EXHIBIT E:
Final Environmental Impact Report, Mitigation and Monitoring Program, CEQA Findings of Facts and Statement of Overriding Considerations

Exposition Corridor Transit Neighborhood Plan
CPC-2013-0621-ZC-GPA-SP; ENV-2013-0622-EIR

Recommended by the City Planning Commission on November 9, 2017.

May 2018

EXPOSITION CORRIDOR TRANSIT NEIGHBORHOOD PLAN
FINAL ENVIRONMENTAL IMPACT REPORT

ENV-2013-622-EIR
SCH# 2013031038
CPC-2013-621-ZC-GPA-SP

Prepared for

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING

Prepared by

TERRY A. HAYES ASSOCIATES INC.

MAY 2018

TAHA 2012-058

EXPOSITION CORRIDOR TRANSIT NEIGHBORHOOD PLAN

FINAL ENVIRONMENTAL IMPACT REPORT

Prepared for

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
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May 2018

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1.0 INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared to comply with the requirements of California Environmental Quality Act (CEQA), Public Resources Code (PRC) Section 21000 *et seq.* and the guidelines promulgated in connection therewith at Title 14 Code of California Regulation (CCR) Section 15000 *et seq.* (the "CEQA Guidelines").

1.1 CEQA REQUIREMENTS

Before approving a project that may cause a significant environmental impact, the CEQA requires the Lead Agency to prepare and certify a Final EIR. CEQA Guidelines Section 15132 states that a Final EIR shall consist of:

(a) The Draft EIR or a revision of the Draft EIR;
(b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
(c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
(e) Any other information added by the Lead Agency.

1.2 PUBLIC REVIEW PROCESS

At the outset of the environmental review process, a Notice of Preparation (NOP) was published and distributed to the State Clearinghouse, trustee agencies, responsible agencies, and other interested parties on March 14, 2013 by the City for a 30-day public review period (State Clearinghouse No. 2013031038). A public scoping meeting was held on April 10, 2013.

The Draft EIR was prepared and circulated as required by state law. The Draft EIR was circulated for a 60-day public review period from April 6, 2017 to June 5, 2017. An open house/public hearing for the Proposed Exposition Corridor Transit Neighborhood Plan (ECTNP, Proposed Project, or Proposed Plan) was held on May 23, 2017 at the IMAN Foundation located at 3376 Motor Avenue, Los Angeles, CA 90034.

1.3 CONTENTS AND ORGANIZATION OF THE FINAL EIR

This document summarizes the project information presented in the Draft EIR and contains responses to comments on environmental issues received from agencies, organizations, and persons who reviewed the Draft EIR. This Final EIR is comprised of four chapters:

Chapter 1 – Introduction: This chapter includes an overview of the Proposed Project, a summary of the alternatives considered, and a summary of the Proposed Project's environmental impacts.

Chapter 2 – Responses to Comments: This chapter contains a summary of the written comments received on the Draft EIR by the City of Los Angeles during the 60-day public review period and responses to each comment. This chapter also contains eight master responses that are provided to address common topics in a comprehensive manner. A list of persons, organizations, and public agencies commenting on the Draft EIR is provided.

Chapter 3 – Corrections and Additions: This chapter provides a list of changes that were made to the Draft EIR in response to comments received during the 60-day public review period, and through the Proposed ECTNP public hearing and adoption process, as well as clarifying language regarding intent, consistency, and other non-substantive changes.

Several issues raised in response to the Draft EIR warrant clarification or correction of certain statements in the Draft EIR, but none of the corrections and additions constitute "significant new information" as defined by CEQA Guidelines Section 15088.5. New information can include changes in the project or environmental setting as well as additional data or other information. New information is not significant unless the EIR is changing in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. Significant new information could include the following:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Corrections and additions to the Draft EIR found in this Final EIR and changes to the Proposed Project do not constitute "significant new information" as defined above.

Chapter 4 – Mitigation and Monitoring Program: This chapter describes the procedures for implementing the mitigation measures identified in the Draft EIR by outlining the implementing agency, enforcement agency and monitoring agency, and monitoring phase/monitoring actions for each mitigation measure.

Appendices: The appendices include the following:

- Appendix A – Comment Letters
- Appendix B – CEQA Findings of Facts and Statement of Overriding Considerations

1.4 SUMMARY OF THE PROPOSED PROJECT

The Los Angeles County Metropolitan Transportation Authority (Metro) Exposition (Expo) Light Rail Transit (LRT) is a 15.2-mile-long transit line running between downtown Los Angeles and the City of Santa Monica. The Proposed Project would establish a Specific Plan to guide future development in the City of Los Angeles within the Expo LRT Corridor around five stations. These stations include Exposition/Bundy (Bundy), Exposition/Sepulveda (Sepulveda), Westwood/Rancho Park (Westwood), National/Palms (Palms), and Culver City. The Proposed Project includes adoption of the Specific Plan and General Plan amendments and zone changes necessary for the Specific Plan that encourage infill development and a mix of uses within the identified areas to promote transit ridership, reduce automobile dependence, and create vibrant neighborhoods around the transit stations.

The Proposed Project: (1) creates four new zones and one new land use designation, and changes zoning and land use designations within specified portions of the Project Area; (2) includes public benefit requirements associated with tiered floor area ratios (FAR) in the new zones; (3) creates streetscape plans for identified street segments in the Project Area; and (4) requires design standards for new development within the Project Area

(excluding R1 and R2 zones). The Proposed Project also includes new open space regulations and parking regulations for select properties within the Project Area.

The Proposed ECTNP would guide future development in identified areas by specifying the type of uses, FAR, development requirements and design standards that would apply. The Proposed Project encourages new development within transit station areas with the goal of promoting transit ridership and creating an active, mixed use environment in the station areas.

The primary objectives for the Proposed ECTNP are as follows:

Primary Objective 1: Implement the policies of the City of Los Angeles General Plan Framework, the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans that encourage growth to be directed to transit-oriented areas and foster more sustainable, mixed use development patterns that improve mobility options and reduce auto dependence.

Primary Objective 2: Accommodate employment, housing, and population growth projections forecasted through the planning horizon year of 2035 by focusing residential development and new job-generating uses around transit stations.

Primary Objective 3: Maintain and expand the City's jobs base and increase opportunities for economic development in the Expo LRT Corridor in order to increase the generation of tax revenue in the City that will help pay for the provision of City services.

Primary Objective 4: Implement the General Plan Framework goal to capture a significant share of regional growth in emerging environmentally oriented and clean industries such as technology industry jobs, which are clustered on the Westside and comprise a growing industry sector, and institute zoning that accommodates and creates incentives for the location and continued clustering of these technology industry jobs in the Expo LRT Corridor where they will benefit from the proximity to transit and mixed use environments.

Primary Objective 5: Create incentives for the provision of affordable housing in new residential development near the Expo LRT Corridor to enhance accessibility and housing options for core transit riders and increase transit ridership.

Primary Objective 6: Improve circulation within the station areas; increase mobility choices; promote transit ridership and use of other alternative transit modes; and reduce vehicle miles traveled per capita for those who live and/or work within the Expo LRT Corridor.

The Proposed ECTNP also includes secondary objectives that aim to develop a more comprehensive, cohesive, and sustainable planning document.

Secondary Objective 1: Ensure new development is pedestrian-oriented, acknowledges the transit stations, and is compatible with surrounding neighborhoods through the design of buildings, streets, and the public realm.

Secondary Objective 2: Stimulate vibrancy and activity and create a unique sense of place within each station area through the design of buildings, streets, and the public realm.

The Proposed Project would establish a Specific Plan and initiate zone changes, General Plan amendments and introduce development and urban design standards. The Proposed Project would also involve new streetscape plans, and parking strategies that together would enhance the pedestrian experience, promote transit ridership, and encourage a variety of mobility options. Zone changes and General Plan amendments would not affect every parcel within the Project Area; changes would only occur within specific "areas of proposed change" also referred to as "subareas."

1.5 SUMMARY OF THE PROPOSED PROJECT IMPACTS

Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project, including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance." In order to approve a project with significant and unavoidable impacts, the lead agency must adopt a Statement of Overriding Considerations (in accordance with Section 15093 of the CEQA Guidelines) indicating that the benefits of approving the Proposed Project outweigh the negative environmental consequences.

Based on the analysis contained in the Draft EIR, the Proposed Project would create significant and unavoidable impacts related to the following topics:

- Aesthetics (Visual Character and Shade)
- Air Quality (Standards during construction and sensitive receptors during construction)
- Cultural Resources (Historical Resources)
- Noise (Construction Noise Standards and Vibration; Operational Noise)
- Public Services (Parks and Recreational Facilities)
- Transportation and Traffic (Circulation System; Neighborhood Intrusion; Congestion Management Plan Arterial Intersection Analysis)

Based on the analysis contained in the Draft EIR, the following environmental topics were found to result in a less-than-significant impact, no impact, or a significant impact that can be mitigated to be less than significant:

- Aesthetics (Scenic Vistas; Scenic Resources; Light and Glare; Geological/Topographical Features)
- Air Quality (Implementation of Air Quality Plan; Odors)
- Cultural Resources (Archaeological or Paleontological Resources; Human Remains)
- Geology and Soils (Rupture of Faults; Seismic Ground Shaking; Liquefaction; Landslides; Expansive Soils; Unstable Geologic Units; Soil Erosion; and Septic Tanks)
- Greenhouse Gas (GHG) Emissions (Emissions Generation; GHG Reductions Plans)
- Hazards and Hazardous Materials (Transport, Use and Disposal; Upset and Accident Conditions; Schools; Sites; Airport Hazards; Airstrip Hazards; Plans; Wildland Fire)
- Hydrology and Water Quality (Water Quality Standards; Groundwater Supplies; Drainage; and Streams or Rivers; Drainage and Erosion; Runoff Water and Stormwater; Flood Hazard; Seiche, Tsunami, and Mudflow/Mudslides)
- Land Use and Planning (Physically dividing an established community; Conflicting with any applicable land use plan, policy, or regulation; Habitat Conservation Plans and Natural Community Conservation Plans)
- Noise (Noise from public airports; Noise from private airstrips)
- Population, Housing and Employment (Inducing population Growth; Displacement of population; Displacement of housing units)
- Public Services (Fire; Police; Public Schools; Libraries)
- Transportation and Traffic (Transit, Bicycle, and Pedestrian Facilities and Plans; Congestion Management Plan Freeway Analysis and Transit Impact Review; Emergency Vehicle Access; Design Features; Construction in the Public Right-of-Way)
- Utilities (Water; Wastewater; Stormwater; Solid Waste; Energy)

2.0 RESPONSES TO COMMENTS

This chapter of the Final Environmental Impact Report (EIR) contains a summary of all comments received on the EIR prepared for the Proposed Exposition Corridor Transit Neighborhood Plan (ECTNP, Proposed Project, or Proposed Plan) during the public review period, as well as responses to each of those comments. The full text of the comment letters is included in **Appendix A**. The responses consist of Master Responses, which address common issues raised in several comments, and individual responses, which address unique issues raised in a single comment letter or testimony at the public hearing.

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, the Los Angeles Department of City Planning (DCP) has evaluated all comments related to physical environmental issues received from public agencies and other interested parties and has prepared written responses to each comment pertinent to the adequacy of the environmental analyses contained in the EIR. Where appropriate and applicable to potential physical environmental impacts, the basis for incorporating or not incorporating specific suggestions into the Proposed Project is provided. In each case, DCP has expended a good faith effort, supported by reasoned analysis, to respond to comments. Although some letters may raise legal or planning issues, these issues do not always constitute significant environmental issues. In such cases, specific responses are not provided. While this Final EIR does not respond to these comments, all comments will be addressed through revisions to the Proposed Plan or in the staff report, all of which will be included in the administrative record and forwarded to decision-makers for their consideration in taking action on the Proposed ECTNP. With respect to comment letters that address both comments on the Proposed Plan and the EIR, only the comments that address physical environmental issues are responded to in this document. Generally, the responses to comments provide explanation or amplification of information contained in the EIR and do not constitute significant new information.

2.1 SUMMARY OF COMMENTS

The EIR was circulated for a 60-day review period which opened on April 6, 2017 and closed on June 5, 2017. During this review period, comment letters relating to the EIR from eight public agencies, nine groups/organizations, and 77 individuals were received. In addition, 18 oral comments relating to the EIR were received at the open house/public hearing for the Proposed Project on May 23, 2017. **Table 2-1** identifies all comments received on the EIR during the public review period. Each comment letter has been assigned a number. The body of each comment letter is separated into individual comments, which are numbered. This results in a tiered numbering system, whereby the first comment in Letter 1 is depicted as Comment 1-1, and so on. These numbered comment letters are included in their entirety in **Appendix A**. This chapter provides a summary of each comment followed by a response.

TABLE 2-1: LIST OF COMMENTERS ON THE EIR

No.	Name	Organization/Address	Page Number
AGENCIES			
1	State of California - Department of Transportation District 7 (Caltrans)	California Department of Transportation 100 S. Main St., MS 16, Los Angeles, CA 90012	2-45
2	Culver City Planning Division & Traffic Engineering	Culver City Planning Division 9770 Culver Blvd., Culver City, CA 90232	2-47
3	Wastewater Engineering Services LA Sanitation (LASAN)	Los Angeles Bureau of Sanitation	2-49
4	Los Angeles County Metropolitan Transportation Authority (Metro)	Los Angeles County Metropolitan Transportation Authority One Gateway Plaza, Los Angeles, CA 90012	2-51
5	Governor's Office of Planning and Research (1)	Governor's Office of Planning and Research 1400 10th St., Sacramento, CA 95812	2-52

TABLE 2-1: LIST OF COMMENTERS ON THE EIR			
No.	**Name**	**Organization/Address**	**Page Number**
6	Governor's Office of Planning and Research (2)	Governor's Office of Planning and Research 1400 10th St., Sacramento, CA 95812	2-52
7	Culver City Transportation	Culver City Transportation Department 4343 Duquesne Ave., Culver City, CA 90232	2-53
8	Los Angeles Department of Water and Power (LADWP)	Los Angeles Department of Water and Power 111 N. Hope St., Los Angeles, CA 90012	2-55
GROUPS/ORGANIZATIONS			
9	Brentwood Community Council	Brentwood Community Council 149 S. Barrington Ave., Box 194, Los Angeles, CA 90049	2-55
10	Brentwood Homeowners Association	Brentwood Homeowners Association P.O. Box 49427, Los Angeles, CA 90049	2-56
11	Fix The City	Fix The City	2-57
12	Fix The City	Fix The City	2-63
13	Marshall P. Riddick Youth Center	Marshall P. Riddick Youth Center 2634 Overland Ave., Los Angeles, CA 90064	2-73
14	Palms Westminster Presbyterian Church	Palms Westminster Presbyterian Church 2908 Robertson Pl., Los Angeles, CA 90039	2-74
15	West of Westwood HOA (WoWHOA)	West of Westwood Homeowners Association P.O. Box 64496, Los Angeles, CA 90064	2-75
16	Westwood Gardens Civic Association	Westwood Gardens Civic Association P.O. Box 642001, Los Angeles, CA 90064	2-79
17	Westwood South of Santa Monica HOA	Westwood South of Santa Monica Blvd. Homeowner's Association P.O. Box 64213, Los Angeles, CA 90064	2-80
INDIVIDUALS			
18	Allen, Lori		2-92
19	Anggelico, Addy		2-92
20	Aragon, Melissa	Westwood South of Santa Monica (WSSM)	2-93
21	Aueiliach, J		2-93
22	Bernstein, Kathryn	WSSM	2-94
23	Bourges, Paula	WSSM	2-94
24	Brewer, James		2-94
25	Broide, Barbara	WSSM	2-95
26	Bruins, Eric		2-95
27	Calahan, Rich		2-96
28	Chen, Pojen		2-96
29	Cimiluca, Bob		2-97
30	Degood, Alexander	Martin Expo Town Center	2-97
31	Dorfman, Joanne		2-97
32	Doss, Marie		2-98
33	Edmond, Lorna		2-99
34	Elkins, Steve		2-101
35	Friedman, David		2-101
36	Frost, Marilyn		2-102
37	Goodman, Roger		2-102
38	Grant, Marcas		2-103
39	Gregora, Dianne		2-103
40	Gregora, Dianne		2-104
41	Guiguis, Sue		2-105
42	Healy, Charles		2-105
43	Healy, Margaret		2-106
44	Healy, Margaret		2-108
45	Helvey, Pamela		2-108

TABLE 2-1: LIST OF COMMENTERS ON THE EIR

No.	Name	Organization/Address	Page Number
46	Huck, Lori		2-109
47	Hugh, R		2-109
48	Javadi, Mike	WSSM	2-109
49	Kasdin, Mitchell		2-109
50	Landsbaum, Scott		2-110
51	Lanet, Ellen		2-110
52	Lee, David		2-111
53	Leon-Grossman, Andrea		2-111
54	Leon-Grossman, Andrea		2-112
55	Leon-Grossman, Andrea		2-112
56	Lesan, Liz		2-114
57	Macdonald, Gay	WSSM	2-114
58	Mercer, Annette		2-116
59	Millar, Debbie		2-117
60	Nataf, Marion		2-117
61	Nedrow, Carrie		2-118
62	Nguyen, Minhlinh		2-118
63	Olavarria, Irene		2-119
64	Olavarria, Irene		2-120
65	Osullivan, James	Fix The City	2-120
66	Park, Andrew		2-121
67	Perlmutter, Ellen		2-121
68	Pindell, Galen		2-122
69	Refuerzo, Ben	UCLA Professor	2-122
70	Rice, Mitchell		2-122
71	Rich, Erika	WSSM	2-123
72	Rogers, Stephen		2-123
73	Rogers, Stephen		2-124
74	Rosenson, Elizabeth		2-127
75	Saffir, Cynthia		2-128
76	Saffir, Cynthia		2-129
77	Saffren, Genie		2-130
78	Schechter, Lisa	WSSM	2-130
79	Schmitt, Frederick	WSSM	2-131
80	Smedley, Linda	WSSM	2-131
81	Smucker, Ellen		2-131
82	Stoller, Herman		2-132
83	Stone, Nancy		2-133
84	Thomas, Lauren		2-133
85	Timberlake, William	WSSM	2-133
86	Ting, Grace		2-134
87	Tobias, Pat		2-135
88	Tobias, Robert		2-135
89	Walch, Nancy		2-135
90	Ward, Maryann		2-136
91	White, Janet		2-137
92	Zimmerman, Jay		2-138
93	Zone Miller, Amy		2-139
94	Stemnock, Tom	Planning Associates, Inc.	2-139

TABLE 2-1: LIST OF COMMENTERS ON THE EIR			
No.	**Name**	**Organization/Address**	**Page Number**
PUBLIC HEARING			
PH-1	Miller, Debbie		2-140
PH-2	Olavarian, Irene		2-140
PH-3	Landworth, Tracy		2-140
PH-4	Rich, Craig		2-141
PH-5	Ting, Grace		2-141
PH-6	Tobias, Pat		2-141
PH-7	Christensen, Kimberly	West of Westwood HOA	2-142
PH-8	Healy, Margaret		2-142
PH-9	Gregora, Dianne		2-143
PH-10	Gonzalez, Daniel J		2-143
PH-11	Rogers, Stephen		2-144
PH-12	Zimmerman, Jay		2-144
PH-13	Zimmerman, Stanley		2-145
PH-14	Campbell, Bruce		2-145
PH-15	Leon-Grossman, Andrea		2-146
PH-16	Broide, Barbara		2-147
PH-17	Kasdin, Mitchell		2-148
PH-18	Pittel, Ann		2-148

2.2 MASTER RESPONSES AND RESPONSES TO COMMENTS RECEIVED ON THE EIR

A number of the comments raised common issues; therefore, rather than responding to each comment individually, the following Master Responses have been prepared to provide a single comprehensive response to address issues that were brought up in multiple instances:

- **Master Response No. 1 - General Comments and Non-CEQA Issues**
- **Master Response No. 2 - General Plan Framework Element Policy 3.3.2**
- **Master Response No. 3 - Emergency Services**
- **Master Response No. 4 - Utilities**
- **Master Response No. 5 - Schools**
- **Master Response No. 6 - Traffic Analysis Methodology**
- **Master Response No. 7 - Neighborhood Intrusion**
- **Master Response No. 8 - Cumulative Impacts**

MASTER RESPONSE NO. 1 - GENERAL COMMENTS AND NON-CEQA ISSUES

Summary of Master Response No.

- **In accordance with CEQA Guidelines Sections 15088 and 15204, detailed responses are not necessarily provided for comments that do not relate either to 1) significant environmental issues, or 2) adequacy of the analysis in the EIR; other issues raised by comments are generally addressed outside the CEQA process.**
- **Parking supply is a social impact and not an environmental impact addressed by CEQA; reasonably foreseeable indirect physical impacts to the environment resulting from adequacy of parking supply, such as air quality or traffic, are addressed within the analysis of those respective EIR sections. Additionally, a majority of the ECTNP Area and the Proposed Plan's subareas are located within Transit Priority Areas (TPAs); pursuant to Public Resources Code (PRC) Section 21099(d), aesthetic and parking impacts are not considered significant for residential, mixed-use residential, and employment center projects located on an infill site in these areas.**

Summary of Comments

Several commenters express their opinions in support or opposition to the Proposed Project, or outline concerns associated with specific features or provisions of the Proposed Plan (e.g., building heights, public benefit requirements) that do not relate either to significant environmental issues or adequacy of the environmental analysis in the EIR. Commenters also express concerns about parking supply in neighborhoods and at stations.

Response

The focus of the City's responses to comments received on the EIR is the "disposition of significant environmental issues raised" in the comments, in accordance with CEQA Guidelines Sections 15088 and 15204. Detailed responses are not necessarily provided for comments that do not relate either to significant environmental issues or adequacy of the analysis in the EIR; this includes comments that raise issues that are not environmental impacts as identified by CEQA (e.g., property values and other socioeconomic concerns), relate to opinions in support or opposition to the Proposed Project, or outline concerns associated with specific features or provisions of the Proposed Plan (e.g., building heights, density). While this Final EIR will not necessarily respond to these comments, comments will generally be addressed through revisions to the Plan and/or in the staff report; all comments will be included in the administrative record and forwarded to decision-makers for their consideration in taking action on the Proposed ECTNP. With respect to comment letters that address both comments on the Proposed Plan and the EIR, only the comments that address significant environmental issues are responded to in this document.

A number of commenters also raise issues and questions regarding parking at specific Metro stations or within the community. Regarding parking at Metro stations, the Proposed Project does not include any changes to parking at the Metro Expo Line stations. Regarding parking issues as a result of the Proposed Project, as discussed on EIR pages 4.12-36 and 4.12-80, parking deficits in and of themselves are social impacts and do not constitute environmental impacts.[1] Furthermore, CEQA Guidelines Section 15131(a) states that even where a social impact may lead to reasonably foreseeable indirect physical impacts such as air quality or traffic, the "focus of the analysis shall be on the physical changes." As the Proposed Project's impacts to air quality and traffic are analyzed in EIR Sections 4.2 and 4.12, respectively, additional analysis related to the social impacts of parking supply is not necessary. Additionally, under PRC Section 21099(d), which was added in 2013 by Senate Bill 743, aesthetic and parking impacts shall not be considered significant impacts on the environment for residential, mixed-use residential, or employment center projects

[1] *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco.* (2002) 102 Cal.App.4th 656, 696-698.

located on an infill site within a TPA, as defined in that section. Ninety-eight percent of the areas of proposed change and the vast majority of Plan Area are located within a TPA due to the proximity of the Expo LRT Line and other bus services; furthermore, development consistent with the Proposed Plan would generally fall within the definition of a residential, mixed-use residential, or employment center project. Therefore, pursuant to PRC Section 21099(d), parking impacts for such projects within TPAs are not significant.

The EIR properly discusses, analyzes, and provides information regarding all physical environmental issues that could be impacted by the Proposed ECTNP. Comments that do not address environmental issues and/or do not provide substantial evidence supporting the need for different analysis or conclusions, including the need for additional mitigation measures from those in the EIR, will largely be addressed through revisions to the Plan or in discussion in the staff report. Therefore, per PRC Section 21091(d) and CEQA Guidelines Section 15204(a), there is no basis for additional analysis and no further response is required.

MASTER RESPONSE NO. 2 – GENERAL PLAN FRAMEWORK ELEMENT POLICY 3.3.2

Summary of Master Response

- **The analyses of impacts of the Proposed Project on Public Services, Transportation, and Utilities and Service Systems provided in the EIR are adequate and comply with the requirements of the CEQA; satisfying the requirements of CEQA Guidelines Section 15121(a).**
- **The Proposed Plan is consistent with the General Plan Framework strategy to direct growth to areas served by transit and other infrastructure, is consistent with the Southern California Association of Governments (SCAG) growth projections for the area which are also used by operating departments of the City to plan for infrastructure and services and is consistent with the relevant Community Plan Goals and Policies.**
- **Planning for public services and infrastructure in the ECTNP Area is not performed separately from the City as a whole. As the population and demand for public services and infrastructure capacity increases, in accordance with the plans of each respective service provider, utility and public service facilities are updated and enhanced to keep pace with demand. The City funds needed infrastructure and service improvements through a variety of mechanisms including through General Fund money, user fees, bonds and other measures.**
- **Following approval of the ECTNP, individual projects would be required to submit an application, which would be reviewed to determine consistency with the ECTNP, including consistency with the growth projections upon which the analysis in the EIR is based. New development would be required to make the necessary local infrastructure connections and upgrades as needed to infrastructure facilities per the normal development process.**
- **Ultimately, decisions regarding new development are policy decisions made by the City Council. The General Plan Framework does not require the City to halt development based upon claims of inadequate infrastructure.**
- **The comments provide no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).**

Summary of Comments

Several commenters express their opinion that new development should be restricted until adequate infrastructure and public services are in place to support increases in development. Commenters also express their opinion that the Proposed ECTNP is inconsistent with the General Plan Framework and specifically Policy 3.3.2.

Response

Introduction

Consistent with CEQA Guidelines Section 15125(d), the EIR thoroughly analyzes the Proposed Project's consistency with the City's General Plan, including applicable Community Plans, and other Specific and Regional Plans, as well as the Proposed Project's consistency with any applicable land use plans, policies and regulations adopted for the purpose of avoiding or mitigating any environmental effect. This analysis includes a thorough analysis of policies in the Framework Element of the General Plan. The following provides further discussion regarding Framework Policy 3.3.2 and demonstrates that even though this policy is not mandatory, the City complies with it through the development and publication of various service and infrastructure plans.

