCULATION

West Los Angeles Transportation Facility

Construction Mitigation

Mitigation Measure WLA-I.1: Prior to the issuance of construction permits the developer shall prepare Work Area Traffic Control Plans that at a minimum should include:

- Identification of a designated haul route to be used by construction trucks;
- Provide an estimate of the number to trucks trips and anticipated trips;
- Identification of traffic control procedures, emergency access provisions, and construction alternative crew parking locations;
- Identification of the on-site location of vehicle and equipment staging;

- Provide a schedule of construction activities;
- Limitations on any potential lane closures to off-peak travel periods;
- Scheduling the delivery of construction materials during non-peak travel periods, to the extent possible;
- Coordinating deliveries to reduce the potential of trucks waiting to unload building materials;
- Prohibiting parking by construction workers on neighborhood streets as determined in conjunction with city Staff.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Once at execution of construction contract; monthly during construction.

Action Indicating Compliance with Mitigation Measure(s): Issuance of any permit for the project; Monthly Statements of Compliance.

Operational Mitigation

Mitigation Measure WLA-I.2: Provide intersection modifications, such as street widening and restriping at the intersection of Jefferson and La Cienega Boulevards to alleviate the tight right-turn. Widen Jefferson Boulevard along the south side west of La Cienega Boulevard and shift the traffic lanes southerly providing a wider westbound curb lane for buses to turn into. This mitigation measure is shown in Figure IV.I-6 (showing bus turning with a standard bus) and Figure IV.I-7 (showing bus turning with an articulated bus) on pages 355 and 356 of the Draft EIR, respectively. This street widening is within the proposed Exposition Light Rail Transit Project right-of-way and must be done in conjunction with any future Exposition transit project. The design of both projects shall be coordinated for compatibility.²⁶ Further, the

²⁶ This traffic analysis identified an alternative mitigation measure for this intersection. This measure would reroute the inbound buses to continue southbound on La Cienega Boulevard to Rodeo Road and make the southbound right-turn at that intersection with another right turn from westbound Rodeo Road to northbound Jefferson Boulevard. The revised inbound route provides right-turn capacity that can accommodate the bus maneuvers but may create noise impact to nearby residential units. Supervisor Yvonne B. Burke's motion of (Footnote continued on next page)

improvements at this intersection shall include restriping of the left-turn queuing lane on Jefferson Boulevard to northbound La Cienega Boulevard to increase the storage capacity, pursuant to discussions with LADOT.

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Phase: Construction

Monitoring Frequency: Plan check review and final inspection

Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits and a Certificate of Occupancy.

Sunset Avenue Project

Construction Mitigation

Mitigation Measure Sunset-I.1: Prior to the issuance of construction permits the developer shall prepare Work Area Traffic Control Plans that should include:

- Identification of a designated haul route to be used by construction trucks;
- Provision of an estimate of the number to trucks trips and anticipated trips;
- Identification of traffic control procedures (including, but not limited to, the use of a flagman during ingress and egress of trucks and heavy equipment), emergency access provisions, and construction alternative crew parking locations;
- Identification of the on-site location of vehicle and equipment staging;
- Provision of a schedule of construction activities;
- Limitations on potential lane closures to off-peak travel periods;

September 25, 2003, Agenda Item No. 26, calls for avoiding this routing during peak periods, and the hours of 9:00 P.M. to 7:00 A.M. to avoid noise impact. Therefore, this alternative routing is not currently proposed. (The motion is included in the Draft EIR as Appendix H-1.)

- Scheduling the delivery of construction materials during non-peak travel periods, to the extent possible;
- Coordination of deliveries to reduce the potential of trucks waiting to unload building materials (delivery trucks shall be brought onto and stored within the project site);
- Prohibition of parking by construction workers on neighborhood streets as determined in conjunction with City;
- Identification of off-site staging procedures for haul trucks during excavation;
 - Haul truck staging shall occur on a designated major arterial street or off-street parking lot where the potential for residential parking and traffic impacts are less than significant. Off-site trucks shall then be called to the site for loading operations;
 - Staging on Main Street shall be avoided to the extent feasible. Any staging on Main Street shall be very limited and allowed only on special occasions and pre-approved by the City via a street use permit
- Provision of off-street parking capacity for construction workers with sufficient capacity for those who cannot park on-site during the demolition, grading, and parking structure construction phases, with shuttle services as necessary.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Once at execution of construction contract; monthly during construction.

Action Indicating Compliance with Mitigation Measure(s): Issuance of any permit for the project; Monthly Statements of Compliance.

Operational Mitigation

Mitigation Measure Sunset-I.2: Right-Turn Restrictions—The proposed Main Street non-residential access shall be restricted to right-turns only (i.e., no left-turn ingress or egress will be permitted at this driveway).

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Phase: Construction

Monitoring Frequency: Plan check review and final inspection

Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits and a Certificate of Occupancy.

Mitigation Measure Sunset-I.3: Main Street and Rose Avenue—Implement the improvement listed for Main Street and Rose Avenue pursuant to the Venice Community Plan Transportation Program by restriping the east- and westbound Rose Avenue approaches to Main Street to provide an exclusive left-turn lane and on optional thru/right-turn lane. Implementation of this improvement would require the removal of approximately four on-street parking spaces on Rose Avenue east of Main Street.

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Phase: Construction

Monitoring Frequency: Plan check review and final inspection

Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits and a Certificate of Occupancy.

Mitigation Measure Sunset-I.4: Main Street and Sunset Avenue—Modify the southbound Main Street approach to Sunset Boulevard to provide an optional thru/left-turn lane, one through lane and a right-turn lane. Restripe the westbound Sunset Avenue approach to Main Street to provide an exclusive right-turn lane and one optional thru/left-turn lane. Construct and restripe the west leg of the intersection to include one exclusive right-turn lane and one through/left-turn lane. Implementation of this improvement would require the

removal of approximately three on-street parking spaces on the west side of Main Street north of Sunset Avenue.

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Phase: Construction

Monitoring Frequency: Plan check review and final inspection

Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits and a Certificate of Occupancy.

Mitigation Measure Sunset-I.5: Upgrade the existing pedestrian crossings located across Main Street at Sunset Avenue and across Pacific Avenue at Sunset Avenue with flashing markers/signage; i.e., “Smart Crosswalks.”

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Phase: Construction

Monitoring Frequency: Plan check review and final inspection

Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits and a Certificate of Occupancy.

Mitigation Measure Sunset-I.6: Lincoln Boulevard and Rose Avenue—The proposed project shall provide a fair-share contribution to the planning and implementation of the rapid bus transit system on Lincoln Boulevard currently under study by the Lincoln Corridor Task Force (LCTF).

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Once at map recordation

Action Indicating Compliance with Mitigation Measure(s): Funding or other financial guarantee prior to Tract Map recordation.

Mitigation Measure Sunset-I.7: Pursuant to Section 6 of the Coastal Transportation Corridor Specific Plan (CTCSP), the applicant, except as exempted, shall pay or guarantee payment of a Transportation Impact Assessment Fee (TIA) prior to issuance of any building permit, as applicable.

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles City Department of Public Works

Monitoring Agency: Los Angeles Department of Transportation; Los Angeles City Department of Public Works

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Prior to issuance of any building permit

Action Indicating Compliance with Mitigation Measure(s): Payment or guarantee payment of a Transportation Impact Assessment Fee

Mitigation Measure Sunset-I.8: The applicant shall consult with LADOT for driveway and internal circulation requirements.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction, construction

Monitoring Frequency: Plan check review and final inspection

Action Indicating Compliance with Mitigation Measure(s): Issuance of building permits and a Certificate of Occupancy.

J. PARKING

West Los Angeles Transportation Facility Project

The Transportation Facility would have no adverse impacts on existing local parking resources and no mitigation measures are required.

Sunset Avenue Project

Mitigation Measure Sunset-J.1: Off-site parking areas, with adequate capacity to serve existing demand and construction worker demand, such as the public parking lot located one block north of the site shall be used for construction worker parking when on-site parking capacity is insufficient. Such off-site parking areas shall be located within walking distance of the project site or shuttle

service shall be provided by the contractor between the off-site parking areas and the project site.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection throughout construction

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report by the applicant during construction.

Mitigation Measure Sunset-J.2: With the implementation of Mitigation Measure Sunset-J.1, construction workers shall not be allowed to park on the residential neighborhood streets.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspection throughout construction

Action Indicating Compliance with Mitigation Measure(s): Quarterly compliance certification report by the applicant during construction.

K. UTILITIES

1. Water

West Los Angeles Transportation Facility

Since this project would not result in significant adverse impacts to the City's water supply or conveyance systems as confirmed by the service provider, mitigation measures are not required.

Sunset Avenue Project

This project also would not result in a significant adverse impact to the City's water supply or conveyance systems, as confirmed by the service provider. Therefore, mitigation measures are not required.

2. Wastewater

West Los Angeles Transportation Facility

Since the West Los Angeles Transportation Facility would not result in any significant environmental impacts upon the City's wastewater collection and treatment infrastructure, mitigation measures are not required.

Sunset Avenue Project

The increased wastewater generation attributable to the Sunset Avenue Project will not create an impact on existing wastewater collection and treatment infrastructure maintained by the City of Los Angeles. Therefore, no mitigation measures for the Sunset Avenue project are required.

APPENDIX A
ORIGINAL COMMENT LETTERS





Arnold
Schwarzenegger
Governor

STATE OF CALIFORNIA

SACMTA
Governor's Office of Planning and Research
FACILITIES MAINT. DEPT
RECEIVED
State Clearinghouse and Planning Unit

Nov 19 4 37 PM '04



Jan Boel
Acting Director

Memorandum

Date: November 12, 2004
To: All Reviewing Agencies
From: Scott Morgan, Senior Planner
Re: SCH # 2003121036/2004031139
Metropolitan Transportation Authority West Los Angeles Transportation
Facility and Sunset Avenue Project

Pursuant to the attached letter, the Lead Agency has extended the review period for the above referenced project to December 21, 2004 to accommodate the review process. All other project information remains the same.

cc: Tim Lindholm (Metro)
One Gateway Plaza
Los Angeles, CA 90012

Jimmy Liao (City Planning)
200 N. Spring Street, Room 750
Los Angeles, CA 90012



Metro

One Gateway Plaza
Los Angeles, CA 90012-2952

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STATE CLEARING HOUSE



City of Los Angeles

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801

November 15, 2004

EIR Case No.: ENV-2004-1407-EIR

Project Name: Metropolitan Transportation Authority West Los Angeles Transportation Facility and Sunset Avenue Project, Venice.

Reference Nos.: SCH # 2003121036 / 2004031139

Address: 3475 South La Cienega Boulevard and 100 East Sunset Avenue, Venice

Due Date: December 21, 2004

NOTICE OF EXTENDED PUBLIC REVIEW PERIOD

The above Environmental Impact Report (EIR) was sent to you for your review on October 21, 2004 with a request for comments. The comment period cited in the request, ending on December 6, 2004, has been extended to December 21, 2004.

We request your comments on any aspect of the draft EIR document. Comments should be submitted to this office in writing and must be submitted by the due date given above.

Please direct your responses to:

West Los Angeles Transportation Facility

TIMOTHY LINDHOLM
Project Manager – Facilities/Operations
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012
(213) 922-7136 (fax)
wlatc@metro.net (e-mail)

TIMOTHY LINDHOLM
Project Manager - Facilities/Operations
Metropolitan Transportation Authority

Sunset Avenue Project

JIMMY LIAO
Project Coordinator
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012
(213) 978-1343 (fax)
jliao@planning.lacity.org (e-mail)

EMILY GABEL-LUDDY
Associate Zoning Administrator
Division of Land/Environmental Review
City of Los Angeles

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044 916/445-0613

SCH # 2003121036/2004031139

Project Title: Metropolitan Transportation Authority West Los Angeles Transportation Facility and Sunset Avenue Project**Lead Agency:** Metropolitan Transportation Authority / City of Los Angeles**Contact Person:** Tim Lindholm (Metro) / Jimmy Liao (City Planning)**Street Address:** One Gateway Plaza / 200 N. Spring Street, Room 750**Phone:** 213.922.7297 (Metro) / 213.978.1331 (City)**City:** Los Angeles**Zip:** 90012**County:** Los Angeles**Project Location:** 3475 South La Cienega Boulevard and 100 East Sunset Avenue**County:** Los Angeles**City/Nearest Community:**

West Adams-Baldwin Hills-Leimert Community and Venice Community

Cross Streets: Jefferson Boulevard & National Boulevard/Rose Avenue & Main Street**Zip Code:** 90016 / 90291**Total Acres:** 4.66 / 3.13**Assessor's Parcel No.** 420527021 & 4205027022 / 4286015900**Section:** -**Twp.** -**Range:** -**Base:** -**Within 2 Miles:** State Hwy #: Interstate 10**Waterways:** Ballona Creek/Pacific Ocean**Airports:** Santa Monica**Railways:****Schools:** Westchester School, Westminster Elementary School, etc.**Document Type:****CEQA:** ☐ NOP ☐ Early Cons ☐ Neg Dec ☒ Draft EIR☐ Supplement/Supplemental EIR (Prior Supplemental EIR) ☐ Other**NEPA:** ☐ NOI ☐ EA ☐ Draft EIS ☐ FONSI**Other:** ☐ Joint Document ☐ Final Document ☐ Other**Local Action Type:**☐ General Plan Update ☐ General Plan Amendment ☐ General Plan Element ☐ Community Plan☐ Specific Plan ☐ Master Plan ☐ Planned Unit Development ☐ Site Plan☒ Reason ☐ Prezone ☒ Use Permit ☒ Land Division (Subdivision, etc.)☐ Annexation ☐ Redevelopment ☒ Coastal Permit ☒ Other Spec. Plan Exception ☐ Lot Line Adjustment ☐ Haul Routes**Development Type:**☒ Residential: Units 225 Acres 3.13 (Sunset site) ☐ Office: Sq.ft. Acres Employees ☒ Commercial: Sq.ft. 10,000 Acres 0.31 Employees 27 (Sunset site) ☒ Industrial: Sq.ft. 72,000 Acres 4.66 Employees 414☐ Water Facilities: Type MGD ☐ Transportation: Type ☐ Mining: Mineral ☐ Power: Type Watts ☐ Waste Treatment: Type**Project Issues Discussed in Document:**☒ Aesthetic/Visual ☐ Agricultural Land ☐ Air Quality ☒ Archeological/Historical ☒ Coastal Zone ☐ Drainage/Absorption ☐ Economic/Jobs☐ Flood Plain/Flooding ☐ Forest Land/Fire Hazard ☒ Geologic/Seismic ☐ Minerals ☒ Noise ☐ Population/Housing Balance ☐ Public Services/Facilities☐ Schools/Universities ☐ Septic Systems ☒ Sewer Capacity ☐ Soil Erosion/Compaction/Grading ☐ Solid Waste ☒ Toxic/Hazardous ☒ Traffic/Circulation☒ Water Quality ☒ Water Supply/Groundwater ☐ Wetland/Riparian ☐ Wildlife ☐ Growth Inducing ☒ Landuse ☒ Cumulative Effects**Present Land Use/Zoning/General Plan Designation:**

West Los Angeles Transportation Authority: Present land use is Vacant/Zoning is MR1 - Restricted Industrial/General Plan Designation is Limited Manufacturing.

Sunset Avenue: Present land use is Transportation Facility/Zoning is M1 - Limited Industrial/General Plan Designation is Limited Manufacturing.

Project Description:**West Los Angeles Transportation Facility**

The proposed project consists of a state-of-the-art transportation facility from which to operate a fleet of up to 175 Compressed Natural Gas (CNG) powered buses and to provide improved public transit service in the central and western areas of Los Angeles County. Relocation of existing operations at Division 6 in Venice to this location would allow Metro to expand service from a more centralized location in response to growing ridership. Development of the transportation facility on the 4.66-acre site would provide Metro with expanded maintenance and administrative facilities, CNG fueling facilities, and bus and employee parking. The project would include 53,120 square feet in a primary administration/maintenance building and approximately 18,800 square feet of auxiliary facilities.

Sunset Avenue Project

The proposed project would replace the vacated Division 6 operation with a mix of residential and commercial uses supported by two levels of subterranean parking. Residential uses would occupy several individual structures that would each contain a varying number of dwelling units. Open areas between the individual structures would allow for communal walkways, common space for recreation or garden areas, water features, and landscaping. A maximum of 225 units would be offered, with a total residential floor area of approximately 270,000 square feet. Residential structures that face Main Street and Pacific Avenue are proposed with building heights that would not exceed 35 feet, while structures in the center of the site and those facing Sunset Avenue and Thornton Place are proposed to be approximately 45 to 56 feet in height. Commercial uses include approximately 10,000 square feet of floor area in a ground floor setting facing Main Street. Commercial and retail space would be occupied by café, retail, and health club uses. This site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65912.5 due to detected contaminants from previous use of the property. However, a health risk assessment has determined that these contaminants do not pose a risk to human health.

State Clearinghouse Contact:

(916) 445-0613

State Review Began:

10-21-2004

SCH COMPLIANCE

12-17-2004

extended review

Project Sent to the following State Agencies☒ Resources ☐ Boating & Waterways ☒ Coastal Comm ☐ Colorado Rvr Bd ☒ Conservation ☒ Fish & Game # 5 ☐ Delta Protection Comm ☐ Forestry & Fire Prot ☒ American FishState/Consumer Svcs ☐ General Services ☐ Cal EPA ☐ ARB - Airport Projects ☒ ARB - Transportation Projects ☐ ARB - Major Industrial Projects ☐ Integrated Waste Mgmt Bd ☐ SWRCB: Clean Wtr Prog ☒ California Fish☒ Parks & Rec ☒ DWR ☒ Health Serv ☒ Reg. Affairs ☒ Toxic ☒ NARC



DEPARTMENT OF CONSERVATION
STATE OF CALIFORNIA

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November 30, 2004

DIVISION OF OIL,
GAS, & GEOTHERMAL
RESOURCES

■ ■ ■

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■ ■ ■

ARNOLD
SCHWARZENEGGER
GOVERNOR

Mr. Tim Lindholm
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

Subject: Draft Environmental Impact Report for the Metropolitan
Transportation Authority West Los Angeles Transportation Facility, SCH#
2003121036

Dear Mr. Lindholm:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California.

The proposed project is located in proximity to the administrative boundaries of the Venice Beach oil or gas field. There are no oil, gas, or injection wells within the boundaries of the project. However, if excavation or grading operations uncovers a previously unrecorded well, the Division district office in Cypress must be notified, as the discovery of any unrecorded well may require remedial operations.

Thank you for the opportunity to comment on the Draft Environmental Impact Report. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

Sincerely,

Paul Frost
Associate Oil & Gas Engineer

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071



December 20, 2004

Jimmy Liao, Project Coordinator
City of Los Angeles Planning Department
200 North Spring Street, #750
Los Angeles, CA 90012

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DEC 21 2004

ENVIRONMENTAL
UNIT

Re: Draft EIR for the Sunset Avenue Project (Venice) Draft EIR (SCH#2004031139).

Dear Mr. Liao:

The Commission staff has reviewed the above referenced document and appreciates the opportunity to submit the following comments. The proposed Sunset Avenue project, as described in the October 2004 Draft EIR, involves the demolition of existing development on an industrial site currently occupied by the Los Angeles County MTA bus maintenance yard, remediation of site contamination, and construction of 225 residential units (including affordable units), 10,000 sq. ft. of commercial area, and approximately 676 parking spaces.

As stated in our prior letter dated April 30, 2004 addressing the proposed development, the project site is located entirely within the Venice coastal zone and thus must obtain a coastal development permit prior to proceeding with any demolition or other development. The standard of review for the coastal development permit is the Chapter 3 policies of the Coastal Act, although the Commission-certified City of Los Angeles Land Use Plan for Venice (Venice LUP) provides specific guidance for interpreting the Chapter 3 policies.

Our first comment is that the certified Venice LUP designates the project site as a "Limited Industry" land use (LUP Exhibit 10a) and also identifies the project site as a potential public parking site (LUP Exhibit 17a & LUP Policies I.C.7 & II.A.2). The final EIR should include an analysis of all of the project site's allowable and preferred land uses set forth by the City's Land Use Plan as alternative projects. Of course, the provision of additional public parking as a component of each alternative should also be considered.

Secondly, we strongly encourage the proposed development to provide public sidewalks through the project site in order to improve public access to Venice Beach. The project should conform with and complement the existing pattern of pedestrian access (i.e., walk streets) in the neighborhood by providing new connections between the area inland of the project site to the Sunset Avenue and Thornton Avenue walk streets that currently provide public pedestrian access from the project area to the Venice Boardwalk and shoreline. The walk streets in the project should provide continuous walkways between Main Street and Pacific Avenue. The subdivision should not be gated.

In regards to the scale of the proposed development, we support the project alternative with building heights that conform with the height of surrounding development and comply with the height limit for the property set forth by the certified Venice LUP. The certified Venice LUP (LUP Exhibit 14a) limits building heights on the project site to 30 feet for flat roofs or 35 feet for

Sunset Avenue Project (MTA Site), Venice
December 20, 2004
Page 2 of 2

varied or steeped back rooflines. Development along walk streets is subject to a 28-foot maximum height limit. A building's height is measured from the fronting right-of-way. The 56-foot high buildings being considered are not in character with the surrounding community and do not conform with the height limits set forth by the certified Venice LUP. Structures as high as 56 feet would require 35-foot wide paved public roadways to provide fire access, with very limited planting. Residential structures in Venice commonly have reduced front and sideyard setbacks, but this is provided within the content of the walk streets, which consist of a public sidewalk surrounded by an often privately landscaped strip.

The certified Venice LUP includes several additional policies and implementation strategies that are applicable to the design and location of the proposed development. We recommend that the final EIR be amended to fully address the proposed project's consistency with policies set forth by the certified Venice LUP and the Coastal Act.

In regards to the proposed West Los Angeles Transportation Facility, we note that while it is not located in the coastal zone, there is an interagency effort to improve water quality and habitat along Ballona Creek near the project site. Therefore, the project provides an excellent opportunity to incorporate plants consistent with habitat restoration into the project landscaping along Jefferson Boulevard. Because of the sensitivity of downstream habitat, we would encourage the MTA to incorporate state-of-the-art Best Management Practices to reduce pollution impacts that could be caused by the proposed project. Please call me if you have any questions.

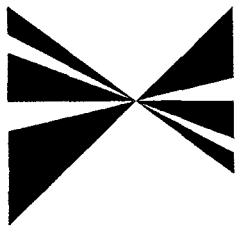
Sincerely,



Charles R. Posner
Coastal Program Analyst

Cc: State Clearinghouse
Councilwoman Cindy Miskowski

SOUTHERN CALIFORNIA



**ASSOCIATION of
GOVERNMENTS**

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San Bernardino County: Paul Biane, San Bernardino County • Bill Alexander, Rancho Cucamonga • Edward Burgnon, Town of Apple Valley • Lawrence Dale, Barstow • Lee Ann Garcia, Grand Terrace • Susan Longville, San Bernardino • Gary Oviatt, Ontario • Deborah Robertson, Rialto

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Charles Smith, Orange County

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

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Nov 15 12 41 PM '04

November 9, 2004

West L.A. Transportation Facility

Timothy Lindholm
Program Manager-Facility/Operations
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Sunset Avenue Project

Jimmy Liao
Project Coordinator
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

**RE: SCAG Clearinghouse No. I20040721 Metropolitan Transportation
West Los Angeles Transportation Facility and Sunset Avenue Project**

Dear Mr. Lindholm and Mr. Liao:

Thank you for submitting the **Metropolitan Transportation West Los Angeles Transportation Facility and Sunset Avenue Project** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Metropolitan Transportation West Los Angeles Transportation Facility and Sunset Avenue Project**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **October 16-31, 2004 Intergovernmental Review Clearinghouse Report** for public for review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,


JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

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FAXED: DECEMBER 3, 2004

December 3, 2004

Mr. Timothy Lindholm
Metropolitan Transportation Authority
Facilities/Operations, MS 99-17-2
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Mr. Lindholm:

**Draft Environmental Impact Report (DEIR) for
MTA West Los Angeles Transportation Facility and Sunset Avenue Project**

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

RVCO40819-01
Control Number

cc Mr. Jimmy Liao, City of Los Angeles Department of Planning, 200 North Spring Street, Room 750, Los Angeles, CA 90012

Cleaning the air that we breathe.

**Draft Environmental Impact Report (DEIR) for
MTA West Los Angeles Transportation Facility and Sunset Avenue Project**

1. The air quality analysis in the DEIR includes an analysis of localized air quality impacts, which, although recommended, is currently a voluntary analysis. The SCAQMD commends the lead agency for taking a leadership role in performing the localized air quality analysis.