The analyses of impacts of the Proposed Project on Public Services and Utilities and Service Systems provided in the EIR is adequate and complies with the requirements of the CEQA. The EIR concludes in Sections 4.11, 4.12, and 4.13, that the Proposed Project would result in less than significant impacts to Public Services (including fire facilities, police facilities, public schools, and libraries) and Utilities and Service Systems (including water, wastewater, stormwater drainage, and solid waste). The EIR also concludes that the Proposed Project would result in significant and unavoidable impacts to the circulation system, neighborhood intrusion, Congestion Management Plan (CMP) Arterial Intersection Analysis, and parks and recreation facilities.[2]

The EIR conclusions related to Public Services, Transportation, and Utilities and Service Systems are generally supported by the following analysis: 1) existing services and infrastructure are adequate to support anticipated levels of population and employment growth; 2) existing development review processes impose fees or otherwise set triggers and mechanisms for upgrading service and infrastructure to address the localized impacts individual project's may have; and 3) existing mechanisms by responsible operating departments and agencies, for ongoing evaluation of the capacity of the existing infrastructure and service systems to accommodate demand over the long term will ensure adequate infrastructure and service provision in the future.

The analysis provided in the respective sections satisfies the requirements of CEQA Guidelines Section 15121(a) to "inform public agency decision-makers and the public generally of the potential significant environmental effects of a project, identify possible ways to minimize the significant effect and describe a range of reasonable alternatives to the project." This Master Response provides supplemental information, does not constitute substantive new information and does not change the impact conclusions found in the EIR.

The EIR concludes that the Proposed Plan is consistent with the General Plan Framework strategy to direct growth to areas served by transit and other infrastructure and is consistent with the SCAG growth projections for the area which are also used by operating departments of the City to plan for infrastructure and services. The EIR thus concludes that the Proposed Plan, which directs growth to an urbanized area of the City that has existing infrastructure and is served by a newly constructed light rail line, generally has a a less than significant impact on the City's infrastructure and public services systems by virtue of its consistency with both the General Plan Framework and the SCAG RTP/SCS. The EIR also concludes that the Proposed Plan is consistent with the relevant Community Plans, as shown in Section 4.8, Land Use.

The impact of the Proposed Project on the transportation system can be used as an example to further illustrate this point. Even though there are significant and unavoidable impacts related to the circulation system disclosed in the EIR, by directing projected growth in both housing and jobs to the Expo LRT Line station areas, transportation analysis conducted during the preparation of the EIR demonstrates that there are transportation system benefits derived from the proposed development patterns. As stated in EIR Section 4.12, Traffic and Transportation on pages 4.12-82 to 4.12-84, a per capita vehicle miles traveled (VMT) analysis shows a 1.4 percent increase in the service population from (a combined population of residents and employees) future without project to future with project, but only a 0.6 percent increase in VMT, indicating that per capita vehicle miles traveled will be lesser under future conditions with the project than future conditions without the project (Table 4.12-19). Additionally, a VMT analysis shows a 12.2 percent increase in the service population from existing conditions to future with project, but only a 8.9 percent increase in VMT, similarly indicating that as a result of the project and other planned transportation programs (i.e., Mobility Plan (MP) 2035), per capita VMT will be lesser under future conditions with project than existing conditions. The reduction in per capita VMT is attributed to shorter trips as a result of the greater mix of uses and more compact development patterns, as well as shifts in transportation mode to transit, bicycle and walking trips, as a result of increased mobility access and options.

[2]Please see Chapter 2.0, Summary, of the EIR for the full summary of impacts.

The Proposed Project accommodates infill development that would make maximum use of existing infrastructure. New development would be required to make the necessary local improvements (such as connections to sewer and water lines and upgraded substations and pumping facilities) per the normal development process. In addition, individual projects would be required to fund their fair share of necessary local infrastructure associated with the proposed development under the Proposed Project per preexisting funding mechanisms.

Ultimately, decisions regarding new development are policy decisions made by the City Council. The General Plan Framework, and specifically Policy 3.3.2, does not require the City to halt development based upon claims of inadequate infrastructure. The programs set forth in Chapter 10 of the Framework Element to implement Policy 3.3.2 are discretionary and dependent upon available funding. Furthermore, commenters provide no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Summary and Analysis of Relevant Community Plan Provisions

The EIR concludes that the Proposed Plan is consistent with the relevant Community Plans. As shown in the EIR in Table 4.8-12 on page 4.8-24, the Proposed Plan is generally consistent with applicable Community Plan Goals and Objectives from the three relevant Community Plans. Most of the applicable Goals and Objectives focus on maintaining industrial use, meeting diverse economic needs, improving commercial areas, increasing transit use and bicycle use, improving the pedestrian experience, and improving recreational opportunities. The Proposed Project would direct commercial, industrial, and residential growth near transit; encourage the use of alternative transportation; and improve the pedestrian experience through the public benefits, streetscape plans, and locating development near transit. The Proposed Project would also encourage recreational opportunities by rezoning an area to open space and requiring individual projects to provide publicly accessible open space as a public benefit in exchange for additional development rights.

Summary and Analysis of Relevant General Plan Framework Provisions

The EIR concludes that the Proposed Plan is consistent with the General Plan Framework strategy to direct growth to areas served by transit and other infrastructure. California Government Code Section 65300 requires counties and cities to adopt a comprehensive, long-term General Plan for future development, including several mandated elements. In 1996, the City of Los Angeles adopted the Framework Element as part of its General Plan, which is intended to offer "a strategy for long-term growth which sets a citywide context to guide the update of the community plan and citywide elements."[3] The Framework Element sets forth a conceptual relationship between land use and transportation on a citywide basis. In addition, the Framework Element sets forth the use of population and employment growth estimates (growth projections), provided by the SCAG, which can be used to guide land use planning as well as the planning of infrastructure and public services. The General Plan Framework is not intended to induce population or employment growth but, rather, to accommodate changes in population and employment that are anticipated to occur in the future[4]; Chapter 1 of the General Plan Framework states that the General Plan Framework is "a comprehensive strategy for accommodating long-term growth should it occur as predicted." The General Plan Framework also outlines guidelines for the establishment and/or updates to comprehensive plans, such as general plan elements, community plans, and specific plans, to ensure internal consistency among the various elements of the General Plan and implement General Plan policies such as the accommodation of projected population and employment growth.

[3]The Citywide General Plan Framework Element of the City of Los Angeles General Plan, Executive Summary, http://planning.lacity.org/cwd/framwk/chapters/00/00.htm, Re-adopted on August 8, 2001.

[4]The Citywide General Plan Framework Element of the City of Los Angeles General Plan, Chapter 2 Growth and Capacity, http://cityplanning.lacity.org/cwd/framwk/chapters/02/02.htm, 1996, Re-adopted on August 8, 2001.

The Proposed Plan is consistent with General Plan Framework policies that encourage a physically balanced distribution of land uses (Goal 3A) that promotes an improved quality of life by facilitating a reduction in vehicular trips, vehicle miles traveled and air pollution (Objective 3.2). By directing growth in housing and jobs to a newly constructed light rail line, the Proposed Plan is encouraging a physical distribution of land uses and development patterns that are consistent with the General Plan Framework.

However, some commenters raise concerns that the Proposed Plan was inconsistent with the General Plan Framework, particularly Policy 3.3.2. This Policy outlines a method for the ongoing evaluation of population, development, infrastructure and service capacities to inform plans and policies and to determine the need for infrastructure and public service investments. Framework Policy 3.3.2 reads as follows:

> *Monitor population, development, and infrastructure and service capacities within the City and each community plan area, or other pertinent service area. The results of this monitoring effort will be annually reported to the City Council and shall be used in part as a basis to:*
>
> *Determine the need and establish programs for infrastructure and public service investments to accommodate development in areas in which economic development is desired and for which growth is focused by the General Plan Framework Element.*
>
> *a) Change or increase the development forecast within the City and/or community plan area as specified in Table 2-2 (see Chapter 2: Growth and Capacity) when it can be demonstrated that (1) transportation improvements have been implemented or funded that increase capacity and maintain the level of service, (2) demand management or behavioral changes have reduced traffic volumes and maintained or improved levels of service, and (3) the community character will not be significantly impacted by such increases. Such modifications shall be considered as amendments to Table 2-2 and depicted on the community plans.*
>
> *b) Initiate a study to consider whether additional growth should be accommodated, when 75 percent of the forecast of any one or more category listed in Table 2-2 (see Chapter 2: Growth and Capacity) is attained within a community plan area. If a study is necessary, determine the level of growth that should be accommodated and correlate that level with the capital, facility, or service improvements and/or transportation demand reduction programs that are necessary to accommodate that level.*
>
> *c) Consider regulating the type, location, and/or timing of development, when all of the preceding steps have been completed, additional infrastructure and services have been provided, and there remains inadequate public infrastructure or service to support land use development. (P42, P43)*

General Plan Framework Policy 3.3.2 is intended to create a mechanism by which DCP can report on the progress of implementing the General Plan and decision-makers can be informed about infrastructure and service needs. For the General Plan Framework, the planning horizon was 2010 or when the City reached the projected population of 4.3 million people. The implementation programs associated with Policy 3.3.2 were not a mitigation measure of the General Plan Framework EIR and there is no requirement that they be implemented. The City Council intended to provide City departments with broad discretion and flexibility when deciding how best to implement the policies of the General Plan Framework Element; consequently, implementation of programs is discretionary and contingent on the availability of adequate funding (which changes over time due to economic conditions and the changing governmental and public policy priorities).

Chapter 10 of the General Plan Framework identifies implementation programs for the policies of the General Plan Framework. The implementation programs are intended to institute the practice of coordination between DCP, the City's operating departments, and other public agencies as part of the long range planning process and to inform decision-making on growth and public investments. Specifically, the General Plan Framework states:

> *"The General Plan Framework Element is implemented by a comprehensive program of strategies that encompass amendments of existing and preparation of new plans, ordinances, development standards, and design guidelines; conduct of studies and analyses; capital investments; coordination of economic development activities; modification of City procedures and development review and approval processes; and interagency coordination."*

The General Plan Framework goes further to describe how programs are expected to be carried out, stating:

> *"Program implementation is contingent on the availability of adequate funding, which is likely to change over time due to economic conditions, the priorities of Federal and regional governments and funding agencies, and other conditions. The programs should be reviewed periodically and prioritized, where necessary, to reflect funding limitations and the City's objectives. In addition, amounts and sources of funding, initiation dates, responsible agencies and the detailed work scope of programs may be changed without requesting amendments to the General Plan Framework Element."*

From the preceding, it can be determined that the City Council intended to vest the City departments with broad discretion and flexibility when deciding how best to implement the policies of the Framework Element. Chapter 10 of the General Plan Framework also explains:

> *"Not all plan policies can be achieved in any given action, and in relation to any decision, some goals may be more compelling than others. On a decision-by-decision basis, taking into consideration factual circumstances, it is up to decision makers to decide how best to implement the adopted policies of the general plan in any way which best serves the public health, safety and general welfare."*

The monitoring program was never intended to be a mitigation measure of the General Plan Framework EIR because implementation programs are discretionary and because the General Plan Framework recognizes that capital improvement planning is typically done in timeframes that differ from the planning horizon of plans and may be done by service areas that differ from Community Plan or Specific Plan boundaries, but which reflect the geographic divisions by which various services are provided. On this the Framework Element says the following:

> *Realistically, the planning and funding of most infrastructure facilities and public services that support growth must be for levels of growth that can reasonably be expected to occur within a shorter time frame than could be accommodated by the long-term vision. Many of the City's short-term capital improvements are defined through a five-year plan that is updated annually (the Capital Improvements Plan). Major improvements that serve large areas of the City and/or are capital intensive, such as schools and fixed rail transit facilities, are planned and funded over an extended period (10 years or more). Some, such as wastewater treatment facilities, are planned to accommodate growth for periods in excess of 50 years.*

Thus, information resulting from the assessment of the infrastructure and service system and General Plan Framework population estimates, citywide and by Community Plan, were never intended to place a limit on growth or to be used as a measure to restrict development, but rather as means to evaluate and report on infrastructure and service demand in light of the growth that is occurring which has been accomplished through the preparation of the EIR for the Proposed ECTNP.

As the Proposed Project would allow for growth in the Project Area, the EIR has been prepared to evaluate and report on infrastructure and service demand in light of the proposed growth and has generally found the infrastructure and services to be adequate. The evaluation and report which discloses the information can be found in Sections 4.11, 4.12, and 4.13 of the EIR. The comments provide no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Planning for and Funding Services and Infrastructure

Public services and infrastructure in the Project Area is not separate from the City as a whole, and the City takes an integrated approach to addressing growing service demand.

Within the City of Los Angeles, the following departments/agencies are tasked with providing the following services:

- The Los Angeles Police Department (LAPD) provides police protection services.
- The City of Los Angeles Fire Department (LAFD) provides fire protection services.
- The City of Los Angeles Public Library (LAPL) System provides library services.
- The Los Angeles City Department of Recreation and Parks (LADRP) manages city-owned parks.
- The Los Angeles Unified School District (LAUSD) provides public elementary and secondary education to City residents.
- The City of Los Angeles Department of Water and Power (LADWP) delivers water and electricity.
- The City of Los Angeles Department of Public Works Bureau of Sanitation (BOS) coordinates wastewater collection and treatment, as well as disposal of solid waste.
- The transportation system is managed by the City of Los Angeles Department of Transportation (LADOT), working in conjunction with County of Los Angeles Metropolitan Transportation Authority (Metro) and the City of Los Angeles Department of Public Works.

General Plan Framework Objective 3.3 states that plans should "accommodate projected population and employment growth…and plan for the provision of adequate supporting transportation and utility infrastructure and public services." The Proposed Plan meets this goal by locating growth on the Westside in an urbanized area already supported by infrastructure and services, where there has been a recent investment in a new transportation project that will give more mobility options to people living and working in close proximity to the line. As it relates to General Plan Framework Objective 3.3 and Policy 3.3.2 (a policy of the foregoing objective) the City has consistently demonstrated that it plans for infrastructure and services in targeted growth areas and throughout the City. The City's operating departments regularly prepare plans to show how they will provide the infrastructure and services to accommodate the growing population. Additionally, the City and other public agencies have demonstrated a pattern of finding new funding sources to pay for the provision of new infrastructure and services when gaps are identified.

The City's efforts to evaluate changes in employment and population and their relationship to infrastructure and services are comprised of various data sources and the operating and strategic plans of the departments and agencies that provide services and infrastructure to the City (i.e., LADWP's Urban Water Management Plan, LAFD's Strategic Plan, etc.). The City and its departments collectively do this on a regular and ongoing basis. Upgraded information systems have expanded the ability of City departments to assess service and infrastructure needs, as well as track the provision of services and infrastructure. Computer technology enables City departments to consider a variety of factors in assessing the need for services and infrastructure, such as the LAPD Computer Statistics Unit (COMPSTAT) Program and the LAFD Strategic Plan. Generally, as the demand for public services and infrastructure capacity increases, in accordance with the plans of each respective service provider, utility and public service facilities would be updated and enhanced to keep pace with demand. Not all of public service providers are City departments and thus, the City cannot prescribe their actions. However, these agencies provide services, facilities, or funding and administer regulations that directly or indirectly affect the Project Area.

Following are some examples of efforts on the part of the City to track changing service demand and need for upgrades to City infrastructure and services. This list is not meant to be exhaustive but rather illustrative of the kinds of actions the City and public agencies in the region have taken.

- **Los Angeles Fire Department (LAFD)**. The LAFD prepared the Strategic Plan 2015-2017 to improve service delivery, implement advanced technologies, employ sound budgeting practices, and enhance leadership. The plan also addresses the development of an even more professional workforce, promoting a positive work environment, and working to strengthen community relationships to improve preparedness and enhance resiliency during emergency events.
- **Los Angeles Police Department (LAPD)**. The LAPD's COMPSTAT Program implements the City's General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. COMPSTAT implements a multi-layer approach to police protection services through statistical and geographical information system analysis of growing trends in crime through its specialized crime control model. LAPD also uses a field deployment software called "Patrol Plan" that takes into account 25 different factors, including crime data, population density, and traffic speeds, to plan for personnel needs at individual stations.
- **Los Angeles Public Library (LAPL)**. The LAPL has prepared the 2015-2020 Public Library Strategic Plan to chart its course for through 2020. The LAPL is currently evaluating its performance, measuring impact, developing action plans and allocating resources to support the library's new and expanded services.
- **Los Angeles Unified School District (LAUSD)**. The LAUSD prepares a Strategic Execution Plan (SEP) annually to guide new school constructions, repair and modernize existing facilities, and otherwise accommodate future educational development needs. The 2017 SEP outlines LAUSD's efforts to build new schools, provide legacy schools with needed repairs and modernization, and make additional long-lasting investments under the School Upgrade Program to improve student health, safety and educational quality.
- **Los Angeles Department of Recreation and Parks (LADRP)**. The LADRP prepared the Citywide Parks Needs Assessment Report in 2009 to: (1) preliminarily prioritize and address the needs for additional recreation and park land; (2) identify existing facilities needing improvements to meet current and future community needs; (3) identify recreation program needs; (4) perform demographic analysis, to prevent future maintenance problems; and (5) offer positive alternatives to an increasingly dense and urbanized population. The Needs Assessment report serves as the foundation for long range planning initiatives and is a critical step in LADRP's development of a Citywide Recreation and Parks Master/Strategic Plan and a Five-year Capital Improvement Plan.
- **Los Angeles Department of Public Work's Bureau of Sanitation (BOS)**. The BOS has prepared an Integrated Resources Plan (IRP) to plan for future wastewater management in the City. The BOS IRP includes a Facilities Plan to address the wastewater, recycled water, and storm water related facilities and needs of the City through the year 2020. The BOS has also prepared a Solid Waste Integrated Resources Plan (SWIRP) to guide the City in managing solid wastes generated in the City through the year 2025.
- **Los Angeles Department of Water and Power (LADWP) - Water**. Programs such as LADWP's 2015 Urban Water Management Plan, which provides for long-term water resources management, and the City's IRP call for water and energy efficiency as well as innovative strategies for water conservation and waste management. In addition, Demand Side Management (DSM), involving conservation policies and programs to reduce per-capita usage, increases the capacity of existing systems. Public use of services and infrastructure changes from year to year. Some infrastructure per-capita or per-dwelling unit usage levels have decreased in recent decades. For example, increased use of water conservation measures, such as low-flush toilets, has resulted in a decrease in water use per capita over the last 30 years in Los Angeles.

- **Los Angeles Department of Water and Power (LADWP) - Power**. LADWP's energy resource planning is guided by an Integrated Resource Plan (IRP), and the 2016 Power IRP is being used to determine the energy resources necessary to provide electricity to Los Angeles for the next 20 years. LADWP's Power Reliability Program will invest more than one billion in the program over the next five to 15 years to replace aging infrastructure and make permanent repairs. As development occurs incremental improvements and upgrades will take place under the direction of LADWP. Any general improvements or construction of new facilities are funded by customer revenues and funds allocated to City departments.
- **Los Angeles County Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT)**. Metro's Long Range Transportation Plans prepare 30-year projections for traffic patterns in the southern California region based on census data and travel surveys. Metro's Travel Demand Simulation Model evaluates how well the highway and transit systems function under existing conditions and a series of future year alternatives, looking at traffic volumes and speeds. This analysis is conducted to determine the effectiveness of alternative transportation strategies and assist in the development of program and project recommendations. Metro's transit service is supplemented by LADOTs commuter bus service and local DASH service.

While the Proposed Project accommodates infill development that would efficiently use existing infrastructure and new development would be required to make the necessary local improvements (such as connections to sewer and water lines and upgraded substations and pumping facilities) per the normal development process, additional infrastructure may be required to support future projects. When it is determined that new or improved infrastructure is needed to meet growing service demand, the City funds these improvements through a variety of mechanisms including property tax revenue; sales tax revenue; user fees; Quimby Act (Park) fees and dedications; business improvement districts; special assessment districts; municipal bonds; the general fund; county, state, and federal funding, and other measures. For example:

- **Los Angeles Fire Department (LAFD) Fire Bond (Proposition F, 2000)**. Proposition F authorized the issuance of $532.6 million in general obligation bonds to finance the construction and rehabilitation of Fire Stations and Animal Shelters throughout the City of Los Angeles. Of the total general obligation bond amount, $378.6 million was allocated to build 19 neighborhood Fire/Paramedic Stations and an Emergency Air Operations/Helicopter Maintenance Facility.
- **Los Angeles Police Department (LAPD) Police Bond (Proposition Q, 2002)**. Proposition Q provided a $600 million general obligation bond, for construction, repair and renovation of police and fire stations and public safety facilities throughout Los Angeles. Proposition Q projects included the construction of two new police stations, the replacement of four police stations and the repair of 11 police stations.
- **LAPL Library Bonds (Proposition 1, 1989; Proposition DD, 1998; Measure L, 2011)**. In 1989, City of Los Angeles voters approved Proposition 1, a $53.4 million Branch Library Facilities Bond also known as the 1989 Library Bond Issue. Under Proposition 1, the LAPL Branch Facilities Plan proposed to obtain new sites for building, renovating, and expanding libraries that were unable to serve the community sufficiently and/or were damaged by the Whittier earthquake. LAPL also obtained additional funds from the Community Development Block Grant Award of federal funds from the California State Library Proposition 85, as well as from Friends of the Library groups, for a total branch construction program of $108 million. Under the 1989 Bond Program, 29 libraries were built.[5] In 1998, Los Angeles voters approved Proposition DD. Proposition DD, also known as the 1998 Library Facilities Bond, authorized $178.3 million in bonds for funding the construction, renovation, improvement, or expansion of 32 new branch libraries. As a result of effective project management, four additional projects were added to the scope of the overall facilities program. Of the 36 total projects, 18 existing library facilities

[5]LAPL, *Strategic Plan, 2007 – 2010, Building on Success; Appendices, VI and VII*, http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf.

were replaced with 18 new library facilities on the existing City-owned sites, nine libraries were constructed on newly acquired sites, five new libraries were constructed on acquired sites in communities that previously did not have library services, and with the four additional projects, existing libraries were renovated and expanded. In 2011, Measure L increased the allocation of City funds to the library system. These funds restored library hours of operations and services, which were reduced during the recession, over a period of four years without raising taxes. Measure L also provided funds to purchase additional books and materials. The funding allowed for the restoration of service on Mondays and two evenings a week at all 73 libraries. Additionally, beginning January 12, 2014, Measure L funds allowed for the opening of the Central Library and eight regional branch libraries on Sundays, one year ahead of schedule.

- **Los Angeles Unified School District (LAUSD) Bond Measures (Proposition BB, 1997; Measure K, 2002; Measure R, 2004; Measure Y, 2005; Measure Q, 2008)**. LAUSD just completed a 20-year, $10 billion school construction project using funds from voter-approved bond initiatives first approved in 1997. Multiple local measures have been approved to construct and modernize school facilities: Proposition BB approved $2.4 billion, Measure K approved $3.35 billion, Measure R approved $3.87 billion, Measure Y approved $3.985 billion, and Measure Q approved $7 billion. There has also been voter approval of funding through state bonds for school construction through Proposition 1A (1998), Proposition 47 (2002), Proposition 55 (2004), Proposition 1D (2006), and Proposition 51 (2016).[6] As a result, the district has built 131 new schools and added 170,000 new classroom seats, allowing the district to eliminate year-round schedules. The district is currently undertaking the School Upgrade Program, which in 2014 allocated $7.85 billion to repair and modernize existing facilities.
- **Los Angeles Department of Recreation and Parks (LADRP) and Bureau of Sanitation (BOS) Parks and Open Space Bonds (Proposition O, 2004)**. Proposition O authorizes the City to issue $500 million in bonds to fund projects that prevent and remove pollutants from the City's waterways and ocean, consequently protecting public safety and meeting federal Clean Water Act regulations. As of August 2017, 45 projects were identified for funding, and 28 have been completed including ten park projects and five green street projects.[7]
- **Los Angeles Department of Water and Power (LADWP) Water and Power Rate Increases (2016)**. Funds generated by recent utility rate adjustments for water and power from 2016 through 2020 are allocated to fund various water and power infrastructure improvements (Ordinance Nos. 184130 and 184133). These improvements are intended to accelerate the replacement of water and power infrastructure, protect against drought conditions, transform water and energy supplies while meeting state and local water and power mandates, and enhance customer service. Specific improvements include replacement of power poles, circuits, cross-arms, and other critical electric infrastructure; repowering coastal generating stations to remove them from ocean water cooling; accelerating the replacement of water infrastructure for reliability as well as to meet water quality regulations; expanding the use of recycled water; enhancing capture of stormwater for reuse and replenishing of groundwater; and remediation of the San Fernando aquifer to restore full use of LADWP's water allocation from the basin. The new rates are anticipated to provide an additional $720 million in new power revenues and $330 million in new water revenues between 2016 and 2020.[8]
- **Los Angeles Metropolitan Transportation Authority (Metro) Measures R and M (2008 and 2016)**. These are two recently approved ballot measures to increase the Los Angeles County sales tax by half cent each in order to fund improvements to transportation infrastructure. Projects include light rail and

[6]LAUSD, *Strategic Execution Plan,* 2017, http://www.laschools.org/documents/download/about_fsd/sep/2012_consolidated_strategic_execution_plan/2017_Facilities_Services_Division_SEP.PDF?version_id=313448462.

[7]City of Los Angeles Bureau of Engineering, *Proposition O Monthly Report*, August 2017, http://www.lacitypropo.org/uploads/docs/monthlyReports/2017/2017-08_PropositionOMonthlyReport.pdf.

[8]LADWP, *2016-2020 Water & Power Rate Changes,* https://d3n8a8pro7vhmx.cloudfront.net/ladwp/pages/41/attachments/original/1461708776/2016Rates_factsheet_web.pdf?1461708776.

heavy rails line expansions, freeway improvements, bus operations, and active transportation infrastructure. Measure R is estimated to generate $40 billion in new local sales tax revenues over 30 years,[9] and Measure M is estimated to generate $860 million annually in 2017 dollars.[10]

ECTNP Project Review

The reasonably foreseeable growth anticipated to occur within the ECTNP Area would not occur immediately, but rather would occur over time. The horizon year (or build-out year) of the Proposed ECTNP is anticipated to be 2035 or beyond. Following approval of the Proposed ECTNP, individual projects would be required to submit an application, which would be reviewed to determine consistency with the Proposed ECTNP, including consistency with the growth projections upon which the analysis in the EIR is based. Each project resulting in additional square footage within the ECTNP Area will be required to undertake a trip generation analysis in accordance with LADOT guidelines in order to determine consistency with the transportation projections analyzed in the EIR. In addition, projects that meet certain thresholds are required to document the water demand from the project to determine if it falls within the amount of additional water demand analyzed in the EIR for the ECTNP Area.

The subsequent environmental review required for projects determined to be consistent with the Proposed ECTNP would depend upon the circumstances of each project and may include the following approaches: (1) A determination pursuant PRC Section 21166 and CEQA Guidelines Section 15162 that the project was fully assessed in this EIR and no further environmental review is required; (2) an addendum to this EIR pursuant to CEQA Guidelines Section 15164; (3) a determination that the project is statutorily or categorically exempt from CEQA; or (4) the project requires subsequent environmental review pursuant to PRC Section 21166 and CEQA Guidelines Section 15162.

Furthermore, the Proposed ECTNP review procedures and plan standards are intended to ensure projects are within the scope of what was analyzed in the project's EIR and are subject to the environmental mitigation measures identified in the project's EIR. Specifically:

- Environmental Review Procedures (ECTNP, Section 6.2) incorporate mechanisms that trigger additional technical studies for individual projects at the time of application when certain conditions are met.
- Plan-wide mitigation measures have been incorporated as plan standards (Environmental Standards, ECTNP, **Appendix E**), and projects are required to demonstrate compliance with applicable environmental standards by incorporation as design features of the project or as a condition of approval of plans prior to building permit sign off.

Response Conclusion

As indicated in EIR Sections 4.11, Public Services, 4.12, Transportation and Traffic, and 4.13, Utilities and Service Systems, over the nearly 20-year planning horizon of the Proposed ECTNP, the changes in population, housing and employment, would increase the need for public services and infrastructure capacity. As the population and demand for public services and infrastructure capacity increases, in accordance with the plans of each respective service provider, utility and public service facilities would be updated and enhanced to keep pace with demand. DCP as well as other departments within the City would continue to upgrade their systems which monitor changes in the utilization of services and infrastructure and continue to undertake long-term planning to deliver budgeted public services and infrastructure. In addition, DCP as well as service and utility departments within the City would review projects within the ECTNP Area, per the requirements for additional review to determine infrastructure and service capacity in conformance with this EIR.

[9]Metro, *Measure R, Background*, https://www.metro.net/projects/measurer/#question002.
[10]Metro, *Impacts of Measure M*, http://theplan.metro.net/.

To the extent that new service facilities/infrastructure would need to be constructed, the impacts of such construction are anticipated to be less than significant (as indicated in EIR Sections 4.11, Public Services and 4.13, Utilities and Service Systems) and/or within the overall construction impacts analyzed in the EIR. Though the EIR has analyzed environmental impacts from the construction of new facilities in a general sense, it would be speculative to try to anticipate specific impacts that could result from specific infrastructure improvements since the location of individual projects and the need for specific infrastructure improvements is not known at this time.

Additional discussions of emergency services, utilities/infrastructure, schools and traffic/transportation within the ECTNP Area is provided in **Master Response No. 3 – Emergency Services** through **Master Response No. 6**.

MASTER RESPONSE NO. 3 - EMERGENCY SERVICES

Summary of Master Response

- **The EIR adequately analyzes potential impacts to fire protection and emergency service facilities and police protection facilities and concludes that impacts would be less than significant.**
- **The response below clarifies the EIR analysis and addresses the commenters' concerns; it is for informational purposes only, and does not constitute significant new information or change the impact conclusions of the EIR.**
- **Increased demand for emergency services or response times do not by themselves constitute a physical impact to the environment that must be analyzed under CEQA for significance; impacts to emergency services are assessed based on whether the Proposed Project would require the construction of new or expanded fire protection, emergency services, or police protection facilities and whether the construction of those new or expanded facilities would result in direct or reasonably foreseeable indirect environmental impacts.**
- **While construction of additional emergency services facilities is not reasonably foreseeable as a result of the ECTNP, the construction and operation of any such new facilities would be within the impacts analyzed in the EIR.**
- **The comments on the EIR do not identify any specific issues with the EIR analysis or conclusions and provide no substantial evidence supporting the need for additional analysis or different conclusions from those in the EIR (State CEQA Guidelines Section 15204(c)).**

Fire Protection and Emergency Service Facilities:

- **The EIR analyzes environmental impacts using the CEQA Guidelines Appendix G threshold of whether fire stations will foreseeably need to be constructed, relocated, or expanded as a result of the Proposed Project. The demand for additional fire protection services, in and of itself, is not an environmental impact under CEQA.**
- **LAFD actively participates in the design of specific roadway changes in order to ensure that adequate fire and emergency access is maintained. LAFD reviews development projects to determine whether adequate fire protection services are available and whether project features such as automatic fire sprinkler systems, fire signaling systems, fire extinguishers, smoke removal systems, or additional fire flow water capacity or hydrants are needed. Additionally, the LAFD continually evaluates the level and allocation of fire protection and emergency service resources to meet the City's needs. Compliance with LAFD conditions through the review and permitting process would ensure that facilities and services are adequate to meet fire protection and emergency service demands associated with the Proposed Project.**

Police Protection Facilities:

- **The EIR analyzes environmental impacts using the CEQA Guidelines Appendix G threshold of whether police facilities will foreseeably need to be constructed, relocated, or expanded as a result of the Proposed Project. The demand for additional police protection services, in and of itself, is not an environmental impact under CEQA.**
- **Additional police service demands can be accommodated through a variety of methods that would increase police protection without the need for construction of new stations; therefore, it is not reasonably foreseeable that the Proposed Project would result in the need for construction of new or physically altered police facilities.**

- **LAPD reviews development projects that require discretionary approval and subdivision applications to determine whether adequate police protection services are available and whether new or expanded facilities are needed. Additionally, the LAPD continually evaluates the level and allocation of police protection resources to meet the City's needs. Compliance with LAPD conditions through the review and permitting process would ensure that facilities and services are adequate to meet police protection demands associated with any new development that implements the Proposed Project.**

Summary of Comments

Several comments state that services and response times for fire protection and emergency services, as well as police protection services, are currently inadequate, and that the ECTNP Area does not have enough police officers, fire stations and emergency services to adequately respond to existing demand. Additionally, commenters claim that these services would not be able to meet the demands of the Proposed Project since the Proposed ECTNP would increase capacity for population and density in the area. The commenters also express concern that the Proposed ECTNP does not address how additional demands on police, fire, and emergency services can be met. Commenters indicate their opinions that response times are required to support the claim that service is adequate. Some commenters express their opinion that emergency vehicle access is impacted in some neighborhoods due to narrow streets, at-grade train crossings, and traffic congestion.

Response

As stated in the EIR on pages 4.11-9 and 4.11-15, impacts to fire and emergency services and police services are assessed based on whether the demand for these services generated by a project would require the construction of new or physically altered facilities such as fire stations or police protection service facilities, and not just whether the Proposed Project would increase demand for a public service or increase response times for emergency services. The analysis is in accordance with *City of Hayward v. Board of Trustees of the Cal. State Univ.* (2015) 242 Cal. App. 4th 833, which held that an increase in demand for public services could lead to potentially significant environmental impacts only if the construction or expansion of a new facility is required, the construction or operation of which might adversely affect the physical environment. However, increased demand for public services, including increased response time, does not by itself constitute a significant impact that requires mitigation under CEQA. Although the EIR discusses response times and public service demand, these in and of themselves are not impacts to the physical environment that must be analyzed for significance or mitigated under CEQA. Rather, these are considerations among many factors in determining whether the Proposed ECTNP would foreseeably result in the construction of new or expanded public service facilities, which could cause significant impacts to the environment. Therefore, analysis of whether there is a significant impact related to emergency services is appropriately based on whether a significant environmental impact will result from the construction of new or expanded facilities.

In the City's adopted Thresholds Guide, the screening criteria for whether additional analysis is needed to determine fire service impacts includes an assessment of whether there will be an increase in the number of intersections with LOS E or F (among other screening criteria, such as a project site's distance to fire station, brush fire hazards, fire hydrant services, storage of combustible materials).[11] This screening criteria informs whether further study is required, including an evaluation of whether a project meets the significance threshold to determine whether there is an environmental impact; it is not in itself a significance threshold of a project's impact.

[11]City of Los Angeles, *L.A. CEQA Threshold Guide*, page K.2-2.

As discussed in the EIR on pages 4.11-5, 4.11-10 to 4.11-12, and 4.11-16, the Proposed Project would not conflict with designated emergency evacuation and disaster routes,[12] and would ensure that emergency access is maintained through a variety of ways, including adherence to existing Citywide regulations in Chapter V, Article 7 of the LAMC, use of traffic signal preemption systems, and review of project-specific emergency access through the permitting process. Additionally, in accordance with the City's practice, LAFD actively participates in the design of specific roadway changes in order to ensure adequate fire/emergency access is maintained. Many of the roadway configurations shown in the City's Complete Streets Design Guide would include continuous center left-turn lanes, which facilitate emergency access when the thru lanes experience delays. In some instances, a roadway reconfiguration could improve emergency access where a continuous center left-turn lane is introduced where it did not previously exist. Generally, multi-lane roadways allow emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. Furthermore, the Proposed Project is not within a hillside area or located where there are increased hazards due to a design feature or incompatible use; the Proposed Project is in an urbanized environment where there is sufficient access for emergency response.

Some comments suggest that narrow streets, at-grade train crossings, and traffic congestion would impact emergency vehicle services. Comments do not provide specific information on where such conflicts would occur and do not suggest any specific issues with the analysis provided in the EIR. The Proposed Plan does not include proposals for narrowing of streets or the addition of at-grade train crossings.

As indicated in **Master Response No. 2 - General Plan Framework Element Policy 3.3.2**, each emergency service provider plans for the future in different ways. The common approach of planning for population increases across emergency service providers is use of population, housing, and employment forecasts from the SCAG RTP/SCS, to continuously update service planning.

As discussed in Chapter 3.0, Project Description, of the EIR, the Proposed ECTNP includes General Plan amendments and zone changes to accommodate the anticipated growth in population, housing, and employment within the ECTNP Area. Based on the reasonably expected development within the Project Area by 2035, implementation of the Proposed ECTNP would result in growth that is consistent with SCAG 2035 forecasts of the Project Area. The SCAG growth projections are the same projections that public service providers, City departments, and other government agencies rely on for long-range planning. The ECTNP forecasted growth has been anticipated citywide by the DCP through other long-range General Plan Elements, such as the Housing Element and the General Plan Framework Element. As discussed in Section 4.10, Population, Housing, and Employment, of the EIR, this level of growth is not considered substantial with respect to anticipated growth in the City as a whole, and the percentage distribution of the City's growth to the ECTNP Area in 2035 is generally comparable to existing levels and would continue to implement the City's adopted and directed growth strategy in the General Plan Framework. As discussed in the EIR on pages 4.11-11 through 4.11-12, the Proposed Project would not result in the construction of a new fire station or police facility based on the reasonably foreseeable growth in the ECTNP Area.

Fire Protection and Emergency Service Facilities

As discussed in the EIR on pages 4.11-10 through 4.11-12, the Proposed Project would result in a less-than-significant impact with regards to fire protection and emergency services. The impact analysis evaluates whether the Proposed ECTNP would require construction of new or expanded fire or emergency services facilities to serve the Proposed Project. LAFD was consulted during the preparation of the EIR to provide input and to identify any concerns and was also provided copies of the Notice of Preparation (NOP) and EIR. LAFD provided information on fire flow and other LAFD requirements as well as location of existing

[12]City of Los Angeles, *General Plan, Safety Element, Exhibit H*, 1996.

facilities that was used in the preparation of the EIR. LAFD did not provide any comments that were inconsistent with the analysis in the EIR.

The EIR analyzes population and emergency response time, as well as other factors, in determining whether development under the Proposed ECTNP would require the construction of new or expanded fire protection and emergency services facilities, which could cause significant impacts to the environment. Although the Proposed Project would increase overall housing, population, and employment in the Project Area, the EIR concludes that compliance with existing regulations would ensure that growth associated with the Proposed Project would not result in substantially increased demand for fire protection and emergency services that would foreseeably require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility. The EIR's analysis of fire protection and emergency service facilities comply with CEQA in focusing on the potential physical impacts associated with the construction of any reasonably foreseeable new or expanded facilities.

As discussed in the EIR on pages 4.11-10 to 4.11-12, the Proposed Project would increase overall housing, population, and employment in the ECTNP Area. However, population increase is only one factor considered by LAFD in determining the need for additional resources. As discussed in the EIR, population increase by itself would not increase demand for fire protection and emergency services. The changing demand for fire protection and emergency services is complex. For example, increasing populations may result in increased density and more construction. However, new buildings are constructed in accordance with increasingly stringent building and fire codes, such as requiring fire sprinklers, making them safer and more resistant to fires. Additionally, the population is aging, which may increase demand for emergency services. However, the population may be becoming healthier with increased and improved healthcare.

As discussed in Section 4.11, Public Services, of the EIR, in addition to population increases, the need for new fire stations, equipment and staff is also based on the geographic distribution of physical structures; access to trucks, ambulances, and other equipment; and the location of the Proposed Project. These factors are used by LAFD to assess whether additional resources are needed and are not the CEQA thresholds used to evaluate a project's impact on fire protection services. As discussed in Section 4.10, Population, Housing, and Employment, of the EIR, population is projected to increase without and with implementation of the Proposed Project. Although LAFD is responsible for identifying and implementing capital improvements (such as new fire stations) as may be needed to respond to anticipated increased demand without and with the implementation of the Proposed Project, LAFD does not have a capital improvement plan that identifies construction of new fire stations in specific locations and, therefore, it is not possible to forecast or identify any specific impacts associated with any potential new or expanded fire stations. Any impacts from building or expanding fire stations and facilities would be speculative at this point in time. Additionally, the EIR concluded that the Proposed Project would not foreseeably require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility. To the extent that new service facilities/ infrastructure would need to be constructed, the impacts of such construction are anticipated to be less than significant (as indicated in the EIR Sections 4.11 Public Services and 4.13 Utilities and Service Systems) and/or within the overall construction impacts analyzed in the EIR. Therefore, the EIR analysis is adequate as it is based on information available at the time of the analysis. Any further analysis would be based on speculation.

Since 2011, LAFD has implemented a Deployment Plan, which provides a fire suppression resource and a paramedic in every fire station service district. Although Section 4.11, Public Services, of the EIR, identifies three fire stations within the ECTNP Area, five other fire stations also serve the ECTNP Area. Although outside of the Project Area, these fire stations also provide fire protection and emergency services to the area. Five of the eight fire stations that serve the ECTNP Area have an engine or assessment engine as part of their station apparatus. As discussed in Section 4.11 Public Services, of the EIR, LAFD's services are based on the community's needs, as determined by on-going evaluations, taking into consideration calls for service.

These evaluations are used to determine the need for the reallocation of equipment or personnel, or if required, the acquisition of equipment, personnel, and/or new stations.

In March 2014, a Third-Party Deployment of Fire Resources Study was prepared for the LAFD to provide for an independent review and analysis of its current deployment of fire and EMS resources and determine the most efficient and cost-effective model that could be implemented by the LAFD. As a result of this study, LAFD prepared A Safer City: Strategic Plan 2015-2017 and initiated a Standards of Response Coverage analysis to assist in the evaluation of specific geographic response areas, specific community risks, deployment methods, response time standards, and the allocation of LAFD resources. The Strategic Plan and Standards of Response Coverage analysis assists LAFD in addressing existing demands on fire protection and emergency services. Currently, LAFD reviews development projects that require discretionary approval and subdivision applications to determine whether new fire and emergency service facilities would be needed. Where appropriate, construction of new facilities is required as a condition of development for the individual projects. As with current practice, LAFD would continue to review future development projects that require discretionary approval within the ECTNP Area to determine whether there is adequate services available for each new development and whether new or expanded facilities would be needed. Additionally, LAFD also reviews building permit applications to ensure adequate access is available to accommodate emergency vehicles. New development projects would also be required to provide adequate access to emergency vehicles. Compliance with LAFD conditions would ensure that facilities and services are adequate to meet fire protection and emergency service demands associated with the Proposed Project.

Personnel and equipment needs for individual fire stations are determined based on LAFD's review of the number of incidents within a station's service area. As the number of incidents increases, LAFD assigns new staff and equipment as necessary. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents and call frequencies, LAFD can shift resources to meet local demands for fire protection, as needed.

One of the commenters indicated their opinion that LAFD has established an EMS response time standard of within 5 minutes 90 percent of the time and non-EMS response time of 5:20 minutes within 90 percent of the time. Neither the City nor LAFD has established these response times as standards; rather, these times are a target which the LAFD strives to achieve. As discussed in the EIR, the Fire Code specifies maximum response distances allowed between specific locations and engine/truck companies based upon land use and fire flow requirements, as shown in Table 4.11-3 of the EIR. When response distances exceed these requirements, the LAFD reviews plans for all new commercial and residential structures as part of the permitting process, and various fire suppression equipment (e.g., automatic fire sprinkler systems, fire signaling systems, fire extinguishers, smoke removal systems, and any other fire protection devices) are required to be incorporated in the plans prior to the approval of an occupancy permit, as deemed necessary by the Fire Chief. In addition to fire flow requirements, the LAFD requires different types of fire hydrants within a specified distance to deliver the required fire flow, which are shown in Table 4.11-4 of the EIR. The LAFD will continue to assess whether fire protection within the ECTNP Area is adequate as growth continues to occur within the area.

Police Protection Facilities

As discussed in the EIR on page 4.11-16, the Proposed ECTNP would result in a less-than-significant impact with regards to police protection services. The impact analysis evaluates whether the ECTNP would require construction of new or expanded police protection facilities to serve the Proposed Project. LAPD was consulted during the development of the EIR to provide input and to identify any concerns, and was also provided copies of the NOP and EIR.

Although the growth associated with the Proposed Project would create increased demand for LAPD services, the need for additional officers created by the increase in demand for police services is not anticipated to result in the need for the construction of new or physically altered police protection facilities due to the mobile nature of police services. As discussed in the EIR on page 4.11-16, additional police service demands can be accommodated through a variety of methods, including overtime or provision of substations in existing structures, which would increase police protection without the need for construction of new stations. Additionally, as with current practice, LAPD reviews development projects that require discretionary approval and subdivision applications to determine whether adequate police protection services are available and whether new or expanded facilities are needed. LAPD also reviews the applications to determine whether the individual projects would provide adequate security features. Where appropriate, construction of new facilities, as well as requiring the applicants to provide security features to decrease the demands police protection services, would be required as a condition of development for the individual projects. New development would also be required to provide adequate access to emergency vehicles, including police vehicles. Compliance with LAPD conditions would ensure that facilities and services are adequate to meet Project-related demands on police protection services.

As with fire protection and emergency services, the EIR addresses response times associated with police protection services. As discussed in the EIR, while the Proposed ECTNP could impact intersection LOS, there is not a direct relationship between predicted travel delay and emergency response times as state law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. In conformance with existing policies, procedures and practices, as development occurs, the LAPD will maintain acceptable service levels through the provision of additional personnel and equipment as needed. Impacts to police services are addressed through standard city policies, procedures, and practices.

MASTER RESPONSE NO. 4 - UTILITES

Summary of Master Response

- **The EIR adequately analyzes Utilities and Service Systems (Section 4.13) and concludes that impacts would be less than significant.**
- **The response below clarifies the EIR analysis and addresses the commenters' concerns; it does not constitute significant new information or change the impact conclusions of the EIR.**
- **Planning for public services and infrastructure in the ECTNP Area is not performed separately from the City as a whole. As the population and demand for public services and infrastructure capacity increases, the plans of each respective utility and service provider would be updated and enhanced to keep pace with demand. The City funds needed infrastructure and service improvements through a variety of mechanisms including through General Fund money, user fees, bonds and other measures.**
- **Applicants for individual projects within the ECTNP Area will be required to pay for on- and/or off-site improvements that are necessary to ensure that water supply and conveyance demand/pressure requirements can be met, and that wastewater capacity is available including construction of a connection to the nearest wastewater line with available capacity.**
- **The Water Supply Assessment (WSA) prepared for the Proposed ECTNP concludes that additional water demand associated with the Proposed Project can be met. If the net increase in water demand from a development project meeting the SB 610 criteria within the ECTNP Area is not within the calculated demand as established in the WSA, a project-specific WSA will be required for that development project.**
- **The construction of new water lines, wastewater conveyance systems, electrical facilities, and natural gas lines within the ECTNP Area may be required but would be within the construction impacts analyzed in the EIR.**
- **The comments do not identify any specific issues with the EIR analysis or conclusions and provide no substantial evidence supporting the need for additional analysis or different conclusions from those in the EIR (CEQA Guidelines Section 15204(c)).**

Summary of Comments

Several commenters state that utilities systems, specifically water, wastewater (sewers), electricity, and natural gas, are currently inadequate, out of date, or damaged. The commenters also express their opinions that these utilities and service systems would not be able to meet the demands of the Proposed Project since the Proposed ECTNP would increase population and density in the area. The commenters express their opinions that the Proposed ECTNP should address how increased demand can be met and that the infrastructure that would accommodate new development should be defined.

A number of commenters state that the City upgrades water pipes every 300 years when their lifespan is 100 years, citing a newspaper article to support their claims. A few commenters indicate their opinions that the Proposed Project should require individual development projects to implement sustainability measures, such as use of recycled water for building and maintenance, and use of solar power or other renewable energy. A few commenters express their opinions that the EIR's conclusion that the increased demand for electricity as a result of the Proposed Project can be accommodated by the existing electricity infrastructure does not match with recent power outages and brownouts, particularly in the summer, and the advertisements that encourage residents to avoid running air conditioners during peak demand periods. A few commenters question how improvements in the utility service systems would be funded.

Response

Introduction

As indicated in **Master Response No. 2 - General Plan Framework Element Policy 3.3.2**, each utility and service system provider plans for future demand in different ways. The common method to plan for population increases across utility providers is use of population, housing, and employment forecasts from the SCAG RTP/SCS.

Planning for public services and infrastructure in the ECTNP Area is not performed separately from the City as a whole. As discussed in the EIR, Sections 4.11 and 4.13, service and utility providers review changes in both population projections and the utilization of services and infrastructure and undertake long-term planning and facility upgrades to deliver public services and infrastructure in accordance with demand and available resources. The relevant plans of each respective utility and service provider would be updated and enhanced to keep pace with expected demand. Utility providers determine the required capacity of utilities and service systems to accommodate existing and anticipated growth based on a number of factors including: estimates of existing and future population, land use designations, zoning, existing infrastructure resources, and other factors. As indicated in the relevant planning documents of each utility provider, as population and demand increases, infrastructure is updated and enhanced to keep pace with demand. When it is determined that new or improved infrastructure is needed to meet growing service demand, the City funds the improvements through a variety of mechanisms including through General Fund money, user fees, bonds and other measures in accordance with available resources.

If an individual project within the ECTNP Area requires specific on- and/or off-site improvements to ensure that water supply and conveyance demand/pressure requirements can be met, the applicant for the individual project will pay for the improvements. If sewer capacity is not available for individual projects, the project applicant would be required to pay for the construction of a connection to the nearest wastewater line with available capacity.

Water

With regards to water, as indicated in the EIR on page 4.13-6, LADWP prepared the 2015 Urban Water Management Plan (UWMP), which forecasts future water demand and water supplies under average and dry year conditions through the year 2040. The UWMP identifies future water supply projects, such as recycled water; provides a summary of water conservation BMPs; and provides a single and multi-dry year management strategy.

In early 2016, LADWP initiated rate increases of 4.7 percent per year for five years (2016 to 2020) to fund improvements to the water system including investing $3.7 billion to complete projects such as replacing approximately one million feet of distribution mainline, replacing 25 water distribution valves, replacing 125,000 small meters, and refurbishing the Los Angeles Aqueduct system.[13] Also in 2016, LADWP prepared a Water Infrastructure Plan.[14] It addresses long-term goals for replacing water infrastructure, including water mainline and trunk lines. On page 2 of the report states that LADWP plans to replace 500 miles of leak-prone and high-risk water mainlines in the next 10 years. Mainline replacements are prioritized based on the leak history, soil conditions, age of pipe, risk of service interruption and community disruption, and coordination with Bureau of Street Services' paving schedule. LADWP is increasing the rate at which it replaces water distribution mainline to bring the pipe replacement cycle closer to the expected pipe life cycle by year 2020. One of the long-term goals for LADWP is to achieve and sustain a replacement cycle that is

[13]LADWP, *Water System Rate Action Report. Chapter 1: Executive Summary*, July 2015, https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB435621&RevisionSelectionMethod=LatestReleased.

[14]LADWP, *2016-17 Water Infrastructure Plan*, https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB421332&RevisionSelectionMethod=LatestReleased.

consistent with the expected 100-year life of water mains.[15] LADWP has also commenced pilot projects to test and evaluate alternate pipe materials to maximize the life of pipeline infrastructure and reduce long-term maintenance.

Improvements to existing local water delivery lines can be funded through rate increases. LADWP may increase water base rates to provide continued system reliability, and meet regulatory obligations and financial and conservation requirements. The department strategically uses available funding to maintain water system infrastructure reliability. According to LADWP's Water System Rate Action Report, LADWP increased water service base rates in 2009 partly to pay the necessary expenses of operating and maintaining the water system. Since this rate increase, major investments have been made to improve the LADWP water system. These improvements included replacing approximately 224,000 feet of water quality-related trunk lines. LADWP also increased rates in 2016 to continue to improve water system infrastructure, continue to meet regulatory requirements and develop sustainable local water supply, while maintaining a healthy financial standing.[16]

As discussed Section 4.13, on pages 4.13-13 through 4.13-18, of the EIR, the Proposed Project would result in a less-than-significant impact with regards to water treatment facilities, water lines, and water supply. Though implementation of the Proposed Project would increase water demand in the ECTNP Area, sufficient water supply exists to accommodate the Proposed Project. As indicated in the 2015 UWMP, the City is planning to provide water for a population of 4,441,545 in 2040. The demographic projections for LADWP service area were provided by the Metropolitan Water District of Southern California, who receives demographic projections from the SCAG RTP/SCS. The reasonably expected population in 2035 in the ECTNP Area would be within the citywide SCAG projection utilized in the 2015 UWMP.

As indicated in the 2015 UWMP, the City anticipates meeting future water needs by increasing water recycling and conservation. New development in the Project Area would be required to comply with the water conservation measures listed in the EIR on pages 4.13-16 and 4.13-17. New development within the Project Area would also be required to comply with the Los Angeles Water Efficiency Requirements (Ordinance No. 180822), Los Angeles Green Building Code (Ordinance No. 181480), and the 2010 California Green Building Standard Code.

As currently required, applicants for new development projects within the Project Area must comply with SB 610 (California Water Code Sections 10910 to 10915). SB 610 requires large projects to prepare a WSA in order to determine water supply sufficiency for a 20-year projection, in addition to the demand of existing and other planned future uses. Under State Water Code Section 10911, if the WSA concludes that water supplies are insufficient, the WSA is required to discuss plans for acquiring additional water supplies and set forth the measures that would be undertaken to acquire and develop those water supplies. A WSA was prepared by LADWP for the Proposed ECTNP on February 6, 2014 (**Appendix J** of the EIR). As discussed in the EIR, Section 4.13, on pages 4.13-11 through 4.13-13 and 4.13-17, the additional demand for water associated with the Proposed Project can be met. The Proposed ECTNP would require applicants for new development projects within the Project Area that meet the SB 610 criteria to coordinate with LADWP to determine if the development project's net increase in water demand would fall within the calculated demand as established in the WSA for the Proposed ECTNP. Generally, if an individual development project is determined to be within the water demand as identified in the WSA, additional environmental review will not be required. If a project exceeds the water demand analyzed in the EIR or otherwise requires additional analysis, then additional analysis or environmental review may be required.