A. Air Toxic Impacts & Project Emissions

2. The lead agency states on pages 148 and 149 of the DEIR that since the buses that would be operating from the facility "would be fueled with CNG or another alternative fuel rather than diesel, ... no health risk assessment is required and no health risk impacts would be anticipated to occur as a result of the project. Project-related air toxic impacts would be less than significant."

The basis for this statement appears to be that one of the goals of the project is to convert the 175-bus fleet to 100 percent CNG by 2013 (page 65). The Draft EIR, however, provides no information on the composition of the existing fleet (diesel versus CNG) or if funding is currently available to convert diesel buses to CNG. Given the fact that diesel engines have a life cycle of ten years or more and, if no funding is currently secured for converting all 175 buses to CNG, operation of a substantial number of diesel-powered buses could continue well past the year 2013.

Based on the foregoing, it is recommended that the lead agency specifically identify the number of diesel buses in the existing fleet and identify the number of buses that can be converted to CNG based on current funding levels. If it appears that a substantial number of buses will continue to operate in the foreseeable future, preparation of a risk assessment for mobile sources may be warranted. If a mobile source health risk assessment is performed, the SCAQMD recommends that the lead agency consider requiring one or more of the following are mitigation measures.

- Accelerate conversion of buses to CNG
 - If diesel buses continue to be used, require the use of particulate filters, oxidation catalysts and low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.
3. Comparing the URBEMIS 2002 construction output data for the MTA-Jefferson site with Table IV.B-4 on page 145 of the DEIR shows some minor inconsistencies for construction phase VOC emissions (this includes accounting for the 28 pound per day VOC emission increase noted in footnote a). Please explain or correct this apparent discrepancy.
 4. To minimize potential adverse air quality impacts in the event of gaseous leaks from the CNG storage tanks and dispensing equipment, it is recommended that methane detectors be installed as part of the project.

5. In calculating operational emissions the lead agency takes credit for emission reductions from reduced non-revenue vehicle miles traveled per day. On page 147 it is stated that non-revenue vehicle miles traveled would be reduced by 2.5 miles per trip. There is no basis for this number except to say that the facility would be more centrally located in the service area. Although there is a possibility of a reduction in non-revenue miles traveled per day for some buses, compared to the existing situation, some buses may have to travel greater distances to their respective bus routes. As a result, it is possible that there would be no net change in non-revenue vehicle miles traveled per day. It is recommended that the lead agency provide additional information supporting the 2.5-mile per day reduction or eliminate this factor.
6. Related to comment #3, Table IV.B-5 on page 149 of the DEIR shows emission reductions associated with a reduction in non-revenue vehicle miles traveled per day. The emission reduction estimates in Table IV.B-5 do not appear to correlate to any numbers identified in Appendix B. Therefore, it is not clear how these numbers were generated. Assuming the lead agency can document the 2.5-mile per day reduction in non-revenue vehicle miles traveled per day, documentation should be provided in the Final EIR showing how the emission reductions were calculated. Documentation should include emission factors used, total vehicle miles reduced, assumptions, calculations, etc.

B. CO Hotspots Analysis

7. CALINE4 modeled temperature, 0.5 degree Celsius, does not reflect regional low temperatures in West LA or the Basin in general. The value is conservative, but unusual. The SCAQMD prefers that the regional low temperature for the specific area or Basin in general be used for CO hotspots analysis.
8. The Air Quality Analysis in the Draft EIR presented CALINE4 modeling for the future without project and the future with project plus mitigation. The Final EIR should also include future project without mitigation should be included for comparison. Mitigation should be presented in detail and the impacts from the mitigation on CO concentrations should be discussed in detail.
9. The road widths presented in the CALINE4 modeling files for Jefferson Boulevard and La Cienega Boulevard, and Jefferson Boulevard and National Boulevard do not match the road widths in Figures 6 and 17 through 20 in the MTA Bus Maintenance Facility Traffic Impact Study. The project proponent should verify that all road widths used in the Air Quality Analysis are consistent with the Traffic Studies. The CALINE4 modeling files in the Final EIR should be consistent with road widths presented in the Traffic Studies.
10. The geometry (road widths) in the CALINE4 modeling files for Jefferson Boulevard and La Cienega Boulevard are the same for the without project and project model runs. The MTA Bus Maintenance Facility Traffic Impact Study presents various proposed geometries for the project Figures 18 through 20. No discussion of the

impact of different proposed mitigated geometries on air quality was found in the Air Quality Analysis in Appendix B or else where in the Draft EIR. The Final EIR should discuss the proposed mitigated geometries and their impact upon CO concentrations at Jefferson Boulevard and La Cienega Boulevard. The CALINE4 modeling files or related discussion should clearly detail which geometry (existing, or specific mitigated geometry) was used for the analysis. The discussions in the Final EIR should also clearly delineate between air quality mitigation and street width mitigation for bus traffic so that the reader is not confused and can clearly understand which is being discussed.

11. A generalized discussion on the development of the EMFAC2002 emission factors and the EMFAC2002 modeling output are presented in the Air Quality Analysis in Appendix B of the Draft EIR. The emissions factors used in the modeling appear to be consistent with the ALL category in the EMFAC2002 modeling output. No discussion is provided on emission factors from CNG or alternative fueled buses. The Final EIR should include a detailed discussion of how the emission factors were developed for the CO hotspots analysis, especially focused on how the emission factors were weighted in the project analysis to include the increased non-diesel fueled bus traffic.

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December 20, 2004

Los Angeles City Council



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BERNARD C. PARKS

Councilmember, Eighth District

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David Meiger, Project Manager

Los Angeles County MTA

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Mail Stop 99-22-5

Los Angeles, CA 90012

Robert D'Elia

RAD Jefferson LLC

615 Hampton Drive, Suite 107A

Venice, CA 90291

Timothy Lindholm

Project Manager – Facilities/Operations

Metropolitan Transportation Authority

One Gateway Plaza

Los Angeles, CA 90012

Re: Comments to Draft EIR for the Metropolitan Transportation Authority West Los Angeles Transportation Facility and Sunset Avenue Project (EIR No. 2004-1407)(SCH No: 2003121036 & 2004031139)

Dear Mr. Meiger, Mr. D'Elia and Mr. Lindholm:

The following are comments on behalf of residents of the Baldwin Hills-Leimert-West Adams Community, regarding the Draft Environmental Impact Statement/Environmental Impact Report ("DEIR") for the MTA West Los Angeles Transportation Facility and the Sunset Avenue Project. Residents are extremely concerned about development plans for the West Los Angeles Transportation Facility, which would bring 175 buses to an area immediately adjacent to residential homes and in an already congested corridor of the City of Los Angeles.



In general, we believe the Project, relocates an undesirable use away from the Venice Beach community to the Baldwin Hills-Leimert-West Adams area. The developer of the Sunset Avenue project, who will develop approximately 225 condominiums, stands to make significant profit from the sale of beach adjacent homes, which are sure to sell in the millions of dollars. At the same time, the bus maintenance yard brings additional noise, traffic and pollution to a predominantly African American neighborhood already plagued by more than its fair share of these problems. In addition, the buses to be serviced within the West Los Angeles Transportation Facility (the "Facility"), will service the areas of Venice, Santa Monica, Malibu, Culver City, Beverly Hills and West Hollywood, and not the local area surrounding the Facility. On behalf of Baldwin Hills-Leimert-West Adams communities, I oppose this project.

My perspective on this DEIR is entirely concerned with the health, safety, and quality of life issues that this Project presents to low-income people of color - our members who live and work in the area surrounding the proposed Project. Following careful analysis of the DEIR, I believe that environmental health, safety and environmental justice have not been adequately evaluated by MTA and RAD Jefferson in the DEIR for this Project. Specifically, (1) the low-income, minority community members who will be impacted by construction and operations of the Facility were ignored by both the MTA and RAD Jefferson in their scoping and planning; (2) the DEIR fails to properly analyze the significant environmental impacts inherent in the construction and operation of the Facility; and (3) the significant noise, vibration and traffic impacts generated by operation of the Facility will disproportionately impact minority residents in Central Los Angeles. As a result of these deficiencies, we request that the construction and operations of the Facility at its currently proposed location not go forward, and further request that all alternatives suggested in these comments be fully explored by MTA staff and consultants.

I. MTA and RAD Jefferson Failed to Properly Consider Environmental Justice Issues As They Relate to the Construction and Operation of the West Los Angeles Transportation Facility

Both the California Environmental Quality Act (CEQA) and the South Coast Air Quality Management Board (AQMD) require analysis of the cumulative and disproportionate impacts of a project on neighborhoods with already existing air pollution sources. Second, CEQA explicitly states that an agency must mitigate the social and economic effects of a project with significant environmental impacts. While an analysis of AQMD/AQMP consistency is included within the DEIR, no discussion or analysis of disproportionate impacts occurs. The DEIR indicates that the project would not result in an increase, nor decrease, in mobile emissions to the overall South Coast Air Basin. However, the DEIR admits that, "the project would have the potential to create new, or worsen existing, localized air quality impacts." Even so, no health risk assessment is to be performed in connection with the construction and operation of the Facility.

We have health, safety and other concerns about the proposed Facility. The proposed Facility is directly adjacent to several residential neighborhoods - in close proximity to our backyards, where our children and families reside and play. We believe it would be dangerous and a health risk to build a bus maintenance yard so close to our homes. During construction of the line, our

families would have to suffer from the noise, traffic, and air quality problems inherent in any large project. During what is sure to be a long construction period, we would have to breathe in the toxins released by the construction materials, as well as the increased emissions from dust and diesel vehicles. Once the Facility is built, the daily lives of our families would be altered by having to worry about daily noise, traffic and increased emissions from 175 additional buses in the neighborhood. The accompanying noise and shaking of windows and house structures caused by the buses would destroy our quality of life, and make it impossible for us to enjoy peace and quiet in our own homes.

The surrounding neighborhood is predominately low-income and minority. According to new 2000 Census information, our community is 30% African-American and over 47% Latino, with 62% of residents earning under \$50,000 per year. In light of the environmental and community impacts of this project, the failure on the part of the MTA and RAD Jefferson to adequately consider or address these issues is unacceptable. In contrast to our neighborhood, the west side area where the Sunset Avenue portion of the project is to occur has an 68% White population nearly 60% of residents earning \$50,000 or more per year. As a result of this obvious disparity in Project impacts, we feel that the MTA and RAD Jefferson have failed to comply with the requirements of CEQA or AQMD. The draft EIR contains no environmental justice analysis and no discussion of the demographics of who will benefit and who will be burdened by the proposed project.

II. The DEIR Fails to Properly Analyze the Significant Environmental Impacts Inherent in the Construction and Operation of the West Los Angeles Transportation Facility

Although MTA and RAD Jefferson included noise and traffic evaluation within the DEIR, we do not think that the analysis is adequate or accurate. In spite of the lengthy DEIR MTA prepared for this Project, MTA has not included sufficient analysis of the accompanying noise, vibration, pedestrian safety, or other negative impacts of the proposed non-revenue connector line on our community and our lives.

It is estimated that the project would generate an average of 1,666 additional vehicular trips per day with 107 morning trips and 103 afternoon trips. Even so, the DEIR indicates that these additional trips will have "no significant impact" on traffic or circulation in this already congested area of Los Angeles. We believe that this analysis is not only inaccurate, but also fails to consider the disproportionate impact of such additional trips on this middle to low income minority community. In spite of these legal requirements, MTA has failed to fulfill its obligations as it relates to the Facility. The Facility, described by MTA as "necessary" in the DEIR, results in unacceptable noise, traffic and pollution to the surrounding neighborhood and creates disproportionate health, safety and welfare risks to surrounding residents.

In addition, this Facility would disrupt our community during what will be a lengthy construction

process and as operations commence. None of our construction-related concerns regarding air quality impacts from fugitive dust, diesel truck and machinery traffic have been addressed, nor have operational noise, vibration, public safety and ongoing health risk concerns of the connector line been adequately addressed as part of this DEIR.

A. The Noise, Vibration and Traffic Impacts on the Surrounding Neighborhoods Have Not Been Sufficiently Analyzed

We find the noise mitigation proposed in the DEIR completely inadequate because of the increased dangers that the proposed Project presents to the health of local residents, particularly children. Also, we note that the projected decibel levels are highest in that same area. As required by federal law and DOT regulations, we request further clarification and demographic analysis, including racial and ethnic data of residents as well as median household income, of who would be negatively impacted by operation of the Facility. We look forward to reviewing such information in the final environmental impact report.

V. Conclusion

We believe that under environmental justice and environmental quality laws, MTA and RAD Jefferson have failed to adequately analyze or address the impacts of this project. In spite of our comments, some may argue that because the homes at issue here are located near an industrial area, the residents nearby have somehow acquiesced to a more polluted environment. Such an argument is simplistic and unfair. Simply because the residents affected here are low-income and minority populations, living where housing is affordable, does not mean that they have implicitly waived their right to the environmental quality of their communities. In fact, the demographics and location of the affected population near the Facility argue otherwise. Because such populations have for years been denied the opportunities to impact the decisions that affect their day-to-day quality of life, their environmental and economic vitality should be protected that much more fiercely. This is a classic case environmental injustice wherein undesirable uses are being transferred away from predominantly white and wealthy communities to predominantly middle and low-income communities of color.

We expect and hope that the MTA and cooperating federal agencies will hold this Project to the highest environmental justice standards.

Sincerely,

A handwritten signature in black ink, appearing to read "Bernard C. Parks". The signature is fluid and stylized, with a large, sweeping initial "B".

Councilmember Bernard Parks
Council District 8

From: Ira Koslow [ikoslow@earthlink.net]
Sent: Monday, December 20, 2004 10:32 PM
To: JLIAO@planning.lacity.org; wlatc@metro.net
Subject: Comment on DEIR No. ENV-2004-1407-EIR



comment on
EIR.doc (28 KB)

December 20, 2004

To: Jimmy Liao, Project Coordinator
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Timothy Lindholm
Metropolitan Transit Authority
One Gateway Plaza
Los Angeles, CA 90012

From: Ira Koslow
33 Park Avenue
Venice, CA 90069

Re: Draft Impact Report No.: ENV-2004-1407-EIR
PROJECT NAME: Sunset Avenue Project (Venice)

Dear Mr. Liao,

I have to strongly disagree with most of the conclusions of the EIR as summarized in the October 21, 2004 Notice of Completion and Availability of Draft EIR No. ENV-2004-1407-EIR. Diluting the impact of this enormous gated community down to a problem of aesthetics is ridiculous. This summary completely ignores the long-term impact of 225 units plus 10,000 feet of commercial use space plus parking for 676 cars on acreage that currently supports 85 units on adjacent streets, on the traffic patterns and parking conditions in Venice. There are no major east/west thoroughfares now and with the proposed Pioneer bakery expansion on Rose Avenue, that street is going to be completely unavailable with the completion of that project. Did anyone bother to drive down Pacific Avenue after 3:30 p.m. on any day of the week? This new traffic jam caused by the spillover from Playa Vista was never clearly researched for that project and now traffic problems are being completely ignored again.

I will now go through my objections to the report itself:

Volume I

Page 10 - E.1.a.2. "Aesthetic character" The main aspect that a gated community is being plopped down in an area of individual residences is completely ignored. Also RAD has already built aluminum looking monstrosities (excuse me "artists lofts") on Main Street south of Sunset. These buildings reflect sunlight with an awful glare and magnify greatly any sounds on the street. When a motorcycle passes, the noise is deafening. This lack of respect for the environment is appalling and to allow this type of construction, which is an assault on the senses, is inexcusable. The height requirements are in place for a very good reason especially on coastal areas. Rescinding these requirements will make for an awful skyline. We now can look from the beach to the mountains and this change will do away with this outlook completely. To destroy our scenic views for the profit of a few is not aesthetically pleasing to the residents of Venice. The current bus yard has no pedestrian traffic allowed and all beach goers have to go around the bus yard to and from the beach. The residents of the gated community will be coming out their gates and walking down our streets. There is no community traffic allowed in the gated community. We will all have to walk around their community to go to Main Street as we do now. How about

mitigation that opens walk streets through the project so the community can share in the experience of their life style as they share in ours.

Pages 36-42 " Land Use " The Specific Plan adopted in Venice reduced the residential density on the North Beach area of Venice. This was done to increase access to the beach area for residents of the entire city. This reduction in density was also a life style decision of the community. To now allow RAD to more than triple the density and take profit from a decision made by the Venice community is deplorable. The formulas used in the report starting with some high figure of 171 units and then increasing by 10% and 25% to arrive at 231 units is a farce. The current adjacent walk-street housing count for an area slightly larger than the bus yard is 85 single-family dwellings. Adding 10,000 feet of commercial space and 600+ parking spots to the 231 units makes the conclusion of the report, that there is no significant land use problem, a farce.

Page 42 " Noise " You address only construction noise in the report. Once again the specifics of the RAD aesthetic are being ignored. Their structures on Main Street currently amplify the noise on the street to unbearable levels. Your report talks in the abstract, there is a specific model to look at on Main Street south of Sunset, on the east side of the street.

Pages 46-52 " Transportation and Circulation " The report completely ignores the increased traffic generated from the increased density of the land use. All of the mitigations deal with repainting intersections to allow for left turn lanes. What about the increase in general traffic that will back these left turn lanes into the general flow of traffic? There are no major east/west streets near the Sunset/Thornton/Main/Pacific rectangle. All the increased traffic will flow down Rose or Brooks, which are both narrow two lane streets. Adding a left and a right turn lane on Rose will have no mitigation of any traffic problem now encountered, or the drastic problem in the future when the Pioneer Bakery property is turned into a mini-mall with residential units. The EIR for that project will also be a developer's dream that ignores all the real problems by putting mitigations in place that look good on paper but are useless in real life. Another neglected problem is the traffic on Pacific that has recently turned into a nightmare with the completion of Phase I of Playa Vista. After Sawtelle filled up, then Centinela filled up, then Lincoln filled up, Pacific became the last natural mitigation for the overflow. With the Sunset Avenue Project traffic added in, the situation will become impossible. It is practically impossible to make a southbound turn onto Pacific from Sunset now. Is it suggested that the egress on Sunset only be allowed to go north as well as the egress from Main Street only allowed to go south. Who is going to enforce these rules? Are the police now going to waste their time on the traffic jams created by poor planning and over development? The left or right turn only signs are routinely disobeyed and the resulting horn honking is another noise problem ignored in the report. The only mitigation for this problem is to limit the project to the current density of the given acreage, 85 units with included walk streets and alley ingress and egress.

Page 53-56 " Parking " The parking that the project will provide for the residences and commercial space seems adequate but what of the street parking. The claim is that only 4 spaces will be lost on Rose Avenue. This does not take into account the lost spaces on Main Street on the west side of the street due to the ingress and egress from the project. Has the report looked at the driveways and entrance lanes necessary to keep traffic flowing smoothly. What of the spaces on Pacific? With the added traffic flow from Sunset and the newly reopened Thornton, are we guaranteed continued parking on Pacific from 8:00 p.m. to 8:00 a.m.? Will the developers demand an after the fact discontinuation of this free parking when they realize that their poor planning has wreaked havoc on the traffic flow into and out of their gated community.

I have lived in Venice for 35 years and lived in the same house on Park Avenue for 32 of those years in peaceful coexistence with the bus yard. I look at the Sunset Avenue Project as an all out assault on my lifestyle and the lifestyle of all my neighbors in Venice. The developers have seen a Golden Goose here and are trying to take advantage of an environment that has been carefully created and maintained over the years by the Venice community. To place a 56-foot high gated community in the middle of this community is criminal. The fact that the MTA is willing to give this gift to a private development company does not mean that we have to idly stand by and let ourselves be ripped off of our community values. No amount of mitigation can make up for this type of loss.

Respectfully submitted,

Ira Koslow

P.S. I am a teacher at LACES, which is very near the proposed West Los Angeles Transit Facility, and I frequently travel on La Cienega Boulevard south of Venice. The traffic is so horrible on that street that I can't imagine anyone in his or her right mind putting a bus depot there. Whatever the report says and whatever mitigations are put in place, this is a horrible mistake that will make itself obvious if the project is approved.

December 20, 2004

From: James Murez
804 Main Street
Venice, Ca 90291
(neighbor within 500 feet of Sunset project)

To: Jimmy Liao
Los Angeles Department of City Planning
200 No. Spring St, RM 750
Los Angeles, Ca 90012

**Notice # ENV-2004-1407-EIR
SCH #200312306/2004031139**

The comments contained herein were based on the published Acrobat PDF file located at <http://cityplanning.lacity.org/EIR/MTAWestLASunset/DEIR/issues/>. Because of the tremendous amount of material that was presented in the four volumes and the very small amount of time provided to review the material, I was unable to comment on the entire document.

All of these comments to date were made in reference to the first volume "vol_I.pdf". The page numbers called out in my comments reflect the numbers Acrobat assigned to the published document and not those contained on the pages if they were printed themselves.

Furthermore, I would like to mention that all of the published Acrobat files were password protected. This caused a great deal more work on my part to be able to comment on the material. The entire process of commenting with the tool used to present the material was disabled as a result of the password protected mode. This meant that I was unable to highlight, copy and paste sections into my comments but instead had to re-type the material or create incomplete sentences in order to save the time to re-type the entire thought. This is not how Adobe who created the Acrobat tool intended it to be used when the original document is published for comment.

Draft E.I.R. Comments

Alternate location for the WLA MTA is the end Marina Freeway (90) on State owned land that is designated for transportation uses. This site is located at the end of a freeway which would give MTA easy access to cross town locations. It is also located along Lincoln Blvd (US #1) on the west end and Culver Blvd on the east end. Both of these major boulevards would greatly increase access to major bus routes without impacting and residential neighborhoods. This location is currently considered excess land by Caltrans. The site is approximately 10 acres. Furthermore, this site would allow MTA to jointly use the site for a bus terminal and also a bus maintenance yard. This site would fit into a much larger plan that would server the general public in a regional beneficial way far greater that the site on Jefferson. It could not only house a these uses, there is enough space to also provide a huge Park-N-Ride use.

Finely, if these reasons are not compelling enough to use this alternate site, consider that the Exposition Blvd right-of-way connects to Culver Blvd at Roberson Blvd and at this intersection the MTA is planning to build a light rail terminal. From that terminal it is only logical to connect the airport (Green Line) by traveling down Culver Blvd to Lincoln, past Marina Del Rey and Playa Vista and LAX. This alternate site would be exactly in the path of this route and therefore be a very logical location for a major MTA site. And if for no other reason, consider the cost impact to the MTA who could acquire this land from the State at a fraction of the cost of the Jefferson Blvd Site.

2. Alternate F. Pg 21 Assumes the entire site as commercial would result in a negative impact on the surrounding community and an increased traffic. This is not true but depends on the commercial use. Example, the site is zoned M1 and therefore could also house a boat yard which generates far less impact than any of the suggested uses. A boat yard just two blocks would meet coastal access needs. A multi-story parking garage with a recreational park on the top story and commercial shops on the Main Street side would also generate less daily traffic and provide far more coastal access.

Further this alternate describes how it would not conform to surrounding uses nor maintain the historic character of the neighborhood. This could not be farther from the truth. This site as far back as the 1800's has always been used for commercial uses and now proposing that it should become residential is changing the very zoning mix that makes Venice such a unique place.

The properties along Sunset and Thornton have always been impacted by a commercial use on this site. Any new development should be sensitive to the residents on these two abutting streets.

Having a commercial use on this site employs people. There are very few sites in Venice that have the ability to create subterranean parking and therefore accommodate commercial uses.

3. Alternate G. pg 23 Assumes the developer must make as much money as possible to make this project feasible. This is not true and very out of character for a public entity like the MTA who is a joint partner in this project. If at the end of the day both sites were created and no profit was generated other than serving the communities in which these projects exist, I for one would be much happier.

4. Of the alternates explore none for the Sunset project on pages 20 through 23, consider the existing uses along Main Street between Rose Ave. and Brooks. Although this developer has just completed a project directly across the street on Main St. called the Venice Art Lofts, this project was a CUP down zoning a M1 site to a mixed-use project which has only 3000 sq. ft. of commercial and 40+ residential units. The Art Lofts site is about 40,000 square feet. The prior use of this site before the Art Lofts project was a small movie production studio. Located at 615 Main St. which is also across the street and next door to the Art Lofts site, the same developer was recently permitted to down zone M1 to again all residential uses another site which is about 40,000 square feet. The prior business on this site was a lumber yard and a parking lot. The combined reduction of commercial or light industrial uses in this area by this developer has been huge already. In just these two projects the commercial space along main street has decreased by 97.25 percent. If the reduction in commercial area from this project is considered in addition the total combined area from Rose to Brooks those numbers would be even greater.

The Venice Local Coastal Program, Land Use Plan (LUP) describes the project site as the North Venice Area (exhibit 2a). The LUP defines the entire area of Venice includes approximately 53 areas of industrial land. This site consists of 9.4% of the total in light industrial land Venice and reducing the zoning from M1 to R3 within the North Venice area will have a tremendous effect on the overall land mix. This will also be very inconsistent with the guidelines of the LUP or the LA City General Plan.

Preservation of existing industrial land uses and employment opportunities, appropriate use of railroad right-of-ways

Section E on pg 24 Describes the west Los Angeles Transportation Facility. It is incorrectly described because it use is the same as that which is now in Venice which has long been referred to as the Bus Maintenance Yard. A transportation facility implies that it is a place of transportation where people can obtain a ride to another place. So unless I'm missing something big, this site is going to be closed to the general public and the only transportation use that is going to exist is when the bus drivers enter and exit the maintenance facility.

It is a waste of resources to build a single use facility. A transportation facility should not be located in some remote location but rather in the hart of things. It should allow people to ride local forms of transportation to it where they can change to higher speed and less local forms of transportation. It should also provide a home where MTA workers can service the buses as needed.

pg 25 heights must conform with the sight lines of the neighboring walk streets on Thornton and Sunset sides. The Pacific side of the project should conform with the height requirements of the Walk Streets between Sunset and Thornton on the west side of Pacific Ave. Any additional allowance in height should only be allowed to fall below the sightline from the opposite site of the street which a measurement is being taken from. This should include roof top patios, mechanical structures and roof top access points. There is a reference document included in the LUP that describes sightline and was the foundation on which the LUP based it guidelines.

The concept of measuring the height of the buildings within this project from a datum point will be very unfair to all surrounding properties. Since the datum point describes one point within the entire project from which all height measurements are to be derived, the site topography is not being considered. Take forinstance, the intersection of Pacific Ave at Sunset Ave, it is nearly 10 feet higher than the corner of Thornton Ave at Main Street. In effect if this project is measured from just one datum point as described in this section then a building on Main at Thornton could be 40 feet in height if measured from the centerline of Main Street as all other projects are in Venice are required to do.

It would be very inconsistent in Venice to allow a project that is 45 times the size of a normal lot (2700 sq. ft.) be considered in the same light when it comes determining which side of the site is considered the front and how this impacts the height and setback requirements. The intent of the LUP when it describes height with a flat roof vs. a varied roof line was concerned with line-of-site from the pedestrians point of view. This assumed the pedestrian would be standing on the street looking up at the roof. Side yard views were not considered because they were not visible from the street which is the publics perception point. Therefore on a project which is expositied to more

than one street along its sides; it only can be assumed that the front yard view shall apply along those sides that abut a street.

Several items have been stated incorrectly including building heights. The LUP states and shows in its map Exhibit 19a Thornton is considered a Walk Street (also see pg 3-28 LUP, Policy II.C.7.). Therefore the height on this side of the project is limited to 28 feet. All other building heights are limited to 30 unless they have a varied roof line. The plan also makes it clear where the height will be measured from and it is not as stated in this DEIR.

I think it is unfair to the community to think of this site as only having one street frontage and therefore having to only conform to setbacks and other regulations that apply to a normal (30' x 90') lot in Venice. Because this site impacts the four surrounding streets, is proposed for two hundred plus residences plus commercial, I feel it should be considered as fronting on all four of these streets. This would allow the project to respect neighboring properties and in some ways maintain the character of the existing scale. In contrast as the project is now proposed, it could claim that Sunset and Thornton are side yards and then install high fences, five foot setbacks, high limit of 35 feet or more and offer no entry ways into the units along these streets. In effect this would make these side streets into dark feeling alley like ways for the existing properties across the street.

To further maintain the character of the abutting community entry points into and out of this project must be consistent with the surrounding properties. Without entries every thirty to sixty feet along the Sunset and Thornton sides, this project will in effect be a gated community sitting behind a solid wall (something that is not permitted in the LCP or LUP for commercial uses). The areas around the outside of the walls weather landscaped or not will be locations of little pedestrian traffic and therefore become neglected over time. The LUC and LCP both refer to ground floor entry points which must exist from the front of all projects. To comply with the intent of these documents this project must create ingress and egress points around the entire perimeter at intervals in scale with the properties across each of the four abutting streets.

Pg 27 Views - this talks about private party views from level ground area and goes on to state that there is no impact on other properties in the area. This is not true. Since this project is asking for a height increase over what any other project can build with exceptions, all other projects will have their views encroached into. It will limit everyone else from having a roof top patio and being able to see the surrounding views whether they be the mountains or the ocean. It is not clear if the heights are absolutes or allows for mechanical and roof top access structures in addition to the height numbers called out. On two prior projects this developer has built across the street, they have shown on their plans maximum heights within the limits and then build roof top access houses that occupy more than 50 percent of the rooftop area. These additional structures completely block the view of the mountains from my building which complies to the 30 foot height limit.

Pg 28 Illumination: This builder showed a model of the site where the exterior was covered with an metal siding and was described in the public meeting to be the same as the Art Lofts building across the street. Assuming they spoke the truth and showed correct information, then this material is very reflective to neighboring properties. My building is about five hundred feet away from the Art Lofts project and we see a very strong light source of light at night reflecting from that building to ours. The Art Lofts building has a very highly reflective building.

Pg 29 Mitigation Measures Sunset Av A1 - I have already commented that I think the site needs to be considered as fronting on four streets. But this section does not consider that Thornton is a specified walk street with a height limit of 28 feet not does it describe that the project is being described to consider these streets are being considered as side yards in terms of height requirements. This is very wrong and out of scale with the existing homes along these streets.

Pg 30 Air Quality - These projects have clearly identified how they will be build will address the SCAQMD requirements but have left out the part about cleaning the air through the planting of trees. The City has a landscaping ordinance that describes planting trees to reduce polienats in the air and create shade for paved and built up areas. In the project this same developer just completed across the street they left out the opportunity to plant trees that would someday shade the buildings. Their reasoning as I was told by the owner is because they had to build their parking garage from lot line to lot line and that did not allow for any large trees to be included in the design. This is very wrong and should not be allowed at either the WLA or Sunset sites. Larges trees should be required and there must be a requirement for the trees to be of a matchure size after ten years (none of this stuff where the developer plants some small trees and then walks away only tolet the trees die and the holes be paved over). This should be recorded on each of the properties.

Pg 34 Historic Resources - The only item being talked about in this report is less than ten years old. However this site has been a transportation site since the inception of City of Venice in the 1900's. The caricell that was once located on this site, prior to the bus yard taking over, had a major impact on the development of this entire region. It would be nice if some sort of public art could be created at the site that described just how the railroad fit into the community back then, how it transformed into a bus line with overhead electric trolley cables into Division 6 as it is today. This history should not be lost and it should be shown on site as a point of interest to visitors.

Pg 44 Geology / Seismic Hazards This report is very brief. We know the site was a train turn-a-round and maintenance yard for many years. We also know the present topography of the site is much higher than it was prior to the bus yard being constructed in the 1950's. Prior to that the trains entered the site on the Thornton / Main Street elevation. This elevation is fifteen lower than the site is at present. We must assume that once the site excavation starts several old oil dump wells will be uncovered. These soils conditions must be considered. Point of case, the building just up the street by one property had a soil condition that was left behind from the old days of Venice that was so contaminated the site had to be cleaned over a six or seven year period.

Pg 44 Soil analysis does not include monitoring and reevaluation of conditions as they excavate. Because this site was once a train station of sorts, and a repair barn for over thirty years, I believe the contaminates that were found are only the tip of the problem. Therefore a program to monitor the soil material and a plan to remove any problems needs to be included in this project.

Furthermore, because the water table is above the bottom of their parking garages, additional measures should be taken to prevent the water from being contaminated during construction. The movement of subsurface soils will release a lot of contaminates into the water which will spread throughout the community.

The polluted ground water will then spread to the trees and plants in the surrounding area, which will feed on this water. Although some of the trees may die from the contaminants the greater risk to the general public will be as these trees grow from this water they will carry the pollutants into their leaves. Then as the leaves drop to the ground the pollutants that have been buried for many years will exist on the surface where people and animals will come in contact with them.

Pg 51 The LCP and LUP specify uses for this site but do not suggest the proportions of residential to commercial uses. These documents do suggest however that industrial zoned lots as this are very limited in the Venice area. Because this project is so heavily weighted as residential, I believe this is out of conformance with the intent of these documents.

This site is very unique to Venice because of its size. To build it out as mostly residential the community is losing the chance to have more local business located here which translates into the loss of local jobs in the community. The net effect is more people having to commute longer distances to get to work which has an even greater effect on the environment and quality of life.

Pg 54 Mitigating measures... This plan is assuming that the existing site complies by making statements like the new use would be no greater of an impact on the community than that which is present. This is flawed because the existing site has never complied with LA City zoning and building codes. If this site was to first comply and then the project impacts were compared the determinations of mitigating measures would be much different. It is wrong to base the findings on a use that does not comply at present. This is like enforcing traffic laws by the cars that exceed the speed limit!

The coastal impacts of this project should not be based on what is being provided but rather that which is not talked about. Industrial/Commercial land near the ocean is very limited. Because of the size of this lot will accommodate the parking requirements of such uses (where most similar zoned lots in Venice can't), the loss to the coastal access will stem from lack of visitor servicing uses that this project has incorporated into it's design.

Other ground floor uses that require a lot of this size to exist include a grocery store, entertainment center, retail stores or a hotel.

Pg 55 The statement that reads, "It would not alter any land use patterns in the area" is just a plain lie. The site is being converted from a industrial bus yard to a mostly residential project. This has a huge effect on land use patterns and must be considered on a community wide level. This site accounts for over 9.4% of the industrial land in Venice.

Pg 58 H.1 The allowed hours of operation seems to always be an issue with some contractors. It needs to be made clear that equipment and trucks that arrive at the site one hour or two before or after these limits are creating an impact on the community and are a breach of this EIR. This should also extend to the workers who arrive or leave the site early or late when parked through the neighborhood. These impacts are very real and must not be allowed to exist.

Pg 60 Truck loads per day is scheduled to be 100 as stated. Based on the start time of 7AM and an end time of 6PM that gives the developer 11 hours per day to run the 100 trips. When converted into trips per hour that comes out to 9.n trips or put another way about one round trip every six minutes. Keeping in

mind each of these trips is an in and out of one truck that means that about every 3 minutes another truck is going to pass my home. This rate exceeds the traffic flow during many hours of the day that is described as their work schedule. This will mean that several trucks per hour will be waiting in traffic if the scheduled described will be maintained. This will have a huge impact on all traveled streets.

Without knowing the exact amount the 100 trucks per day will carry, I can only guess at the period of time it will take the developer to move the 125,000 cubic yards of dirt. But based on what I know about dump trucks I will take a guess that these trucks (without over loading the local streets from weight or size) can carry 12 yards per trip. In doing the math assuming all goes as planned, the excavation period will last for 10,416 trips or 104 week days (20 weeks).

Although this number on paper may not seem like much, to have these double trailer trucks driving back and forth for nearly a half year does create a very large short-term impact. When the accumulated effect of this with the trucks that will be waiting in traffic on the 3 minute interval occurs the impact will be even greater. Therefore the trips per day should be greatly reduced (perhaps to 35 during non peak hours) even though it will mean it takes longer to dig the hole.

Pg 63,64 Mitigating measures... Workers must park at remote sites and should not be allowed to enter the job site by other than the remote shuttle which will only service the remote parking lot. This is the only way to control the construction workers from parking in the neighborhood and removing the limited public parking that exists today.

Furthermore no barricades, construction fences or other means of street closures should be allowed that remove street parking from Main Street or Pacific Ave. In the event that new curbs, gutters and sidewalks are to be created along these streets, the work done here must try to limit any required inconveniences to the local community. This work should only be allowed to start once the underground parking structures are complete and could be offered as temporary replacement parking.

Parking in the North Venice area is very limited and every public parking space is always utilized.

Pg 64 2.I.2 Right turn restriction will only cause people to break the law or make U-turns at the next possible intersection. Going south from the project the next place to turn-a-round will be a U-turn at Brooks Ave which would cause traffic problems for the cars turning north from Abbot Kinney to Main Street or a left turn into the private driveway of 796 Main St. and then backing out onto Main. There is no other logical way for cars to leave the property exiting on Main. This option will cause lots of problems and should not be considered. Adding a traffic light at Thornton Ave would make a lot more sense since it would also provide for pedestrian crossing. The light would need to be timed with Brooks and Rose.

Pg 64 2.I.3 Re-striping Rose causing the loss of 4 public parking spaces should not be allowed. If this project is going to remove public parking than it needs to be scaled back to reduce the impact or it needs to create additional parking on Sunset or Thornton Ave. to replace that which they are removing. Under no circumstances should re-striping be permitted if any loss of parking will occur.

Pg 64 2.I.4 For reasons given above no parking should be allowed to be removed. Furthermore, the re-striping of sound bound traffic to provide a left and right dedicated turn lanes will cause the street to lose one of the two existing south bound traffic lanes. This will cause many traffic problems and cause more traffic onto neighboring residential streets.

The corner of Sunset and Main should be required to have a traffic light installed. A controlled crosswalk is very needed at this intersection since the next crossing point is very far away and because Sunset is a through street to the Oakwood neighborhood where a lot of pedestrians come from that travel to the beach.

In prior years an underground tunnel existed at this intersection. The tunnel allowed the hundreds of beach traveler's safe passage without having to stop traffic on Main Street. In the early 1990's the tunnel was closed on both ends because homeless had made it to dirty and the City did not want to maintain it any longer.

This intersection if equipped with a traffic light control would not only allow safer access to this site and provide safer travels to coastal visitors, it would also create a traffic break that could be tied into migrating the right turn only item called out in 2.I.2 above.

Pg 65 2.I.5 This flashing light will not solve cross traffic problems that already exist. Furthermore, it will not improve the egress from the project exit on Sunset for cars that want to travel northbound on Main St.

Pg 68 J.1 This measure assumes there is a parking lot one block north of the project site that is not in use at present. This is a false assumption. The lot is owned by the City and is used at night by local residents and during the day by beach visitors and for overflow street parking and for the local businesses on Main and on Rose.

Furthermore, by allowing the construction workers to arrive to the jobsite on foot, the contractor has no way to ensure the workers did not take street parking. The project should not allow any worker to arrive on foot. The only way for workers that don't park on site to arrive should be by contractor sponsored shuttle. The parking lots for the shuttle should be located outside the beach impact area at a remote lot east of Lincoln Blvd. No exception to this recommendation should be permitted. This should not preclude onsite parking within the property lines of this project.

Pg 121 talks about the Goal 2 Chapter 3... What the writer has left out is the accumulation effect that this developer has brought to the area. This will their third project on this block. The first project was building that is now called Art Lofts which took an industrial site that was used as a movie studio for nearly thirty years and down zoned it to 44 artist-in-residences. The second project is scheduled to begin any day now. It is also across the street from the existing MTA site. It is a one acre M1 and C2 zoned lot that up to a few years ago was a lumber yard and then a parking lot. The project that is being built on this lot is again 35 (or 38) condos. Now comes the MTA Division 6 site. It is zoned M1 and could support commercial uses but again the site is being down zoned to build more residential units for the most part. This is not following the intent of the Goal 2 nor the General Plan Framework. We do not want our commercial areas turned into high priced condos. The ratio of commercial to residential is very out of balance given what has been done and that which is being proposed here.

Pg 123, 10.F.3.a Describes the height limits of the LCP however stop short to describe how to interpret them when the project fronts on all sides nor does the writer describe where the property line of the internal Condos will be considered. Since the internal buildings are all condos and each owner will have title to their portion of the overall project then it seems to me that those boundaries should apply to the height and setback laws as well. To think that a project of this size should be allowed to call Thornton Ave (which in the LUP is described as a Walk Street) a side yard and therefore exceed the height of the front yard maximum by over fifteen feet is outrageous.

Let me also point out that the height limit does not prevent roof top access structures and as anyone can now see the project across the street that this developer just completed (Art Lofts) has not one roof top structure that everyone can use but one for every unit which has effectively added another entire story to their building. Also these rooftop structures are a lot larger than is required to bring a stairway to the roof. None of this is described in the DEIR and should not be allowed. The maximum height limit described in this document should include everything including all mechanical and roof access structures.

----- General comments -----

The project site needs to be considered to have four fronts with respect to setbacks and any conditions that should apply to a property frontage. To consider this project as having just front, two sides and one rear is just not right. No other site in Venice comes even close to the size of this lot. To allow this project to have the side height exceed that which would be allowed across the street on Pacific, Sunset or Thornton where front heights must be preserved is totally wrong and out of character with the neighborhood.

It does not conform to the current zoning codes ("Q" conditions) and should not be allow to move forward until those conditions are first met (at least on paper). The existing conditions require the site to provide 75 parking spaces to the general public. These would be considered replacement spaces at the present time by the coastal commission and would be required in addition to the parking being offered at present.

No mention is made about under grounding overhead power and communication services. The power service to the MTA lot was increased about ten fold a little over a year ago. The lager service required three very large transformers be located on Thornton Ave. The service was so large that many new poles had to be installed along Electric Ave. all the way back to Venice Blvd. This service upgrade impacted many properties with the new bigger and more frequent power poles. Since the proposed use will not need this tremendous service (described by one DWP supervisor as enough electricity to power a small city), the contractor should not only locate these transformers inside the underground area of their site, I think the poles that are no longer going to be required for the MTA power plant should be removed or the service put underground all the way back to Venice Blvd.

The artist rendering of the project (figure II-7) is looking at the south east corner where Thornton intersects to Main Street. Also located at this intersection and not shown in the drawing is a electrical service box that is part of the Thornton Ave Storm Water Pumping Station. The drawing nor any of the text describes what will become of this service nor how it will receive it's electrical power once the project is constructed.

Given the eight months the developer had to prepare this document using several teams of writers, it seems unfair to not extend a longer period of time for the community to respond. What a way to spend the pre-holiday season! I just wonder who is going to read any of the comments prior to next year.

####

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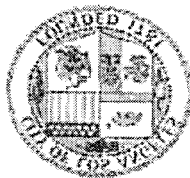
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World Wide Web (WWW): <http://www.cityofla.org>

December 21, 2004

Timothy Lindholm
West Los Angeles Transportation Facility
Project Manager – Facilities / Operations
Los Angeles, CA 90012

Dear Mr. Timothy:

**SUBJECT: METROPOLITAN TRANSPORTATION AUTHORITY WEST LOS ANGELES
TRANSPORTATION FACILITY**

Our office has completed reviewing the subject draft EIR prepared by MTA's consultants. The following are our comments to the subject project:

COMMENTS TO EXISTING SECTIONS IN DRAFT EIR

1. New roadway realignment or roadway widening improvements initiated by the project will require new street lighting systems. Bureau of Street Lighting will determine if existing lighting equipment can be replaced or relocated, or if a new lighting system is needed WLA-1.2. Page 354.

2. Streets adjacent to a proposed **Transportation Facility** stations will require lighting improvements per City's standards. Page 355 and 356

Create a sub section called "Lighting Improvement and Proposition 218 Process":

1. In general, any street/pedestrian lighting improvements that create new assessments or increase existing assessments to property owners will require the Proposition 218 process to take effect. This process not only requires community participation but also their approval throughout a ballot process.
2. Depending on the classification of this project (private or public road and facility), the jurisdiction and lighting standards of this Bureau may only apply to portions of the project. Proposition 218 does not impact improvements to private facilities.
3. Complete information of the Proposition 218 process is available at BSL. This process typically takes about 6 months to complete. The lighting assessment is paid by property owners through the County Property Tax Bill. Assessments must be confirmed by City Council before construction of the system starts.

Utility Protection/Relocation: The draft report needs to include hazard and construction impacts and it needs to address street lighting impacts and temporary street lighting needs during construction.

Add in this section: All street lighting systems within the City of Los Angeles that are part of the project will be designed to meet the IESNA/ANSI RP-8-00 as adopted by the City of Los Angeles.

Mitigation Measures WLA-1.2: Intersection modifications, such as street widening at the intersection of Jefferson and La Cienega Boulevards to alleviate the right-turn may require more street lights or an upgrade to the existing street lights to meet our standard adopted illumination level.

Should there be any questions, I may be contacted at (213) 485-1377.

Very truly yours,

Ed Ebrahimian, Director
Bureau of Street Lighting

By:  Orlando Nova, Division Manager
Bureau of Street Lighting

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DEC 10 11 15 AM '04

December 8, 2004

Culver CITY

Mr. Timothy Lindholm
Project Manager, MTA
One Gateway Plaza
Los Angeles, CA 90012

**Re: City of Culver City Comments on the October 2004 Draft
Environmental Impact Report for the MTA West Los Angeles
Transportation Facility; State Clearing House No. 2003121036**

Dear Mr. Lindholm:

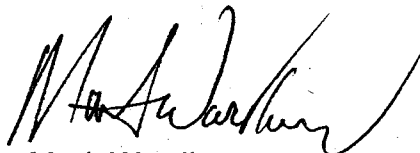
Thank you for the opportunity to review and comment on the October 2004 Draft Environmental Impact Report (Draft EIR) for the proposed Metropolitan Transportation Authority (MTA) West Los Angeles Transportation Facility.

This letter transmits the City of Culver City's (the City) comments on the Draft EIR which are provided in Resolution No. 2004-R090, including Exhibit A, which the City Council approved on Monday, November 22, 2004.

The City appreciates the time and effort the MTA spent preparing the 2004 Draft EIR. However, there are several issues, which are of concern to Culver City regarding the 2004 Draft EIR.

The City sincerely hopes and looks forward to working together with MTA to accomplish our mutual goal of better services to the community.

Sincerely,



Mark Wardlaw
Deputy Community Development Director

(Attachments and distribution next page)

Mr. Timothy Lindholm, 2004 MTA DEIR

Page 2 of 2

December 8, 2004

Attachments:

1. City Council Resolution No. 2004-R090 including Exhibit A

CC: Honorable Mayor and City Council Members

Jerry Fulwood, Chief Administrative Officer

Deborah Fancett, Assistant Chief Administrative Officer

Susan Evans, Community Development Director

Charles D. Herbertson, Public Works Director/City Engineer

Steve Cunningham, Transportation Director

Carol Schwab, City Attorney

John Montanio, Police Chief

Jeff Eastman, Fire Chief

David McCarthy, Deputy City Attorney

Lt. Dave Tankenson, Police Lieutenant

Robert Bruce, Fire Marshall

Sammy Romo, Traffic Engineer

Heather Burton, Management Analyst

Susan Yun, Associate Planner

1 **RESOLUTION NO. 2004-R090**

2 A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF
3 CULVER CITY, CALIFORNIA, TRANSMITTING THE
4 OFFICIAL CITY RESPONSE TO THE OCTOBER 2004
5 DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
6 PROPOSED MTA TRANSPORTATION FACILITY LOCATED
7 AT 3475 SOUTH LA CIENEGA BOULEVARD.

8 WHEREAS, the Metropolitan Transportation Authority ("the MTA") is
9 proposing to operate a new bus maintenance and operation facility ("the Transportation
10 Facility") located at 3475 South La Cienega Boulevard; and,

11 WHEREAS, the proposed Transportation Facility will operate a fleet of up to
12 175 Compressed Natural Gas (CNG) powered buses on a 4.66 acre site in the City of Los
13 Angeles, immediately adjacent to the eastern boundaries of Culver City; and,

14 WHEREAS, the proposed Transportation Facility consists of approximately
15 53,120 square feet of office and maintenance area that will include 14 high bays. Auxiliary
16 areas include a CNG fueling area, bus washing area, and an inspection bay area. The
17 facility provides 175 surface level bus parking spaces and up to 240 employee parking
18 spaces on a grade separated parking deck; and,

19 WHEREAS, on January 2, 2004, Culver City provided written comments to
20 the Notice of Preparation of a Draft Environmental Impact Report (Draft EIR), which in
21 addition to other comments, requested that issues related to traffic and circulation,
22 aesthetics, parking, lighting, and cumulative impacts be analyzed in the Draft EIR; and,

23 WHEREAS, the MTA has prepared a Draft EIR dated October 2004 to
24 analyze the potential environmental impacts caused by the proposed Transportation
25 Facility, which was released for public review and comment on October 21, 2004; and,

1 WHEREAS, a City staff team, consisting of various City Departments and
2 consultants was established to evaluate and comment on the adequacy of the Draft EIR in
3 addressing potential impacts to Culver City; and,

4 WHEREAS, the City Council of the City of Culver City, accepted public
5 comments and considered the Draft EIR at public meetings on November 8, 2004 and
6 November 22, 2004.

7 NOW, THEREFORE, the City Council of the City of Culver City, California,
8 DOES HEREBY RESOLVE as follows:
9

10 1. Establishes that this Resolution, including attached Exhibit A,
11 constitutes the City of Culver City's official comments on the October 2004 Draft EIR that
12 was prepared for the proposed MTA Transportation Facility.