[15]LADWP, *2016 Water Infrastructure Plan*, page 2.
[16]LADWP, *Water System Rate Action Report, Chapter 2*, July 2015.

In regards to local water delivery lines, as noted above, the City has increased funding (through rate increases) for improvements to local water lines and prepared the 2016 Water Infrastructure Plan, which presents the City's plan to replace 500 miles of water mainline in the next 10 years. As discussed in the EIR on page 4.13-14 acknowledges that local water delivery lines may need to be augmented in certain locations depending on specific uses, locations, and the capacity and conditions of the existing infrastructure. As currently required, applicants of new development projects within the Project Area must coordinate with LADWP to ensure that existing and/or planned water conveyance facilities are capable of meeting water demand/pressure requirements. In coordination with the LADWP, each applicant/contractor is required to identify any specific on- and/or off-site improvements needed to ensure that water supply and conveyance demand/pressure requirements can be met prior to issuance of a certificate of occupancy. Existing regulations and City requirements ensure that sufficient water supplies and water conveyance facilities are in place prior to occupancy of new development.

Construction of new water lines within the ECTNP Area may be required in certain locations within the ECTNP Area; the construction of these facilities would be within the construction impacts analyzed in the EIR.

Wastewater (Sewers)

As discussed in the EIR on pages 4.13-25 through 4.13-30, the Proposed Project would result in a less-than-significant impact with regards to wastewater treatment, wastewater treatment facilities, and wastewater conveyance systems. Though the Proposed Project would increase wastewater generation over existing conditions, all wastewater from future development within the Project Area would be conveyed to existing treatment facilities and treated according to requirements of the National Pollutant Discharge Elimination System (NPDES) permit authorized by the Los Angeles Regional Water Quality Control Board (LARWQCB). The Hyperion Treatment Plant (HTP), which treats wastewater for the Project Area, has remaining available capacity to treat wastewater flows associated with the reasonably foreseeable growth within the ECTNP Area. Water conservation, which is required for development within the City and more particularly within the ECTNP Area, would reduce anticipated water demand, which would in turn decrease wastewater flows. As discussed in the EIR, the anticipated wastewater generation within the ECTNP Area would represent a minimal proportion of total average daily flows, and would be well within the existing capacity of the HTP.

With regards to wastewater, approximately every 10 years, BOS prepares a wastewater facilities plan that evaluates current wastewater treatment system, projects future wastewater flows based on SCAG population projections, and identifies ways in which future demand can be managed. The most recent wastewater facilities plan prepared by BOS is the Integrated Resource Plan (IRP), which addresses and integrates the water supply, wastewater treatment, and stormwater management of the City to the year 2020. Objectives of the IRP include, but are not limited to, meeting the projected wastewater system needs of the City; complying with all regulations protecting public health and the environment; conforming to the sustainability guidelines of the City; providing for safe use of recycled water; and providing cost-effective services. The IRP evaluates five alternatives and identifies a preferred alternative that provides for increased treatment capacity without the need to build new treatment plants.

The BOS prepares a Wastewater Capital Improvement Program (WCIP), consistent with the direction of the IRP, every 10 years that identifies the wastewater system upgrades, equipment, and modifications to be funded by the City within the next 10-year period. The WCIP also addresses rehabilitation of old sewer mains, maintenance holes, and replacement of aging equipment and structures at treatment and pumping plants.

As noted above, BOS prepares a WCIP that plans for wastewater system upgrades as determined necessary and appropriate. In addition, the BOS Wastewater Engineering Services Division reviews sewer connection permits for residential, commercial, and industrial projects to determine whether sufficient sewer capacity is

available for new sewer connections. All projects that require sewer connection permits, also called an "S" Permit, are evaluated with respect to existing capacity of sewer lines in the vicinity of a given site prior to issuance of building permits. Each new development is required to adhere to the most current Sewer Design Manual specifications, as well as applicable City engineering requirements for various types of structures (such as sewers and storm drains) as indicated in Standard Plans developed by the Bureau of Engineering.

Los Angeles Municipal Code (LAMC) Sections 64.11 and 64.12 require approval of a sewer connection permit prior to connection to the wastewater system. Each new connection is assessed a Sewerage Facilities Charge, which is deposited in the City's Sewer Construction and Maintenance Fund for wastewater-related purposes. LAMC Section 64.15 requires that the Bureau of Engineering perform a Sewer Capacity Availability Review (SCAR) when a sewer permit is sought for a new connection to the City's wastewater system, or in the event that a proposed increase in discharge to a public wastewater line or proposed future development is anticipated to generate 10,000 gallons or more of wastewater per day. A SCAR evaluates the existing wastewater collection system to determine whether adequate capacity exists to convey project-related wastewater to the appropriate treatment plant. If capacity is available, the Bureau of Engineering accepts the development project plans and specifications for the individual project's sewer permit application. Otherwise, development projects are placed on a waiting list to receive an allocation of forthcoming capacity, or applicants are required to construct a connection to the nearest wastewater line with available capacity. The development project may not connect to the City's wastewater system until capacity is available and a sewer permit is available.

The City has immediate response and reporting procedures in place to attend to any unexpected sewer overflows. The procedures are maintained in the Wastewater Collection Systems Division's Sanitary Sewer Overflow Response and Reporting Procedures. Moreover, BOS proactively monitors the sewer system to preemptively identify and resolve deficiencies before they can become problematic. System deficiencies in need of rehabilitation are then included in the WCIP, which are attended to according to their associated priority ranking.

According to a letter from Ali Poosti, Division Manager of the Wastewater Engineering Services Division of BOS, dated September 30, 2013, the sewers within the ECTNP Area have no current conveyance capacity constraints and are in good to very good structural condition. In addition, according to the letter, future individual development projects within the ECTNP Area exceeding the BOS criterion of 20,000 gallons per day will require detailed gauging during the permitting process in order to determine whether the sewer conveyance system is capable of safely accommodating the total flow generated. Individual applicants within the Project Area would be required to coordinate with the BOS to ensure that existing and/or planned sewer conveyance and treatment facilities are capable of meeting wastewater flow capacity requirements.

Construction of new wastewater conveyance systems within the ECTNP Area may be required; the construction of these facilities would be within the construction impacts analyzed in the EIR.

Electricity

LADWP provides electricity to residents and businesses within the Project Area. LADWP power resources are shown in the EIR in Table 4.13-20. LADWP prepared the 2016 Power IRP, which identifies actions that are central to the continued reliability of the LADWP power system while meeting all regulatory requirements. The document identifies initiatives to use renewable resources to generate electricity to support the goal of reducing greenhouse gas (GHG) emissions and decrease reliance on fossil fuels. The 2016 Power IRP states that electricity generation from renewable resources will continue to increase in the future.

LADWP implements several measures to reduce power outages. To reduce energy use over a given time period, such as during the summer months, LADWP implements an energy management tool called Demand Response (DR). DR is an incentive-based, voluntary energy management program that helps LADWP

customers reduce their energy use during peak demand periods and lower the cost of the customers' utility bills while helping to ensure the reliability of the electric grid. Customers are incentivized to reduce energy usage at critical peak demand periods in a manner that decreases overall system costs.

In addition to DR, the City initiated a Power System Reliability Program in 2014, which includes the establishment of metrics and indices to help prioritize infrastructure replacement and expenditures from all major functions of the power system, including generation, transmission, substation, and distribution. It also includes all power system assets affecting reliability in an integrated and comprehensive manner and proposes corrective actions and capital expenditures designed to minimize outages and maintain reliability in the short and long term. According to the 2016 Power IRP, the efforts made through the Power System Reliability Program have decreased distribution outages.

LADWP prepares a Ten-Year Transmission Plan, which identifies a number of transmission improvements that are needed to maintain reliability. It provides findings and recommendations that LADWP implements to maintain operational flexibility and avoid potential future overload conditions.

As discussed in the EIR on pages 4.13-47 through 4.13-49, the Proposed Project would result in a less-than-significant impact with regards to inefficient use of electricity. Though the Proposed Project's electricity demand could increase over existing conditions, new development projects within the ECTNP Area would be subject to California Code of Regulations Title 24, Part 6, the California Energy Code, which requires local jurisdictions to use energy efficient appliances, weatherization techniques, and efficient cooling and heating systems to reduce energy demand stemming from new development. In addition, development occurring from the implementation of the Proposed Project would be required to comply with the City of Los Angeles' Green Building Code Energy Efficiency requirements.

Construction of new electrical facilities (such as substation and undergrounding overhead lines) within the ECTNP Area may be required. The construction of these facilities would be within the construction impacts analyzed in the EIR.

Natural Gas

The Southern California Gas Company (SoCalGas), a unit of Sempra Energy, provides natural gas to the Project Area. SoCalGas is responsible for the maintenance and repair of natural gas pipes and facilities. As discussed in the EIR on pages 4.13-50 through 4.13-52, the Proposed Project would result in an increase in natural gas usage. The Proposed Project would consume 0.02 percent of SoCalGas' 2035 projected available supply.

Construction of new natural gas lines within the ECTNP Area may be required; the construction of these facilities would be within the construction impacts analyzed in the EIR.

Response Conclusion

The analyses of impacts of the Proposed Project on Utilities and Service Systems provided in the EIR are adequate and comply with the requirements of the California Environmental Quality Act. The EIR concludes, in Section 4.13 that the Proposed Project would result in less than significant impacts to Utilities and Service Systems (including water, wastewater, electricity, and natural gas).

The analysis provided in the respective sections of the EIR satisfies the requirements of CEQA Guidelines Section 15121(a) to "inform public agency decision-makers and the public generally of the potential significant environmental effects of a project, identify possible ways to minimize the significant effect and describe reasonable alternatives to the project." This Master Response provides supplemental information, does not constitute substantive new information and does not change the impact conclusions found in the EIR.

The Proposed Project accommodates infill development that would make maximum use of existing infrastructure. New development would be required to make the necessary local improvements (such as connections to sewer and water lines and upgraded substations and pumping facilities) per the normal development process. In addition, individual projects would be required to fund their fair share of necessary local infrastructure associated with the proposed development under the Proposed Project per preexisting funding mechanisms. To the extent that new infrastructure would need to be constructed, the impacts of such construction are anticipated to be less than significant and within the overall construction impacts analyzed in the EIR.

Commenters provide no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Additional discussions of the General Plan and utilities/infrastructure within the ECTNP Area is provided in **Master Response No. 2 - General Plan Framework Element Policy 3.3.2**.

MASTER RESPONSE NO. 5 – SCHOOLS

Summary of Master Response

- **The EIR provides LAUSD school boundary, enrollment, and capacity data for School Year (SY) 2012-2013, which appropriately reflects the existing conditions at the time the Notice of Preparation (NOP) was published in March 2013, and adequately analyzes and discloses impacts to school facilities based on data available at the time of the environmental analysis (CEQA Guidelines Section 15125).**
- **The LAUSD school boundary, enrollment, and capacity data provided below reflects School Year (SY) 2016-2017 and is for informational purposes only; it does not constitute significant new information or change the impact conclusions of the EIR.**
- **Implementation of the Proposed Project would require the payment of school fees by development projects, which constitutes the exclusive method for mitigating school facilities impacts and is considered full and complete mitigation (Government Code Section 65996). Therefore, the EIR concludes that impacts to school facilities are less than significant.**
- **The comments do not identify any specific issues with the EIR analysis or conclusions and provides no substantial evidence supporting the need for additional analysis or different conclusions from those in the EIR (CEQA Guidelines Section 15204(c)).**

Summary of Comments

Several comments on the EIR relate to school services in the ECTNP Area. These comments express concerns that the enrollment and student capacity figures of the Los Angeles Unified School District (LAUSD) schools serving the ECTNP Area are outdated. Commenters indicate that several schools serving the ECTNP Area, specifically Westwood Charter Elementary School and Overland Elementary School, are operating at or in excess of capacity and are unable to adequately serve the current or new student population that would be generated by the Proposed Project. The commenters also express their opinions that the lack of space at schools to accommodate new students from new residential development may result in a change to LAUSD school boundaries that could divide social networks within a community. These comments include, but are not limited to the following: Comments 20-1, 22-1, 23-1, 29-1, 32-1, 43-4, 43-6, 48-1, 51-1, 52-1, 53-2, 57-2, 58-1, 62-1, 67-1, 71-1, 72-1, 73-1, 74-3, 75-1, 76-6, 77-2, 78-1, 79-1, 80-1, 81-2, 83-1, 86-2, 15-20, 16-4, and 17-56.

Responses

Introduction

The EIR discusses LAUSD school boundary, enrollment, and capacity data for School Year (SY) 2012-2013, which appropriately reflects the existing conditions at the time the Notice of Preparation (NOP) was published in March 2013 (EIR Table 4.11-10 on page 4.11-22). Use of this data for EIR analysis is in accordance with CEQA Guidelines Section 15125(a), which states that "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 no 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." [Emph. add.] Nonetheless, because environmental analysis takes time to complete, LAUSD school boundary, enrollment, and capacity data is now available for subsequent school years. The school boundary, enrollment, and capacity data provided below reflects the most recent LAUSD SY 2016-2017 data (see Updated **Table 4.11-9**). This data does not change the baseline conditions (2013) or impact conclusions in the EIR, and is provided for informational purposes only.

UPDATED TABLE 4.11-9: PUBLIC SCHOOLS SERVING THE PROJECT AREA

School Name	Location	Station Area /a/	Current Capacity (in seats) /b/	Current (Resident) Enrollment /c/	Actual Enrollment (in seats) /d/	Available Capacity (in seats) /e/	Over-crowded /f/
ELEMENTARY SCHOOL							
Castle Heights	9755 Cattaraugus Ave.	CC, P	598	464	564	134	No
Palms	3520 Motor Ave.	CC, P	414	407	355	7	**YES**
Shenandoah Street	2450 Shenandoah St.	CC	483	561	455	-78	**YES**
Overland Avenue	10650 Ashby Ave.	P, W, ES	548	387	501	161	No
Clover Avenue	11020 Clover Ave.	W, ES	639	575	598	64	No
Richland Avenue	11562 Richland Ave.	W, ES, P, EB	334	226	263	108	No
Westwood Charter	2050 Selby Ave.	W, ES	912	869	857	43	No
Brockton Avenue	1309 Armacost Ave.	EB	274	270	219	4	**YES**
Nora Sterry	1730 Corinth Ave.	ES, EB	358	229	317	129	No
		TOTAL	**4,560**	**3,588**	**4,129**	**572**	--
MIDDLE SCHOOL							
Palms	10860 Woodbine St.	CC, P, W	1,513	1,121	1,387	392	No
Emerson	1650 Selby Ave.	W, ES	569	910	622	-341	**YES**
Webster	11330 Graham Pl.	W, ES, EB	682	868	431	-186	**YES**
Mark Twain	2224 Walgrove Ave.	CC	767	828	631	-61	**YES**
		TOTAL	**3,531**	**3,727**	**3,071**	**-196**	--
HIGH SCHOOL							
Alexander Hamilton	2955 S. Robertson Blvd.	CC, P, W	3,253	2,838	2,735	415	No
University	11800 Texas Ave.	W, ES, EB	1,740	1,614	1,659	126	No
Venice	13000 Venice Blvd.	W, ES	2,273	2,607	1,988	-334	**YES**
		TOTAL	**7,266**	**7,059**	**6,382**	**207**	--

/a/ Station area is abbreviated as follows: Culver City (CC), Palms (P), Westwood (W), Exposition/Sepulveda (ES), and Exposition/Bundy (EB). This column identifies the station areas that each of the schools serves.
/b/ Capacity data from SY 2016-2017. Current capacity represents the school's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet program.
/c/ Current (Resident) Enrollment represents the total number of students living in the school's attendance area and who are eligible to attend the school plus students enrolled at any on-site magnet centers.
/d/ Actual Enrollment represents the number of students actually attending the school now, including magnet students.
/e/ Available Capacity is equal to Current Capacity minus Current (Resident) Enrollment.
/f/ A school is considered overcrowded if the school is currently on a multi-track calendar, there is currently a seating shortage, or there is a seating overage of less than or equal to a "safety margin" of 30 seats.
SOURCE: Los Angeles Unified School District, Facilities Division, Rena Perez, written correspondence, July 11, 2017.

As stated in the EIR on page 4.11-21, impacts to schools are assessed based on whether the demand for school services generated by a project would result in the construction of new or physically altered public school facilities. The analysis is in accordance with *Goleta Union School District v. The Regents of the University of California (1995) 37 CA4th 1025*, which held that an increase in demand for public services could lead to potentially significant environmental impacts only if the construction or expansion of a new facility is required, the construction or operation of which might adversely affect the physical environment. Therefore, discussion in the EIR that relates solely to the level of school services provided to the residents of the ECTNP Area, including any existing or future needs and deficiencies, is for informational purposes. Determination of whether there is a significant impact related to schools is based on whether a significant environmental impact will result from the construction of new or expanded school facilities.

Based on the EIR analysis, new school construction may be needed to accommodate students generated within and outside the ECTNP Area (EIR on pages 4.11-23, 4.14-8, and 4.14-9). The EIR analyzes construction and operation of commercial and residential development throughout the ECTNP Area and outside the ECTNP Area through cumulative analysis. The additional incremental construction associated with development of new schools would be minor in comparison to the anticipated commercial and residential development and within the general assumptions analyzed. The EIR analysis of construction impacts associated with development (including new or expanded schools facilities) is based on information known or reasonably available at the time of the analysis and reasonably foreseeable impacts; any further analysis would be based on speculation.

As discussed in the EIR on pages 4.11-17 and 4.11-23, California Government Code Section 65995 authorizes school districts, such as LAUSD, to collect impact fees from developers of new residential and commercial/industrial space. Per California Government Code Section 65996, developer impact fees are the exclusive method for consideration and mitigation of school facilities impacts, and provide full and complete mitigation of impacts related to the adequacy of school facilities. These fees collected on residential and commercial development may be used to pay for all of the following: land (purchased or leased) for school facilities, design of school facilities, permit and plan checking fees, construction or reconstruction of school facilities, testing and inspection of school sites and school buildings, furniture for use in new school facilities, and interim school facilities (purchased or leased) to house students generated by new development while permanent facilities are constructed. These fees provide funding to alleviate school overcrowding and would ensure that new development in the ECTNP Area would bear its fair share of the cost of accommodating additional students generated. Therefore, the analysis of impacts with regard to schools provided in the EIR is reasonable and legally adequate and the collection of developer impact fees is considered full and complete mitigation of school impacts.

LAUSD School Boundaries and Charter School Status

School boundaries are continuously evaluated and revised to balance enrollment among neighboring schools, and represent administrative changes; school boundary revisions do not create barriers that could physically divide a community. LAUSD school boundaries are defined and updated to respond to changing demand, transportation, safety considerations, calendar changes, and long-range goals of the District.[17] The LAUSD boundary planning and revision process occurs on an ongoing basis regardless of comprehensive land use and planning changes such as those included in the Proposed Project. In the long-term, changes in population distribution in West Los Angeles, including the ECTNP Area, may result in further boundary changes. However, such boundary changes are not reasonably foreseeable at the present time and any further discussion of such potential boundary changes would be speculative.

LAUSD has approved and adopted several revisions to school service boundaries subsequent to the publishing of the NOP in March 2013. The revisions to school service boundaries result in additional schools serving ECTNP Station Areas: two additional elementary schools serve the Bundy Station Area, an additional middle school and high school serve the Sepulveda Station Area, and an additional middle school serves the Culver City Station Area. Some revisions to school boundaries serving the ECTNP Area have also resulted in no changes to schools that serve individual ECTNP Station Areas (see **Updated Table 4.11-9** "Station Area" column). Additionally, there are no anticipated boundary changes for LAUSD schools serving the ECTNP Area in the current school year (SY 2017-2018).[18] Specific revisions to school service boundaries that occurred subsequent to the NOP include:

- **Daniel Webster Middle School** – revised service boundary; no change to school service within ECTNP Station Areas.
- **Emerson Community Charter School** – revised service boundary; school now serves the ECTNP Sepulveda Station Area.
- **Mark Twain Middle School** – revised service boundary; school now serves the ECTNP Culver City Station Area.
- **Nora Sterry Elementary School** – revised service boundary; school now serves the ECTNP Bundy Station Area.
- **Palms Middle** School – revised service boundary; no change to school service within ECTNP Station Areas.

[17]LAUSD Facilities Services Division, *Boundary Planning Process*, http://www.laschools.org/documents/download/mpd/documents/boundary_planning_process/LAUSD%20Boundary%20Planning%20Process%20-%20REVISED%20June%202012.pdf, accessed September 27, 2017.

[18]LAUSD Facilities Services Division, *Boundary Change Information*, http://www.laschools.org/new-site/mpd/boundary-changes/, accessed July 24, 2017.

- **Richland Avenue Elementary School** – revised service boundary; school now serves the ECTNP Bundy Station Area.
- **Venice High School** – revised service boundary; school now serves the ECTNP Sepulveda Station Area.

Additionally, Ralph Waldo Emerson Middle School was granted LAUSD affiliated charter school status in July 2014 for a five-year term, and changed its name to Ralph Waldo Emerson Community Charter School. As an LAUSD school that has been converted to a District-affiliated charter school, the school is given discretion in developing academic programs and admitting students from outside the service boundaries, but still operates under LAUSD labor contracts and must give admission preference to students residing within the former service boundaries.[19] If the number of students who wish to attend the charter school exceeds the school capacity, priority admission is given to current students and students who reside within the former service boundaries, and admission for the remaining seats is given based on a random lottery.[20] Due to its LAUSD affiliation as a conversion charter school, Ralph Waldo Emerson Middle School is still included in the LAUSD enrollment and capacity data.

LAUSD School Enrollment and Capacity

LAUSD capacity and enrollment data includes both LAUSD public schools and LAUSD-affiliated charter schools, but not independent charter schools or private schools. The LAUSD capacity and enrollment data takes into account portable on-site classrooms, expansions of existing schools, student permits and transfers, school-specific educational programs, and other operational activities or educational programming that affects capacity and enrollment at LAUSD schools. LAUSD's methodology to assess whether a school can enroll additional students ("Available Capacity") is to determine the maximum number of students the school can serve while operating on its current calendar ("Current Capacity") and subtract the total number of students either living within in the school's service boundaries who are eligible to attend the or enrolled at any on-site magnet centers ("Current (Resident) Enrollment"). "Actual Enrollment" represents the number of students actually attending the school now, including magnet students. Based on LAUSD standards, a school is considered overcrowded if 1) the school is currently on a multi-track calendar, 2) there is currently a seating shortage, and/or 3) there is a seating overage of less than or equal to a "safety margin" of 30 seats. Although "Actual Enrollment" may be less than the school's maximum capacity, schools may still be designated as overcrowded because of how LAUSD defines overcrowding; LAUSD's definition of "Available Capacity" reflects the difference between maximum capacity and the number of students residing within the service boundaries that have admission preference and could potentially enroll, not the actual number of students enrolled.

The LAUSD school services analysis in Section 4.11 of the EIR, utilizes school boundary, enrollment, and capacity data for SY 2012-2013, the most recent data available at the time of the analysis. As shown in the EIR, Table 4-11.9 on page 4.11-19, a total of 15 schools serve the ECTNP Area: nine elementary schools, three middle schools, and three high schools. Based on SY 2012-2013 data, two schools were identified as operating in excess of capacity: Shenandoah Street Elementary School (seating overage of 13) and Webster Middle School (seating shortage of 200). The remaining schools serving the ECTNP Area were operating under enrollment capacity. The net available capacity for all schools serving the ECTNP Area results in a seating overage of 734 for elementary schools, a seating overage of 1,158 for middle schools, and a seating overage of 3,789 for high schools.

Data from LAUSD's most recent school year (SY 2016-2017) is provided in an updated Table 4.11-9 for informational purposes only. As shown in the Updated Table 4.11-9, a total of 16 schools serve the ECTNP Area: nine elementary schools, four middle schools, and three high schools. Based on SY 2016-2017 data, seven

[19]LAUSD Facilities Services Division, *Options for Students, Letter to Parents,* January 22, 2013, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/106/Options%20for%20Students%20-%20Letter%20to%20Parents%20-%20English%201.pdf, accessed August 8, 2017.

[20]LAUSD Facilities Services Division, *LAUSD Charter Schools: Frequently Asked Questions,* https://planning.lacity.org/eir/ CrossroadsHwd/deir/files/references/K311.pdf, accessed August 8, 2017.

schools were identified as operating in excess of capacity: Palms Elementary School (seating overage of 7), Shenandoah Street Elementary School (seating shortage of 78), Brockton Avenue Elementary School (seating overage of 4), Emerson Community Charter School (seating shortage of 341), Webster Middle School (seating shortage of 186), Mark Twain Middle School (seating shortage of 61), and Venice High School (seating shortage of 334). The remaining schools serving the ECTNP Area are operating under enrollment capacity. The net available capacity for all schools serving the ECTNP Area results in a seating overage of 572 for elementary schools, a seating shortage of 196 for middle schools, and a seating overage of 207 for high schools.

LAUSD enrollment forecasts are limited to five-year increments and do not extend out to 2035, and thus, a comparison to LAUSD forecasts for the plan horizon year of 2035 is not possible. Nonetheless, for informational purposes, EIR Impact 4.11-3 discusses how the Proposed Project could be expected to increase student enrollment at LAUSD schools by the year 2035 of 2,221 students (based on LAUSD *Student Generation Rate Calculation*), including 1,051 elementary school students, 537 middle school students, and 632 high school students. Based on the updated SY 2016-2017, the LAUSD schools serving the ECTNP Area would not be able to accommodate the increase in student enrollment generated from the Proposed Project. As discussed in the EIR, student population may change (inside and outside the ECTNP Area) between now and 2035 and LAUSD will need to respond accordingly. LAUSD may need to expand existing schools and/or provide new facilities to accommodate students generated by cumulative development and the Proposed Project.

To help relieve schools that are operating at or in excess of capacity, LAUSD employs the LAUSD Choices Program that provides education choices including Magnet and Permits with Transportation programs to students residing within LAUSD boundaries. Magnet themes in the program include business, communication arts, gifted/highly gifted/high ability, liberal arts, public service, science/technology/engineering/math, and visual and performing arts. Independent Charter Schools, as well as private schools, also provide additional options.