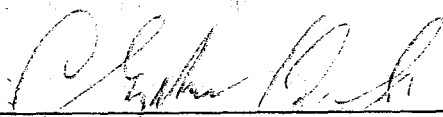
13 2. Directs and authorizes staff to transmit comments of the City of Culver
14 City on the Draft EIR to the Metropolitan Transportation Authority.
15

16 APPROVED and ADOPTED this 22nd day of November 2004.

17
18 
19 STEVEN J. ROSE, MAYOR
20 City of Culver City, California

21 ATTEST:

22 APPROVED AS TO FORM:

23 
24 CHRISTOPHER ARMENTA, City Clerk
25 A04-00958

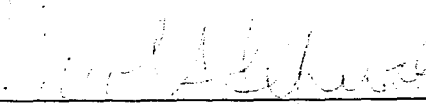
26 
27 CAROL A. SCHWAB, City Attorney
28

EXHIBIT A
CITY OF CULVER CITY RESOLUTION NO. 2004- R090

Draft EIR Comments
MTA Transportation Facility at 3475 La Cienega Bl.
November 22, 2004

General Comments

1. There is no analysis of the consideration of a customer service center (i.e. lost and found, sale of bus passes, customer call center) at the proposed project.
2. Page 322, Section 4 ("Mitigation Measures"), part (a), "Motion by Supervisor Yvonne Burke" is referenced as an Exhibit to the EIR. However, in the summary portion of the EIR, on page 44, under "(c) "Mitigation Measures" The Motion by Supervisor Yvonne Burke" is mentioned, but no reference is made to the "Motion" attached as an exhibit. For consistency, any reference made to the "Motion by Yvonne Burke" should include a reference to the attached Exhibit as well.
3. Page 324, Section 5 ("Level of Significance"), part (a) "West L.A. Transportation Facility", states that no significant impacts associated with the construction or operation of the Facility was identified. However, on page 322, under Section 4 ("Mitigation Measures"), part (a) "West L.A. Transportation Facility", the Draft EIR states that although no significant impacts were identified, a list of mitigation measures are identified to implement the measures requested pursuant to "Motion by Supervisor Yvonne Burke". For consistency, these should again be identified and explained how the measures would reduce any impacts in Section 5, on page 324.
4. Page 423, V. ("Alternatives"), Section 2 ("Environmental Impacts"), in the previous analysis of the Alternatives (page 405), the "Environmental Impacts" Section is broken down into subsections such as: aesthetics, air quality, historic resources, geology/seismic hazards, hazardous materials, water quality, land use, noise, transportation/circulation, parking and utilities. These subsections are not specifically identified in this Alternatives discussion on page 423, although most of those same issues are briefly discussed. For consistency and easier reading, this section should include those same subsections (which are also included in all the Alternatives analysis).
5. Please explain how the project will accommodate articulated buses and how much room for articulated buses will be provided.

Aesthetics/Illumination

6. The DEIR states (p.112) that "Placement of wall and/or pole mounted lighting, foot candle levels, and use of hoods or shields (to avoid light backwash) would comply with applicable City regulatory provisions to ensure that adjoining properties are not adversely affected. These regulations address lighting intensity, and the avoidance of off-site glare from direct lighting sources, where sensitive uses may be affected." The DEIR does not identify the specific lighting regulations that the project will be subject to so that readers can understand how potential glare impacts will be avoided.

In order to ensure that no adverse light and glare impacts occur at this facility, especially as it is proposed to be an 24 hour a day operation, a condition of approval or mitigation measure reflecting the above should be incorporated into the project.

7. The conceptual rendering in Figure II-3 on page 70 of the DEIR shows a fortress type building that seems to lack windows or any line of sight to Jefferson Boulevard. In the interest of being good neighbors, Culver City strongly recommends a design that strengthens the Division's connection (perceived or not) to Culver City, instead of severing it. A total inability to provide opportunities for "eyes on the street" is not neighborly.

Air Quality

8. Regarding air emissions from busses traveling to and from the maintenance and storage facility to their routes, the DEIR notes (p.147) that "a quantitative non-revenue miles analysis has not been conducted since it is unknown exactly how bus maintenance and overnight parking assignments would change". Given that this is a Project EIR, this type of analysis should be performed in the EIR and well before the project is approved so that air quality impacts can be fully understood prior to a decision. While the total non-revenue miles and emissions may be reduced as a result of the facility relocation, localized air pollution levels could increase along the new routes to and from the new maintenance facility.
9. The project will use approved City of Los Angeles haul routes. Culver City haul routes and schedules should be followed if traffic passes through City limits.
10. A sound and/or dust barrier should be built around the project site.
11. It is unclear as to whether or not the project site will contain diesel fueling capabilities. If so, additional air quality impacts may occur that appear not to have been analyzed.

12. The cumulative impacts on air quality during the operational phase of Division 6 in conjunction with construction of the Sunset Avenue project will be significant and unavoidable. Culver City would suggest that all SCAQMD Rule 403 Best Available Control Measures and Rule 1166 General Mitigation Plans Requirements be applied to this project to reduce air quality impacts on surrounding communities and in the Los Angeles Basin in general. Syd Kroenthal Park and the Turning Point School are sensitive receptors located only 750 feet from the project site.

Hazardous Materials

13. The DEIR notes that the site contains contamination from TRPHs which can either be removed or treated on-site. Mitigation Measure WLA-E.1 states that impacted soils "shall be excavated during the grading for the proposed project" but does not discuss where contaminated soils will be disposed or the haul route if on-site treatment is not feasible. Potential impacts related to the removal, transport and disposal of contaminated soils should be discussed. CEQA requires an analysis of all impacts, including those related to mitigation measures.

Land Use

14. On p.280, the DEIR states that "the Transportation Facility Project would not conflict with any applicable land use plan, policy or regulation". However, on p.269-270 the DEIR in the discussion of the project's conformance with zoning regulations it states that the required front yard setback in this district is 15 feet but that "compliance with the full front yard setback "...would require Metro to reduce the proposed number of bus parking spaces, thereby decreasing Metro's ability to effectively serve the central and western portions of its service area". This section goes on to say that "Metro would provide the maximum feasible setback along Jefferson Boulevard consistent with Metro's ability to achieve project objectives." From this discussion it appears that Metro does not intend to comply with the required front yard setback for this zoning district, but the DEIR concludes that this is not a significant impact. These two sections of the document appear to be inconsistent.

Noise

15. Page 321, IV.H. ("Noise"), Section 3 ("Cumulative Impacts"), reference is made to the Mid-City/Westside Transit Draft EIS/EIR. Are these studies incorporated into the EIR or made available for review?

Traffic and Circulation

16. Despite Culver City bordering the project site on three sides, not one Culver City intersection has been analyzed in the Traffic Study. Furthermore, there is no explanation of how the three intersections studied were selected beyond a cursory explanation that LADOT staff was consulted. Culver City's Traffic Engineer was not consulted.
17. Culver City finds it impossible to assess the validity of the proposed mitigation measure WLA-1.2 (Jefferson Blvd. widening and re-striping) without knowing the alignment of the Light Rail line. This mitigation measure seems to assume an aerial LRT alignment over Jefferson, but without knowing for sure, Culver City cannot evaluate this proposed mitigation.
18. The timing of the Jefferson Boulevard widening mitigation is not clear. Its construction will be tied to the development of the Light Rail line where groundbreaking is expected to occur in 2007. However, Division 6 should be completed by then. A safety impact will occur if the street widening is not put into place before Division 6 becomes operational. Therefore, the proposed widening of Jefferson Blvd., at La Cienega must be completed before the new MTA Division 6 Transportation Facility is operational.
19. Please explain the following sentence from Traffic Study Appendix B regarding the Exposition Light Rail line: "The elevated LRT alignment would return to ground level at a point just east of La Cienega Place within the City of Los Angeles." This is in direct opposition to other statements throughout the document that assume the LRT will cross Jefferson Blvd. at National with an aerial alignment in order to implement the widening mitigation.
20. At present, there is no pedestrian access to/from the project site from points westward: there is no pedestrian crossing at Jefferson/National and no connection from west of the creek to the site. Any improvements to the Jefferson/National intersection must include walkable access to and from Culver City.
21. The following statement can be found on page 5 of the Traffic Study: "Three of the stations on the proposed alignment are within the Plan Area, namely: (1) Exposition/Crenshaw Boulevards; (2) La Brea Avenue/Exposition Boulevard; and (3) La Cienega/Jefferson Boulevards. Culver City feels that this is a very unusual "Plan Area" because both the proposed Crenshaw and La Brea Stations are actually slightly farther from the site area than the future Venice/Robertson station. Please explain this omission and the reasoning behind including these two, more distant, proposed LRT stations.
22. The Traffic Study provides no analysis of impacts on the local transit system.

23. Page 1 of the Traffic Study states that, "...proposed bus routing assignments within the study area associated with the facility have been reviewed and approved by the MTA for use in this study." Culver City would also like the opportunity to comment upon proposed bus routing assignments.

24. The DEIR includes no analysis of the impacts that left turns out of the facility may have on Jefferson traffic (both bus and non-bus).

25. As shown in the analysis of Division 10's traffic generation rates, the highest volume of non-bus trips to/from the facility occurs around 12:00 - 1:00 pm. Please provide additional information on how this off-peak traffic may impact surrounding streets which already experience some lunch hour traffic due to their industrial and commercial nature.

26. Study Intersections: The DEIR analyzes only three study intersections for the West Los Angeles Transportation Facility. The study intersections are limited to those within the City of Los Angeles and those bordering the site. Further, the DEIR does not provide any information on deadheading to and from the yard by MTA buses. As such, it is unclear what routes buses will take and which other intersections in the surrounding area should be studied. The only information available applies to the Jefferson/La Cienega intersection, making it impossible to account for bus movements beyond this location. How can neighboring communities analyze the impacts of 175 buses when it is not clear where they will be run? Trips generated by the project would likely travel along Culver City streets. The potential traffic impacts within Culver City limits must be analyzed.

27. Study Intersections: Recent traffic studies in the surrounding area show a number of intersections operating at poor or unacceptable levels of service. In order to accurately assess project impacts on the surrounding area, the following study locations at the minimum should be analyzed:

- La Cienega Boulevard at Venice Boulevard
- La Cienega Boulevard at Washington Boulevard
- La Cienega Boulevard at Fairfax Avenue
- Fairfax Avenue at Washington Boulevard
- National Boulevard at Venice Boulevard
- Robertson Boulevard at Venice Boulevard
- Jefferson Boulevard at Duquesne Avenue
- Jefferson Boulevard at Overland Avenue

28. Existing Traffic Counts: The traffic counts on National/Jefferson and La Cienega/Jefferson are questionable. A difference of 40% (approximately 450

vehicles during the AM peak and 250 vehicles during the PM peak) was found between the two study intersections even though the peak hours determined were both the same time (7:30-8:30 AM and 5:15-6:15 PM). The land uses on Jefferson between National and La Cienega are mostly industrial and auto repair. Those land uses won't generate enough trips to make the difference in traffic volumes between the intersections.

29. Freeway and Street Characteristics: National Boulevard provides direct access from the I-10 Freeway to the project site. It is highly likely that any trips approaching the project site from the west would travel along National Boulevard. In addition to the additional intersections identified in a previous comment, the impacts of the MTA facility on the Santa Monica Freeway/Robertson Boulevard Ramps should be analyzed.

30. Bus traffic from the facility should be restricted from making left turns from northbound Jefferson to westbound National should future improvements to this intersection make this turning movement possible. In addition, inbound bus traffic should be prohibited from using eastbound National Blvd. to approach Jefferson Blvd. Supervisor Yvonne Brathwaite Burke made a motion which establishes certain restrictions on this facility. Culver City requests that the Supervisor add to her motion a restriction on buses turning left from Jefferson onto National in the event that future improvements to this intersection make this movement possible.

31. Trip Generation: Trip generation data for the project was developed by surveying a "similar site". It would seem logical to use the existing Division 6 facility as a model for analyzing the proposed one. Nevertheless, the Division 10 data was not provided in the Traffic Impact Analysis Report/EIR. The EIR's traffic analysis shows the "adjusted" hourly traffic characteristics of the proposed site. An explanation of how the trip generation was derived should be included to understand the assumptions and/or methodologies applied in gathering the data. Although it has been stated that surveys were conducted at a similar site, operations at Division 10 were not clearly described. How many driveways were surveyed? Are there separate driveways for employees and buses? Were there any adjustments made with the raw data collected? What is the operating hours and characteristics of the division surveyed? When do drivers, mechanics, and other personnel arrive/depart? How many deliveries do they get each day? The operating characteristics of the surveyed site and Division 10 should be discussed.

32. Traffic Generation: The number of employees in Division 10 compared to the proposed site was not mentioned in the report. Overall trip generation was derived using the proportion between the fleet sizes (271 vs. 175). That should only apply to the number of bus trips rather than employee trips. Since there's no mention of the number of employees in Division 10 and the

proposed site, the proposed number of parking spaces for the employees suggests that the proportion number of employees on the proposed project site would be higher compared to Division 10. Division 10 has 295 parking spaces compared to the proposed 240 parking spaces. The ratio should be 0.81 (240/295) rather than 0.65 (175/271) for the projected employee trips.

33. Traffic Assignment: Although the bus routes are defined as described in the report, what are the assumptions made on employee trip distribution? Were the Cities of Los Angeles and Culver City approached in determining employee trip distribution? Based on the employee traffic flow provided, only 10% of the employee trips are projected to originate from north/northwest of the project site? The proposed site would replace the existing MTA bus maintenance facility located in Venice (Division 6) and relocate the existing employees. Thus, a large portion (greater than 10%) of the employee trips would primarily originate west of the proposed site.

34. Traffic Impacts: The EIR does not discuss traffic impacts within Culver City limits. Employee trips are expected to use Culver City street system to access the project site from the west/northwest. What are the potential impacts of the proposed project within Culver City? How is the potential for "cut-through" traffic within the residential streets going to be addressed?

35. Page 343, discusses trip generation and there is a statement that "Articulated Buses" would also utilize the proposed facility. However, the adjustment factor discussed on Page 342 does not seem to differentiate between conventional and "articulated" buses. The DEIR and FEIR should clearly state whether there are actually 2 different adjustment factors used for the 2 different types of buses that will be using the proposed facility.

36. On page 22 of the technical appendix, Volume IV, it states that ambient traffic growth is 4%. Does this represent 4% per year or the total growth from 2004 to 2006?

37. On page 29 of the technical appendix, Volume IV, another column on Table 6 should be included at the end stating significant impact or not for the study intersections.

38. On page 47 of Volume I in Footnote #12, the words "to continue southbound on La Cienega Boulevard" should be inserted in the second sentence after the words "...reroute the inbound buses".

Related Projects

39. The Related Projects section is inadequate and several projects within the site's immediate vicinity have been omitted. In fact, the MTA seems to have forgotten its own Light Rail station planned at Venice / Robertson, an end-of-the-line gateway station which will include 600 - 800 park-and-ride spaces and serve as a transfer point for thousands of travelers on a daily basis. By not including several important local developments in the project's immediate vicinity in the related projects list, the DEIR and Traffic Study fail to fully account for future traffic. As a result, the forecasted traffic impacts may be significantly lower than they will be when all surrounding development is accounted for. The following additional related projects should be reflected in both the Traffic Study and the Cumulative Analysis section of the Draft EIR:

- Venice/Washington LRT Station.
- West Los Angeles College Master Plan 2004
- 8511 Warner Drive - Multiple use performing arts facility comprising of office, retail, and restaurants.
- Transit Oriented Development at the future Venice/Washington Station, including housing and retail components (Sites A and B).
- The Baldwin Hills Scenic Overlook.
- The Culver City Transfer Station.
- The Culver City Dog Park.

40. Cumulative Impacts: The EIR indicates there are 11 cumulative projects within the study area. The latest cumulative project list for Culver City contains 27 projects and three projects in the surrounding area in the City of Los Angeles. Thus, the future without project and future with project traffic conditions and impacts may be understated. Furthermore, of the 11 related projects listed, 9 of them are in Culver City. Yet, the report does not study a single intersection in Culver City.

Construction Impacts

41. Potential traffic impacts of construction worker trips during construction should be addressed. Construction worker traffic could potentially use residential streets within Culver City to access the project site. One of the mitigation measures that the FEIR should include is a requirement that Culver City must approve any haul route that includes any street in the City. Haul routes should be restricted to La Cienega Boulevard for both north bound and south bound connections to I-405. Also, Culver City Engineering staff should be consulted and should have authority to approve the construction staging and vehicle storage and queuing areas, including construction worker parking, if they are in or immediately adjacent to Culver City.

42. The DEIR only seems to indicate that construction worker parking would occur on adjacent streets. Most of the streets in the area have minimal or no parking. The closest area with street parking is the Hayden Tract which already has a high demand for on street parking. The FEIR should ensure that the project construction workers not park in the Hayden Tract or other residential areas in Culver City.
43. Page 353 of Volume I, Mitigation Measures: Simply providing an estimate for the number of truck trips is not mitigation. Coordination should be done with the City of Culver City's Engineering staff to discuss construction traffic staging.
44. Construction Mitigation Measures: Construction workers should be restricted from traveling along residential streets through Culver City.
45. Page 338, under IV.I. ("Transportation and Circulation"), (c) "Analysis of Project Impacts", the EIR states that construction workers' trips would occur outside the morning and afternoon peak hours, and construction impacts from this type of traffic would be less than significant (hours being from 7am to 3 pm). It is highly unlikely that 7am to 3pm is in fact outside the "peak hours" for traffic.
46. Construction mitigation measures and best management practices to minimize dust generated on the site as well as dirt tracked from the site should be employed including tire shakes at the exit of the construction site. Also, all applicable storm water BMPs should be employed to prevent storm water contamination due to runoff from the construction site.



L.A.C.M.T.A.
FACILITIES MAINT. DEPT
**BALDWIN NEIGHBORHOOD
HOMEOWNERS' ASSOCIATION**

P.O. Box 781329, Los Angeles, California, 90016

December 14, 2004

Timothy Lindholm
MTA
One Gateway Plaza
Los Angeles, CA 90012

Please find attached comments and questions to the Draft EIR regarding the West Los Angeles Transportation Facility. Also, find attached copies of a petition signed by representatives of several Homeowner groups who are affected by the traffic on La Cienega Blvd. and the probable impact on traffic and noise as a result of this proposed MTA project. Those who have signed the petition object to the project and concur with the comments and questions being sent to you.

Responses should be sent to all individuals who have signed the petition and as well
The Baldwin Neighborhood Homeowners Association
C/o Carol Tucker, President
3513 Cochran Avenue
Los Angeles, CA 90016
(323) 934-2273
e-mail: ctliteracy@aol.com

Thank you,

Carol Tucker

Carol Tucker

DEC 17 11 16 AM '04
L.A.C.M.T.A.
FACILITIES MAINT. DEPT
RECEIVED

**DRAFT EIR West Los Angeles Transportation Facility
DOCUMENT REVIEW AND COMMENT
December 14th 2004
Baldwin Neighborhood Homeowners Association**

Turn Radius at Jefferson and La Cienega.

The report indicates that the turn from La Cienega to Jefferson is very tight but could possibly be made.

- ◆ Former bus drivers have said to us that the turn could not be made without widening the street.
- ◆ Are there plans to widen Jefferson? If so how would it be done? Are there plans to purchase the property currently at that location?
- ◆ On the southside of Jefferson at La Cienega are MTA Rail tracks which would be the sight for the Light Rail crossing according to the Light Rail representatives from MTA. What effect will this have on the widening of Jefferson to accommodate buses turning on to that street?

Buses Exiting at Jefferson and National.

- ◆ According to Light Rail representatives there will be an overpass at La Cienega and Jefferson. There needs to be about 500 feet of area to allow the train to descend to ground level after crossing La Cienega, It appears that Light Rail would be coming down to ground level at the same area in which the buses would be exiting and returning at the intersection of Jefferson and National How can that be mitigated?
- ◆ Officials of MTA stated that Light Rail would begin running at 4:00 A.M. and trains would be arriving within 5 minutes of another. What time would buses be leaving to avoid the trains? If buses are to be out of the area by 7:00 A.M., again, what time would they have to leave and how long will it take for all of the buses to leave from that location? What effect will Light Rail have on the buses returning to the maintenance yard in that Light Rail does not stop running until midnight and the buses, we are told, will return about 9:00 P.M.? How will you avoid a back-up of buses Departing and returning at the Jefferson and National Junction?

Departures of buses from Jefferson and Rodeo, Higuera and Jefferson.

- ◆ What will be the departure routes? What measures would there be to mitigate noise especially at Jefferson and Rodeo? How will the Higuera location be mitigated as there is not sufficient turn radius at that location?

Buses returning after the morning rush hour and departing again for the afternoon rush hour.

- ◆ According to information in the MTA Land Swap Agreement there would be a portion of the buses returning to the Transportation Center after the Rush hour and departing again just prior to the late afternoon rush hour.
Traffic on La Cienega becomes very heavy by 7:00 A.M. and continues well into the night time hours, which means it doesn't lessen throughout the day.
- ◆ What routes will be taken to avoid traffic on La Cienega, and as well, Light Rail running along Jefferson to National as well as the very busy commercial area along Higuera at Hayden?

Presently, there are gasoline tanks underground which were previously used by Sparkletts Water Company. What measures will be taken to remove the gasoline tanks and the toxic waste caused by them?

Also we have received information regarding the need for upgrading the present sewage lines in the area of Jefferson and includes the property proposed for the WLA Transportation Center. Please describe measures being taken to clean up toxic waste from deteriorated sewage lines.

Newport-Inglewood Fault

The Draft EIR identifies the West Transportation Facility Site (the "Site") as within 680 feet of the Newport-Inglewood Fault; it also identifies the Site as within a liquefaction hazard zone. (See pages 187-191 of the Draft EIR.) Yet it does not identify or address any mitigation effort necessary to ameliorate the danger of locating underground fuel storage tanks within a fault zone. Besides the safety factor of potential fires or explosions, what would be the impact on Ballona Creek/Santa Monica Bay since Methane does not biodegrade, but is slightly water soluble?

Impact on noise and traffic

The Draft EIR does not adequately address the impact of the Transit Station noise on the surrounding community. A more detailed noise assessment as noted in the manual "FTA, Transit Noise and Vibration Impact Assessment, 1995d" is required to obtain a more accurate assessment; especially in light of the impending potential noise impact from the proposed light-rail project in the same vicinity. Even the quote from the same manual noted on p. 313 of the DRAFT EIR is incomplete. The quote continues, "When buses cause effects such as rattling of windows, the source is almost always air-bourne vibration." It is unclear to readers of the DRAFT EIR what impact 1000 plus bus trips per day would have, within the time sensitive sleep-time hours of operation of the bus transit facility, on air-bourne vibration noise within the community surrounding the transit facility.

The Air Quality Management District has indicated that the pollution within areas of South Central Los Angeles is at its' peak ; that increased traffic will further pollute the area. The DRAFT EIR also acknowledges that this proposed project will have an impact on noise and traffic and would require further EIR study. What will further studies show

and what mitigation measures will there be to ameliorate a situation that is currently out of control.

PETITION

We the undersigned residents of the 10th Council District object to the construction of the **MTA WEST LOS ANGELES DIVISION 6 TRANSPORTATION CENTER** because of the major impact that this project would have on the environment within this community. The environmental impact being that of increased traffic congestion and noise in an area that is currently at its' peak in regards to pollution.

PRINT NAME	SIGNATURE	ADDRESS	HOMEOWNER GROUP
1 ~~YERREY~~ ~~AY~~ ~~COBB~~	~~[Signature]~~	~~2400 DUNSMuir~~	~~P. L. H. A.~~
2 ~~YERREY~~ ~~AY~~ ~~COBB~~	~~[Signature]~~	~~5799 CLEVELAND ST~~	~~S. [Signature] Robert H. H. A.~~
3 ~~S. [Signature]~~	~~[Signature]~~	~~3554 N. [Signature]~~	~~B. N. H. A.~~
4 ~~ALINNIE JACKIN~~	~~[Signature]~~	~~5703 CHURCH ST~~	~~CLANET BOUL' H. A.~~
5 ~~Sybil J. T. Coker~~	~~[Signature]~~	~~5336 HIGHWAY 101~~	~~P. N. H. A.~~
6 ~~CARMEN FRANKS~~	~~[Signature]~~	~~5642 BODD ST~~	
7 ~~Deborah Harris~~	~~[Signature]~~	~~5448 1/2 Village Green~~	~~Village Green~~
8 ~~RONALD HINES~~	~~[Signature]~~	~~3416 S. DUNSMuir~~	~~B. N. H. A.~~
9 ~~LOIS HINES~~	~~[Signature]~~	~~" " "~~	~~B. N. H. A.~~
10 ~~Robert Chesebro~~	~~[Signature]~~	~~3525 S. FRANKLIN AVE~~	
11 ~~[Signature]~~			
12 ~~Cecelia Pitt~~	~~[Signature]~~	~~3437 S. DUNSMuir~~	~~B. N. H. A.~~
13 ~~Harry [Signature]~~	~~[Signature]~~	~~2301 W. 70th St.~~	~~Western I. H. A.~~
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PETITION

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PRINT NAME	SIGNATURE	ADDRESS	HOMEOWNER GROUP
1 NINA McDowell	Nina McDowell	5662 Clemson St.	
2 Robbie Benford	Robbie Benford	2544 Clemson	
3 DARREN SMITHS	Darren Smiths	3407 S COCHRAN	BHNA
4 Karen Starks	Karen Starks	3407 S COCHRAN	BHNA
5 Karen Tucker	Karen Tucker	3434 S. Sycamore	BHNA
6 Dian Berran	Dian Berran	2931 S. Spaulding	
7 Mary Hegg	Mary Hegg	5662 Bodin St.	
8 Elizabeth Brown	Elizabeth Brown	2931 S. Spaulding	
9 Thomas Riley	Thomas Riley	3505 S. Sycamore	
10 Patricia Brown	Patricia Brown	3400 Delnombrin	BHNA
11 Maria A. Jara	Maria A. Jara	1469 S. Everett	
12 Michael Jara	Michael Jara	5757 Y 20th	
13 Pat Welch	Pat Welch	Alhambra Ave	BHNA
14 Valerie Getty	Valerie Getty	BHNA	BHNA
15 Geraldine Pitt	Geraldine Pitt	3439 S. Sycamore	BHNA
16 Brad Harris	Brad Harris	3410 S. Cochran Ave	BHNA
17 Jitendra B. Patel	Jitendra B. Patel	5825 Bowdoin #3	C.W.H.O.A.
18 Eugene Barber	Eugene Barber	3625 Kalsman Dr #2	Cameo Wood.
19 Zita Davis	Zita Davis	5606 Sunlight Pl	BHUGA
20 Beverly Johnson	Beverly Johnson	5783 Bowesfield St	BHUGA
21 Akil Yancy	Akil Yancy	5703 Bowesfield St	BHUGA
22 Laverne Kimble	Laverne Kimble	5401 Highlight Pl	Baldwin Hill R.C.
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PETITION

We the undersigned residents of the 10th Council District object to the construction of the MTA WEST LOS ANGELES DIVISION 6 TRANSPORTATION CENTER because of the major impact that this project would have on the environment within this community. The environmental impact being that of increased traffic congestion and noise in an area that is currently at its' peak in regards to pollution.

PRINT NAME	SIGNATURE	ADDRESS	HOMEOWNER GROUP
1 Leonard Sully-Blanks	[Signature]	3424 ALSACE	BNHA
2 Bridgette Smith	[Signature]	5367 Sunlight	BNHA
3 Matt Welch	[Signature]	3456 Alsdell	BNHA
4 Willis C. [unclear]	[Signature]	5749 1/2 C. [unclear]	Clemson Corbett
5 Juanita Harris	[Signature]	5763 CLEMSON	Clemson Corbett
6 Lorena Pullian	[Signature]	5767 1/2 Corbett	Clemson Corbett
7 Terri Holman	[Signature]	3517 Alsdell Ave	BNHA
8 Edward Ewell	[Signature]	5180 POWERSFIELD	BHNL
9 James Maury	[Signature]	3498 CARMANA	BHNA
10 Willie Williams	[Signature]	3476 CARMANA	90016
11 Emma [unclear]	[Signature]	5707 CLEMSON	90016
12 P. KOSANKE	[Signature]	3645 Kalsman	90016 Camerwood
13 MICHAEL NATHAN	[Signature]	3647 Kalsman Dr.	90016
14 Susan Arend	[Signature]	3648 Kalsman Dr.	90016
15 Doug Cochran	[Signature]	3633 Kalsman Dr.	90016
16 Laverne VanZant	[Signature]	3441 S. Cloverdale	90016 BHNA
17 Kasha Murphy	[Signature]	5766 1/2 CLEMSON	90016
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12/20/2004 16:38 3108386124

MARY ANN GREENE

PAGE 01

TO: TIMOTHY LINDHOLM
PROJECT MANAGER - FACILITIES / OPERATIONS
METROPOLITAN TRANSIT AUTHORITY
ONE GATEWAY PLAZA
LOS ANGELES, CA. 90012

FAX: 213-922-7136

FROM: MARY ANN GREENE
BLAIR HILLS ASSOCIATION

RE: COMMENTS ON ENVIRONMENTAL IMPACT REPORT FOR WEST
LOS ANGELES TRANSIT FACILITY

MEMBERS OF THE BLAIR HILLS ASSOCIATION HAVE REVIEWED THE E.I.R.
AND THEIR COMMENTS FOLLOW AS INDIVIDUAL RESPONSES.

12/20/2004 16:30 3108386124

MARY ANN GREENE

PAGE 02

Timothy Lindholm, Project Manager
Facilities/Operation
One Gateway Plaza
Los Angeles, Ca 90012

Dear Sir:

I have the following comments on the EIR for the West L.A. Transit facility, which is to be built near the neighborhood in which I live.

I am concerned about the availability of land for landscaping, which would greatly soften the stark, angular structure being presented. The report referenced the Restricted Industrial Zone ordinance of Los Angeles Municipal Code, specifying section D.1 which requires 15 foot front yard setbacks on lots in excess of 100 feet in depth, specifying that: "All front yards shall be suitably landscaped and maintained except for necessary driveways and walkways."

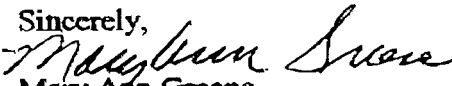
The report further states that the Los Angeles Metropolitan Transit Authority is not restricted by, nor required to abide by the L.A. Municipal Code. While this exemption gives the MTA the latitude it may need to create such a facility, and thus meet the ever increasing transportation demands of the region, it is prudent to give considerable attention to the value of landscaping. I would urge you to try and make more land available for landscaping on the perimeter of the building. Such landscaping would be in keeping with neighborhood associations' attempts to get civic bodies to "green" this area, and reduce the negative impact of poorly maintained and blight ridden light industrial facilities in the area. This transit facility will be in place and in use for many, many years to come. It should help create better aesthetics in the area, thus contributing to better quality of life for area businesses, residents, and consumers, alike.

Lighting of the building is very important. The report indicates that lighting will be directed away from streets and any adjacent premises. The lighting design and mechanisms used to distribute the lighting should be aesthetically pleasing, too. It will be important that all efforts be made to discourage graffiti, through design processes. Therefore, lighting should also incorporate a design aimed at graffiti reduction.

"Greening" the rooftop is one measure that would solve the aesthetics issue of line of sight, and view angles from homes. It would also help improve air quality, since trees help increase oxygen.

It would appear that the MTA has tried to take into consideration the concerns of residents through community outreach efforts, an important part of building community partnerships.

Sincerely,


Mary Ann Greene

12/20/2004 16:30 3108386124

MARY ANN GREENE

PAGE 03

Page 1 of 1

Subj: **draft EIR for MTA project**
Date: 12/5/2004 3:24:01 PM Pacific Standard Time
From: jonm@vi-i.com
To: MGr1814262@aol.com
Sent from the Internet (Details)

Comments on the Summary from the Draft EIR for the MTA WLA and Sunset Avenue Transport Authority Project, EIR 2004-1407, SCH No. 2003121036, 2004031139

Jonathan D. Melvin
Resident of Blair Hills, Culver City
December 5, 2004

Pages 43, 44, 57, 58, and 59 were missing. I printed them from the CD and added them. They need to be stapled in to the two copies provided.

Comments:

1. Page 175 indicates that the MTA facility needs the full 175 bus capacity, notwithstanding what was said at our neighborhood meeting. If the capacity is not met, yet another facility would be needed with an overall negative impact on the region, thus supporting building it out to the full 175 bus capacity here. The only negative impact is that there will be a less than 15 foot set back on Jefferson. But the setback is not required for MTA projects (as opposed to other light industrial projects) and the area impacted is all industrial, so I do not consider this significant (see p 37).
2. How will compliance with the mitigation measures on pp. 20, 23, 24, 27, 28, 36, 46, 47 be enforced?
3. p31 - Geological report - all information is from one geotechnical company (Environmental Support Technologies, Inc.). It would be good to get another opinion - I trust Exploration Technologies, Inc. in Houston, Texas. They gave a careful evaluation of the underground gas hazards for the Vista Pacifica project, for the city of Los Angeles.
4. p32 - hazardous waste - it would be good to get an independent statement from CCFD. What do they really think of this project?
5. p47 - mitigation of the turning space at La Cienega and Jefferson seems important to me. I am glad it is in the project.



Jonathan D. Melvin
Vision Implementers, Inc.
JonM@vi-i.com

Monday, December 20, 2004 America Online: MGr1814262

DEC-20-2004 MON 15:35 TEL:27136

NAME: FACILITIES-

P. 3

Timothy Lindholm
MTA
One Gateway Plaza.

11-29-04

Subject: The proposed MTA yard
in the 10th district
site at La Brea & Jefferson

Dear Sir:

Because of the increased traffic, noise, smog
and decreased resulting property values in the area,
I encourage you to consider an MTA location
elsewhere.

Sincerely,

Gene Barbie

3625 Kalsman Dr. #2

Los Angeles, CA

90016-4438



Mr Eugene Barbie
Unit 2
3625 Kalsman Dr
Los Angeles, CA
90016-4438

From: Wally Marks [wally@wmmrealty.com]
Sent: Wednesday, November 03, 2004 9:29 AM
To: wlatc@metro.net
Subject: Transportation Facility located at 3475 South La Cienega Bl.



Wally Marks.vcf
(204 B)

Hello MTA officials:

I operate a business in the area of the proposed Transportation Facility located at 3475 South La Cienega Bl.

I support the efforts of the MTA to locate a new facility at this location. I believe that the site will serve well.

I hope that the MTA includes in the construction of the facility Green Building Standards, including the installation of the photovoltaic cells, as a way to continue being the leader in progressive and innovated building choices.

The community watches how government, and the MTA, promotes progress.

Thank you.

Wally Marks
Los Angeles

Wally Marks III
WALTER N. MARKS, INC.
8758 Venice Boulevard
Los Angeles, CA 90034
310-204-1865 (o)
310-836-2208 (f)
310-678-5524 (c)
wally@wmmrealty.com

Subject:

Fwd: Response to the DEIR for the West LA Transportation Facility

>>> Darren Starks <dastarks@sbcglobal.net> 12/21/2004 3:49:09 PM >>>

From: Darren Starks

Homeowner and Board member of the Baldwin Neighbors Homeowners Association
(323) 965-9668

Mr Jimmy Liao,

This email is in response to the proposed West LA Transportation Facility that MTA wants to build near Jefferson Bl. and National. There would be severe problems with run off during the rain that would drain in to the Balona Creek (wash) which would be directly across the street from the facility. Second, there are earthquake fault lines that run through that area which would cause great danger with the proposed underground tanks of natural gas that they plan to use to power the buses. And third, this would cause enormous traffic problems on an already busy street (La Cienega). The proposed route that this buses would use to exit and get to the freeway would be greatly impacted. Further more there is not enough room for these buses to make a safe turn when returning to the facility. With the MTA also proposing to have light rail running down Exposition, and having a station as well as a park and ride close by, this appears to be too much in this one area. This would cause extra pollution to an area that is already at its limit. It would cause noise beyond belief. It would also affect our property values and our quality of life. La Cienega is already a major route to those trying to get to LAX and with the proposed expansion of the airport the traffic will only get worse. MTA has been careless and has been unfair in their treatment of the neighbors that this project would impact. They never gave us any propose alternate sites not did they propose better use of the existing facilities that already exist. If there is to be light rail down Exposition, then there should be a lesser need for more buses there by eliminating the need for this facility. I feel that the proposed area where this facility to be built would be better served as a mixed use/light industrial site.

BOARD OF PUBLIC WORKS
MEMBERS

VALERIE LYNNE SHAW
PRESIDENT

ELLEN STEIN
VICE PRESIDENT

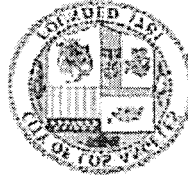
JANICE WOOD
PRESIDENT PRO-TEMPORE

RONALD LOW

VACANT

JAMES A. GIBSON
SECRETARY

CITY OF LOS ANGELES
CALIFORNIA



JAMES K. HAHN
MAYOR

DEPARTMENT OF
PUBLIC WORKS

BUREAU OF
STREET LIGHTING

ED EDRAHMAN
INTERIM DIRECTOR

600 SOUTH SPRING STREET
14TH FLOOR
LOS ANGELES, CA 90014
(213) 847-8400
FAX: 847-5405

E-mail: streetlighting@bsl.lacity.org
World Wide Web (WWW): <http://www.lacity.org>

December 21, 2004

Jimmy Liao
LA. Department of City Planning
200 N. Spring St, Room 750
Los Angeles, Ca 90012

Dear Mr. Jimmy:

**SUBJECT: METROPOLITAN TRANSPORTATION AUTHORITY SUNSET AVENUE
PROJECT.**

Our office has completed reviewing the subject draft EIR prepared by MTA's consultants. The following are our comments to the subject project:

COMMENTS TO EXISTING SECTIONS IN DRAFT EIR

1. New roadway realignment or roadway widening improvements initiated by the project will require new street lighting systems. Bureau of Street Lighting will determine if existing lighting equipment can be replaced or relocated, or if a new lighting system is needed. Page 329
2. Streets adjacent to a proposed project that would construct 225 units will require lighting improvements per City's standards. Page 277

Create a sub section called "Lighting Improvement and Proposition 218 Process":

1. In general, any street/pedestrian lighting improvements that create new assessments or increase existing assessments to property owners will require the Proposition 218 process to take effect. This process not only requires community participation but also their approval throughout a ballot process.
2. Depending on the classification of this project (private or public road and facility), the jurisdiction and lighting standards of this Bureau may only apply to portions of the project. Proposition 218 does not impact improvements to private facilities.
3. Complete information of the Proposition 218 process is available at BSL. This process typically takes about 6 months to complete. The lighting assessment is paid by property owners through the County Property Tax Bill. Assessments must be confirmed by City Council before construction of the system starts.

Utility Protection/Relocation: The draft report needs to include hazard and construction impacts and it needs to address street lighting impacts and temporary street lighting needs during construction.

Add in this section: All street lighting systems within the City of Los Angeles that are part of the project will be designed to meet the IESNA/ANSI RP-8-00 as adopted by the City of Los Angeles.

Mitigation Measures Sunset Avenue Project: Street widening along Main Street requires relocation of the existing street lights or an upgrade of street lights to meet our standard adopted illumination level.

Mitigation Measures Sunset -1.3: We may have to upgrade the street lights at the intersection at Main Street and Sunset Avenue.

Mitigation Measures Sunset -1.5: We may have to upgrade the pedestrian crossings located across Main Street at Sunset Avenue and Pacific Avenue at Sunset Avenue.

Mitigation Intersections:

The draft Report reflects 13 signalized intersections to be impacted. They were evaluated to determine potential mitigation measures; Full Street lighting improvements will be required by the City/BSL at all Signalized Intersections. Page 331 and 332

Should there be any questions, I may be contacted at (213) 485-1377.

Very truly yours,

Ed Ebrahimiian, Director
Bureau of Street Lighting

By:  Orlando Nova, Division Manager
Bureau of Street Lighting

Los Angeles Unified School District

ROY ROMER
Superintendent of Schools

ANGELO J. BELLOMO
*Director,
Office of Environmental Health and Safety*

Environmental Review File
Miscellaneous "AO"

November 15, 2004

Jimmy Liao
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

**SUBJECT: WEST LOS ANGELES TRANSPORTATION FACILITY & SUNSET
AVENUE PROJECT**

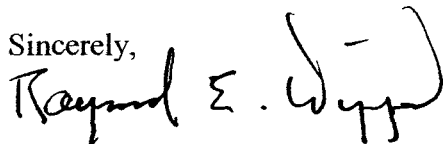
Dear Mr. Liao:

Thank you for giving the Los Angeles Unified School District (LAUSD) the opportunity to comment on the Subject project. This project is located on the **Westminster Elementary School's Pacific Avenue Walk Route**. Therefore, this project's impact on the school's students and staff must be considered.

The District has prepared the attached comments on the Westminster Elementary's, school traffic, student safety, and transportation issues. These comments describe the mitigation measures that will be necessary to protect the school's Pacific Avenue walk route during the project construction. The measures set forth in these comments should be adopted as conditions of project approval to offset unmitigated impacts on the affected school students and staff.

Thank you for your attention to this matter. If you need additional information please call me at (213) 241-3923.

Sincerely,



Raymond E. Dippel
Assistant Environmental Planning Specialist

RD:rd
Attachments

c: Ms. Coleman
Ms. Curry
Mr. Smith

ENVIRONMENTAL IMPACT RESPONSE

The following are environmental impact concerns and mitigation measures necessary to address school traffic, pedestrian routes and transportation safety issues.

- LAUSD Transportation Branch, (323) 342-1400, must be contacted regarding the potential impact, if any, upon existing school bus routes.

School buses must have access to Westminster Elementary School

During construction phase, truck traffic and construction vehicles may cause traffic delays for our transported students.

During and after construction, changed traffic patterns, lane adjustment, traffic light patterns and altered bus stops may impact school bus-on-time performance and bus passenger safety.

Because of provisions in the California Vehicle Code, other trucks and construction vehicles may encounter school buses using the red flashing lights and must stop

The Project Manager or designee should notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic through the areas.

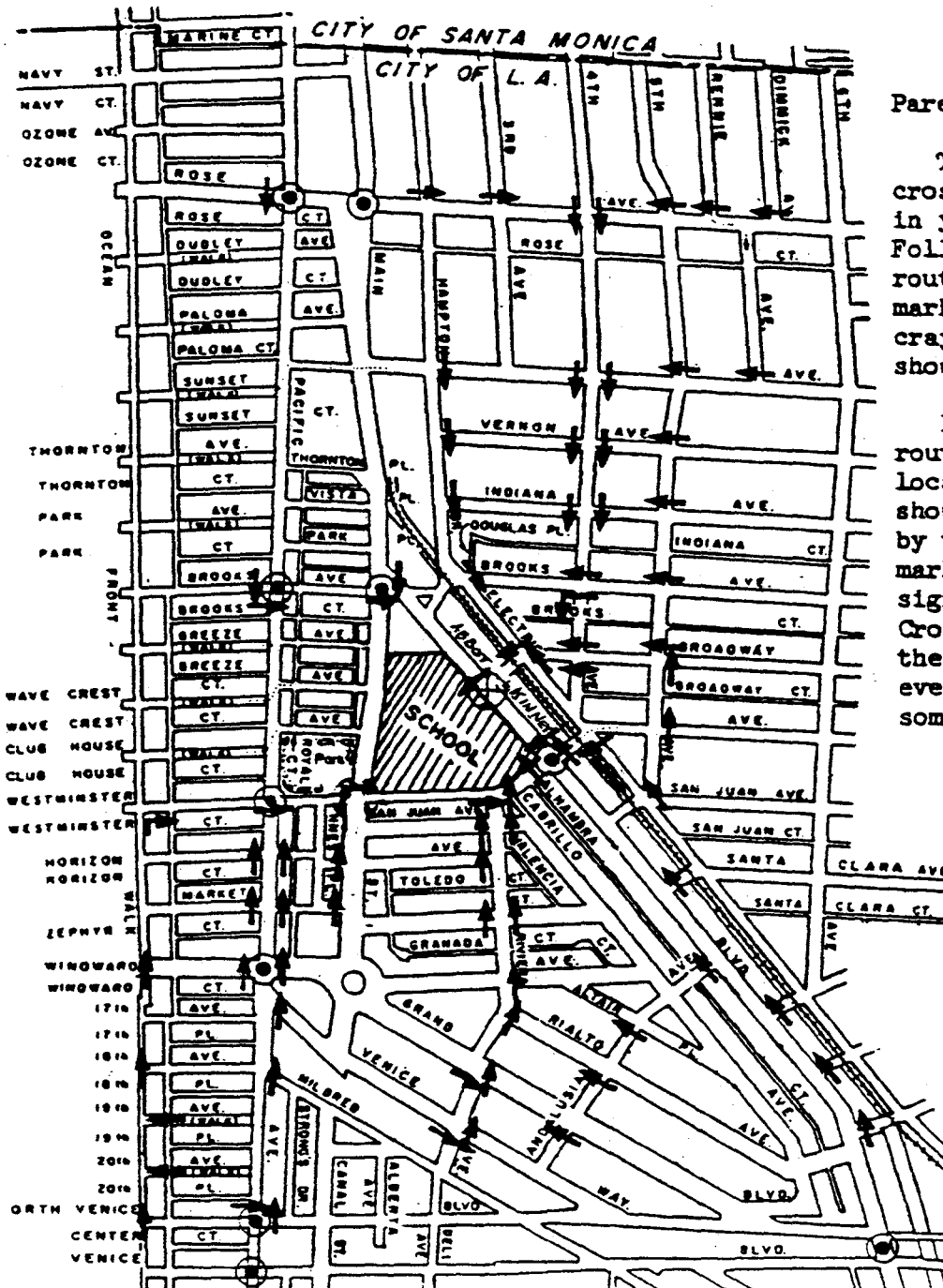
- Contractors must guarantee that a safe and convenient pedestrian route along the School's Pacific Avenue Walk Route to Westminster Elementary School is maintained. The "Pedestrian Routes to Westminster Elementary School" map will be provided upon request.
- Contractors must maintain ongoing communication with the administrator of Westminster Elementary School, providing sufficient notice to forewarn children and parents when existing pedestrian and vehicular routes to school will be impacted.
- Appropriate traffic controls (signs and signals) must be installed as needed to ensure pedestrian and vehicular safety.
- Haul routes are not to be routed past Westminster Elementary School's Pacific Avenue Walk Route, except when school is not in session.
- No staging or parking of construction vehicles, including vehicles to transport workers on streets adjacent to Westminster Elementary School.
- Funding for crossing guards to be provided when safety of children is compromised by construction-related activities at impacted crossings.
- Barriers must be constructed as needed to minimize trespassing, vandalism, and short-cut attractions and attractive nuisances.
- Security patrols should be funded and provided to minimize trespassing, vandalism, and short-cut attractions.
- Fencing should be installed to secure construction equipment to minimize trespassing, vandalism, and short-cut attractions.

PEDESTRIAN ROUTES To WESTMINSTER AVENUE SCHOOL

Padres de Familia:

Este mapa le indica la ruta más segura de cada cuadra o manzana en el área de su Escuela. Siguiendo las flechas en el mapa, seleccione la ruta más conveniente de su casa a la Escuela y márquela con una línea gruesa. Esta será la que sus niños deban seguir.

Instruya a sus niños a usar esta ruta siempre y a cruzar las calles solamente en los lugares indicados. Usted y sus niños deberán familiarizarse con esta ruta recorriéndola juntos. Observe las señales de calles marcadas con cruce para peatones. Estos cruces para peatones han sido instalados en aquellos lugares donde se ha determinado que son más necesarios. La ruta de su casa a la Escuela tal vez sea más larga, pero es la más segura.



Parents:

This map shows the recommended crossings to be used from each block in your school attendance area. Following the arrows, select the best route from your home to the school and mark it with a colored pencil or crayon. This is the route your child should take.

Instruct your child to use this route and to cross streets only at locations shown. You and your child should become familiar with the route by walking it together. Observe marked crosswalks, stop signs, traffic signals and other traffic controls. Crossing points have been located at these controls wherever possible, even though a longer walk may sometimes be necessary.

Legend (Leyenda)

- Recommended Crossing (Lugar de cruce recomendado) →
- Traffic Signal (Señal de Tráfico) ⊙
- Crossing Guard (Lugar del guardia para cruzar) ⊗



City of Los Angeles
DEPARTMENT OF TRANSPORTATION
S. Edwin Rowe, Gen. Mgr.
COUNCIL DISTRICT NO.
Rev. 7/93

100 200 300
SCALE (FT)

From: Kasell, Brian W. [bwk@JMBM.com]
Sent: Monday, December 06, 2004 7:35 PM
To: 'jllao@planning.lacity.org'
Cc: 'wlatc@metro.net'
Subject: Sunset Avenue Project



CondoOppositionltr.pdf (36 KB)...

Mr. Liao:

This is a short comment to the DEIR regarding the above-referenced project (Report No. ENV-2004-1407-EIR). It is submitted on behalf of the 41 Sunset Ave Condominium Association (the "Association") and its individual members.