LAUSD Facilities Planning

As stated in the EIR, LAUSD does not have plans for increasing enrollment capacity at the schools serving the ECTNP area, with the exception of Webster Middle School. The LAUSD Facilities and Services Division (FSD) is responsible for the execution of the LAUSD school construction bond programs, maintenance and operation of schools, utilization of existing assets, and master planning for future capital projects. FSD monitors growth and school capacity to ensure educational development needs are met. The LAUSD prepares a Strategic Execution Plan (SEP) which provides an update on bond programs and guides new school construction, repair and modernization of existing facilities, and otherwise accommodates future educational development needs. The 2017 Strategic Execution Plan is the latest SEP developed by the LAUSD. In January 2014, the Board of Education approved the School Upgrade Program (SUP) to support the creation of projects that will modernize, build, and repair school facilities to improve student health, safety, and educational quality. The SUP will be the next phase of the LAUSD bond program for future LAUSD projects.

In summary, the EIR adequately analyzes impact of the Proposed Project on schools. The City has reviewed the comments and does not find that the commenters provide substantial evidence supporting the need for different analysis or conclusions from those in the EIR.

MASTER RESPONSE NO. 6 – TRAFFIC ANALYSIS METHODOLOGY

Summary of Master Response

- **The comments concern general traffic congestion levels on the Westside of Los Angeles and are not specifically related to the adequacy of the technical analysis undertaken in the EIR or the impacts identified as a result of the Proposed Project. These comments will be included in the administrative record and forwarded to decision-makers for their consideration in taking action on the Proposed ECTNP.**
- **The transportation analysis undertaken in the EIR adheres to the City of Los Angeles guidelines for evaluating the impacts of a land use project to the circulation system and sufficiently addresses the requirements of CEQA.**
- **The transportation analysis concludes that the Proposed ECTNP will have significant and unavoidable impacts with regard to the circulation system, neighborhood intrusion, and the Congestion Management Plan (CMP) arterial intersection analysis.**
- **In addition to the intersection Level of Service (LOS) analysis, other metrics, such as Vehicle Miles Traveled (VMT) per capita, are used in the EIR analysis to evaluate the Proposed ECTNP in the context of cumulative conditions. These metrics show that the Proposed ECTNP could have an overall positive impact on the transportation system within the West LA region under a VMT analysis.**
- **The Proposed Project includes provisions to help minimize transportation impacts from the Proposed Project. The Proposed Plan requires development located within the boundaries of the West Los Angeles Transportation Improvement and Mitigation (WLA TIMP) Specific Plan Area to pay the applicable Transportation Impact Assessment (TIA) fees in that plan, and will contribute to the funding and provision of transportation improvement projects identified on the WLA TIMP list.**

Summary of Comments

Several comments relate to the general traffic conditions and congestion levels on the Westside of Los Angeles. The commenters states that the streets are near gridlock, delays to vehicles have increased, that the Proposed Project's changes to the roadway network would exacerbate traffic congestion, and that a number of specific streets cannot accommodate existing traffic demand and would not be able to accommodate any additional demand resulting from the Proposed Project.

Response

The Westside of Los Angeles, like many other urban areas throughout the country, experiences significant traffic congestion. As stated on page 4.12-39 of the EIR, multiple intersections in the study area were observed to experience acute traffic congestion during the afternoon peak traffic period on certain approaches of the intersection, resulting in a reduced number of vehicles traveling through the intersection. Despite an extensive street network, vehicular circulation continues to deteriorate due to historical over-reliance on the car as the primary mode of transportation. The combination of many regional destinations, oversaturated roadways, and limited north-south transit options contribute to the congestion levels.

The analysis in the EIR follows the City of Los Angeles *Traffic Study Policies and Procedures* and industry practices in evaluating the effect of the Proposed Project against both existing (2015) and future (2035) traffic conditions. The traffic analysis uses the year 2015 to represent existing conditions, as the anticipated opening year of Phase 2 of the Expo LRT Line was 2015 and the Proposed ECTNP assumes the Expo LRT to be operational. The evaluation of traffic impacts includes the influence of local and regional travel, traffic related to cumulative development, and the vehicle trips associated with the Proposed Plan land uses within

each station area. The thresholds of significance and standards used in the analysis are found in the EIR on pages 4.12-31 to 4.12-37. The EIR analyzed all reasonably foreseeable cumulative impacts related to transportation and traffic in Section 4.12, Transportation and Traffic, of the EIR, which evaluates the cumulative impacts of the Proposed Project in conjunction with other reasonably foreseeable future projects.

Where traffic impacts to the circulation system were identified in the EIR, Impact 4.12-2, on page 4.12-45, mitigation measures, such as roadway restriping and signal modifications, were evaluated; however, traditional physical roadway widening mitigations were generally determined to be infeasible due to right-of-way constraints and because they conflict with the objectives of the Proposed Plan to encourage travel by alternative modes such as transit, walking, and biking. Analysis was also undertaken for intersections located in the adjacent cities of Culver City and Santa Monica. Mitigation measures for impacted intersections were identified in these jurisdictions but were generally deemed to be infeasible as the City of Los Angeles does not have control of these intersections in order to implement the identified mitigation measures.

In addition to analyzing traffic based on Level of Significance (LOS), the EIR for informational purposes included analysis of the Proposed Project based on VMT-related metrics. The incorporation of VMT-related metrics is in response to SB 743, which called for the Office of Planning and Research (OPR) to develop new technical guidance for transportation metrics that measure project impacts by encouraging projects to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses versus the current priority of reducing vehicle delay at intersections (LOS) through roadway widening as a mitigation. SB 743 specifically instructs the Governor's OPR to revise the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts in Transit Priority Areas (TPAs). Consistent with PRC Section 21099(c), the draft CEQA guidance from OPR addressed transportation impacts in general, not just those in TPAs. It focuses on per-capita VMT as a metric for analyzing traffic impacts, it also identifies other potential metrics that can be considered in measuring transportation impacts, including total VMT, vehicle trips (VT), and peak period mode split. The EIR addresses VT, total VMT, VMT per capita, and mode split metrics in the context of cumulative conditions (which includes the Regional Transportation Plan, MP 2035, and the CTCSP/WLA TIMP) with and without the Proposed ECTNP within the West Los Angeles area. With the mix of land uses and density proposed as part of the Proposed ECTNP, the overall VMT is expected to increase in the West Los Angeles area. However, it is anticipated that by providing housing and employment opportunities near transit, total VMT per capita within the area will decrease as people and jobs locate in proximity to transit (EIR on page 4.12-82). In addition, the analysis in the EIR shows the Proposed ECTNP has the effect of decreasing automobile mode share while increasing transit/bicycle/walk trips (EIR on page 4.12-83). VMT and other metrics are provided for informational purposes only as the City has not implemented a significance threshold for VMT or VMT per capita at this time.

The City of Los Angeles is currently in the process of adopting an amendment to an existing transportation plan and impact fee for the Westside (including most of the ECTNP Area) which aims to minimize the transportation impacts caused by new development. The existing West Los Angeles Transportation Improvement Mitigation Program (WLA TIMP) assesses fees on certain new developments to pay a fair share towards improving the overall transportation system. (Improvements anticipated to result from the WLA TIMP are not relied upon in the intersection LOS calculations and analysis in the EIR). The plan and fee program for the West Los Angeles area cannot be responsible for addressing congestion caused by existing land uses, but it aims to help offset transportation impacts caused by new development. Per the State of California Mitigation Fee Act, development impact fees, like those established by the WLA TIMP, cannot include the cost attributable to existing deficiencies in public facilities (Government Code Section 66000-66008).

In summary, the EIR adequately analyzes transportation and traffic using appropriate assumptions from approved models. The City has reviewed the comments and does not find that the commenters provide substantial evidence supporting the need for different analysis.

MASTER RESPONSE NO. 7 – NEIGHBORHOOD INTRUSION

Summary of Master Response

- **The comments express concern over the potential for increased traffic levels resulting from the Proposed Project to impact traffic conditions on neighborhood streets. These comments will be included in the administrative record and forwarded to decision-makers for their consideration in taking action on the proposed ECTNP. No response is required because these comments do not raise any new significant environmental issues or address the adequacy of the technical analysis undertaken or the impacts identified as a result of the Project. Nevertheless, the concerns are addressed below.**
- **The transportation analysis in the EIR adheres to the City of Los Angeles guidelines for evaluating the impacts of the implementation of the Proposed ECTNP to the circulation system and sufficiently addresses the requirements of CEQA.**
- **The EIR analysis accounts for the potential redistribution of vehicular traffic from highly congested roadways to roads that have more available capacity.**
- **Although the extent to which trips would divert to local roadways is not reasonably foreseeable due to the broad scope of the Project, the EIR analysis anticipates that increased traffic could occur on local roadways. Therefore, the EIR concludes that Neighborhood Intrusion impacts are significant and unavoidable.**

Summary of Comments

A number of comments express concern regarding general traffic congestion on the Westside and the potential for new trips generated by the Proposed Project to result in neighborhood intrusion and "spill over" traffic from the major streets in the area. Commenters state that changes in the roadway network in the Plan would "exacerbate" existing congestion and also result in additional traffic being diverted into residential neighborhoods. Commenters also express the opinion that the Beverlywood and Cheviot Hills neighborhoods north of the Palms Station currently suffer from an "onslaught" of cut-through traffic. There was an overall opinion expressed that neighborhoods are already suffering from cut-through traffic without the Proposed Project.

Response

The transportation analysis in the EIR considers and discloses traffic impacts in and around the ECTNP Area at study intersections and on residential roadways. As stated in the EIR on pages 4.12-34 to 4.12-35 and discussed under Impact 4.12-3, the Los Angeles Department of Transportation's *Traffic Study Policies and Procedures* sets forth thresholds of significance to determine whether a project has a significant impact related to neighborhood intrusion based on increase in average daily traffic volume on a local residential street. Because the routing of traffic to local residential streets depends on the locations of site access points for each development site, and those access points cannot be known at this time, the Proposed Project is assessed qualitatively against these thresholds and this approach is adequate for purposes of the EIR.

Regarding the potential for traffic diversion into the local neighborhoods as a result of the Proposed Project, the traffic analysis in the EIR accounts for the potential redistribution of vehicular traffic from highly congested roadways to roads that have more available capacity. While not every local street is included in the City's Travel Demand Model, the existing and cumulative effect of cut-through traffic is accounted for on the modeled roads. The extent to which trips would divert to specific adjacent local residential roadways is not reasonably foreseeable given the broad scope of the Proposed Project and the uncertainty of the specific locations of individual development project driveways; therefore, impacts cannot be precisely determined. The EIR adequately analyzed the topic based on available information and reasonably

foreseeable impacts, and further detail would be speculative due to information currently available. However, it is anticipated that increased traffic could occur on local neighborhood roadways. Therefore, the EIR Impact 4.12-3, on page 4.12-69 indicates that the Proposed Project would result in a significant impact related to neighborhood intrusion. Mitigation Measure **TR-14** was identified to address this impact (EIR on page 4.12-70), but even with this measure, the EIR concludes that impacts would remain significant.

MASTER RESPONSE NO. 8 - CUMULATIVE IMPACTS

Summary of Master Response

- **The growth assumptions utilized in the EIR for purposes of analyzing potential cumulative impacts are based on information known or reasonably available at the time of analysis and are reasonable and legally adequate.**
- **The cumulative analysis presented in the EIR uses the Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) growth forecast, which is generally consistent with the 2016-2040 RTP/SCS, to identify reasonably foreseeable growth anticipated to occur in the same timeframe as implementation of the Proposed ECTNP.**
- **Project details were known for the Casden Sepulveda Project at the time of the EIR analysis; therefore, the development proposal was specifically included in the analysis and growth assumptions.**
- **Project details were not known for the Martin Expo Town Center, the Fox Studio Master Plan, or the Veterans Affairs Master Plan projects at the time of the EIR analysis; while project-specific details were not included in the analysis, these projects fall within the growth assumptions included in the SCAG 2012-2035 RTP/SCS and analyzed in the cumulative analysis of the EIR.**
- **In determining reasonably foreseeable levels of development, the SCAG growth forecasts and DCP assumed that some portion of projects would make use of development incentives for affordable housing.**

Summary of Comments

Several commenters indicate their opinion that the cumulative impacts from major projects proposed subsequent to 2008 were not considered in the EIR analysis. Comments specifically note the following projects as not being addressed: the Casden Sepulveda Project, the Fox Studio Master Plan Project, the Martin Expo Town Center Project, and the Veterans Affairs (VA) Master Plan Project. In addition, commenters indicate their opinions that the cumulative growth projections fail to factor in development incentives (i.e., floor area, dwelling units, height, etc.) available to developers in exchange for the provision of affordable housing under SB 1818, SB 375, SB 743, and other state laws that would result in increased density or intensity.

Summary of Cumulative Impact Analysis Methodology

Cumulative impacts are discussed in Section 4.14, Cumulative Impacts, of the EIR. The analysis considers different geographies as appropriate to each environmental impact area. Many cumulative impacts (such as aesthetics and noise) occur within the immediate vicinity of specific development projects (adjacent to or within half mile); some impacts (such as impacts to local utility lines) affect infrastructure farther away (one to two miles); some impacts are at the City level (such as the impact to the City's sewer treatment facilities); some impacts are regional (such as air quality criteria pollutants) and one impact is global (greenhouse gas (GHG) emissions). For transportation impacts, anticipated growth in the overall area (both within and outside the ECTNP Area) is distributed to the transportation network and analyzed accordingly. The cumulative analysis presented in the EIR concludes that the Proposed ECTNP would result in a cumulatively considerable contribution to significant impacts related to aesthetics (visual character and shade/shadow), air quality (construction), cultural resources (historic resources), noise (construction), public services (parks), and traffic (circulation, neighborhood intrusion, and CMP arterial facilities).

The cumulative impact analysis in Section 4.14, Cumulative Impacts, of the EIR appropriately uses adopted projections from a regional planning document (SCAG 2012-2016 RTP/SCS), pursuant to CEQA Guidelines

Section 15130. CEQA Guidelines Section 15130 identifies the following two basic methods for establishing the cumulative environment in which a project is considered: (1) the use of a list of past, present, and probable future projects, or (2) the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. Use of a list of past, present, and probable future projects is typically only appropriate for short-term growth forecasts because a cumulative project list identifies projects that are in the planning phase and will be completed within five to ten years, but does not account for projects likely to occur in an area over a 20-year time frame. Use of a regional planning document is most appropriate for the Proposed Project's forecasted planning horizon year of 2035. While the SCAG forecast does not identify specific development projects on specific sites, it generally includes sufficient growth within the larger scale of the analysis to more than account for individual projects overall through the approximately 20-year planning horizon of the Proposed ECTNP. Therefore, the cumulative analysis presented in the EIR uses the SCAG 2012-2035 RTP/SCS adopted growth forecast to determine the reasonably foreseeable growth through 2035 expected to occur outside the ECTNP Area.

Appendix F of the EIR explains the methodology for determining reasonably foreseeable growth within and outside the ECTNP Area, based on SCAG projections, policy changes, and market demand. As discussed below, specific development projects known at the time the population modeling was being conducted were accounted for in the reasonably foreseeable growth forecasts. In Table 4.14-1 of the EIR, presents projections for population, housing, and employment in the areas adjacent to, but outside of, the ECTNP Area, including portions of the cities of Santa Monica and Culver City. Within two miles of the Project Area (but not including the ECTNP Area itself), approximately 44,000 people, 31,000 dwelling units, and 29,000 employees are forecast to be added by 2035 according to the SCAG 2012-2035 RTP/SCS. This growth, combined with the growth within the ECTNP Area, is the reasonably foreseeable cumulative development analyzed in the EIR.

As explained in the **Appendix F** of the EIR, at the time of the EIR analysis, the 2012-2035 RTP/SCS was the most recent adopted RTP/SCS available. The 2016-2040 RTP/SCS was adopted April 7, 2016, after the analysis in the EIR was completed. During the final stages of preparation of the EIR, the 2016-2040 RTP/SCS was reviewed to determine if there were any substantial differences in either: 1) policy and/or 2) growth trends associated with the socioeconomic data, as compared to the 2012-2035 RTP/SCS. Based on this review it was determined that the minor refinements in policy and associated updated socioeconomic data in the 2016-2040 RTP/SCS would not substantially affect the analyses or conclusions of the EIR. Further, SCAG staff indicated that between the 2012-2035 RTP/SCS and the 2016-2040 RTP/SCS changes to the network and associated calculations were minor. Please see **Appendix K** of the EIR for a more detailed discussion of the differences between the 2012-2035 RTP/SCS and the 2016-2040 RTP/SCS.

Specific Development Projects Proposed in the ECTNP Area and Vicinity

Generally, development projects for which details were known at the time of the EIR analysis were incorporated specifically into the analysis assumptions; development projects for which details were not known at the time of the analysis were not incorporated specifically into the analysis assumptions, but are within the growth assumptions included in the SCAG 2012-2035 RTP/SCS projections and analyzed in the cumulative analysis of the EIR in Section 4.14, Cumulative Impacts. Specific development projects and incorporation in the EIR analysis are as follows:

- The Casden Sepulveda Project, which is located within the ECTNP Area at the northwest corner of Exposition and Sepulveda Boulevards, was generally known at the time the growth assumptions were being developed for the EIR. For purposes of analysis, 591 dwelling units and 14,324 square feet of commercial development were assigned to the Casden Sepulveda Project parcels (and were included in the Future with Project and Future No Project conditions analyses). The Casden Sepulveda Project was approved with 595 dwelling units and 15,000 square feet of commercial development, an insignificant difference compared to what was analyzed.

- The Martin Expo Town Center Project, which is located within the ECTNP Area at the northwest corner of Olympic Boulevard and Bundy Drive was approved with 150,000 square feet of creative office space 516 residential units, a 35,000-square-foot supermarket, 46,000 square feet of general retail uses, and 14,000 of restaurant uses. This project was not specifically included in the analysis, as project details were not known at the time of the analysis (the Martin Expo Town Center Project was not approved by City Council until 2016). The development capacity of the proposed Hybrid Industrial: Jobs Emphasis zone was assumed for the Martin Expo Town Center site. The site was also analyzed in the Alternative Compliance scenario to include more residential/less jobs. The approved Martin Expo Town Center project falls within the range of potential development that was analyzed for this station area.
- The Fox Studio Master Plan Project, which is located outside of the ECTNP Area, was not known at the time the analysis in the EIR was undertaken. However, as explained above and in **Appendix F** of the EIR, growth assumptions from the SCAG 2012-2035 RTP/SCS were used to anticipate and analyze development in areas outside the ECTNP Area. The Fox Studios Master Plan Project is located in Century City, which is located in two traffic analysis zones (TAZs). The SCAG model identifies 40,533 jobs in these two TAZs in 2008 (because of the recession, jobs in 2008 were similar to jobs in 2013); in 2035 the SCAG model anticipates that 44,891 jobs will be located in Century City (in the same two TAZs). That represents an increase of 4,358 jobs from existing conditions. The Fox Studios Initial Study (published in April 2016) indicates that on average days there would be a net increase of approximately 3,090 jobs through 2035 as a result of the Fox Studios Expansion. The Fox Studios Master Plan Project has yet to go through the City's review and approval process and may change as a result of input during that process. Nonetheless, the growth assumptions included in the SCAG 2012-2035 RTP/SCS, which were used in the EIR, are sufficient to accommodate the Fox Studios Master Plan Project as currently contemplated.
- The Veterans Affairs (VA) Master Plan Project, which is also located outside the ECTNP Area, proposes construction of 1,200 permanent supportive housing units for disabled and traumatized veterans and 739 short-term units for homeless veterans. The Master Plan also accommodates the possibility of adding 900 supportive housing units as well as alternative supportive housing uses, resulting in a possible total of up to 3,500 supportive housing units. Vehicle trips generated from permanent supportive housing tend to be relatively minimal. According to the LADOT's 2016 Transportation Impact Study Guidelines, permanent supportive housing generates 1.27 daily vehicle trips per dwelling unit, compared to typical residential or mixed-use developments which generate 6.65 daily vehicle trips per dwelling unit.[21] The SCAG 2012-2035 RTP/SCS did not specifically anticipate that development that comprises the VA Master Plan. However, TAZs within a one-mile radius of the VA West Los Angeles Campus contained 34,884 housing units in 2008, and projected that these TAZs would contain 42,898 housing units in 2035. This projected growth of 8,014 housing units would more than accommodate the possible 3,500 supportive housing units proposed in the VA Master Plan, as well as allowing for other housing developments that are anticipated to occur in the area. The RTP/SCS TAZ development assumptions are intended to be used as representative growth for an area and not intended to be used to determine impacts at the block level. Given the distance of the VA site from the ECTNP Area and the assumed growth in West Los Angeles in general, the impacts of the VA Master Plan are reasonably accounted for in the EIR.

Incorporation of Density Bonus Incentives into Development Assumptions

Several recent state and local laws, including Measure JJJ and the Transit Oriented Communities Affordable Housing Incentives Guidelines, have been passed to encourage and/or facilitate increased density for housing developments that include affordable units with a particular emphasis on projects that are located in proximity to transit. Growth forecasts undertaken by SCAG are based on a number of factors including historic trends and

[21] Institute of Transportation Engineers (ITE), *Trip Generation Manual, 9th Edition*, 2012.

policy incentives, generally taking into account applicable regulations (which include various incentive programs and regulations). Similarly, within the ECTNP Area, including both change and non-change areas, future reasonably expected development is based on a number of factors including anticipated demand, incentives, and density limitations (see **Appendix F** of the EIR). The analysis of impacts using reasonably expected housing units is a disclosure of potential development levels that could occur in 2035, the horizon year of the Proposed Plan, based on the proposed land uses and zone changes. The EIR analyzes reasonably expected development (See page 3-5 and **Appendix F**). Assumptions are made about the level of build-out that is likely or reasonably expected to occur in the Project Area based on the acreage of land designated for each type of land use; allowable densities and intensities in each designation; and assumptions about average levels of development, which is informed, in part, by development trends and building permit history. The ECTNP Area is largely built out, though in some areas it is built out at densities and intensities that are below the maximum permitted by the current zoning. Moreover, redevelopment of properties within the Proposed ECTNP is likely to occur in only a fraction of the total Plan Area during the life of the Plan. Also based on historical evidence, redevelopment typically does not occur at the maximum allowable densities and intensities. Economic conditions, market trends, financial lending practices and construction and land acquisition costs affect marketplace decisions relating to proposed development. Additionally, past building data demonstrates that a number of City policies and regulations place further limitations on development densities. Density bonus units have historically represented a small subset (one through five percent) of the housing units built in the City. Density bonus incentives created by the Proposed Plan as well as incentives applicable to properties within the Plan Area but outside the areas of proposed change have been factored into the calculations of reasonable expected development based on the trends discussed above.

While, as noted above, affordable housing density bonus incentives have been accounted for in the reasonably expected development assumptions, a significant portion of the Project Area is zoned R1 or R2 and, by virtue of the permitted densities in those zones, would not be eligible for density bonus incentives. Density bonus incentives are only applicable to projects of five or more dwelling units. Within the approximately 1,971 acres of the Project Area, approximately 805 acres are zoned R1 and approximately 70 acres are zoned R2; therefore, roughly 44 percent of the Project Area is ineligible for density bonuses. Furthermore, numerous parcels within the ECTNP Area are ineligible for these incentive programs because housing is not allowed (such as parcels zoned as Open Space or Industrial).

In addition, a Market Study (see **Appendix L** of the EIR) was prepared for the ECTNP Area to determine the market demand for jobs and housing within the ECTNP Area. The forecasted growth within the ECTNP Area aligns with anticipated demand indicated in the Market Study. In determining the levels of development in the EIR, it was assumed that some portion of projects would utilize development incentive programs, including the incentive program provided through the Bonus FAR system in the Proposed Plan (within areas of proposed change).

The City's capacity calculations and analysis represent the City's best efforts to identify and disclose the potential impacts from the Proposed Plan. No further response is required because the comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR, including growth forecasts. (PRC Section 21091(d); CEQA Guidelines Section 15204(a)).

Conclusion

CEQA Guidelines Section 15130(b) allows that "the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact." Therefore, the growth assumptions utilized in the EIR for purposes of analyzing potential cumulative impacts from reasonably foreseeable development inside and outside the ECTNP Area are reasonable and legally adequate.

LETTER NO. 1

Dianna Watson, IGR/CEQA Branch Chief
State of California
Department of Transportation District 7 (Caltrans)
California Department of Transportation
100 S. Main Street, MS 16
Los Angeles, CA 90012

Response 1-1

The commenter summarizes the objectives of the Proposed ECTNP and points out that such objectives are consistent with State policy to promote active transportation, reduce greenhouse gas emissions, and address climate change. The commenter's statements will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 1-2

The commenter expresses concern regarding parking regulations and the potential for minimum parking requirements to increase housing cost and enable automobile use rather than transit use. The commenter further suggests consideration of maximum parking requirements rather than minimum parking requirements.

Parking issues are not addressed under CEQA unless they lead to physical environmental impacts. The commenter does not indicate a physical environmental impact at issue. Accordingly, see **Master Response No. 1 – General Comments and Non-CEQA Issues**. The Proposed ECTNP contains parking requirements that are consistent with citywide regulations for areas around transit.

Response 1-3

The commenter expresses the opinion that the restriping of the roadway to increase the number of travel lanes or turning pockets has the same effects as the widening of a roadway, and that it promotes driving at the expense and comfort of other modes such as walking and bicycling. The comment refers to the EIR page 4.12-58, which states that physical intersection improvement mitigations that require widening travel lanes, adding turn lanes, and increasing pedestrian crossing distances would be in conflict with multiple Project Objectives, and therefore considered to be infeasible.

The feasible intersection mitigation measures identified in the EIR include improvements, such as restriping, signalization, and traffic signal modifications, that would be consistent with Project goals and objectives. These types of mitigation measures are not considered the same as measures that require additional right-of-way in order to be implemented. Widening roads in urban areas is typically at the expense of narrowing sidewalks, and creates a less hospitable environment for pedestrians, bicyclists, and transit patrons. While restriping a roadway may change the configuration of a street and the number of lanes at an intersection, it does not result in increased crossing times or distance for pedestrians and has not been proven to negatively affect safety. Given the increase in vehicular travel at some of the intersections in the Project Area, this type of mitigation measure was considered to meet the goals and objectives of the plan as it helps to mitigate some of the Project-related traffic impacts without compromising other modes of travel. Mitigation measures that widen the roadway or increase pedestrian crossing distance were determined to be inconsistent with the objectives of the Plan and thus infeasible (EIR on page 4.12-58). Additionally, streetscape improvements and pedestrian features were carefully considered as part of the plan and have been proposed in many of the station areas. The recommended vehicular mitigation measures do not lead to the plan

foregoing "potential treatments that may be more consistent with the ECTNP's Primary Objectives" nor do they conflict with regional and state policy goals.

Response 1-4

The commenter suggests that land use and zone changes in the Project should be expanded to incorporate additional areas so as to realize a greater benefit in terms of per capita VMT and GHG emission reductions.

The Proposed Plan represents a series of policy decisions and takes into account feedback from the public received through the development of the Proposed Plan. The areas of proposed change as well as the proposed levels of allowable development intensity result in a capacity that was adequately discussed and disclosed in the EIR. The capacity is sufficient to accommodate the demographic projections by SCAG as well as a Market Study commissioned for this project area.

As discussed in the EIR, the City of Los Angeles has not adopted any thresholds related to VMT or VMT per capita. Thus, the VMT-related analysis in the EIR is provided for informational purposes only and is not relied up for determination of impact levels. Section 4.5, Greenhouse Gas, of the EIR discusses impacts related to GHG emissions, concluding that impacts under the Proposed Plan would be less than significant.

The comment will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 1-5

The commenter suggests that the Final EIR should clarify whether the studied impacts are worse relative to "preserving the existing automobile-oriented status quo," as it is anticipated that the mixed-use development and greater density allowed under the Proposed ECTNP would "lower per capita use of resources, emissions and traffic impacts."

The EIR evaluates a number of different scenarios, and compares the future year 2035 with the Project to future year 2035 without the Project. The EIR also analyzed future conditions assuming the addition of the 2012-2035 RTP/SCS, the adopted Mobility Plan 2035 (MP 2035) and proposed updates to the Coastal Transportation Corridor Specific Plan and West LA Transportation Improvement and Mitigation Specific Plan (CTCSC/WLA TIMP) and compared these future cumulative conditions with and without the project.

As shown in Table 4.12-19 of the EIR, the cumulative analysis showed that although overall VMT is anticipated to increase with implementation of the Proposed Project, per capita VMT would decrease. Additionally, Table 4.12-20 of the EIR illustrates that it is anticipated that implementation of the Proposed Project would result in a decrease in the share of trips made by automobile and an increase in the share of trips made by transit, bicycling, and walking. As discussed on pages 4.12-83 and 4.12-84 of the EIR, the cumulative conditions considered in the transportation analysis in combination with the Proposed Project would improve access to transit and concentrate growth in compact, mixed-use developments in proximity to transit, resulting in decreased VMT per capita. The EIR addresses VT, VMT, VMT per capita, and mode split metrics in the context of cumulative conditions (including the regionally adopted RTP, MP 2035 and CTCSP/WLA TIMP) with and without the Proposed ECTNP. This analysis is provided for informational purposes only and was not used to determine the level of impact.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. The comments are noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project.

Response 1-6

The comment states that construction activities that require the use of oversized–transport vehicles on State highways or that perform work within State right-of-way require a permit from Caltrans and recommends that large size truck trips be limited to off-peak commute periods. The comment also states that projects need to be designed to discharge clean run-off water.

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The City follows a set of guidelines relating to traffic management plans during construction of a new land use project. The City or applicant will coordinate with Caltrans when a transportation or encroachment permit is necessary. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

In regards to the comment pertaining to stormwater runoff, as discussed in Section 4.7, Hydrology and Water Quality, of the EIR, all construction activities would be subject to applicable requirements of the City's Standard Urban Stormwater Mitigation Plan (SUSMP), Stormwater and Urban Runoff Control Ordinance, and Low Impact Development Ordinance to address stormwater pollution. These requirements are enforced through the City's plan approval and permit process and all new individual projects are subject to City inspection. Compliance with the existing regulatory framework would ensure that construction does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality.

LETTER NO. 2

Gabriela Silva
Culver City Planning Division
Traffic Engineering Division
9770 Culver Boulevard
Culver City, CA 90232

Response 2-1

The comment contains introductory text, and no further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 2-2

This comment states that the sentence in the EIR on page 4.12-10, under the Culver City Station should be corrected to state, "Station Area neighborhoods also include multi-family homes between Washington ~~Place~~ Boulevard and Venice Boulevard."

Please see Chapter 2.0, Corrections and Additions for page 4.12-10.

Response 2-3

The comment states that the traffic analysis in the EIR incorrectly uses Culver City's thresholds of significance to determine impacts to intersections located within Culver City, and that the City of Los Angeles is required to use thresholds from the City of Los Angeles traffic impact guidelines, referring to a letter from Culver City dated October 31, 2006.

The 2006 letter stated that "the City of Culver City is in the process of updating our guidelines for preparing traffic studies" and requested that "in the interim" LADOT's thresholds be used for analyzing impacts on intersections in Culver City by development projects in the City of Los Angeles. Subsequent to the 2006 letter, Culver City's staff recommended update to the City's traffic study guidelines was considered by the Culver City Planning Commission in a public hearing on June 17, 2009, which was continued to June 30, 2009. The proposed revisions included formally changing Culver City's thresholds of significance to conform to those used by the City of Los Angeles. The meeting minutes state that the Culver City Planning Commission approved a motion to retain Culver City's thresholds for traffic studies.[22] Therefore, the Culver City Planning Commission has endorsed utilization of Culver City's thresholds of significance for traffic studies on intersections with Culver City. The Culver City Council to date has not heard discussion on this topic, and therefore the City of Culver City has not formally adopted new thresholds.

Additionally, the City of Los Angeles, as the lead agency, has the discretion to select and apply thresholds of significance for its projects. The analysis methodology chosen for the EIR includes applying each of the affected local agency standards/thresholds for the purpose of evaluating traffic impacts. This has been the City's standard practice and has been applied consistently in environmental impact reports authored by the City. Furthermore, the City has concluded based upon its professional judgment that utilizing the thresholds used by the jurisdiction in which the traffic facility is located ensures the analysis of significant impacts to traffic facilities in other jurisdictions is consistent. Therefore, the thresholds of significance used in the EIR for intersections in Culver City were appropriate, in light of the above facts.

Based on this approach, the impact conclusions in the EIR for the identified intersections located within Culver City (Intersections 59, 65, 73, 81, 82, 83, 84, 85 and 86) are presented accurately and were determined to be less than significant in accordance with the approach/methodology selected by the lead agency. In summary, the EIR correctly analyzes traffic impacts in Culver City.

Response 2-4

This comment states that the EIR, Table 4.12-13: Summary of Number of Intersections Significantly Impacted needs to be revised to reflect additional impacted intersections in Culver City.

Please refer to **Response 2-3**. The EIR correctly analyzes traffic impacts in Culver City and Table 4.12-13 does not require revisions.

Response 2-5

The comment states that Cattargus Avenue between Venice and Washington Boulevards and other residential streets in this area could be impacted by traffic and notes that residents of this area have already complained about neighborhood intrusion.

Regarding the potential for traffic intrusion into the local neighborhoods, please refer to **Master Response No. 7 - Neighborhood Intrusion**.

The commenter's statements will be forwarded to the decision-makers for their consideration prior to taking action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

[22]Meeting Minutes, Regular Meeting of the Culver City Planning Commission for June 17, 2009.

Response 2-6

The comment states that the Culver City Transportation Department may provide comments regarding impacts related to transit service.

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. The Culver City Transportation Department submitted a comment letter (Comment Letter No. 7), which is responded to separately. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 2-7

The comments states that the Culver City Fire Department will provide comments related to emergency services.

See **Master Response No. 3 - Emergency Services**. Regarding impacts to emergency response, please see the discussion in the EIR of Impact 4.12-7. The analysis in the EIR determined that the impact to emergency services is less than significant.

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No additional input was received from the Culver City Fire Department and hence no further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

LETTER NO. 3

Ali Poosti, Division Manager
Los Angeles Bureau of Sanitation (LASAN)
Wastewater Engineering Services Division

Response 3-1

The comment contains introductory text and states that Wastewater Engineering Division of Los Angeles Sanitation (LASAN) has found the Proposed Project to be consistent with State, regional, and local policies to encourage infill development proximate to transit stations as a means to accommodate growth. The comment also states that LASAN does not have sufficient information to provide a detailed analysis regarding sewer capacity (since the specific location of development is not known). The comment requests that DCP provide updates on any changes to the Proposed Project to assist LASAN in determining if a sewer assessment is required in the future. As project details become available developers are required to contact LASAN to ensure sewer availability.

The responses below address LASAN's specific comments on the Proposed Project and the environmental analysis in the EIR.

Response 3-2

The commenter states that the LASAN Watershed Protection Division (WPD) is in charge of ensuring implementation of Municipal Stormwater Permit requirements within the City. LASAN anticipates that the Proposed Project would require the implementation of stormwater mitigation measures, including Stormwater Low Impact Development (LID) requirements as outlined in the manual "Development Best Management Practices Handbook – Part B: Planning Activities." The comment recommends that development projects within the Proposed Plan Area seek WPD input regarding LID requirements in the early phases of development. In addition, the comment includes a description of the Green Street Initiative

and states that projects would be required to implement Green Street elements such as infiltration systems, biofiltration swales and permeable pavements, which could be implemented in conjunction with the LID requirements to mitigate the impact of stormwater runoff and other environmental concerns.

As discussed in the Section 4.7, Hydrology and Water Quality, of the EIR, the Proposed Project would not result in a substantial increase in impervious surfaces, and therefore, the Proposed Project would not cause a substantial increase in the peak flow rates or volumes that would exceed the drainage capacity of existing stormwater drainage facilities. In addition, consistent with City's LID Ordinance, individual development projects would be required to implement best management practices to manage stormwater and maintain or restore the natural hydrologic character of a development site, reduce off-site runoff, improve water quality, and provide groundwater recharge. Likewise, individual development projects would be required to implement Green Street elements in conjunction with the LID requirements to further address stormwater runoff.

Response 3-3

The comment details stormwater control requirements to minimize stormwater pollution during construction. The comment notes the Wet Weather Erosion Control Plan requirement for projects involving construction during the rainy season, between October 1 and April 15, and the California General Construction Stormwater Permit requirements for projects that disturb more than one acre.

As discussed in Section 4.7, Hydrology and Water Quality, of the EIR individual development projects would be required to comply with all City ordinances and regulations related to stormwater control to ensure that future development does not result in substantial stormwater pollution.

Response 3-4

The comment describes the groundwater conservation measures required by the City of Los Angeles Department of Water and Power (LADWP). The comment also includes a description of the Technical Assistance Program, offered by LADWP to help offset costs of water conservation and reuse systems for qualified projects, and as well as other incentive and rebate programs.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. However, the comments are noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project.

Response 3-5

The comment identifies the onsite recycling requirements for residential developments of four or more units or when the addition of floor area is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. However, the comments are noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project.

LETTER NO. 4

Elizabeth Carvajal, Sr. Manager
Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza
Los Angeles, CA 90012

Response 4-1

The comment contains introductory text and provides recommendations concerning issues that are germane to Metro's statutory responsibility. The comment also provides a brief description of the Proposed Project and expresses Metro's commitment to working with stakeholders to support the development of transit oriented communities. The responses below address Metro's specific comments on the environmental analysis in the EIR.

Response 4-2

The comment states that bus lines 234, 734, and 778 include stops or layovers at the Expo/Sepulveda Station and recommends that DCP include language to inform future development activity within the Proposed ECTNP of Metro's notification procedures and considerations to ensure Metro's bus operations are maintained during and after all construction.

As discussed in Section 4.12, Transportation and Traffic, of the EIR, the Proposed Project seeks to enhance access to transit stations and improve the configuration and condition of streets to better promote pedestrian circulation. Construction-related impacts would generally be temporary and would depend on the approach to development of each parcel or development site. Although specific impacts related to construction cannot be known at this time, it is likely that construction activities could necessitate temporary lane, alley, or street closures or result in bus stop relocation or bus rerouting. Mitigation Measure **TR16** is identified in Section 4.12, Transportation and Traffic, of the EIR to reduce impacts related to construction.

TR16 Projects that require a worksite traffic control plan per current LADOT guidelines shall submit to LADOT for review and approval a plan that mitigates the impact of traffic disruption and ensures the safety of all users of the affected roadway. The plan shall address construction duration and activities and include measures, such as operating a temporary traffic signal, using flagmen adjacent to construction activities, or providing a dedicated pedestrian walkway, as appropriate.

The City would ensure that individual development projects comply with Metro's notifications procedures and considerations to ensure that Metro's bus operations are maintained during and after all construction.

Response 4-3

The comment identifies Metro's *Adjacent Construction Design Manual* that describes Metro's development project review process and considerations for project siting as it relates to Metro facilities. Because of the proximity of the Expo LRT Line and the increased traffic at railroad grade crossings to the Proposed Project, the comment requests the City include policy language or guidance in the Proposed ECTNP that clearly denotes development occurring within 100 feet of a Metro facility will require Metro review and approval, including compliance with Metro's Development Guidelines.

As discussed above, the City would ensure that individual development projects comply with Metro's notifications procedures and considerations to ensure Metro's facilities are maintained during and after all construction. Parcels within 100 feet of Metro facilities are tagged in the ZIMAS system with ZI No. 1117, an inter-departmental correspondence that requires applicants to obtain clearance from Metro prior to any construction activities on the site. However, the comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project.

Response 4-4

The comment states that if a proposed development project has the potential to impact Metro bike facilities and/or parking facilities, the project sponsor must coordinate with Metro, and that any impact to Metro bike or parking facilities during construction must be replaced at a ratio of 1:1. The comment also expresses interest in collaborating with the City to effectuate policies and implementation activities that promote transit and active transportation supportive communities.

As discussed in the EIR on page 4.12-44, the Proposed Project seeks to improve the configuration and condition of streets to better promote bicycle circulation. The analysis anticipates the bicycle networks identified in the City's MP 2035 and the Proposed Project provides for these networks to be accommodated in the future. The Proposed Project would not disrupt any existing or planned bicycle facilities, or create conflicts or inconsistencies with adopted bicycle system plans, guidelines, policies, or standards. However, the comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project.

LETTER NO. 5

Scott Morgan, Director
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95812

Response 5-1

The comment states that the State Clearinghouse (SCH) submitted the EIR to selected state agencies for review, and no state agencies submitted comments before the close of the review period on May 22, 2017. The comment also acknowledges that the City has complied with SCH review requirements for draft environmental documents, pursuant to CEQA.

LETTER NO. 6

Scott Morgan, Director
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95812

Response 6-1

The comment identifies a comment letter on the EIR that was received by the SCH after the review period closed on May 22, 2017. The comment requests that although the City is not required to respond to comments received after the review period, the Governor's Office of Planning and Research encourages the City to incorporate the comments in the Final EIR.

Response 6-2

This comment letter from Caltrans is the same as Comment Letter 1. Please refer to **Responses 1-1** through **1-6**.

LETTER NO. 7

Diana Chang
Culver City Transportation
Culver City Transportation Department
4343 Duquesne Avenue
Culver City, CA 90232

Response 7-1

The comment identifies a number of corrections and additions regarding the Culver City Bus Lines.

The EIR accurately reflects data from the base year (2013). Please see Chapter 3.0, Corrections and Additions, of the Final EIR for changes to pages 4.12-21 and 4.12-22 of the EIR. Information beyond the base year is provided for informational purposes only.

Response 7-2

The commenter indicates that the EIR should conduct a detailed analysis on the impacts to the bus service around each station area in order to evaluate impacts on bus circulation, travel/run time and bus capacity. The comment suggests that there should be additional criteria for determining a safety impact. The commenter also indicated concern with Impact 4.12-9 related to the construction of new development under the specific plan, and requested that applicable transit providers be notified of any changes that may impact transit operations or service.

The analysis presented in Section 4.12, Transportation and Traffic, of the EIR discloses the transportation impacts per LADOT's *Traffic Study Policies and Procedures* and states regulations such as CMP. The future transit system is also subject to change at any time by the operators and under the purview of agencies such as Metro, Culver Bus, and Big Blue Bus. The transit agencies monitor the performance of their services and these may change based on their short- and long-term planning.

The analysis conducted in the EIR concluded that there would not be impacts (per thresholds in the CMP guidelines) to the transit system, including bus service, based on the expected increase in ridership expected to result from the Proposed Project. A detailed assessment of bus circulation, travel/run time and bus capacity is not required under these guidelines. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

The Proposed Project does not include specific design features at this time that could reasonably be expected to increase hazards, so the Proposed Project is assessed qualitatively against these thresholds for purposes of the EIR. The commenter's opinions will be forwarded to the decision-makers for their consideration prior to taking action on the Proposed Project.

Changes in the transportation network that are directly affected by construction will be discussed and addressed by the City of Los Angeles as part of the review process of individual construction projects. Any changes to transit service or stop locations during construction would be addressed through construction traffic management plans and the relevant operators would be notified.

Response 7-3

The comment states that transit benefits should not only be required for non-residential uses that have 50 employees, but should be also required for non-residential uses that have fewer than 50 employees to maximize people's use of transit. The comment also notes that the station areas in the ECTNP Area also serviced by other transit agencies such as Culver City, and a "B-TAP+Green" transit pass (that will allow people to use both Metro and Culver City Bus service) should be established and provided.

The comment relates to specific provisions of the Proposed Plan, and does not address the adequacy of the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 7-4

The commenter notes that the Proposed ECTNP indicates that projects must demonstrate either a 10 percent reduction in AM or PM peak-hour weekday vehicle trips from baseline vehicle trip level, or an Average Vehicle Ridership (AVR) of 1.75 for AM peak-hour weekday vehicle trips and inquires what happens if the AVR is still lower than 1.75 after the 10 percent reduction in peak hour vehicular trips. The commenter also inquires if there are additional measures that the developers will be required to implement in order to achieve the AVR goal. The commenter suggests that the 10 percent reduction requirement should be achieved through implementing TDM strategies and that the trip reductions caused by internal capture should not be counted toward the 10 percent reduction. In addition, the commenter inquires if an AVR of 1.75 exempts projects that result in new net square footage from conducting a Vehicle Trip Generation Analysis. Lastly, the commenter suggests that the following mobility amenities be added to the plan: Dedicated kiss-and-ride area, private shuttle area, and taxi area.

Projects subject to the vehicle trip reduction requirement have to comply with one, but not both, of the following metrics: an AVR of 1.75 or more, or a 10 percent reduction in peak hour weekday vehicle trips from baseline level. This is a policy goal of the Proposed Plan, and this requirement is not being relied upon to mitigate transportation impacts. The EIR has concluded that there are significant and unavoidable traffic impacts. These requirements represent additional measures that projects can implement to minimize impacts.

The comment relates to specific provisions of the Proposed Plan, and does not address the adequacy of the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 7-5

The commenter states that the Proposed ECTNP Streetscape Plan erroneously shows that there is a northbound stop on Sepulveda Boulevard south of Pico Boulevard (nearside of Sepulveda/Pico intersection). In addition, the commenter notes that the Proposed ECTNP doesn't show the northbound bus stop under the train track after Exposition Boulevard. The commenter states that there should be a southbound bus stop in front/adjacent of the Expo LRT Line Sepulveda Station. Lastly, the commenter inquires if other bus lane configurations have been studied for Sepulveda Boulevard and notes that that the Culver City Bus provides bus service on Sepulveda Boulevard from Wilshire Boulevard to Los Angeles International Airport (LAX), which includes the Sepulveda Boulevard corridor in the ECTNP Area.

The comment outlines concerns with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR Accordingly, please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 8

Charles C. Holloway, Manager of Environmental Planning and Assessment
Los Angeles Department of Water and Power (LADWP)
111 N. Hope Street
Los Angeles, CA 90012

Response 8-1

The comment contains introductory text and provides background information about the LADWP. The comment also states that the LADWP determined that the Proposed Project may have impacts to utility resources. The responses below address LADWP's specific comments on the Proposed Project and the environmental analysis in the EIR.

Response 8-2

The commenter requests that DCP consider updating the EIR based on the 2015 UWMP and to include page numbers on all LADWP references.

The analysis in the EIR was based on the information available at the time, which included the 2010 UWMP. Please refer to **Master Response No. 4 – Utilities** for a discussion of utilities and the 2015 UWMP as it relates to the Proposed Project; this discussion is provided as supplementary information and does not change the analysis in the EIR.

Response 8-3

The commenter recommends a number of corrections and additions to the Water Supply discussion in Section 4.13, Utilities and Service Systems, of the EIR.

Please see Chapter 3.0, Corrections and Additions, of this Final EIR, for changes to Section 4.13, Utilities and Service Systems, on pages 4.13-2 through 4.13-16.

Response 8-4

The commenter recommends a number of corrections and additions to the Energy discussion in Section 4.13, Utilities and Service Systems, of the EIR.

Please see Chapter 3.0, Corrections and Additions, of this Final EIR, for changes to Section 4.13, Utilities and Service Systems, on page 4.13-43.

LETTER NO. 9

Larry Watts, BCC Chairman
Brentwood Community Council
149 S. Barrington Avenue, Box 194
Los Angeles, CA 90049

Response 9-1

The comment contains introductory text and provides background information about the Brentwood Community Council (BCC). The comment states that the BCC supports the ECTNP proposals for the Bundy Station, particularly the rezoning of the area south of Olympic Boulevard to allow for multi-family residential buildings. The comment also requests that any retail spaces included as part of mixed-use developments be truly neighborhood serving and not be big establishments that draw in car trips from outside the immediate area. The commenter opposes the addition of any commercial office space to the area and

expresses their opinion that a lot of traffic in the area is due to an overabundance of commercial space combined with a lack of housing.

The comment provides opinions and comments regarding specific features of the Proposed Plan, and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 9-2

The comment requests that the addition of a median to Olympic Boulevard, west of I-405, be small enough to not take away any traffic lanes, and thereby not worsen the area's traffic problems.

The Proposed Plan does not propose removing a travel lane on Olympic Boulevard. As shown in the proposed Exposition Corridor Streetscape Plan, the median on Olympic Boulevard would be located within the existing center turn lane, with turn pockets at intersections.

Response 9-3

The comment requests that DCP consider requiring funding contributions from developers who build large projects within the ECTNP Area in order to support the use of active transportation in the area.

The comment relates to specific features of the Proposed Plan, and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 10

Raymond Klein, President
Brentwood Homeowners Association
PO Box 49427
Los Angeles, CA 90049

Response 10-1

The comment states that DCP should acknowledge the fact that the Bundy/Olympic area already has significant density coupled with crippling traffic. The comment suggests that the Proposed Project refrain from encouraging a mix of uses that includes office space and retail, and that new development be limited to housing and locally-serving retail. The comment also expresses the opinion DCP should consider simultaneously working on the ECTNP and the Community Plan to evaluate cumulative impacts.

The combination of increased density, a mix of uses, and proximity to transit fulfill multiple State, regional, and local planning goals that seek to reduce GHG emissions. The comments do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please also refer to **Master Response No. 8 – Cumulative Impacts** for a discussion of methodology used to evaluate cumulative impacts.

Response 10-2

The comment provides a description of the recently approved Martin Expo Town Center project and states that the additional congestion will divert traffic through the Brentwood area that originates in Santa Monica and travels toward the I-405.

Please refer to **Master Response No. 8 – Cumulative Impacts** for a discussion of cumulative impacts and the Martin Expo Town Center Project and **Master Response No. 7 – Neighborhood Intrusion** for a discussion of potential traffic impacts on neighborhood streets. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

LETTER NO. 11

Fix The City

Response 11-1

The comment contains introductory text and expresses the commenter's opinion that the EIR is inadequate and seeks to remove public involvement from the planning process.

See **Master Response No. 1 - General Comments and Non-CEQA Issues**. The EIR properly discusses, analyzes, and provides information regarding all physical environmental issues that could reasonably be impacted by the Proposed ECTNP.

Response 11-2

The comment states that the Proposed ECTNP is inconsistent with the West Los Angeles Community Plan in regards to infrastructure and public services. The commenter also states the Proposed ECTNP is inconsistent with the General Plan Framework Element with regard to City mandated mitigation restricting increases in density unless and until there is adequate infrastructure. Lastly, the comment states the General Plan Framework Element EIR relied on these mitigations to ensure adequate public safety and that the City cannot abandon those mitigations now.

Please refer to **Master Response No. 2 - General Plan Framework Element Policy 3.3.2**. Also see **Master Response No. 3 - Emergency Services**, **Master Response No. 4 - Utilities**, and **Master Response No. 5 - Schools**.

Response 11-3

The comment states that the Proposed ECTNP is inconsistent with the Exposition Corridor Transit Project Phase 2 Final EIR findings that growth inducing impacts of the Expo Line are less than significant."

Please refer to **Master Response No. 8 - Cumulative Impacts**.

Response 11-4

The comment states that the Proposed Project is inconsistent the Westwood/Pico Neighborhood Oriented District and that it is unclear what regulations of the Neighborhood Oriented District would remain after the adoption of the Proposed Project. In particular, the commenter highlights text from the Neighborhood Oriented District that states that a majority of structures have a similar size.

The Proposed ECTNP (**Appendix M** of the EIR) clearly states on page 1-4 that "The Westwood/Pico Neighborhood Oriented District, Ordinance No. 171,859, including use prohibitions and signage regulations, apply to properties that are located within both the boundaries of the Neighborhood Oriented District and this Specific Plan." Additionally, the Proposed ECTNP includes Design Standards (Section 4) similar to those found in the Neighborhood Oriented District to ensure design consistency and quality and to encourage pedestrian activity.

Response 11-5

The comment states that impacts to public safety are neither discussed nor studied.

Please refer to **Master Response No. 3 – Emergency Services** and Section 4.11, Public Services, of the EIR.

Response 11-6

The comment states that impacts to schools are neither discussed nor studied, especially with regard to capacity.

Please refer to **Master Response No. 5 – Schools** and Section 4.11, Public Services, of the EIR.

Response 11-7

The comment states that growth inducing aspects are neither discussed nor studied.

The EIR properly analyzed growth inducing impacts; please see Section 4.10, Population, Housing, and Employment, Impact 4.10-1, and Section 6.4, Growth Inducing Impacts, of the EIR. Please also refer to **Master Response No. 8 - Cumulative Impacts**.

The Proposed Project would be consistent with growth projections from SCAG. Growth projections are intended to be a target, and the City's long-standing policy is to meet or exceed SCAG projections for a plan area in a manner that is consistent with the General Plan Framework and regional policies, while remaining generally within Citywide projections. In general, the Proposed Plan would accommodate growth projections and therefore is not growth inducing.

Response 11-8

The commenter states that "pre-expo" traffic analyses are no longer valid.

As stated in the EIR on pages 4.12-42 and 4.12-43, the EIR did not study a traffic scenario that represented traffic volumes before the opening of the Expo Line. Instead, traffic volumes were developed for a baseline year of 2015, which at the time of the analysis was after the projected opening of the second phase of the Expo Line (from Culver City to Santa Monica). These traffic volumes were subsequently evaluated with the addition of the Project to determine traffic impacts. Please refer to **Master Response No. 6 – Traffic Analysis Methodology**.

Response 11-9

The commenter states that areas targeted for increased density are located along potentially active fault lines, at least including the Overland Avenue Fault.

Please see Chapter 3.0, Correction and Additions, of this Final EIR for revisions to Figure 4.4-1 and page 4.4-11.