After reviewing the DEIR, the Association stands by its original concerns, submitted to you by letter dated April 26, 2004. For your convenience, a copy of that letter is attached hereto. The proposed project will have significant adverse impact on the aesthetic quality of the area in which it is located, as well as dramatically increase traffic congestion, reduce parking availability, and adversely impact shading and air quality. We are opposed to the project in its present form.

With that said, we nonetheless recognize that it is likely that the project, in one form or another, is likely to move forward. Accordingly, we note that, in our view, the most preferable of the several alternatives discussed in the DEIR are those presented in Section D.2 as Alternative G (Reduced Density) and Alternative H (Reduced Height). Of course, if the Reduced Density alternative also resulted in reduced height, it would be far more preferable that Alternative H.

Finally, we note that the sponsors of the project (or their agents) have embarked on a program of directly contacting area residents to suggest that parking spaces at the new development might be made available (for a fee) to area residents to "ease parking problems specific to the neighborhood." Frankly, we view this activity by the sponsors as distasteful and highly disingenuous. Their offer of a few fee-based parking spaces is a thinly veiled attempt to obscure the fact that their project will dramatically worsen the already difficult task of parking in the area. Their tactics in this regard are nothing less than insulting to the area residents, and we mention them here so as to be sure the Department of Planning is aware of them.

Brian W. Kasell
Telephone: (310) 785-5330
Fax: (310) 203-0567
E-mail: bwk@jmbm.com

<<CondoOppositionltr.pdf>>

41 SUNSET AVENUE CONDOMINIUM ASSOCIATION

C/O BRIAN W. KASELL

41 SUNSET AVENUE # 301

Venice, California 90291

Phone: (310) 785-5330

Fax: (310) 203-0567

e-mail: bwk@jmbm.com

April 26, 2004

VIA FACSIMILE: (213) 978-1343

Jimmy Liao, Project Coordinator
200 North Spring Street, Room 763
Los Angeles, California 90012

Re: Sunset Avenue Project (Venice)

EAF NO.: ENV-2004-1407

Dear Mr. Liao:

The members of the 41 Sunset Avenue Condominium Association (the "Association"), both individually and on behalf of the Association, write to you in connection with the above-identified proposed development project. Specifically, we wish to express our concerns over the proposed scope of the project and the adverse impact the project will undoubtedly have on the quality of life in our neighborhood.

As we are sure the City of Los Angeles and its Planning Department are aware, the Venice community, especially in the areas within a few blocks of the beach, is already one which suffers from extreme difficulties relating to parking. At certain times of the day, it is basically impossible to find a parking place on the street in the vicinity immediately surrounding the proposed project. These parking problems are greatly exacerbated both on weekends and during the warmer months when large numbers of visitors descend on Venice.

Further, traffic congestion is a perennial problem in the area. Pacific Avenue is, on a daily basis, so crammed with traffic (in both directions) that drivers seeking to enter the street must often wait for an extended period of time to do so (and usually are only able to get on the street through the courtesy of another driver who stops and lets them in). On weekends and warmer weather periods, the traffic congestion in the area is nothing short of overwhelming.

We believe that the proposed project presents an unacceptable risk of dramatically increasing the area's parking and traffic problems. First, the project proposes to add, in a small and relatively restricted location, 225 residential condominiums, as well as 13,500 square feet of retail space. The additional cars and traffic that will be generated by these

numbers will have an immediate and highly negative impact on the area's parking and traffic problems.

More importantly, the location of the proposed project will enhance those problems. The block where the proposed project is to be located was never designed or intended for this kind of high-density residential dwelling or commercial use. The streets at the north and south boundary of the proposed project (*i.e.*, Sunset Avenue and Thornton Place), which apparently will provide the only ways to enter and leave the development, are very small, one way streets that will simply not be able to handle the massive increase in traffic that will accompany the project.

In short, we believe the present scope of the proposed project is overreaching and will have severe adverse impacts on our neighborhood and quality of life. We believe a smaller development, with a reduced number of residential units and a reduced amount of commercial space, would be a more appropriate use of the space that will be opened up upon the City's leaving the existing bus depot.

Further, although we have focused on parking and traffic, there are other factors militating against the proposed project's present scope, including the aesthetic impact of the project on the traditional nature of the Venice community (which has an unusual history and occupies a unique place in the Los Angeles landscape), the quality of the air in the neighborhood (which will no doubt be significantly impacted), and even the fate of the Vietnam MIA Memorial which lines the Pacific Avenue side of the west wall of the existing bus depot.

We are concerned about the quality of life in our neighborhood, and wish to be heard in connection with the proposed project, which we believe will adversely affect that quality of life in a number of ways. Accordingly, please keep us posted as to further meetings and/or decisions concerning the proposed development.

Very truly yours,
The 41 Sunset Avenue Condominium Association:

Thom Magana, Unit 101

Cheryl Buysse, Unit 102

Karen Kelly & Will Pipkins, Unit 103

Tim & Robyn Knappenberger, Unit 104

Mike Caffey, Unit 210

Ted & Michael Peterson, Unit 202

Steve Mason, Unit 203

Mike Barbee & Claudia Kloss, Unit 204

Brian Kasell, Unit 301

Jonathan Del Gatto, Unit 302

Debbie Zeitman, Unit 303

Melissa Goddard & Georgie Smith, Unit 304

Subject: Fwd: Sunset Avenue Project

F.Y.I.

>>> <KAliceMPR@aol.com> 10/22/2004 2:59:02 PM >>>

We are very concerned that the parking lot at the end of Thornton Ave. has been closed for over a month, fenced in, with no work being done and no one being able to use it. Every minute that we can't use it is hard. We have a baby, no parking at our house, and parking several blocks away and having to get the baby home along with all gear, is unbelievable. How long until something happens or are you going to open the lot back up due to delays?

This is unbelievably inconvenient, and the lot is like a ghost town. Please advise. Thank you.

Kathryn Alice
22 Thornton Ave.
Venice 90291

Subject: Fwd: Sunset Ave. Project

>>> AMY ARMSTRONG <amyarmstrong@earthlink.net> 12/21/2004 3:38:34 PM
>>>

>Dear Jimmy and Tim,

>

As a longtime Venice resident, I am writing to you to express my
opposition to the Sunset

>Avenue Project in Venice, and to the Environmental Impact Report
which seems to

>gloss over the project's numerous shortcomings.

>

>I am particularly concerned about the notion of building a gated
>development in Venice. Historically, residents of this community
have shared their

>proximity to the beach with residents of Los Angeles and innumerable
>tourists. The notion that a new group of residents will only feel
safe if

>they can isolate themselves from other members of the community and
its

>visitors is reprehensible. Just as the dwellers of the new project
will

>be able to walk down neighboring streets to access the beach, so
should

>others be able to walk through the new development.

>

>The fact that a bus yard has been there for decades is no argument
for

>continuing to block access to this area. The land on which the bus
>terminal stood should now be open to the public, not the private

preserve of a

>developer.

>

>Thank you so much for your consideration.

>

>Best,

>

>Amy

Subject: Fwd: NEED MORE TIME AND MAYBE A MORATORIUM, TOO!

F.Y.I.

>>> "Carol Beck" <rexbeck@msn.com> 10/23/2004 11:02:30 AM >>>

Dear Jimmy Liao,

This is in the matter of the SUNSET AVENUE PROJECT (MTA LOT), 100 EAST SUNSET AVENUE, VENICE, CA 90291. EIR # 2004-14007

As a resident of Venice, this project affects me. I believe the comment period should be extended to a minimum of 60 days, if not 90. The reason for this has to do with CEQA GUIDELINES, 15105 a and EIR #2004-14007 which states the public review period for draft EIR shall not be less than 30 days nor should it be longer than 60 days EXCEPT UNDER UNUSUAL CIRCUMSTANCES.

In my opinion, California has been "under unusual circumstances" since 9/11/01 and this must be addressed. Clearly, it is no longer appropriate to use the 30-60 day indicator because we are in a war situation with unknowable futurity. It might be more appropriate to utilize a 90 day indicator.

For that matter, it might be better to consider a moratorium for at least 6 months until the Venice community and our neighborhood council has had an appropriate opportunity to marshal proper resources to deal with the onslaught of war-inappropriate, luxury over-development taking place in this very small town.

Have a great weekend and a nice day, too!

Sincerely,

Carol V. Beck, rexbeck@msn.com<mailto:rexbeck@msn.com>

Mr. Jimmy Liao
200 North Spring Street
Room 750
Los Angeles, Calif 90012

RECEIVED
CITY OF LOS ANGELES

NOV 22 2004

ENVIRONMENTAL
UNIT

November 19, 2004

Regarding proposed development at Sunset and Main Street, Venice.

Dear Jimmy Liao;

Good day to you and let us begin by saying we have read the DEIR at our local library, yet we are still left with our main concern; parking spaces for existing residents.

We have been residents of Venice for over 20 years and residents of Los Angeles since 1969. We are the owners of 102 Paloma Ave and 504 Pacific Avenue. We have watched the traffic increase and the parking availability decrease steadily to become the problematic state it is now in. There simply is not enough parking for the existing residents any more. We have neighbors (some of them elderly, some with small children and strollers) parking up to five blocks away having to carry their groceries over busy streets laden with speeding vehicles. Pacific Ave has become similar to a freeway with the majority of cars driving upwards of 45 mph and parking there is not allowed anymore from 8 am to 8 pm.

We, along with our nine other tenants are very concerned that the proposed development will take away even more of the few parking spaces that are left.

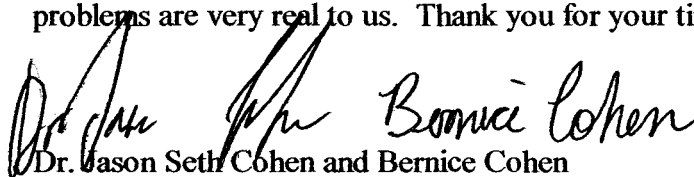
Realistically, this is Los Angeles, not New York. People don't walk here, they drive everywhere they go. We understand that the proposed development will offer enough parking for their residents and their guests. But what happens when the 800 or so residents want to leave their condo and drive a few blocks away to get a burger or do their dry-cleaning or go to work-out etc. THEY will need parking in the surrounding areas too.

Rad has offered parking spots for a fee for a limited number of cars. However, most of the residents cannot afford additional elevated parking costs. Some of the existing residents have lived here forty years and it's not fair to put this burden on them.

We believe a remedy to this problem could be:

- A. If the proposed development goes through, then preferential parking permits for the existing residents should be created. Or
- B. If the proposed development goes through, then the existing parking lot on Main and Rose could be used as a preferential parking lot for existing residents.

Please take our concerns into consideration as we live in this neighborhood and these problems are very real to us. Thank you for your time.


Dr. Jason Seth Cohen and Bernice Cohen
102 Paloma Avenue
Venice, California 90291
(310) 305-1033

From: Naomi Glauberman [naomiglmn@comcast.net]
Sent: Tuesday, December 21, 2004 8:50 AM
To: wlatc@metro.net
Subject: Sunset Avenue Project

Dear Timony Lindholm,

I am writing to you once again to express my opposition to the Sunset Avenue Project in Venice, and to the Environmental Impact Report which seems to gloss over the project's numerous shortcomings.

I am particularly concerned about the notion of building a gated development in Venice. Historically, residents of this community have shared their proximity to the beach with residents of Los Angeles and innumerable tourists. The notion that a new group of residents will only feel safe if they can isolate themselves from other members of the community and its visitors is reprehensible. Just as the dwellers of the new project will be able to walk down neighboring streets to access the beach, so should others be able to walk through the new development.

The fact that a bus yard has been there for decades is no argument for continuing to block access to this area. The land on which the bus terminal stood should now be open to the public, not the private preserve of a developer.

Thank you so much for your consideration.

Best,

Naomi Glauberman
32 Breeze Avenue
Venice, Ca 90291
310-396-1380

Ellie & Alice Goldstein
30 Thornton Avenue
Venice, CA 90291

12-20-04

Jimmy Liao
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

VIA FAX
- 213-978-1343
- 213-922-7138

Re: Sunset Avenue Project

Dear Mr. Liao,

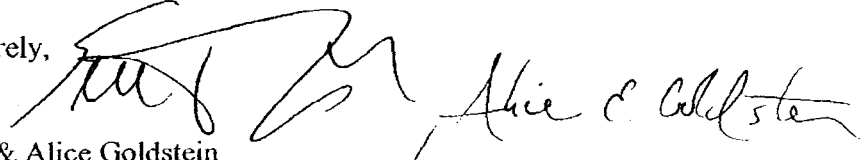
We would like to voice our strong opposition to the Sunset Avenue Project. We have lived in Venice since 1978 and on Thornton Avenue since 1981. This is a quiet "walk-street" area that attracts casual strollers to the Oceanfront and allows the inhabitants a relaxed lifestyle.

While the EIR says there is only "short-term and unavoidable construction impacts," **this is not the case.** The construction will impact negatively the neighborhood with its increase in size and height of the construction. The Venice plan calls for new construction to fit into the existing community. This project does not fit architecturally, is oversized, and its potential uses are at odds with the community. It will have a negative impact on beach access and increase crowding, as well as increase traffic and noise and debris. The detritus of the commercial buildings, their delivery trucks, the double parking and the noise from them will cause deterioration in the local community and its life style.

Under our current councilperson, Ms. Misakowski, development has run rampant in Venice, contrary to the ideals of the Venice Specific Plan. At the other end of Thornton Ave, there is another approved "mixed use project" and these two together amplify the effects of each other. The impact of "mixed use" is increasing the population density of an already overcrowded area. It's a good thing that Misacowski can't run for reelection due to term limits.

This project is not consistent with the neighborhood structures, existing architecture, the building heights, or the nature of the neighborhood. We ask the Planning commission to perform their due diligence [instead of the usual rubber stamp of a councilpersons suggestions] and deny this project.

Sincerely,


Ellie & Alice Goldstein

November 2, 2004

Mr. Jimmy Liao
Los Angeles Department of City Planning
201 North Spring Street, Room 750
Los Angeles, California

RECEIVED
CITY OF LOS ANGELES

NOV 04 2004

ENVIRONMENTAL
UNIT

Dear Mr. Liao:

Re: ENV-2004-1407-EIR
Sunset Avenue Project
100 East Sunset Avenue
Los Angeles, California

My name is Neil A. Greco; I reside at 115 Park Place Venice, California. The current Adopted Venice Specific Plan Ordains that ALL proposed developments within Venice Coastal Zone comply with the various Ordinances Established. I would like to take this opportunity to voice my opposition to the referenced planned project with specific reference to the Section 2, Subsections A through F of the Venice Specific Plan:

Public and costal pedestrian access would not be allowed pass through the project site because of the perimeter/security fencing proposed, this is a very large site with multiple dwellings proposed public access should be allowed this is not a single family dwelling site. What happened to adhering to Section 2, Subsection B provision that states to assure that public access to the coast and public recreation areas is to be provided as REQUIRED by the Costal Act and the LCP?

The proposed structures within the center of the site as stated by the developer are planned for 35 to 56 feet in height. The allowable building height within the Venice Coastal Zone, Sub area North Venice states the ALLOWABLE building height to be 35 feet. What happened to adhering to Section 2, Subsection F provision that states to REGULATE all DEVELOPMENT, including USE, HEIGHT, DENSITY, SETBACK, BUFFER ZONE and other FACTORS in order that it be COMPATABLE in CHARATER with the EXISTING COMMUNITY and to provide for CONSIDERATION of AESTHETICS and SCENIC PRESERVATION and ENHANCEMENT?

The planned project as proposed DOES NOT ADHERE to the current Adopted Venice Specific Plan, Subarea North Venice for proposed developments within Venice Coastal Zone.

TIME after TIME various developers have been granted building variances to the Ordinances adopted in the Venice Specific Plan within the Subarea North Venice. The Department of City Planning has the OPPORTUNITY to ENACT and IMPLEMENT the Goals and Policies of the Coastal Act adopted in the Venice Specific Plan as they relate to the referenced project.

Please call with any questions or comments. 310-392-9442

Sincerely,

Neil A. Greco

GRECO
115 PARK PLACE
VENICE CALIFORNIA
90291

F.Y.I.

>>> Lori Leboy <leboy@procreation.com> 10/31/2004 3:57:47 PM >>>
re: EIR # ENV-2004-1407-EIR

Dear Mr. Liao

My name is Lori LeBoy and I am a property owner in Venice. My primary address is 117 Park Place and I also own 1208 Abbot Kinney.

I am very distressed over the proposed project for 100 East Sunset Avenue. This neighborhood cannot tolerate the additional vehicles that 225 residential units and 10,000 square feet of commercial space would bring.

Traffic on Lincoln, Pacific, Main and Abbot Kinney is already congested. The east bound traffic on the 10 frwy west of the 405 is already crawling by 3:00 pm on week days. There seems to be no end to the new development that this city will allow.

While small residential projects in my neighborhood are denied height variances to exceed the 28 ft restriction, the Sunset project proposes heights of 35 - 56 feet.

I strongly urge you to reject the proposal for the 100 East Sunset Avenue Project.

Please let me know where and when I may appear, in person, to voice my dissent.

Sincerely,

Lori LeBoy
117 Park Place
Venice, CA 90291
310 452-3053

From: Eric Mankin [mankin@usc.edu]
Sent: Monday, December 20, 2004 3:26 PM
To: wlatc@metro.net; jliao@planning.lacity.org
Subject: comments on DEIR ENV-2004-1407-EIR



mankin.1407DEIR.d
oc (29 KB)

RE: Draft Environmental Impact Report ENV-2004-1407-EIR
West Los Angeles Transportation Facility and Sunset Avenue Project, Venice

December 20, 2004

To: Jimmy Liao, Los Angeles City Department of Planning
(213) 978 1343 fax, jliao@planning.lacity.org
Timony Lindholm, West Los Angeles Transportation Facility
(213) 922-7136 fax, wlatc@metro.net

From: Eric Mankin 41 Paloma Avenue, Venice, CA 90291
(310) 396-4986 voice, stet@well.com

Below are my comments on the above-referenced draft EIR. They focus on the impacts of the proposed Sunset Avenue Project, which is near my home. They are also attached as a Word file.

Pacific Avenue Traffic Impacts

The analysis of traffic impact seems to be flawed by failing to take into account an important local condition in determining street capacity. The method used for determining level of service in Los Angeles is set by the LADOT and standard: Critical Movement Analysis, which first determines the capacity of an intersection given the architecture, determines traffic flow, and gives a numerical computation of how close to capacity the intersection is a peak hour. "The peak-hour traffic counts were used along with current intersection geometrics to determine the intersections operating condition." (p. 328).

The problem with this application is a major north-south arterial serving the Sunset project area, Pacific Avenue, is one-lane until 8 a.m., that is, until well into the morning rush hour. The fact is noted in the description (p. 330), along with the fact that the street carries 1,300 vehicles northbound during peak morning rush hour -- at least half of which falls in the period when Pacific is one-lane. The street and intersection geometry remains the same, but the flow to the intersection is drastically different. The calculations do not seem to have taken this circumstance into account, apparently assuming that Pacific remains a 4-lane thoroughfare through the rush hour.

The CMA calculations indicate that such intersections as Sunset & Pacific and Rose and Pacific are now at A or B service during morning rush hour. This is not clear at the scene. As residents of the area know, it traffic flow along Pacific during the 7:30-8:00 hour is extremely dense, with motorists attempting enter the traffic flow northbound from the alleys that serve the walk street blocks west of Pacific having to wait substantial lengths of time for a break in the continuous stream of cars. Illegally parked cars that remain in the traffic lanes after the 8 a.m. deadline routinely complicate the picture more. An increase of 100 additional rush hour cars -- predicted in the DEIR (p. 347) would put many of these cars on Pacific, the main commuter route to the north (Santa Monica) and east (greater Los Angeles). Though the volumes seem small the impact of the addition of this number of cars from a single output into a single lane of Pacific Avenue traffic does not seem to be directly addressed by the CMA analysis.

Conceivably these effects could be mitigated by expanding the hours in which parking is not permitted on Pacific from 8 a.m. to 8 p.m., to 7 a.m. to 7 p.m. Doing so, however, would be a major inconvenience and a major impact. Consideration of such impacts should be part of the planning process.

Truck traffic construction impacts

The first phase of construction of the project will have large volumes (200 trips per day) of large trucks coming and going from the Main Street site over an extended period of time. This is a high number of heavy vehicles to be moving through any residential neighborhood, particularly one characterized by development that "precedes the automobile as a shaper of urban forms." (p. 251).

The initial discussion of this circumstance (p. 345) notes that "a substantial inconvenience may occur unless measures are taken to control such activities," and a set of measures are subsequently suggested. (p. 357). While all of these measures seem well considered (putting out flagmen, finding a route, limiting lane closures, etc), the impact remains drastic: hundreds of heavy trucks a day through narrow streets in residential neighborhoods. Nevertheless, the conclusion reached (p. 359) is that "these measures would reduce potential impacts to less-than-significant levels." No backup is provided for this assertion: it is simply presented as a matter of fact, and without more documentation, it is difficult to imagine most residents would agree.

Pedestrian Access Easements

Currently, the property is not at all accessible to the neighborhood, either as a destination, or

as a passageway: it is a fenced compound, surrounded on all sides by wall, with access only at a corner.

Unhappily, the proposed plan seems - though the impact is not spelled out - to continue this situation, in a way that is out of keeping with the traditions and architecture of the surrounding community.

Venice, as the EIR notes, is a community in which "pedestrian-ways are emphasized, and parking is limited." (p. 251) The development will provide parking but it will not contain public pedestrian ways. The view presented of the proposed Sunset development along Pacific Avenue shows a wall broken by two closed iron fences.

It is reasonable and likely to assume that residents who live in the complex, once built, will be able to cross those gates from the inside and make their way down the public walk streets (Sunset and Thornton) westward toward the beach. However, it seems also likely that residents of Sunset and Thornton, or other Venetians or beachgoers will not be able to the other way -- to pass directly eastward on a pedestrian walkway or walkways through the project down to Main Street. They will instead have to move around the project, as they now have to move around the busyard.

This seems inequitable, and also out of keeping with the architectural and historical fabric of Venice -- the Venice in which "pedestrian ways are emphasized."

Mitigation of this seems straightforward: provisions of pedestrian easements through the property. Security is a consideration -- but homes along the walk streets deal with the same security problem. Easy access to the beach from the businesses proposed for the Main Street -- and easy access to these businesses from the beach would also seem to be economically desirable.

To summarize: the aesthetic and historical nature of the North Venice community west of Main Street is defined by walk streets, pedestrian ways. For this or any other development to fit into this fabric, it should include pedestrian easements through it - ideally, one north and south, and two east and west.

Height Restriction Exemption

The proposed project would be 56 feet high, 21 feet higher than the height limits duly adopted and in effect for the neighborhood, and in fact as much as 26 feet -- the Venice Specific code provides that "the maximum height allowed is 30 feet, or 35 feet for projects with varied rooflines, provided that any portion that exceeds 30 feet is set back from the required front yard

by a least one foot for every foot of height above 30 feet. But the artists rendering (p. 77) seems to show no setback at all for the higher buildings -- flat roofed structures that rise straight up 55 feet.

The EIR states that the Mello Act (p. 264), provides that "in mixed use developments, the City may grant incentives such as reduced parking, additional height or increased densityS." In fact, the Mello Act itself does not explicitly mention "additional height:" The language (GOVERNMENT CODE SECTION 65915(l)) reads "education in site development standards or a modification of zoning code requirements or architectural design requirements including, but not limited to, a reduction in setback and square footage requirements and in the ratio of vehicular parking spaces that would otherwise be required." While the phrase "not limited to" may allow for height exemptions, the formulation in the EIR seems misleadingly explicit. Particularly, it seems a stretch to say that "it is reasonable to expect that such exceptions would parallel the density bonus provisions," particularly if no effort is made to exhaust other alternatives before doing so.

This is particularly to the point because the height limit for Venice development was not adopted hastily or frivolously, Venice is a historic community now under heavy development pressure as lot-owners near the beach attempt to provide ocean views as they redevelop older properties.

The EIR acknowledges, as is indeed undeniable, (p. 118) that "impacts regarding aesthetic character would be significant." The report argues that the impact should be "weighed against the project's potential to displace the existing on-site automotive maintenance facility, provide affordable housing, and provide beach impact zone parking." (Page 125)

However, the first and third of these benefits would accrue with alternative projects not breaching the height limits, explored in "Alternatives" section, pp 444 & following)

Regarding the second, an alternative not explored for accommodating additional units without a height exemption is to use the lot area designated for commercial development for additional dwelling units. The request for height limit waiver seems an effort to have a commercial development cake and eat a residential development bonus too.

And the bottom line justification provided for the more intensive development seems to be entirely out of keeping with the whole idea of Environmental Impact and planning process. After discussing less dense or less-high alternatives, the conclusion is "Finally, this alternative would not maximize the value of the propertyS."

(p. 452). If the idea is simply to maximize value of the property, why have development regulations at all, but simply allow developers to do whatever they believe will maximize their profit. More to the point, such introduction of economic considerations regarding the development is not supposed to be part of the EIR process, which is explicitly aimed at discussing impacts of property, not their profitability.

###

F.Y.I.

>>> tierrasolymar <tierrasolymar@earthlink.net> 11/19/2004 10:23:27 AM

>>>

Dear Mr. Liao,

One of my concerns with the proposed project at Sunset Avenue is that it not become a gated community. My understanding is that the developers are proposing walk streets similar to the ones to the north and south of the project, but that they plan to gate them for "security". These pedestrian streets should not be gated. This is public property and the City should insist that the developers provide this very simple amenity to the community.

I would also like to recommend that the developers be allowed a reduced parking requirement if they provide parking for some Flex cars (<http://www.flexcar.com/>), and provide a bicycle storage/rental facility like the Bike Station in Long Beach (<http://www.bikestation.org/longbeach/index.asp>)

Sincerely,

Ian McIlvaine, AIA
601 Rose Avenue
Venice, CA 90291

310-392-2775

JOHN OKULICK

604 Hampton Drive, Venice, California 90291 (310) 392-6949 Fax (310) 392-3092 EMAIL: okulick@aol.com
November 23, 2004

Jimmy Liao
LA Dept of City Planning
200 N Spring St., RM 750
Los Angeles, CA 90012

RECEIVED
CITY OF LOS ANGELES

NOV 24 2004

ENVIRONMENTAL
UNIT

RE: Sunset Ave Project # ENV-2004-1407-EIR SCH#200312306/200043031139

Dear commissioners,

I would like to voice my opposition to the development planed for the Sunset Ave Property now occupied by the MTA transportation facility.

I feel any development at this property should make the developer and not the city pay for toxic waste removal and disposal. The public would like to know what contaminates are in the ground and what will be done to remove them. This was a swamp area at one time and these contaminates may have migrated to other adjoining properties. If so it should be remedied and paid for by the developer and not the city.

I would also like to voice my opposition to the fact that this is a proposed private or gated development, which makes it an "anti community" development, which unlike the walk streets it surrounds is closed to the public. This like much of the recent approved development in the area provide higher profits for the people who built here and give the community absolutely nothing in return but more density, traffic, noise, and complaints. The rich getting richer at the neighborhoods expense.

I am tired of this repeated effort by the planning commission to undermine the community by letting political sway determine these projects. When will you start listening to the public who are being force out by higher property values and rents? As a result people who where born and raised here are force out. Is this your idea of progress?

Developers and politicians who sit in their Bel Air mansions could care less about who is affected by this. Politics as usual has got to stop. The amount of variances approved is corrupt as are the public relations firms hired to sedate the public. The payoff is for a worse quality of life at a higher price. We do not want private development dictating what will be done but responsible planning that looks at the impact this high density, obnoxiously tall buildings (allowed variances, no setbacks, no landscaping), and over crowding bring to this area.

I am watching how the commissioners respond and will create a watch list that will be emailed to the community. This list will be rating the actions of the commissioners and from which political action will be requested. It is sad that sensitivity to peoples lives and life styles need to be controlled for profiteering gangsters.

John Okulick

F.Y.I.

>>> <Jaypop70@aol.com> 11/20/2004 10:28:41 AM >>>
Mr. Liao,

I have lived in Venice for more than ten years. For the past five years I have lived at 49 Sunset Ave. Parking in this area is an enormous problem. There aren't enough spaces to accomodate the residents. On a regular week we have to park up to six city blocks away from our apartment. During the summer we actually end up paying to park our car in the \$8 lots because there isn't anywhere else to go. Since the increase in gym memberships at Gold's and the recent developement of the art lofts and a few other commercial properties in the neighborhood it has been a noticeably more difficult to find parking. I often see people who appear to be residents of the art lofts parking on the street. It is my fear that this will happen with the proposed Sunset Ave. Project, but on an even greater scale especially with the addition of commercial space. RADManagement sent out letters offering to discuss renting assigned parking spaces to residents on a first come first serve basis. This is a real slap in the face since it will be their project which will cause the problem in the first place. So after they take our free spaces away they can charge us for more parking. Can you please let me know what other residents are saying and if there is a reasonable proposal to deal with the parking in this area.

Sincerely,
Jason Popieniuck 49B Sunset Ave.

December 21, 2004

via fax: 213-978-1343

Mr. Jimmy Liao
Los Angeles Department of City Planning
200 North Spring St. Room 750
LA, CA 90012

Re: RAD/Sunset Avenue Project

Dear Mr. Liao,

I wish first and foremost to register a vote against the proposed density and 56 foot height variance of the Sunset Avenue Project. Certainly a more imaginative "village" can be created for this gateway piece of land.

The project pretends to mirror the walk streets of Venice, but current plans describe the development as a gated environment— not accessible to the public—or as an avenue to the Pacific. It's avenues and sidewalks will become part of a private enclave. The traditional walk streets of Venice are accessible to all—part of the spirit and charm that has defined this unique city by the sea for almost a century.

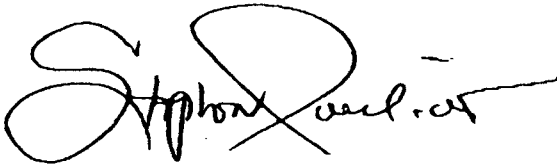
The Sunset project needs to be scaled down. Generous landscaping should be included, especially as breaks between the existing housing on Sunset and Thornton Place. Perhaps part of the development could even include a much-needed pocket park or two to buffer it from Main Street.

Undoubtedly the development will add tax revenue for the city of Los Angeles, but outside of a minimum of affordable housing and retail space that will increase traffic far more than the bus station, how is a project this size and in this key site benefiting the Venice community? For example, instead of leasing all the retail space perhaps RAD can dedicate a space to a community meeting room—or offer a permanent home to house the Venice Historical Society.

-2-

I attended several community meetings on the Sunset Project—and heard no voice from the community that favored the project in its current form.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephen Pouliot", with a large, stylized initial "S" and a horizontal line extending to the right.

Stephen Pouliot
122 Thornton Avenue
Venice, CA 90291

From: Gailee33@aol.com
Sent: Monday, December 20, 2004 7:46 PM
To: jliao@planning.lacity.org; wlatc@metro.net
Subject: Comments following review of the Draft EIR

December 20, 2004

To: Jimmy Liao, Los Angeles City Department of Planning
Timothy Lindholm, West Los Angeles Transportation Facility

Below are my comments on the above referenced DEIR:

In your letter dated October 21, 2004 in which you notified us of the availability of the DEIR, you seem to gloss over the "unavoidable impact....with regard to aesthetic character.." As a thirty-year resident and home-owner in Venice, the aesthetic character is one of the most important aspects of our life here. It is not something to be glossed over so lightly.

The developers are completely out of touch with the history and architectural fabric of Venice. For example, this summer, we received a flyer from RAD Associates, saying that they were a husband and wife team who have "lived and played in Venice for the past few years". The flyer was publicizing a free shuttle service that would leave from Sunset and Main and give residents free rides to Abbot Kinney Blvd. and the Venice Library to alleviate traffic flow. If they were in touch with who we are, they would know that we do not drive to Abbot Kinney Blvd. One of my favorite walks is from my house on Park Avenue to the Venice Public Library. In fact, I walked there today to return a book and take out another. The people who will live in this gated community may fear contact with the locals and need this shuttle to keep their isolation complete. This is an increase in traffic, not a decrease as purported in their flyer.

The other issues that have not been addressed to my satisfaction are the density and traffic problems. I can no longer drive into and out of my alley without having to wait at least fifteen minutes for a break in traffic along Pacific Avenue. What will happen when there are over two hundred more residents?

Lastly, I cannot imagine the construction impacts being "short-term" and would have to face years and years of noise and dirt.

I am calling for a moratorium on development. Leave the bus yard where it is.

Respectfully submitted,
Gail Rogers

HELEN HOOD SCHEER

132 Park Place • Venice, CA 90291
Tel: 310 399 2433 • E-mail: hh_scheer@earthlink.net

December 20, 2004

To: Jimmy Liao, Los Angeles City Department of Planning
(213) 978 1343 fax, jliao@planning.lacity.org

To: Timony Lindholm, West Los Angeles Transportation Facility
(213) 922-7136 fax, wlatc@metro.net

EAF No: ENV-2004-1407
Project Name: Sunset Avenue Project (Venice)
Project Address: 100 East Sunset Avenue

Dear Mr. Liao and Mr. Lindholm,

Although I support having a mixed-use space development at 100 East Sunset Avenue in Venice and I am glad that the bus depot will be relocating, I strongly oppose current development plans. I have lived within a two-block radius of the Venice site for over 30 years and strongly believe that the DEIR cited above is a superficial propaganda piece in favor of the development proposal and it repeatedly lacks hard data, specifically in regards to the impact the development will have on traffic, parking, noise, aesthetics and community value.

The traffic and parking analysis are flawed. The report does not take into account that Pacific Avenue is a one-lane street during peak morning rush-hour. The study also does not adequately consider the impact on cross-traffic from the nearby allies. If a car needs to enter any given alley, traffic will slow significantly or completely halt. If the project proceeds as planned, it is conceivable that the city will need to improve the traffic flow and this eventuality should be studied in the DEIR. One option for ameliorating what will be a big traffic slow-down would be turning the parking lane that is currently permitted between 8PM and 8AM back into a drive lane, or reducing the current hours of free parking along Pacific Avenue. However, this would be a major inconvenience with unforeseen impact on the community. The fee-based parking structure in the proposed development offers no significant advantage to the community, and the reduction in current free parking needs to be more thoroughly investigated.

The DEIR states that construction vehicles would make 200 trips to and from the site per day. This is a high number of heavy vehicles to be moving through any residential neighborhood, particularly one that is a walking-community and has increased traffic during the summer and most of Southern California's beautiful weekends year-round. This large scale construction will be a noise and debris nuisance to our community and will also command our much-needed parking free parking. Again, the report offers no hard data to substantiate its claim that there would be "less-than-significant levels" of impact during the construction phases; this is flippant commentary that undermines the notion of unbiased analysis.

The proposed plan is essentially a gated community, closed into itself – just like the development

already existing across the street. The new development should be constructed as walk streets, like the rest of the community. It is reasonable and likely to assume that residents who live in the proposed development, will be able to cross those gates from the inside and make their way down the public walk streets (Sunset and Thornton) westward toward the beach. However, it seems also likely that residents of or visitors to the surrounding area will not be able to the other way. This is inequitable, and also out of keeping with the architectural and historical fabric of Venice.. The fact that creating new walk streets in the development site – the most obvious way to keep in character with the neighborhood – is not studied or even mentioned in the DEIR is a huge oversight, again undermining any pretense of thorough and unbiased analysis.

The DEIR cites the development across the street as a precedent, which worries me, since it too is a gated community and fails to utilize the commercial space in manner that benefits the community. Similarly, the new commercial/living spaces on Abbot Kinney are cited as similar venues in the DEIR, when in fact these places seem to fall short of their zoning regulations (they are not offering significant commercial outlets). I am also concerned that trash and debris from food suppliers will litter the surrounding walk streets.

Waiving the local height restrictions is absolutely unacceptable and has an unforeseeable negative impacts, including setting a precedence for similar height restriction waivers in a community now under heavy development pressure to offer residence with ocean views. This portion of the DEIR, particularly the discussion of the Mello Act, is misleading and false – the act does not include a height allowance. If height allowances are to be altered, the entire community (not the limited area you are polling) should be able to offer comments – the restrictions are in place for a reason in our costal areas and altering the laws affects more people than have been informed of the current proposal. The sole benefit of additional height seems to be increasing the number of rental units – and developer profit.

The DEIR does not adequately consider the materials to be used in the proposed development. The developer's project across the street is problematic – it has created a sound bounce that is a public nuisance and light glare that bothersome and dangerous. This proposed development offers no benefit to the surrounding community. In addition, the artists renderings shows no setback at all for the higher buildings.

As the map on page 263 show, this is a low population density community with 85 residential units in a the surrounding area of roughly the same size. The proposed development, with 225 units, violates the both the established scale and density. The map and discussion in the report fail to note the fact that even the “industry” areas across the street from the proposed development are extremely low density.

The DEIR does not serve it's purpose. The environmental concerns are not presented with data and alternatives (such as mimicking the walk street design) are not adequately considered. Instead, the report seems to be an opinion piece in favor of the development project, and the project is driven by profit motives. The primary developer has a track record of deceit and is a blight to our community. The lack of respect for the environment in the proposed plan is appalling and to allow this type of construction, which is an assault on the senses, is inexcusable.

Thank you for your time and attention. I want to be kept informed about future meetings.

Sincerely,

Helen Hood Scheer

Subject: Fwd: Sunset Ave Project, Venice Ca.

>>> "james schley" <jmschley@hotmail.com> 12/21/2004 10:57:16 AM >>>

Gentlemen,

Please be informed that I very strongly oppose the project under consideration at the bus facility on Sunset Ave. in Venice. If you lived in the immediate area you would understand that this is an impossible situation. When we were involved with dealing with the impact of the new project which will be built just a block away which took away a huge amount of

community parking we were told of the possibility of moving the bus facility to provide very

large number of spaces which we were to lose. Now to find that not only are we not going to get this much needed parking but yet another development is on the drawing board is too much to digest. Every person to whom I have spoken has voiced their objection to this project. This property was part of our community and in a sense was owned by the people. What is happening is

unconscionable.

Please use your influence to alter this project.

Thank you, James Schley, 18 Park Ave. Venice, Ca 310-399-2332,
213-489-5015

**BOARD OF
FIRE COMMISSIONERS**

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JAMES K. HAHN
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DEPARTMENT OF FIRE

200 NORTH MAIN STREET
LOS ANGELES, CA 90012

WILLIAM R. BAMATTRE
FIRE CHIEF

(213) 485-6003
FAX: (213) 485-8247

<http://www.lafd.org>

December 21, 2004

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

ATTN: Timothy Lindholm, Project Manager, Facilities/Operations

(WEST LOS ANGELES TRANSPORTATION FACILITY)

PROJECT LOCATION

3475 South La Cienega Boulevard. The project site is located in the West Adams-Baldwin Hills-Leimert Community in the City of Los Angeles on the east side of Jefferson Boulevard between Rodeo Boulevard and National Boulevard.

PROJECT DESCRIPTION

The proposed site is 4.66 acres and would provide expanded Metro maintenance, administrative facilities, CNG fueling facilities, and bus and employee parking. The project would include 53, 120 square feet in a primary administration/maintenance building and approximately 18,800 square feet of auxiliary facilities.

The following comments are furnished in response to your request for this Department to review the proposed development:

A. Fire Flow

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Timothy Lindholm
December 21, 2004
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Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low Density Residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 6,000 to 9,000 G.P.M. from 4 fire hydrants flowing simultaneously.

Based on a required fire-flow of 6,000 to 9,000 G.P.M., the first-due Engine Company should be within 1 mile, the first-due Truck Company within 1 ½ mile(s).

B. Response Distance, Apparatus, and Personnel

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No.94
4470 Coliseum Street
Los Angeles, CA 90016

Task Force Truck and Engine Company
Paramedic Rescue Ambulance
Miles- 1.5
Staff- 12

Fire Station 43
10234 National Boulevard
Los Angeles, CA 90034
Single Engine Company
Paramedic Rescue Ambulance
Miles- 2.4
Staff- 6

Fire Station 58
1556 S. Robertson Blvd.
Los Angeles, CA 90035
Task Force Truck and Engine Company
Miles- 2.5
Staff- 10

The emergency response goal of the Los Angeles Fire Department is to respond to 90% of emergencies within 5 minutes.

Based on these criteria (response distance from existing fire stations), fire protection would be considered adequate.

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The above distances were computed from 3475 S. La Cienega Boulevard.

C. Firefighting Access

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

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

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

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

Businesses that intend to handle hazardous materials may have to participate in the Unified Hazardous Waste and Hazardous Materials Management Program (Unified Program). Businesses are required to register with the Fire Department and complete a hazardous materials inventory if they handle hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases; or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR parts 30, 40 or 70. Businesses that operate underground storage tanks must apply for permits to install, modify, abandon or operate those tanks. Businesses that generate, treat, recycle or otherwise handle hazardous waste must register with the Unified Program Agency and receive a permit for these activities.

Businesses that intend to handle regulated substances (previously called extremely hazardous substances) which are listed in Section 2770.5 of the California Code of Regulations (CCR) Title 19, Division 2, Chapter 4.5 may be required to participate in the California Accidental Release prevention Program (CalARP). These businesses shall notify the Fire Department's Unified Program Agency in writing of their inclusion into the program.

Risk Management Plans involve all administrative and operational procedures of a business which are designed to prevent the accident risk of regulated substances, including, but not limited to programs which include

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design safety of new and existing equipment, standard operating procedures, preventative maintenance programs, operator training and accident investigation procedures, risk assessment for unit operations or operating alternatives, emergency response planning, and internal or external audit procedures to ensure that these programs are being executed as planned. Refer to CCR Title 19, Division 2, Chapter 4.5 and Federal regulations 40 CFR Part 68: "Chemical Accidental Prevention Provisions" for further information and requirements regarding this program. If a business is required to submit a Risk Management Plan, the plan shall be submitted to the Fire Department prior to the facility beginning operation.

For additional information regarding the Unified Program, please contact the Technical Section of the Fire Department at (213) 482-6543.

Submit plot plans indicating access road and turning area for Fire Department approval.

If demolition of any current structure(s) is necessary, the Fire Department access will remain clear and unobstructed.

The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

At present, there are no immediate plans to increase Fire Department staffing or resources in those areas, which will serve the proposed project.

All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

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

The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

Timothy Lindholm
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Page 5

The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.

Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.

Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.

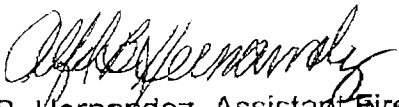
No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel. Exception: Dwelling unit travel distance shall be computed to front door of unit.

CONCLUSION

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

For additional information, please contact Inspector Kathleen White of the Construction Services Unit at (213) 482-6506.

WILLIAM R. BAMATTRE
Fire Chief



Alfred B. Hernandez, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

ABH:KAW:gm
c:\wla transp facility

Date December 22, 2004

To: City of Los Angeles Planning Department
Jimmy Liao
jliao@planning.lacity.org

From: Grassroots Venice Neighborhood Council
Land Use and Planning Committee

CC: Councilmember Cindy Miscikowski

Re: Comments on Draft EIR – Metropolitan Transportation Authority West
Los Angeles Transportation Facility and Sunset Avenue Project
EIR 2004-1407
SCH No. 2003121036
SCH No. 2004031139

The Venice Land Use and Planning Committee (“LUPC”) has reviewed the Draft EIR issued for the Metropolitan Transportation Authority West Los Angeles Transportation Facility and Sunset Avenue Project (issued October 2004) (“DEIR”). The Sunset Avenue Project is located on a significant and important site within the Venice Community. The LUPC offers the following comments on the DEIR:

1. Height

The Proposed Project would contain building heights of up to 56’. This height would exceed the greatest height allowed under the Venice Specific Plan (“VSP”) by 21’, an excess of 60%.

The DEIR correctly recognizes this proposed excess height as a significant environmental impact. Furthermore the DEIR studies a “Reduced Density” alternative, Alternative G (p.9), and a “Reduced Height” alternative, Alternative H (p.10). Alternative H is recognized in the DEIR as the Environmentally Superior Alternative (p.10).

The impacts of the proposed building heights under both the Proposed Project and Alternative H are not, however, sufficiently defined and analyzed in the DEIR. It is unclear from the information provided exactly where the different building heights would occur on the site. For both the Proposed Project and Alternative H, a site plan showing the specific locations of the different maximum building heights and their distances from the site boundaries should be included. For example, a building height of 56’ which is 5’ from the northern property line has a significantly different environmental impact than an equally high 56’ building height which is set back 100’ from the property line. Plans must be included in the DEIR which make the impacts of the various proposed building heights

explicit and comprehensible to the community, so the impacts can be properly evaluated.

For clarity's sake, the DEIR should include a table comparing features of the various proposed alternatives for the Sunset site. The table should include features such as maximum building height, number of units, number of affordable units, number of parking spaces (including beach impact spaces and excess spaces available for public use), whether or not the alternative complies with the VSP, and other features which vary between the different alternatives.

In addition to these site plans showing the different proposed building heights in plan view, the section views included on p.115 should show the proposed maximum heights of each building shown.

The DEIR should also explicitly state whether or not Alternative H would comply with all height restrictions in the VSP.

2. Exceptions to the VSP

The DEIR states that the Proposed Project would require exceptions for building height and FAR (p.14). The DEIR further states "Such exceptions are consistent with the overall intent of the plan to encourage affordable housing, and would exercise a trade-off that is anticipated in the Plan" (p.14). Please clarify specifically where such trade-offs are anticipated in the VSP and what language in the VSP supports such trade-offs.

The DEIR further claims that the Proposed Project "would be compatible with the overall aims of applicable plans and therefore considered not to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project would not be inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site" (p.280).

Please provide further justification for this statement. The DEIR specifically acknowledges that the Proposed Project would violate the density and height restrictions in the VSP. Because the Proposed Project may comply with other, less specific goals included in broader plans such as the General Plan, does that give the project carte blanche to ignore the requirements of the VSP or other applicable regulations? The DEIR seems to suggest this on p.280 as well as in other sections. Please clarify.

3. Feasibility

The DEIR states in many areas that suggested mitigation measures and whether or not they should be required is dependent on the feasibility of the project and its

“potential to displace the existing on-site automotive maintenance facility, provide affordable housing, and provide beach impact zone parking.” (p.16). Please clarify how the feasibility of mitigation measures, specifically complying with VSP height restrictions, will be evaluated. For example, if Alternative H is determined to be feasible only without excess public parking and/or affordable housing, please include the methodology by which this determination of infeasibility was reached.

4. Vietnam POW/MIA Memorial Mural (“Mural”)

The DEIR correctly recognizes the Mural as a cultural feature significant to the Venice community, and concludes that its retention in place is infeasible (p.21). Mitigation measure Sunset-C.2 is to evaluate the feasibility of relocation of the Mural, including “a determination of a reasonable and acceptable cost for the mural’s relocation [to] be established between the Applicant, Metro, and a qualified architectural historian, historic architect, or historic preservation professional who satisfies the Secretary of the Interior’s Professional Qualification Standards for History, Architectural History or Architecture pursuant to 36 CFR 61.” (p.23).

- a. How is the “qualified architectural historian, historic architect, or historic preservation professional” to be selected? Is this person to be selected by the Applicant, Metro, or the City of Los Angeles Planning Department?
- b. Should the Mural’s relocation be determined to be infeasible, an alternative mitigation measure should be prescribed. Such an alternative mitigation measure could, for example, include payment of in-lieu funds in an amount comparable to the cost of relocation to the Vietnam Veterans Aid Foundation, the foundation which the Mural was originally created to raise funds for, or a comparable charitable organization.

5. Affordable Housing

The Proposed Project includes 17 affordable units, to be “for-sale” to very low income persons. This represents 7.5% of the 225 units proposed for the site.

The project claims this meets the requirements of the Mello Act for affordable housing in the Coastal Zone, based on a requirement “between 10% and 20% of the base density” (p.72).

The “Mello Act Compliance Process for Coastal Zone Projects” issued by Con Howe, Director of Planning for the City of Los Angeles (issued October 16, 2001) states the following:

“New Housing Developments – Ten or more units. New housing developments of ten or more units must provide inclusionary residential units. Applicants have two options: (1) twenty percent of all units must be

*reserved for low income households; or (2) ten percent of **all** [emphasis added] units must be reserved for very low income households” (p.3)*

The City of Los Angeles document states the requirement is 10% based on **all** units, not 10% of “base density”. Please provide further discussion of the Mello Act and the project’s compliance with it, including citing why 10% of base density is used rather than 10% of the total number of units.

6. Walk Streets

The Proposed Project is adjacent to walk streets on the west side of Pacific. Walk streets are a significant feature of the residential character of Venice, recognized prominently in the VSP. The walk streets, whether they be west of Pacific, in the Milwood area, or the Venice canals, provide interaction between public and private spaces which vitally enhances the character of the Venice community. As stated in the DEIR, in the existing land use patterns, “Pedestrian-ways are emphasized” (p.251).