As discussed in Section 4.4, Geology and Soils, of the EIR, on page 4.4-11 (as revised) and illustrated in the revised Figure 4.4-1 included in the Chapter 3.0, Corrections and Additions, of this Final EIR, there are four faults within two miles of the ECTNP Area including: the Overland Avenue fault, Santa Monica fault, Charnock fault, and the Newport-Inglewood-Rose Canyon fault. Furthermore, as noted in the EIR on pages 4.4-11 and 4.4-12, the Proposed Project would not exacerbate existing geologic hazards and because CEQA does not require an analysis of the environment's impact on the project, this analysis is provided for informational purposes only.[23]

[23] *California Building Industry Association v. Bay Area Air Quality Management District* (2015), Cal.4th (Case No. S213478)

Response 11-10

The commenter states that the displacement of existing businesses is neither discussed nor studied.

The EIR evaluates potential physical environmental impacts that could result from the changes in land uses proposed by the Project including changes in commercial activity. Impacts to specific businesses are not an impact under CEQA unless it were to lead to physical impacts. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Accordingly, see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 11-11

The commenter states that displacement of existing residents is neither discussed nor studied, especially those in "rent controlled housing."

The EIR evaluates potential physical environmental impacts that could result from the changes in land uses anticipated to result from the project including changes in residential development. As stated in Impact 4.10-2 and Impact 4.10-3, impacts related to displacing housing units and people were found to be less than significant. The Proposed Plan will result in a net increase of approximately 4,423 housing units within the Project Area. No specific residential units are proposed to be demolished, converted from affordable to market rate, or removed through other means as part of the ECTNP. When properties are redeveloped, there is a potential for a mismatch between affordability of housing that is removed and the affordability of new housing constructed in its place. However, within the change areas there are very few affordable housing units dedicated to very low- and low-income households; those that exist are located in relatively new developments that are not likely to be removed within the life of the Plan. In addition, in certain zones the Proposed ECTNP allows increased FAR in exchange for the provision of affordable housing for low-income households. Projects using this FAR bonus would also be required to replace any existing affordable units on the site with equivalent units of the same type and affordability level, in accordance with the provisions of AB 2222. This requirement is related to Primary Objective 5 of the Proposed Project, as stated on page 3-2 of the EIR, which states that the provision of affordable housing is a priority in the Project Area. Thus, there is not anticipated to be a net loss of affordable housing units within the areas of proposed change due to the Proposed Project, and instead there is a potential for a net gain.

Impacts to residents or types of residents (such as those in rent-stabilized housing) are generally considered to be socio-economic impacts unless such impacts could result in physical changes to the environment. There is no basis in CEQA to treat indirect displacement resulting from a social and economic impact (unlike the type of displacement identified in CEQA Guidelines Section 15131(b) that results directly from physical construction) as a physical impact or extend CEQA's requirements to assess the social and economic impacts or a physical impact that indirectly resulted from a social and economic impact. The comment does not provide substantial evidence showing that the analysis in the EIR is inadequate. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 11-12

The commenter states cut through traffic, or neighborhood intrusion, as a result of the Proposed ECTNP is not analyzed in the EIR, including impacts on Motor Avenue.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology** and **Master Response No. 7 - Neighborhood Intrusion** for a discussion related to cut through traffic.

Response 11-13

The commenter states their opinion that there appears to be "piecemealing" of certain policies and procedures with regard to the West LA TIMP (WLA TIMP).

The comment does not provide specific examples to support this claim, and therefore, no specific response is possible. Nonetheless, the EIR adequately incorporated the WLA TIMP, as well as the Coastal Transportation Corridor Specific Plan (CTCSP) and the Mobility Plan 2035 (MP2035) into the cumulative analysis of the Proposed Project (see Section 4.12, Transportation and Traffic and Section 4.14, Cumulative Impacts, of the EIR). The combination of the Proposed Project together with MP 2035 and CTCSP/WLA TIMP would result in traffic impacts worse than those identified for the year 2035 with Project in the intersection analysis above. All three projects together would result in significant traffic impacts. The Proposed Project would result in a cumulatively considerable contribution to circulation system impacts in the Project Area.

Response 11-14

The commenter states that there is no discussion of air quality issues as a result of increased congestion.

Please refer to Section 4.2, Air Quality, of the EIR on page 4.2-18 for a discussion of how mobile source emissions were estimated. The data used for this analysis included speed information, which allowed the analysis to account for increased congestion in the Future with Project scenario. The analysis provided sufficiently addresses the requirements of CEQA.

Response 11-15

The commenter states that there is no discussion of "the impact on mass transit if density is increased around stations, thus making them less accessible to more remote stakeholders."

As discussed in Section 4.12, Transportation and Traffic, of the EIR the Proposed Project seeks to enhance access to transit stations and creates new zoning regulations to encourage appropriate mixes and scales of uses as well as site design supportive of transit use. The Proposed Project would not disrupt any existing or planned transit facilities or create conflicts or inconsistencies with adopted transit plans, guidelines, policies, or standards, but rather helps to implement them by encouraging development patterns that would foster transit ridership.

Response 11-16

The commenter states that "The ECTNP, including the goal of decreasing congestion, is inconsistent with stated goals of the MP 2035."

The Proposed ECTNP is consistent with the goals of the MP 2035 and complies with the General Plan Framework Element adopted by the City Council. The Primary Objectives of the Proposed Plan, as identified on pages 3-1 and 3-2 of the EIR clearly states objectives related to sustainability, improving mobility options, reducing automobile dependence, improving circulation, promoting transit ridership, and reducing vehicle miles traveled per capita for the Plan Area.

Response 11-17

The commenter states that there is no Health Impact Assessment discussion or guidelines with regard to the health impacts of building near freeways, especially with regard to outdoor amenities.

As discussed in Section 4.2, Air Quality, of the EIR on pages 4.2-27 and 4.2-28, four of the five station areas within the ECTNP Area, with the Westwood Station Area being the exception, include the potential for new residential land uses to be located within 1,000 feet of the I-405 or I-10. These land uses could be exposed to substantial pollutant concentrations. However, with respect to health risks from existing emissions sources, in the California Supreme Court *California Building Industry Association vs. Bay Area Air Quality Management District* (December 17, 2015), the Court held that "agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a proposed project could exacerbate those environmental hazards or conditions that already exist,

an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment – and not the environment's impact on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions." It is not reasonably foreseeable that the Proposed Project would exacerbate any existing conditions. Assessing health risks from existing freeway emissions equates to assessing the environment's impact on the project. The California Supreme Court ruled that this analysis would not be consistent with CEQA.

In addition, as discussed in Section 4.2, Air Quality, of the EIR on pages 4.2-12 and 4.2-28, the City recently adopted the Clean Up Green Up Ordinance, adding LAMC Sections 95.314.3 and 99.04.504.6 and amending Section 99.05.504.5.3, to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns.

- LAMC Section 95.314.3 defines unacceptable locations for obtaining outside or return air for heating or cooling air systems (e.g., a closet, bathroom, toilet room, or kitchen).
- LAMC Section 99.04.504.6 states that, "[i]n mechanically ventilated buildings within 1,000 feet of a freeway, provide regularly occupied areas of the building with air filtration media for outside and return air that provides a MERV of 13. Filters shall be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual." An exception is provided for existing mechanical equipment.
- LAMC Section 99.05.504.5.3 requires MERV 8 filters for mechanically ventilated buildings located farther than 1,000 feet from freeways.

Additionally, the Proposed ECTNP includes plan standards to address the design of buildings containing sensitive land uses in proximity to freeways, including the location of on-site open spaces and recreation areas.

Therefore, taking into consideration existing regulatory requirements and the requirements of CEQA, the EIR concluded that the Proposed Project would result in less than significant operational impacts related to exposing sensitive receptors to substantial pollutant concentrations.

Response 11-18

The commenter states that "there is no analysis on traffic patterns in the area, especially with regard to at grade crossings and increased pedestrian volume."

As discussed in **Master Response No. 6 - Traffic Analysis Methodology**, the City of Los Angeles traffic study guidelines specify how a project such as the Proposed ECTNP should be analyzed for an environmental impact report. The EIR accounts for intersections that are in close proximity to Expo Line at-grade crossings in the study area around each station and beyond.

Regarding the comment on not accounting for increased pedestrians, the technical analysis follows very specific procedures and methodologies relating to how intersection Level of Service (LOS) is calculated. The Circular 212 method of calculating LOS at an intersection does not measure the effect of pedestrian volume as it is a purely vehicular based methodology. However, the design of the project is assessed from a general safety perspective and does not propose any changes that would result in increased hazards (see EIR, Impact 4.12-8, on page 4.12-79). The project is also consistent with current pedestrian plans and policies (see EIR Impact 4.12-1, on page 4.12-44).

Response 11-19

The commenter states that there is no analysis or assessment of impacts of homelessness in the project area.

Homelessness is generally considered to be a socio-economic issue and is not analyzed under CEQA. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 11-20

The commenter states that "proper assessment by the public is impossible without a fully detailed mitigation monitoring plan."

The Mitigation and Monitoring Program for the Proposed Project is included in Chapter 4.0 of this Final EIR; the provision of the Mitigation and Monitoring Programs in this manner is consistent with Department practice. Furthermore, the Mitigation Monitoring Program is not part of a EIR and is approved at the time of project approval (CEQA Guidelines Section 15097).

Response 11-21

The commenter states that the elimination of the site plan review process (ECTNP, Section 1.1.3.E.) removes "a key assurance for the public, the loss of which has not been adequately disclosed to stakeholders."

The comment expresses concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 11-22

The commenter states that the elimination of the requirements of LAMC Section 12.22 A.18 has not been adequately disclosed.

The comment expresses concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 11-23

The commenter states that the removal of conditional use permit requirements per LAMC Section 12.24.V eliminates local input into planning decisions, the loss of which has not been adequately disclosed to stakeholders.

The comment expresses concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues.**

Response 11-24

The commenter states that the removal of conditional use permit requirements for major projects per LAMC Section 12.24.U.14 eliminates a critical point of engagement in planning decisions, the loss of which has not been adequately disclosed to stakeholders.

The comment expresses concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues.**

Response 11-25

The commenter states that the impact of the statement in ECTNP Section 1.1.3.B (regarding conflicting regulations and the Specific Plan prevailing) has not been adequately disclosed and its meaning is unclear when taken with other statements in the EIR such as the statement made in ECTNP Section 1.1.3.C (regarding the Westwood/Pico Neighborhood Oriented District continuing to apply where applicable).

See **Response 11-4**.

The comment expresses concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 11-26

The commenter includes citations and claimed web links to websites regarding response times, parks assessment, sidewalk status and water pipe status. The commenter does not indicate how this information could be relevant to the Proposed Project's impact on the physical environment. The EIR appropriately evaluates all public services and utilities in Sections 4.11 and 4.13 of the EIR. The information, including the web links, provided by the commenter will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because this comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

LETTER NO. 12

Laura Lake
Fix The City

Response 12-1

The commenter states that an analysis of cumulative impacts must be included within the Community Plans and not be piecemealed. The comment also notes the ECTNP needs to address the Fox Studio Expansion proposal to see if the provision of additional density and entitlements is required and how the two plans would impact each other.

Please refer to **Master Response No. 8 - Cumulative Impacts**.

Response 12-2

The commenter states the traffic analysis is "stale" and that data and analysis must be updated as the project began in 2013.

The analysis in the EIR adheres to the LADOT's *Traffic Study Policies and Procedures* and industry practices, and is adequate given information available at the time of the analysis. The transportation analysis was started in 2013; however, the data used to estimate existing conditions was adjusted to account for the opening of the Expo Line in 2015. Typically, development projects in the City of Los Angeles are required to utilize count data no older than two years from the NOP date, which in the case of this study was March 2013. The count data used in the study was subsequently adjusted to represent 2015 conditions and is acceptable for use in the environmental documentation. See also **Master Response No. 6 – Traffic Analysis Methodology**.

Response 12-3

The commenter states that there is no evidence that merely increasing density will promote transit ridership.

This comment does not relate to significant environmental issues and does not address the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. There is a large body of research on the topic of factors that influence transit use and density of development, mix of uses, and proximity to job centers has been found to influence mobility patterns and use of multimodal transportation.

Much of this research has been documented by the Transit Cooperative Research Program (TCRP). A UCLA paper ("The Factors Influencing Transit Ridership: A review and Analysis of the Ridership Literature"[24]) highlights the relationship between density and ridership and references the source of this information in detail. The paper states that "dense, compact development is found to be more conducive to efficient transit operations than dispersed and sprawling patterns of urban development," and "the most important [variables] for determining transit demand … are overall housing density per acre and overall employment per acre."

Response 12-4

The commenter states that General Plan Framework Element Policy 3.3.2 mandates that development not be intensified and may be halted unless and until adequate infrastructure and public services are provided. The commenter further asserts that EIR does not provide substantial evidence that police and fire services are adequate and can accommodate intensified development. The commenter also requests that an origin destination study be provided and recirculated to support the premise that the Proposed ECTNP will reduce auto dependence.

Please refer to **Master Response No. 2 - General Plan Framework Element Policy 3.3.2, Master Response No. 3 - Emergency Services,** and **Master Response No. 6 – Traffic Analysis Methodology**. See also **Response 12-12** and **Response 12-20**.

Response 12-5

The commenter states that the impact on visual character and shade conflicts with the preservation and conservation of existing residential communities.

As discussed in Section 4.1, Aesthetics, the EIR concludes that beyond the proposed design standards, no feasible mitigation measures have been identified to reduce the potentially significant impacts related to visual character and shade and shadows. CEQA requires that if the lead agency approves a project that will result in the occurrence of significant and unavoidable adverse impacts to the environment, the agency must state in writing the reasons to support its action based on the certified EIR and/or other information in the record; please see **Appendix B** of this Final EIR.

Response 12-6

The commenter states the police and fire services are understaffed now and have substandard response times and facilities, and questions the basis for the EIR to conclude that there are no significant adverse impacts on police and fire.

Please refer to **Master Response No. 3 - Emergency Services**.

Response 12-7

The commenter requests that an additional alternative for self-driving vehicles versus intensification of land uses adjacent to the Expo Line be provided.

A project alternative that considers and analyzes self-driving vehicles does not meet the goals and objectives of the Proposed Project. The future utilization of self-driving vehicles in the study area could have a range of potential impacts, such as reduced vehicle travel times due to efficiencies in roadway capacity or less demand for parking as more users shift to a shared vehicle fleet. There is no reasonably foreseeable time frame for availability of self-driving vehicles or their adoption by the public. Therefore, the range of

[24]Taylor, B. D., Fink, C. N. Y., University of California, Los Angeles. (2003*), "The Factors Influencing Transit Ridership: A Review and Analysis of the Ridership Literature"*, Los Angeles, CA: UCLA Institute of Transportation Studies.

potential impacts is speculative at this time, and not considered a viable project alternative. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 12-8

The commenter states that the EIR failed to adequately analyze the risks associated with increased development near the Overland Fault/Newport-Inglewood fault and requests the EIR be revised and recirculated.

See **Response 11-9**.

Response 12-9

The commenter states that the LAFD response time to the stations serving the Expo Corridor is not presently meeting the City's standard and that LAFD facilities and resources and are inadequate to serve the Proposed Project.

Please refer to **Master Response No. 3 - Emergency Services**.

Response 12-10

The commenter states that there is a conflict between the conclusions made under Impact 4.12-1 of the EIR and a statement in the Plan that mentions the Project was not required to comply with the MP 2035.

As noted on page 4.12-44 of the EIR, the Proposed Project is consistent with MP 2035 goals and policies. It is assumed that the comment is referring to a footnote on the Street Standards table in **Appendix B** of the Proposed Plan, which states that "The roadway width does not need to comply with the MP 2035 and shall be constructed to the dimensions shown here." The street dimensions in this table reflect right-of-way widths that are consistent with the MP 2035 for each street segment. The MP 2035 allows for variations in roadway configuration and width within a street designation, but does not allow variation in the overall right-of-way width without modifying the street designation. The Proposed Project is consistent with this approach.

Response 12-11

The commenter states that there is already neighborhood intrusion and there need for evidence presented to support the conclusion that the Proposed Project will not increase neighborhood intrusion.

Please refer to **Master Response No. 7 - Neighborhood Intrusion**. The impact related to Neighborhood Intrusion, as stated in the EIR, is anticipated to be significant and unavoidable.

Response 12-12

The commenter indicates that substantial evidence is required to confirm that the CMP network is not impacted on the freeways and that an origin-destination study is necessary to reach this conclusion.

Please see **Master Response No. 6 – Traffic Analysis Methodology**. The analysis presented in Section 4.12, Transportation and Traffic, of the EIR, discloses the transportation impacts per LADOT Traffic Study Policies and Procedures and state regulations such as the CMP. Based on the methodology used in the analysis, trips were distributed to the network using a travel demand model that relies on surveyed household data to send trips from their origin to destination locations. Once these trips have been assigned to the roadway network (including freeways) the Level of Service (LOS) for each facility (intersection and roadway segment) can be calculated and assessed against a set of thresholds to determine if the project results in a significant impact. This methodology is standard industry practice and therefore no origin-destination study is required.

As a result of the detailed analysis of the freeway CMP system, it was determined that there would not be any significant impacts to the freeway system.

Response 12-13

The commenter states that cumulative impacts from major projects proposed subsequent to 2008 are not analyzed in the EIR.

Please refer to **Master Response No. 8 - Cumulative Impacts**.

Response 12-14

The comment inquires if the Proposed Project complies with the mitigations mandated in the EIR certified for the Fire Service Element of the General Plan Framework Element. In addition, the commenter inquires if the Proposed Project complies with the mandate in the West Los Angeles Community Plan to balance development with adequate emergency services and traffic capacity.

Please refer to **Master Response No. 2 – General Plan Framework Element Policy 3.3.2** and **Master Response No. 3 - Emergency Services**.

Response 12-15

The commenter inquires if the Proposed Project includes park-and-ride facilities to augment and encourage transit ridership.

The Proposed Project does not propose to provide park-and-ride facilities. These are under the jurisdiction of Metro, as they have their own criteria for determining at which stations to provide parking. The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-16

The comment inquires if the EIR provides a comparison between baseline floor area ratio (FAR), proposed base FAR, and bonus FAR and notes that changing commercial FAR from 1.5:1 to 4:1 is a significant increase that assumes the City's infrastructure and public services can accommodate this increase.

The EIR evaluates the reasonably foreseeable development anticipated to occur as a result of the Proposed ECTNP. EIR Chapter 3.0 Project Description identifies existing and proposed FARs within the ECTNP Area (Tables 3-2 to 3-4 and Figures 3-10a and 3-10b and 3-11a and 3-11b) as well as changes in FAR (Figures 3-12a and 3-12b). As described in Chapter 5.0, Alternatives, of the EIR, Alternative 1 – No Project Alternative, assumes reasonably foreseeable development under the current community plans, including existing zoning and FAR, and General Plan land use designations. Section 5.0 Alternatives compares potential impacts under the No Project Alternative to the Proposed Project. As with the Proposed Project, all impacts related to utilities and service systems as well as the need to provide new or physically altered police and fire facilities, libraries, and schools would be less than significant under the No Project Alternative. However, due to the decreased population and employment capacity, these impacts under the No Project Alternative would be less when compared to the Proposed Project. See also **Master Response No. 4 – Utilities** for a discussion of impacts related to infrastructure and utilities.

Response 12-17

The comment states that Table 4.8-1 in Section 4.8, Land Use and Planning, of the EIR fails to provide the height permitted around Bundy Station and that in the absence of the height for light industrial, the ability to determine how much FAR can be accommodated is impossible.

Table 4.8-1 provides the existing land use and zoning regulations within the Bundy Station Areas of proposed change, including the maximum allowable height, where applicable. The comment does not relate to the adequacy of the environmental analysis contained in the EIR.

Response 12-18

The comment states that Table 4.8-2 in Section 4.8, Land Use and Planning, of the EIR fails to include the additional entitlements available to developers under SB 1818, including additional FAR, dwelling units, and height. The commenter contends that the cumulative analysis of the Proposed Project therefore fails to include the cumulative impacts of other regulations, especially if developers seek off-menu incentives and questions how this and other state laws factored into the cumulative growth projections.

See **Master Response No. 8 - Cumulative Impacts** for a discussion of the incorporation of density bonus programs (such as SB 1818) into the development assumptions for the EIR.

Response 12-19

The comment states that since LAFD response times are already below the City's standard, there is no substantial evidence to support the conclusion that the goal/objective of a safe, secure and residential environment for all economic, age and ethnic segments of the community is feasible.

Please refer to **Master Response No. 3 - Emergency Services**.

Response 12-20

The comment states that there is no substantial evidence that increasing development near the Expo Line will decrease the use of vehicles. The commenter notes that this would require as an origin-destination study.

See **Response 12-3**. The goal of the Project was not just to reduce vehicle trips but to develop in an area and manner that provides transportation options. The Proposed Project also reduces VMT per capita, which means that future residents and employees are expected to drive less and/or drive shorter distances. However, as acknowledged in Section 4.12, Transportation and Traffic, of the Drat EIR, new vehicle trips will be generated by the Proposed Project land uses. No origin-destination study is required – see **Response 12-12**.

Response 12-21

The comment states that the premise of increased density is that it will mitigate the affordable housing crisis. However, the commenter contends that there is no substantial evidence provided to support this premise, particularly because these projects are not required to provide affordable housing, but merely provide an in-lieu payment for off-site housing that is speculative. The commenter contends that the EIR needs to be updated and recirculated to provide an alternative that examines how much development potential already exists within each community plan, as well as how many habitable properties are vacant.

The EIR evaluates the reasonably foreseeable development anticipated to occur as a result of the Proposed ECTNP, taking in to account all applicable regulations in the area. See also **Master Response No. 8 - Cumulative Impacts**. The Proposed ECTNP provides incentives for the provision of on-site affordable housing; the Proposed ECTNP does not include the creation of any in-lieu fees. The reasonably foreseeable development anticipated to result from the Proposed ECTNP was estimated as explained in Chapter 3.0, Project Description and **Appendix F** of the EIR. Alternative 1 – No Project Alternative, as described in Chapter 5.0, Alternatives, of the EIR, assumes reasonably foreseeable development under the current community plans, including existing zoning, General Plan designations, and land use regulations. The analysis includes potential development on all properties, including those that may be currently vacant. In the discussion of Alternative 1, the EIR concludes that it does accommodate the projected housing, population, and employment growth (Chapter 5.0, Alternatives, of the EIR, page 5-57).

Response 12-22

The commenter states several reasons why they believe the fire service analysis is flawed and deficient.

Please refer to **Master Response No. 3 - Emergency Services** and **Master Response No. 2 - General Plan Framework Element Policy 3.3.2**.

Response 12-23

The commenter expresses their opinion that the Proposed Plan is inconsistent with the Community Plans because it does not protect stable single-family neighbors. The commenter further states that here are no mechanisms provided in the Proposed Plan that promote transit ridership.

In regard to consistency with Community Plans, see **Master Response No. 2 – General Plan Framework Element Policy 3.3.2**. In regard to the comment regarding transit ridership, the ECTNP requires certain projects to submit a Transportation Demand Management (TDM) Plan. The measures in the TDM Plans are expected to promote transit ridership. This comment expresses concern associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-24

The commenter states that the exemption from Conditional Use Permits for hotel uses will deny residents within 500 feet notice of a public hearing, as presently provided by the City code.

Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. However, no further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 12-25

The commenter states that there is no required notice or input/approval by a Neighborhood Council, and this must be provided to assure that there is full transparency for the community.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-26

The commenter states that conflicting regulations create inconsistencies with the Community Plans. The commenter further states that the public right of way requirements mandated by MP 2035 cannot be overridden by the Proposed Plan. The commenter also inquires whether or not the Proposed Plan factored in the Fox Studio Expansion Project and other projects that could overwhelm the infrastructure of the area.

Please refer to **Master Response No. 8 - Cumulative Impacts, Master Response No. 2 – General Plan Framework Policy 3.3.2**, and Section 4.8, Land Use and Planning, of the EIR for a discussion of the Proposed Project's consistency with the General Plan Framework Element and community plans.

Response 12-27

The commenter states that the Base FAR and Bonus FAR tables do not provide the current permitted FAR to determine the actual increase in density/intensity.

See **Response 12-16**.

Response 12-28

The commenter states that exempting projects from Site Plan Review violates the Friends of Westwood Decision upheld by the California Supreme Court.

The Plan does not violate the Friends of Westwood Decision as that decision addressed whether certain City approval processes were ministerial or discretionary in nature. The project approval process set forth in the Plan is consistent with that decision. In addition, the EIR has evaluated the reasonably foreseeable development anticipated to occur as a result of the Proposed ECTNP. Projects falling within the parameters of what was analyzed in the EIR may be able to rely upon the EIR for the project's CEQA clearance. Development that is not within the envelope of impacts analyzed in the EIR will be required to conduct project-specific environmental review (see Response 12-37). The comment does not relate to the adequacy of the environmental analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-29

The commenter states that the Director's authority to approve alternative compliance has no standards to determine whether or not the Director is being arbitrary and capricious.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-30

The commenter expresses their opinion that public benefits should be required as part of project approval and not an extra, with the exception of affordable housing units.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-31

The commenter inquires whether or not front yard setbacks conflict with the sidewalk requirements of the MP 2035. The commenter also raises questions regarding permitting process for outdoor dining and whether or not alcohol would be permitted to be served outdoors.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-32

The commenter inquires whether or not there is a width limitation for pedestrian bridges across public rights of way and states that this is major issue with the Westside Pavilion.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-33

The commenter expresses their opinion that paseos should be 20 feet minimum in order to not impact street capacity and requests that this be analyzed.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-34

The commenter inquires whether or not landscaping surface parking areas has this been evaluated by Los Angeles Police Department with regard to public safety and crime prevention.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-35

The commenter expresses their opinion that parking structures should not be visible from the street and should be required to have ground floor retail/office/residential uses to shield pedestrians from this visual blight. The commenter further inquiries how permitting three levels of above ground parking enhances the walkability of streets and whether the Proposed Plan conflicts with MP 2035.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-36

The commenter expresses their opinion that monument signs need to be scaled-down from 24 square feet per side, and the location of the sides should be within the building's footprint and not the public right of way.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-37

The commenter states that the environmental review requirements appear to exempt projects with potentially significant impacts, in violation of CEQA and that environmental impacts must be analyzed if significant or potentially significant, and mitigated, per CEQA.