While the project recognizes this critical feature of the community through its design to “extend part of the character provided by the streets with openings between rows of small residential properties north and south of the site and west of Pacific Avenue. Space between the individual structures would allow for **communal walkways** [emphasis added], common space recreation or garden areas, water features and landscaping” (p.112-113), it is unclear if this design element truly extends the walk street element of the Venice community. The Conceptual Design Concept and Venice Setting (p.114) shows gates blocking the walkways which continue the walk streets existing west of Pacific Ave. from public use. Should the entire 3.13 acre site (excepting the 10,000 sf of commercial area) be shut off from public access, then the Proposed Project clearly would not be properly incorporating the walk street element of the Venice community. Please clarify whether or not the “communal walkways” extending the walk streets west of Pacific will be accessible to the public or if they will be private space, thus effectively creating a “super-block” gated community on the site.

7. Related projects

The draft EIR contains a list of 21 related projects. Omitted from this list are the following:

the Marina Point project

the LAX expansion

the 300-330 Washington Blvd. project

the Lincoln Place redevelopment project

the Daniel Freeman redevelopment project

the Trammell Crow project

the Chateau Marina apartment complex

There cannot be an accurate cumulative impact analysis if current and planned development is left out of the equation. This is especially true with regard to traffic impacts. The residents of Venice are repeatedly told that all traffic impacts will be mitigated to a level of insignificance as traffic worsens exponentially. Please recompute the traffic impacts, especially along Lincoln Boulevard between the Marina Freeway and the Santa Monica Freeway, factoring in all active and planned developments, with the list reflected above taken into consideration.

8. Transportation/Circulation

a) A footnote 178 on page 330 states the assumption that traffic will flow down Abbot Kinney to Venice Blvd. and not along California to Lincoln Boulevard. If true, project traffic will impact the Abbot Kinney / California intersection which is already highly congested with both vehicles and pedestrians. No traffic counts were taken at this intersection. Absent this information the decision maker cannot determine traffic impacts at this intersection. the Abbot Kinney/California intersection is especially important since California is the main street connecting Lincoln with Abbot Kinney between Rose and Venice.

1) What are the traffic counts of Abbot Kinney/California?

2) What impact will this project have on the L. O. S. at Abbot Kinney/California?

b) The closest supermarket to the project is located at California and Lincoln. If residents do not travel east on California to the market, what other grocery store in the area can they use?

c) The proposed Lincoln Center project at California and Lincoln is planned to be mixed use with a considerable increase of retail over the current conditions. What traffic routes do you anticipate the residents of your project will follow to access the new Lincoln Center when it is completed.

d) Page 329 (a) *Freeway and street characteristics* suggest "Therefore, the city could asked for a 2 ft. widening along the main street frontage of the Sunset Ave. site. Peak hour traffic is approximately 900 VPH northbound in the morning and southbound in the afternoon."

e) On page 328 the Marina Freeway (State Highway 90) is cited as the nearest regional transportation facility serving the Sunset project. Isn't State Highway one, Lincoln Boulevard, the closest? Also, Highway 10, the Santa Monica Freeway, is 2 miles away. Although this is located in the city of Santa Monica the traffic must flow through Venice streets to get their. What route to the Santa Monica Freeway are Sunset project residents anticipated to take?

f) Traveling north on Main Street, east on Pico and north on Lincoln it is 2.0 mi. from the Sunset project to the entrance to the Santa Monica Freeway. Traveling south on Main, south east on Abbot Kinney , east on Venice and southbound on Lincoln to the Marina Freeway is 2.5 mi..

- 1) What route was taken to yield the of 1.25 mi. between the Sunset project and the Marina Freeway?
- 2). Why does the draft EIR credit the Marina Freeway with being the nearest regional transportation facility when clearly the Santa Monica Freeway is closer?
- 3) Since the only access to the Marina Freeway is via Lincoln Boulevard and since the Marina Freeway is identified as the nearest regional transportation facility why were no traffic counts done at Lincoln and Venice, the intersection most likely to be impacted as Sunset residents traveled to the Marina Freeway?
- 4) What is the anticipated route from the Sunset project to the Santa Monica Freeway and what are the traffic counts at the critical intersections?

g) Venice Beach is the largest tourist attractions Southern California. It attracts more visitors than Disneyland. To address the unique traffic problems during the tour season separate traffic counts were done as follows:

June 5, 2004-12 p.m. to 4 p.m.

In/As Main Street
E/W. Ocean Park

N/S. Main Street
E./W. Rose

N/S. Main Street
E./W. Thorton Place

N/S. Nielsen Way
E./W. Ocean Park Blvd.

N/S. Pacific Ave.
E./W. Rose Ave.

N/S. Lincoln Boulevard
E./W. Rose

June 12, 2004 12 p.m. to 4 p.m.

N/S. Main Street
E/W Abbot Kinney

N/S Venice Blvd.
E/W Abbott Kinney

N/S Pacific Ave.
E/ W Sunset Ave.

N/S Pacific Ave.
E/W Windward Avenue

N/S Pacific Ave.
E/W North Venice

N/S Pacific Ave.
E/W South Venice

July 3, 2004 12 p.m. to 4 p.m.

N/S Main Street
E/W Sunset Ave./MTA service driveway

With the exception of July 3, 2004 no other traffic counts were taken during the height of the tourist season.

- 1) How were traffic counts from June 5 and June 12 analyzed to draw conclusions about traffic conditions during the summer congestion period of July and August?

h) The Playa Vista EIR calculates levels of service for the following intersections as follows:

Rose and Lincoln	D.
Venice and Lincoln	F.

This draft DEIR calculates levels of service at these two intersections as follows:

Rose and Lincoln	C.
Venice and Lincoln	no calculation was done

- 1) Please explain the discrepancy for the Rose and Lincoln level of service.
- 2) Why was no calculation done for Venice and Lincoln?

9. Other Comments By Stakeholders

A) Craig Ochikubo

As a long time resident of the Santa Monica area and now living directly across from the proposed Sunset Ave project, I am concerned over the key point of the waiver of the height restriction on the development.

The current buildings in the surrounding area are all of similar height, and the significant increase in the height of the proposed Sunset Ave project would create a look and feel that is significantly different from the rest of the surrounding buildings. In addition, the added height would ultimately block the afternoon light and create/cast a shadow upon the buildings to the West of the Sunset Ave project.

My hope is that one of the key the goals of the planning committee would be to ensure that the community is maintained and that the development of these rare coastal areas is done in a way that enhances the area.

I would like to see that the current height restriction that is currently in place in the community be maintained and that the development meet that current requirement.

Craig Ochikubo
615 Hampton Drive
D302
Venice, CA 90291
ochikubo@yahoo.com

B) Ira Koslow

I have to strongly disagree with most of the conclusions of the EIR as summarized in the October 21, 2004 Notice of Completion and Availability of Draft EIR No. ENV-2004-1407-EIR. Diluting the impact of this enormous gated community down to a problem of aesthetics is ridiculous. This summary completely ignores the long-term impact of 225 units plus 10,000 feet of commercial use space plus parking for 676 cars on acreage that currently supports 85 units on adjacent streets, on the traffic patterns and parking conditions in Venice. There are no major east/west thoroughfares now and with the proposed Pioneer bakery expansion on Rose Avenue, that street is going to be completely unavailable with the completion of that project. Did anyone bother to drive down Pacific Avenue after 3:30 p.m. on any day of the week? This new traffic jam caused by the spillover from Playa Vista was never clearly researched for that project and now traffic problems are being completely ignored again.

I will now go through my objections to the report itself:
Volume I Page 10 - E.1.a.2. "Aesthetic character" The main aspect that a gated community is being plopped down in an area of individual residences is completely ignored. Also RAD has already built

aluminum looking monstrosities (excuse me "artists lofts") on Main Street south of Sunset. These buildings reflect sunlight with an awful glare and magnify greatly any sounds on the street. When a motorcycle passes, the noise is deafening. This lack of respect for the environment is appalling and to allow this type of construction, which is an assault on the senses, is inexcusable. The height requirements are in place for a very good reason especially on coastal areas. Rescinding these requirements will make for an awful skyline. We now can look from the beach to the mountains and this change will do away with this outlook completely. To destroy our scenic views for the profit of a few is not aesthetically pleasing to the residents of Venice. The current bus yard has no pedestrian traffic allowed and all beach goers have to go around the bus yard to and from the beach. The residents of the gated community will be coming out their gates and walking down our streets. There is no community traffic allowed in the gated community. We will all have to walk around their community to go to Main Street as we do now. How about mitigation that opens walk streets through the project so the community can share in the experience of their life style as they share in ours.

Pages 36-42 " Land Use"

The Specific Plan adopted in Venice reduced the residential density on the North Beach area of Venice. This was done to increase access to the beach area for residents of the entire city. This reduction in density was also a life style decision of the community. To now allow RAD to more than triple the density and take profit from a decision made by the Venice community is deplorable. The formulas used in the report starting with some high figure of 171 units and then increasing by 10% and 25% to arrive at 231 units is a farce. The current adjacent walk-street housing count for an area slightly larger than the bus yard is 85 single-family dwellings. Adding 10,000 feet of commercial space and 600+ parking spots to the 231 units makes the conclusion of the report, that there is no significant land use problem, a farce.

Page 42 " Noise"

You address only construction noise in the report. Once again the specifics of the RAD aesthetic are being ignored. Their structures on Main Street currently amplify the noise on the street to unbearable levels. Your report talks in the abstract, there is a specific model to look at on Main Street south of Sunset, on the east side of the street.

Pages 46-52 " Transportation and Circulation"

The report completely ignores the increased traffic generated from the increased density of the land use. All of the mitigations deal with repainting intersections to allow for left turn lanes. What about the increase in general traffic that will back these left turn lanes into the general flow of traffic? There are no major east/west streets near the Sunset/Thornton/Main/Pacific rectangle. All the increased traffic will flow down Rose or Brooks, which are both narrow two lane streets. Adding a left and a right turn lane on Rose will have no

mitigation of any traffic problem now encountered, or the drastic problem in the future when the Pioneer Bakery property is turned into a mini-mall with residential units. The EIR for that project will also be a developer's dream that ignores all the real problems by putting mitigations in place that look good on paper but are useless in real life. Another neglected problem is the traffic on Pacific that has recently turned into a nightmare with the completion of Phase I of Playa Vista. After Sawtelle filled up, then Centinela filled up, then Lincoln filled up, Pacific became the last natural mitigation for the overflow. With the Sunset Avenue Project traffic added in, the situation will become impossible. It is practically impossible to make a southbound turn onto Pacific from Sunset now. Is it suggested that the egress on Sunset only be allowed to go north as well as the egress from Main Street only allowed to go south. Who is going to enforce these rules? Are the police now going to waste their time on the traffic jams created by poor planning and over development? The left or right turn only signs are routinely disobeyed and the resulting horn honking is another noise problem ignored in the report.

The only mitigation for this problem is to limit the project to the current density of the given acreage, 85 units with included walk streets and alley ingress and egress.

Page 53-56 " Parking" The parking that the project will provide for the residences and commercial space seems adequate but what of the street parking. The claim is that only 4 spaces will be lost on Rose Avenue. This does not take into account the lost spaces on Main Street on the west side of the street due to the ingress and egress from the project. Has the report looked at the driveways and entrance lanes necessary to keep traffic flowing smoothly. What of the spaces on Pacific? With the added traffic flow from Sunset and the newly reopened Thornton, are we guaranteed continued parking on Pacific from 8:00 p.m. to 8:00 a.m.? Will the developers demand an after the fact discontinuation of this free parking when they realize that their poor planning has wreaked havoc on the traffic flow into and out of their gated community.

I have lived in Venice for 35 years and lived in the same house on Park Avenue for 32 of those years in peaceful coexistence with the bus yard. I look at the Sunset Avenue Project as an all out assault on my lifestyle and the lifestyle of all my neighbors in Venice. The developers have seen a Golden Goose here and are trying to take advantage of an environment that has been carefully created and

maintained over the years by the Venice community.
To place a 56-foot high gated community in the middle of this community is criminal. The fact that the MTA is willing to give this gift to a private development company does not mean that we have to idly stand by and let ourselves be ripped off of our community values. No amount of mitigation can make up for this type of loss.

Respectfully submitted,

Ira Koslow
33 Park Avenue
Venice, CA 90069

P.S. I am a teacher at LACES, which is very near the proposed West Los Angeles Transit Facility, and I frequently travel on La Cienega Boulevard south of Venice. The traffic is so horrible on that street that I can't imagine anyone in his or her right mind putting a bus depot there. Whatever the report says and whatever mitigations are put in place, this is a horrible mistake that will make itself obvious if the project is approved.

C) Eric Mankin

Pacific Avenue Traffic Impacts

The analysis of traffic impact seems to be flawed by failing to take into account an important local condition in determining street capacity. The method used for determining level of service in Los Angeles is set by the LADOT and standard: Critical Movement Analysis, which first determines the capacity of an intersection given the architecture, determines traffic flow, and gives a numerical computation of how close to capacity the intersection is a peak hour. "The peak-hour traffic counts were used along with current intersection geometrics to determine the intersections operating condition." (p. 328).

The problem with this application is a major north-south arterial serving the Sunset project area, Pacific Avenue, is one-lane until 8 a.m., that is, until well into the morning rush hour. The fact is noted in the description (p. 330), along with the fact that the street carries 1,300 vehicles northbound during peak morning rush hour -- at least half of which falls in the period when Pacific is one-lane. The street and intersection geometry remains the same, but the flow to the intersection is drastically different. The calculations do not seem to have taken this circumstance into account, apparently assuming that Pacific remains a 4-lane thoroughfare through the rush hour.

The CMA calculations indicate that such intersections as Sunset & Pacific and Rose and Pacific are now at A or B service during morning rush hour. This is not clear at the scene. As residents of the area know, the traffic flow along Pacific during the 7:30-8:00 hour is extremely dense, with motorists attempting to enter the traffic flow northbound from the alleys that serve the walk street blocks west of Pacific having to wait substantial lengths of time for a break in the continuous stream of cars. Illegally parked cars that remain in the traffic lanes after the 8 a.m. deadline routinely complicate the picture more. An increase of 100 additional rush hour cars -- predicted in the DEIR (p. 347) would put many of these cars on Pacific, the main commuter route to the north (Santa Monica) and east (greater Los Angeles). Though the volumes seem small the impact of the addition of this number of cars from a single output into a single lane of Pacific Avenue traffic does not seem to be directly addressed by the CMA analysis.

Conceivably these effects could be mitigated by expanding the hours in which parking is not permitted on Pacific from 8 a.m. to 8 p.m., to 7 a.m. to 7 p.m. Doing so, however, would be a major inconvenience and a major impact. Consideration of such impacts should be part of the planning process.

Truck traffic construction impacts

The first phase of construction of the project will have large volumes (200 trips per day) of large trucks coming and going from the Main Street site over an extended period of time. This is a high number of heavy vehicles to be moving through any residential neighborhood, particularly one characterized by development that "precedes the automobile as a shaper of urban forms." (p. 251).

The initial discussion of this circumstance (p. 345) notes that "a substantial inconvenience may occur unless measures are taken to control such activities," and a set of measures are subsequently suggested. (p. 357). While all of these measures seem well considered (putting out flagmen, finding a route, limiting lane closures, etc), the impact remains drastic: hundreds of heavy trucks a day through narrow streets in residential neighborhoods. Nevertheless, the conclusion reached (p. 359) is that "these measures would reduce potential impacts to less-than-significant levels." No backup is

provided for this assertion: it is simply presented as a matter of fact, and without more documentation, it is difficult to imagine most residents would agree.

Pedestrian Access Easements

Currently, the property is not at all accessible to the neighborhood, either as a destination, or as a passageway: it is a fenced compound, surrounded on all sides by wall, with access only at a corner.

Unhappily, the proposed plan seems - though the impact is not spelled out - to continue this situation, in a way that is out of keeping with the traditions and architecture of the surrounding community.

Venice, as the EIR notes, is a community in which "pedestrian-ways are emphasized, and parking is limited." (p. 251) The development will provide parking but it will not contain public pedestrian ways. The view presented of the proposed Sunset development along Pacific Avenue shows a wall broken by two closed iron fences.

It is reasonable and likely to assume that residents who live in the complex, once built, will be able to cross those gates from the inside and make their way down the public walk streets (Sunset and Thornton) westward toward the beach. However, it seems also likely that residents of Sunset and Thornton, or other Venetians or beach goers will not be able to the other way -- to pass directly eastward on a pedestrian walkway or walkways through the project down to Main Street. They will instead have to move around the project, as they now have to move around the busyard.

This seems inequitable, and also out of keeping with the architectural and historical fabric of Venice -- the Venice in which "pedestrian ways are emphasized."

Mitigation of this seems straightforward: provisions of pedestrian easements through the property. Security is a consideration -- but homes along the walk streets deal with the same security problem. Easy access to the beach from the businesses proposed for the Main Street -- and easy access to these businesses from the beach would also seem to be economically desirable.

To summarize: the aesthetic and historical nature of the North Venice community west of Main Street is defined by walk streets, pedestrian ways. For this or any other development to fit into this fabric, it should include pedestrian easements through it - ideally, one north and south, and two east and west.

Height Restriction Exemption

The proposed project would be 56 feet high, 21 feet higher than the height limits duly adopted and in effect for the neighborhood, and in fact as much as 26 feet -- the Venice Specific code provides that "the maximum height allowed is 30 feet, or 35 feet for projects with varied rooflines, provided that any portion that exceeds 30 feet is set back from the required front yard by a least one foot for every foot of height above 30 feet. But the artists rendering (p. 77) seems to show no setback at all for the higher buildings -- flat roofed structures that rise straight up 55 feet.

The EIR states that the Mello Act (p. 264), provides that "in mixed use developments, the City may grant incentives such as reduced parking, additional height or increased density." In fact, the Mello Act itself does not explicitly mention "additional height:" The language (GOVERNMENT CODE SECTION 65915(l)) reads "reduction in site development standards or a modification of zoning code requirements or architectural design requirements including, but not limited to, a reduction in setback and square footage requirements and in the ratio of vehicular parking spaces that would otherwise be required." While the phrase "not limited to" may allow for height exemptions, the formulation in the EIR seems misleadingly explicit. Particularly, it seems a stretch to say that "it is reasonable to expect that such exceptions would parallel the density bonus provisions," particularly if no effort is made to exhaust other alternatives before doing so.

This is particularly to the point because the height limit for Venice development was not adopted hastily or frivolously, Venice is a historic community now under heavy development pressure as lot-owners near the beach attempt to provide ocean views as they redevelop older properties.

The EIR acknowledges, as is indeed undeniable, (p. 118) that "impacts regarding aesthetic character would be significant." The report

argues that the impact should be "weighed against the project's potential to displace the existing on-site automotive maintenance facility, provide affordable housing, and provide beach impact zone parking." (Page 125)

However, the first and third of these benefits would accrue with alternative projects not breaching the height limits, explored in "Alternatives" section, pp 444 & following)

Regarding the second, an alternative not explored for accommodating additional units without a height exemption is to use the lot area designated for commercial development for additional dwelling units. The request for height limit waiver seems an effort to have a commercial development cake and eat a residential development bonus too.

And the bottom line justification provided for the more intensive development seems to be entirely out of keeping with the whole idea of Environmental Impact and planning process. After discussing less dense or less-high alternatives, the conclusion is "Finally, this alternative would not maximize the value of the property." (p. 452). If the idea is simply to maximize value of the property, why have development regulations at all, but simply allow developers to do whatever they believe will maximize their profit. More to the point, such introduction of economic considerations regarding the development is not supposed to be part of the EIR process, which is explicitly aimed at discussing impacts of property, not their profitability.

Eric Mankin
41 Paloma Avenue
Venice CA 90291
310 396 4986 cell 310 383 4109

Subject: Rad -- FW: [Fwd: Sunset Ave Project - Environmental Impact Report Comments]

-----Original Message-----

From: Jimmy Liao [mailto:Jliao@Planning.Lacity.Org]
Sent: Wednesday, December 22, 2004 11:50 AM
To: G.Schalman@pcrnet.com
Subject: [Fwd: Sunset Ave Project - Environmental Impact Report Comments]

>>> "L Burns, Co-Chair, LUPC GRVNC" <lburnslupc@earthlink.net>
12/22/2004 11:12:36 AM >>>

----- Original Message -----

Subject: Sunset Ave Project - Environmental Impact Report
Comments
Date: Wed, 22 Dec 2004 09:07:57 -0800
From: Craig Ochikubo <ochikubo@broadcom.com>
To: lupc@grvnc.org
CC: ochikubo@yahoo.com

GRVNC LUPC Subcommittee:

As a long time resident of the Santa Monica area and now living directly across from the proposed Sunset Ave project, I am concerned over the key point of the waiver of the height restriction on the development.

The current buildings in the surrounding area are all of similar height, and the significant increase in the height of the proposed Sunset Ave project would create a look and feel that is significantly different from the rest of the surrounding buildings. In addition, the added height would ultimately block the afternoon light and create/caste a shadow upon the buildings to the West of the Sunset Ave project.

My hope is that one of the key the goals of the planning committee would be to ensure that the communittee is maintained and that the development of these rare coastal areas is done in a way that enhances the area.

I would like to see that the current height restriction that is currently in place in the community be maintained and that the development meet that current requirement.

Craig Ochikubo
615 Hampton Drive
D302
Venice, CA 90291
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>>> Helen Hood Scheer <hh_scheer@earthlink.net> 12/22/2004 5:41:36 PM

>>> >>>

To: Jimmy Liao, Los Angeles City Department of Planning
(213) 978 1343 fax, jlliao@planning.lacity.org
Timony Lindholm, West Los Angeles Transportation Facility
(213) 922-7136 fax, wlatc@metro.net

EAF No: ENV-2004-1407

Project Name: Sunset Avenue Project (Venice)

Project Address: 100 East Sunset Avenue

December 21, 2004

Dear Mr. Liao & Mr. Lindholm,

Yesterday, I sent you the letter of opposition to the Sunset Avenue Project referenced above. I have 2 additional comments for the record.

First, I would like to request a revised Environmental Impact Report that addresses the concerns of our community as soon as possible. Until that time, there needs to be a moratorium on development.

Second, I would like the new report to expand on the development project's plans for the commercial space. The DEIR states that the commercial development will provide "much needed services" and I would like to know what these are. We certainly do not need another health club (which is specifically cited in the current DEIR) -- there is already space for three of them within a half mile radius of the project, two of which are currently operational. I also want to see a much more detailed description of the proposed food/restaurant/cafe venues and detailed analysis of their impact on the community, including smells that would be emitted, parking, and trash clean up from our walk streets. There needs to be strict limits set as to what kind of food establishments can exist at the proposed development. Does the parking lot validate for the commercial spaces? Or will people who dine at the development be taking up street parking?

Sincerely,

Helen Hood Scheer
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Venice, CA 90291
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Melvin I. Scheer, MD

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Tel & Fax (310) 392

Email

December 21, 2004

Mr. Jimmy Liao
Los Angeles City Department of Planning

Re: Sunset Avenue Project

Dear Mr. Liao:

As a 35-year resident and homeowner on Park Avenue, I am appalled at the plans for the Sunset Avenue Project.

The project is out of character with the most attractive features of the community. The neighborhood is a low-density area with pedestrian access to the rest of Venice—its beach and shops. Most particularly, the traffic-free walk streets mark this part of Venice. The walk streets provide an oasis of quiet and neighborliness. A high-rise, gated community would be the antithesis of all that defines this area. I do not know what RAD likes about Venice if it misses this point.

The intended project's tenants can groove on their way through the walk streets as they make their way to the beach, but I cannot get to Main Street via their private reserve? For shame.

To set a gated community within a foot and bike traffic community violates reason as well as the aesthetic traditions that the designers were taught in architecture school.

No matter how much it is euphemized as "mitigated", the high-rise nature of the proposed development, relative to the rest of Venice, speaks of bald, in-your-face greed. Like the standard to which its neighbors adhere, the height should be at maximum 35 feet on the commercial Pacific and Main Street sides and 28 feet where it faces the neighboring residential streets. Everyone living in the neighborhood and not reaping cash benefits from the project would see it as an imposing, light-stealing eyesore and blight. Allowing the project to proceed as currently proposed would also be a precedent for the dismemberment of height limits along Main and Pacific and possibly westward toward the beach as well. And RAD knows it.

The human density of the project as proposed is also too high. Traffic on Pacific and Main Street is already too congested during rush hour. Again, greed would be the only reason to give the project so many residential units. This cash lollipop vision of future development and architectural work is shameful.

Sure change has its costs. However the hidden hands that arranged the bus yard land swap do not need to have their palms further greased with the destruction of this community's soul. Instead their fingers should take up pen (and computer), go back to the drawing boards and come back with a development plan that is more in character with this area.

I believe Los Angeles City Planning can do better than this.

Sincerely yours,

Melvin Scheer