The analyses of impacts of the Proposed Project provided in the EIR are adequate and comply with the requirements of the CEQA. Following adoption of the Proposed ECTNP, individual projects would be required to submit an application, which would be reviewed to determine consistency with the Proposed ECTNP. Each project resulting in additional square footage within the ECTNP Area will be required to undertake a trip generation analysis in accordance with LADOT guidelines in order to determine consistency with the transportation projections analyzed in the EIR. In addition, projects that meet certain thresholds are required to document the water demand from the project to determine if it falls within the amount of additional water demand analyzed in the EIR for the ECTNP Area. The subsequent environmental review required for projects determined to be consistent with the Proposed ECTNP would depend upon the circumstances of each project and may include the following approaches: (1) A determination pursuant PRC Section 21166 and CEQA Guidelines Section 15162 that the project was fully assessed in this EIR and no further environmental review is required; (2) an addendum to this EIR pursuant to CEQA Guidelines Section 15164; (3) a determination that the project is statutorily or categorically exempt from CEQA; or (4) the project requires subsequent environmental review pursuant to PRC Section 21166 and CEQA Guidelines Section 15162.

Response 12-38

The commenter states that permitting a cumulative maximum of 1,200 dwelling within the ECTNP Area in excess of what is allowed by the zoning is confusing.

The limit of 1,200 dwelling units approved through the Alternative Compliance Scenario process applies to the entire ECTNP Area, not to each project. The Alternative Compliance Scenario was considered while analyzing the impacts of the Proposed Plan and all impacts are provided in the EIR in compliance with CEQA. The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-39

The commenter inquires whether or not Table M is supported by analysis of current conditions and proposed increases in traffic.

The EIR presents existing traffic conditions in the Section 4.12, Transportation and Traffic, of the EIR, (analysis of existing environmental conditions is presented in the environmental setting sections for all topics evaluated). Similarly, traffic anticipated to result from reasonably foreseeable development (identified in Chapter 3.0, Project Description, of the EIR) is analyzed in Section 4.12, Transportation and Traffic, of the EIR. Please refer to **Master Response No. 6 – Traffic Analysis Methodology**. The number of trips indicated in Table M of the Proposed Plan represents the total number of trips within each station area, including existing trips and additional trips resulting from reasonably expected development within the Plan Area.

Response 12-40

The commenter states that the points for streetscape projects appear to reward development projects that are already required to provide these amenities under the City's adopted design standards.

The comment expresses concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-41

The commenter inquires if the City considered requiring rooftop gardens to promote cooling and community gardens.

The comment expresses concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-42

The commenter inquires if the City considered mandating graywater for all landscaping and water features.

The Proposed ECTNP includes a number of water conservation measures (**Appendix E** of the EIR) including requiring that all irrigation systems be plumbed to enable a connection to a recycled or gray water system once it is available.

Response 12-43

The commenter inquires if the provision of parklets has been analyzed with regard to impacts on local businesses.

See **Response 11-10** regarding impacts to individual businesses. Impacts to specific businesses are not an impact under CEQA unless it were to lead to physical impacts. The commenter does not provide evidence demonstrating that parklets could have impacts on businesses that could lead to physical impacts. Accordingly, see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 12-44

The commenter states that noncompliance with MP 2035 roadway widths requires a GPA and requests that this be analyzed.

See **Response 12-10** and **Response 12-31**.

Response 12-45

The commenter expresses their opinion that public open space should have minimal hardscape and that outdoor seating in open space areas would violate the ADA requirements to permit a disabled person to traverse the area.

The comment expresses concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-46

The commenter inquiries about crime control, liability and public nuisances in the public and privately owned and maintained open space areas.

The comment expresses concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 12-47

The commenter asks why there was not a supplemental EIR to address the changes identified in **Appendix N**. The commenter indicates that the addition of a subarea on Pico must be analyzed in a supplemental EIR "since it is limited to internal changes and doesn't address other changes such as the Fox Studios Expansion" and "further that other increases in FAR such as Fox Studios Expansion are not taken in to account."

Analysis of these revisions to the Plan is provided in **Appendix N**. **Appendix N** explains that as a result of comments received through the Proposed Plan's community engagement process, a policy decision was made to refine certain subareas of the Proposed Plan. **Appendix N** concludes that the revisions to the zoning and land use for these subareas represent minor modifications to the Proposed Plan which would not substantially affect the analysis or conclusions of any of the analyzed impact categories of the EIR. Therefore, none of the circumstances that would require the recirculation of the EIR have been triggered. See **Master Response No. 8 - Cumulative Impacts** for a discussion of the cumulative impacts of other projects outside of the Plan area.

Response 12-48

The commenter requests an analysis of impacts of at-grade Expo Line on traffic congestion and an analysis of elevating the Expo Line or placing it below-grade for Overland Avenue and other at-grade crossings. The commenter also requests an analysis of the "falling bus ridership with overall mass-transit use."

The Proposed Project was analyzed assuming that Phase 2 of the Expo rail project was in place and has the same alignment and grade crossings that have been constructed and are in operation today. Traffic impacts

were identified at locations around the stations and in the immediate vicinity, and mitigations were proposed where feasible; see Section 4.12, Transportation and Traffic, of the EIR. Metro is not currently considering grade separating the current at-grade crossings along the Expo Line, and such a change is not within the scope of the Proposed Project

Regarding the second comment, the traffic analysis was undertaken with field-observed traffic counts; please see **Master Response No. 6 - Traffic Analysis Methodology**. This data would have reflected any changes in trip generation related to "falling bus ridership" and the calculated LOS reflects this data. The travel demand model used to assess traffic impacts assumes anticipated transit service for the forecast year 2035 and this influences the modal share calculated in the model. This analysis complies with standard industry practices and reflects the potential for patrons of the Proposed Project and surrounding area to use transit instead of driving. Therefore, there is no need to run a new scenario with lower ridership estimates for the bus service.

LETTER NO. 13

Maura Howe, President
Marshall P. Riddick Youth Center
2634 Overland Avenue
Los Angeles, CA 90064

Response 13-1

The comment requests the City to provide some public benefit funds to Marshall P. Riddick Center, in order for them to serve the anticipated increase in demand for neighborhood youth and families resulting from the Proposed Project. The comment also states concern with "increase in traffic, lack of other new recreational facilities, increased demands on neighborhood infrastructure - police, fire, water, and the sewer system" adding that "there is nothing in the plan to address how these new demands can be met" and "that absolutely no measures are even considered for library services."

Increased demand for family services is not a physical environmental impact under CEQA. See **Master Response No. 1 - General Comments and Non-CEQA Issues**. For comments related to traffic please see **Master Response No. 6 - Traffic Analysis Methodology**, for comments related to emergency services please see **Master Response No. 3 - Emergency Services**, and for comments related to utilities please see **Master Response No. 4 - Utilities**.

With regard to impacts on parks, future development under the Proposed Project, as explained in the Regulatory Framework discussion in Section 4.11, Public Services, of the EIR on pages 4.11-24 through 4.11-26, would be subject to LAMC Sections 12.33 and 17.12, which are part of the City's implementation of the Quimby Act. However, there are no other feasible mitigation measures to reduce the Project's impacts on parks to less than significant level. As such, the Proposed Project would result in a significant impact related to public parks.

As explained in Section 4.11, Public Services, of the EIR on pages 4.11-33 and 4.11-34, impacts to library services would be less than significant. As stated in the EIR, the Proposed Plan would not create substantial capacity or service level problems that would require the provision of new or physically altered library facilities in order to maintain an acceptable level of service for libraries.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 13-2

The comment states that the outdated school enrollment study of 2012 cited in the EIR is misleading and Overland and Westwood Elementary Charter Schools could not be classified as under-enrolled, as stated in the EIR. The comment also states that that the increase in population as a result of the Proposed Project, enrolment at schools would be over the capacity.

Please refer to **Master Response No. 5 - Schools**.

Response 13-3

The comment states that there are no plans to increase capacity at schools and the City should therefore modify density of developments to levels that can be absorbed by current school capacities. The comment further suggests that the City not upzone Pico Boulevard to RAS4, not allow for mixed-use on Westwood Boulevard between Pico and National Boulevards, lower heights/density for the Sepulveda/Pico Area and the Westside Pavilion remain a commercial zone and not be changed to a residential zone.

With regard to concerns about school capacity, see **Master Response No. 5 - Schools**. With regard to the comments on the proposed zoning, these comments express concerns associated with specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 14

Mary M. Park, Elder, Session Member
Palms Westminster Presbyterian Church
2908 Robertson Place
Los Angeles, CA 90039

Response 14-1

The comment contains introductory text about Palms Westminster Presbyterian Church and provides information on the recent interest from developers in this property. The responses below address their specific comments regarding the Proposed Project and the environmental analysis in the EIR.

Response 14-2

The commenter expresses concerns regarding traffic congestion and street infrastructure if multi-level commercial/residential buildings are developed in Subarea 13. The commenter states that traffic congestion already exists during Hamilton High School drop-off/pick-up hours and wonders what would happen to the students. In particular, the commenter has concerns about how Helms Avenue, Cattaraugus Avenue and Robertson Place will handle additional motor vehicle traffic.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**.

Response 14-3

The comment expresses concerns about the availability of street parking and the misuse of the Church's parking lot.

Please see **Response 1-2** and **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment expresses concern regarding parking supply, which is considered a social impact and not an environmental impact addressed by CEQA.

LETTER NO. 15

Terri Tippit, President
West of Westwood Homeowners Association
P.O. Box 64496
Los Angeles, CA, 90064

Response 15-1

This comment contains introductory text and provides a general summary of the commenter's concerns. The responses below address specific comments on the Proposed Project and the environmental analysis in the EIR.

Response 15-2

The commenter expresses concern that groups comprised of individuals that do not reside in their neighborhood are attempting to disproportionately "up-zone" their neighborhood, as opposed to adding housing density in all of the neighborhoods throughout Los Angeles.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-3

The commenter identifies components of the Proposed ECTNP that the commenter supports, including retaining R2 and R1 land uses on Exposition Boulevard, existing zoning on Pico Boulevard, transitional height requirements, requirements for shade and shadow studies, the Streetscape Plans and increased opportunities for jobs and housing.

The comment expresses an opinion in support of specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-4

The commenter identifies components of the Proposed ECTNP that the commenter is opposed to, including allowing hospital, nursing, residential care facilities, recreation facilities and gyms, commercial hotels and colleges and vocational/technical schools in the Mixed-Use: Commercial/Residential zone. The commenter also objects to colleges and vocational/technical schools in the Hybrid Industrial: Residential Emphasis zone. In addition, the commenter opposes any increase in mixed-use density along Westwood Boulevard and adjacent to the Westwood Station, as well as the proposed residential density for the Mixed-Use Commercial Residential zone and the reduction and/or potential elimination of neighborhood serving retail uses at this location.

The comment expresses an opinion in opposition of specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-5

The commenter expresses concern regarding the proposed Bonus FAR that could nearly double the FAR in the Mixed-Use: Commercial/Residential zone. The commenter indicates that the Bonus FAR proposed in the Plan should be significantly reduced or eliminated. Commenter requests that the Bonus FAR be reduced to a maximum of 25 percent.

The EIR evaluates the reasonably foreseeable development anticipated to occur as a result of the Proposed ECTNP. The comment does not address the adequacy of the environmental analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-6

The comment requests that the Mixed Use: Commercial/Residential zone maintain at least a minimum of 50 percent of non-residential uses and Hybrid Industrial Residential Emphasis Zoning District maintain a minimum of 40 percent for the base FAR and 30 percent for the Bonus FAR, and thereby reduce the minimum require percentage of non-residential uses.

The comments outline concerns associated with specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-7

The commenter is concerned about the selection of sites eligible for Alternative Compliance as shown on Map E of the Proposed Plan. The commenter would like to see the parcels near the Sepulveda Station removed from eligibility and would like to see the sites along Pico Boulevard between Westwood Boulevard and Overland Avenue remain ineligible for Alternative Compliance.

The comments outline concerns associated with specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-8

The commenter objects to the ability of the Director of Planning to be able to allow up to a maximum of 1,200 additional residential dwelling units within the ECTNP Area in excess of what is allowed by the zoning.

The Alternative Compliance scenario was considered while analyzing the impacts of the Proposed Plan and all impacts are provided in the EIR in compliance with CEQA. The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 15-9

The commenter opposes the maximum building heights for all properties within the Sepulveda and Westwood Station Areas. The commenter suggests reducing allowable building heights in the Plan and in some areas capping potential building heights to more closely match what exists on the ground.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-10

The commenter would oppose the elimination of the proposed transitional height limits.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**

Response 15-11

The commenter opposes reducing the parking minimums.

Please see **Response 1-2** and **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment expresses concern regarding parking supply, which is considered a social impact and not an environmental impact addressed by CEQA.

Response 15-12

The commenter expresses their opinion that the Base FAR should provide public benefits. The commenter also requests that community amenities be required for Bonus FAR regardless of what percentage of non-residential uses are in the project and that the vehicle trip reduction percentage should be increased from 10 percent to 15 percent. The commenter suggests a significant percentage of public benefit point money should be used for Palms Park and Riddick Youth Center.

The comments outline concerns associated with specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-13

The commenter expresses their opinion that residential density for the Mixed Use: Commercial/Residential zone should be decreased.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-14

The commenter requests that the City require more evergreen trees in landscape plans in front of and adjacent to tall buildings, and along the parkways. The commenter states that the requirement for evergreen trees should be incorporated into the Streetscape Plan where applicable.

The comments outline concerns associated with specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-15

The commenter requests that a minimum setback requirement of 25 feet be added and proposed for any street setback adjacent to or across the street from residential uses.

The comment outlines concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-16

The commenter requests that projects should be prohibited from taking any vehicular access to or from Military Avenue.

The comment expresses concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-17

The commenter opposes truck hauling on residential streets except for residential projects and requests that the Proposed ECTNP prohibit truck hauling from residential streets, including but not limited to, residential corridors of Military Avenue, Exposition Boulevard and Ashby Avenue.

Truck hauling is typically a concern for hillside areas; none of the Project Area is considered a hillside. Development projects within the ECTNP Area would be subject to the City's Haul Route Monitoring Programs, which includes Los Angeles Department of Building and Safety (LADBS) inspectors that monitor conditions of haul routes, including: enforcing the Good Neighbor Construction Practices; verifying compliance with conditions on approved haul routes; responding to complaints of violations; referring violations to appropriate involved City agency; and mediating conflicts and issues between neighbors and construction projects. Furthermore, the EIR provides an analysis of construction impacts in terms of transportation, air quality, and noise. Construction impacts would include a range of construction activities, including truck hauling.

Response 15-18

The commenter requests that the design standards and the Proposed ECTNP prohibit balconies, patios or other outside active open space areas above the ground floor that face Military Avenue and the R1 and R2 neighborhoods to the east.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-19

The commenter suggests that driveways should be a minimum of 20 feet wide.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 15-20

The commenter indicates that the EIR dismisses schools as being impacted and that the data from 2012-2013 is outdated. The commenter indicates the EIR was false because it only counted neighborhood enrollment.

Please refer to **Master Response No. 5 - Schools**.

Response 15-21

The commenter summarizes their concerns as affecting health, welfare, safety and overall quality of life.

See responses to individual comments from this commenter above. The comment does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see also **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 16

Marilyn Tusher, President
Westwood Gardens Civic Association
P.O. Box 642001
Los Angeles, CA 90064

Response 16-1

The comment contains introductory text about the Westwood Gardens Civic Association and expresses their support for the Proposed ECTNP. The responses below address specific comments on the Proposed Project and the environmental analysis in the EIR.

Response 16-2

The commenter supports not changing development regulations for single and two family residential zones. The comment urges the City to maintain the current zoning along Exposition and Westwood Boulevards and not permit increased density along these two streets around the Westwood/Expo station.

The comments express an opinion in support of specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 16-3

The comment expresses support for transitional height requirements and the removal of the RAS4 zone change area on Pico Boulevard between Sepulveda Boulevard and Overland Avenue.

The comment expresses an opinion in support of specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 16-4

The commenter indicates that the conclusion that schools are under-enrolled is troublesome as they are not when all children are counted.

Please refer to **Master Response No. 5 - Schools**.

Response 16-5

The comment suggests that public benefit points should be directed to local centers such as the Palms Park and Library, the Riddick Youth Center, and the future Neighborhood Greenway.

The comment provides a suggestion regarding a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 16-6

The comment states that the primary goal of the Westwood Gardens Civic Association has been to preserve and protect their quality of life and wish to see the very best plan come forth which must protect single-family neighborhoods from up-zoning.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 17

Barbara Broide, President
Westwood South of Santa Monica Blvd. Homeowner's Association (WSSM)
P.O. Box 64213
Los Angeles, CA 90064

Response 17-1

This comment contains introductory text summarizing the concerns, and states that the comments are limited to the areas around the Westwood and Sepulveda stations. The commenter raises broad concerns regarding: emergency vehicle access, lack of adequate infrastructure, traffic impacts, and indirect displacement of residents. In addition, the commenter states that the EIR is "out of date" and does not reflect changes to the Proposed Plan (specifically for zoning along Pico Blvd).

Regarding to emergency vehicle access, please refer to **Master Response No. 3 - Emergency Service**s. Regarding infrastructure impacts, please refer to **Master Response No. 4 – Utilities**. Regarding traffic impacts, please refer to **Master Response No. 6 - Traffic Analysis Methodology**. Regarding displacement of residents, please refer to **Response 11-11**. The responses below address specific comments regarding the Proposed Project and the environmental analysis in the EIR.

Response 17-2

The commenter identifies the components of the Proposed ECTNP that the WSSM is in support of.

The comments express an opinion in support of specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-3

The commenter identifies the components of the Proposed ECTNP that the WSSM is opposed to.

The comments express an opinion in opposition to specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-4

The commenter requests that haul routes for projects under the Proposed ECTNP be prohibited from using residential streets, except for residential projects, and staging of trucks should be limited to commercial locations – not adjacent to residences. The comment also provides recommendations for driveway designs.

Development projects within the ECTNP Area would be subject to the City's Haul Route Monitoring Programs, which includes LADBS inspectors that monitor conditions of haul routes, including: enforcing the Good Neighbor Construction Practices; responding to complaints of violations; referring violations to appropriate involved City agency; and mediating conflicts and issues between neighbors and construction projects. The comment does not provide substantial evidence showing that the analysis in the EIR is inadequate. The EIR analyzes air quality and noise impacts related to construction, which includes truck hauling, in Section 4.2, Air Quality and Section 4.9, Noise, respectively. On page 4.9-20 includes Mitigation Measure **N1**, which requires construction haul trucks to avoid residential areas whenever feasible. Nevertheless, as stated in the EIR, construction impacts related to air quality and noise were found to be significant and unavoidable.

Response 17-5

The commenter expresses concerns that the remaining light industrial/light manufacturing uses within the ECTNP Area will inevitably be "chased away" by residential uses. The comment notes that residents will then need to travel further for the services that these uses provide. In addition, the comment expresses concern that the "Casden Sepulveda Project" took away land that could have been uses as a Westside mobility hub.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-6

The commenter questions what a "vibrant" neighborhood is, requests examples of other neighborhoods in the City that have been transformed by this approach and questions the long-term effects of an area being made "vibrant."

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-7

The commenter states that tax revenues can be generated for the City by development in any part of the City; not just in areas around transit stations.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-8

The commenter questions whether "emerging environmentally oriented and clean industries" are clustered on the Westside and states that such business seek creative space most notably on large parcels of land that are not readily available in the ECTNP Area.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-9

The commenter questions whether transit ridership needs to be increased and whether jobs for the new residents would also be near transit.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-10

The commenter states that by DCP's own estimates, vehicle miles traveled will "increase" with addition of housing near the Expo Line, and this is contrary to Primary Objective 6 which states: Improve circulation within the station areas; increase mobility choices; promote transit ridership and use of other alternative transit modes; and reduce vehicle miles traveled per capita for those who live and/or work within the Expo Corridor.

While overall vehicle miles travelled in the area is anticipated to increase as a result of the Proposed ECTNP, the service population (residents and workers) in the area is anticipated to increase at a higher rate. Thus, the per capita vehicle miles travelled will decrease. See Section 4.12, Transportation and Traffic, of the EIR.

Response 17-11

The commenter questions why the focus of the Proposed ECTNP is only on Phase 2 of the Expo Line.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-12

The comment questions why it is assumed that development would occur in an "ad hoc, disorganized fashion" without the Proposed ECTNP.

The Proposed ECTNP is a comprehensive land use plan to support objectives that aim to direct growth to transit-served areas and promote transit ridership, consistent with state, regional and local objectives for sustainable development that reduces GHG emissions. The Proposed ECTNP also provides design standards to promote a consistent urban form that is supportive of transit use and other non-vehicular modes of transportation. Without such guidance, it is anticipated that development would still occur, but would be less successful at achieving identified goals of the ECTNP.

Under the current zoning, development in the area is constrained due to existing limits on allowable FAR, density, and uses in key locations proximate to the stations, and would not accommodate projected growth. Consequently, it is likely that, without the Proposed Plan, future projects would require individual zone changes, General Plan amendments, and/or other discretionary actions which would not likely meet the Project objectives stated in the EIR. By contrast, development under the Proposed Plan would be more predictable and reflect a cohesive land use strategy for the area. The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-13

The commenter states that the City should be planning for the public facilities (fire, police, schools, water, sewage conveyance, etc.) needed to address growth "independent" of the existence of this Expo Plan.

Please refer to **Master Response No. 2 – General Plan Framework Policy 3.3.2, Master Response No. 3 - Emergency Services**, **Master Response No. 4 - Utilities**, and **Master Response No. 5 - Schools**.

Response 17-14

The comment calculates the number of units that could occur in a square mile with RAS4 zoning.

In Chapter 3.0, Project Description, of the EIR, identifies the proposed zoning and allowable residential densities according to the LAMC and the Proposed Plan; **Appendix F** of the EIR provides an overview of the Population, Housing and Employment Methodology. Estimates of future development, known as the "reasonable expected development," is not intended to represent maximum build out. The assumption for average levels of development is based on a number of factors that affect development and include historical evidence, economic conditions, market trends, financial lending practices and construction and land acquisition costs, which influence marketplace decisions relating to proposed development. Estimates of reasonable expected levels of development are derived based on such factors, as further described in **Appendix F** of the EIR. The comment does not address a specific concern regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR.

Response 17-15

The commenter states that oftentimes a "streamlined process" means that the public loses the opportunity to review pending projects and to provide sometimes valuable input. The comment further states that if the public's input is not incorporated into the review process and entitlements area granted "by right", then the projects will have missed a very important opportunity to hear feedback and improve their final product.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-16

The commenter questions that if a purpose of the Proposed ECTNP is to enhance the pedestrian experience and much-needed open space, then why is the front yard setback established as a "maximum" rather the establish a minimum and encourage as large a front setback as the site and project can accommodate.

The comments expresses concern regarding a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-17

The commenter expresses concern and seeks protection from digital signage. The comment further states that the despite the existing sign regulations cited in the EIR that City has had difficulty enforcing and prohibiting digital signage in the City. The comment requests that the Proposed ECTNP contain language that makes it clear that there is to be no new digital signage in the area.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-18

The commenter states the that the urban forest/tree canopy is important and while the EIR cites various ordinances that seek to protect a rather limited number of important tree species, the commenter prefers that there be a mechanism defined in the Proposed ECTNP that would help the community defend their street trees from illegal trimming, maiming or removal. The comment also requests evergreen trees be incorporated into the Streetscape Plan where applicable.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-19

The commenter expresses concerns about the allowed buildings heights and density along Sepulveda Boulevard in the ECTNP Area and cites quality of life and health effects experienced by individuals living in high rise buildings (including concerns related to aesthetic impacts of proposed building heights).

For impacts related to aesthetics, see Section 4.1, Aesthetics, of the EIR. As stated in Impact 4.1-1, impacts related to obstruction of views were determined to be less than significant. As stated in Impact 4.1-5, future construction within the Project Area could result in significant and unavoidable impact related to development of structures that would shade shadow-sensitive uses. SB 743 instituted changes to CEQA when evaluating environmental impacts of projects in areas served by transit, and provides that aesthetic impacts of a residential, mixed use residential, or employment center project on an infill site within a Transit Priority Area (TPA) shall not be considered significant impacts on the environment. The majority of the Project Area is located within a TPA; however, some portions fall just outside the TPA boundaries.

Potential health effects of the Proposed Project are addressed in the analyses as appropriate (e.g., Section 4.2, Air Quality, of the EIR). Other types of health effects on humans identified by the commenter are socioeconomic effects and therefore need not be analyzed in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-20

The commenter inquires if regulations can be incorporated into the Proposed ECTNP that would give the community some mechanism to review the small cell technology that the cellular telephone companies seek to install.

The comment expresses concern regarding specific provisions of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-21

The comment inquires if the Proposed ECTNP planning effort can include the removal of utility poles and power lines.

The comment expresses concern regarding specific provisions of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-22

The comment states that the EIR references State Route 2, north of State Route 201 in La Canada-Flintridge as the nearest state designated Scenic Highway and inquiries about the designation of State Route 2 (Santa Monica Boulevard) from Century City to the I-405.

On page 4.1-9 of the EIR, contains a discussion of State designated Scenic Highways in the Project Area. According to Caltrans, State Route 2 between from Century City to the I-405 is not a state designated Scenic Highway.

Response 17-23

The commenter expresses concerns about the operational air quality impacts resulting from increased total vehicle miles traveled and the adequacy of mitigation measures.

Please refer to Section 4.2, Air Quality, of the EIR, for a discussion on operational air quality impacts. As discussed on pages 4.2-22 and 4.2-23, the Proposed Project would not generate emissions that exceed the South Coast Air Quality Management District (SCAQMD) regional significance thresholds, and although traffic volumes would be higher in the future both with and without the implementation of the Proposed Project, CO emissions from mobile sources are expected to be much lower due to technological advances in vehicle emissions systems and normal turnover in the vehicle fleet. Therefore, the Proposed Project would result in a less than significant impact related to regional operational emissions and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation.

Response 17-24

The commenter expresses health risk concerns associated with living in proximity to major transit arterials and the I-405. The comment states that air quality testing should have been conducted in the Project Area.

Please refer to **Response 11-17** for a discussion of health impacts of building near freeways. Section 4.2, Air Quality, of the EIR, on page 4.2-13 and Table 4.2-3 discusses the existing setting and methodology. The

methodology used to inform the analysis in the EIR conforms to standard industry practice. The comment does not provide substantial evidence suggesting that the methodology used was inadequate.

Response 17-25

The comment asks if DCP has considered including a mechanism in the Proposed Plan to provide for community open space outside of the fine particulate contaminated areas where residents could recreate without the risk of being exposed to potential debilitating future respiratory disease.

The comment expresses concern regarding specific provisions of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-26

The commenter notes that the EIR references LAMC Section 91.106.4.5.1, which states that permits for the demolition of a building over 45 years old will not be issued unless abutting property owners and the applicable City Council Office are notified in writing and a public notice of application for demolition has been posted at the site at least 30 days prior to the date of issuance. The commenter inquires how the Proposed ECTNP can help preserve neighborhood character through the preservation and/or reuse of older properties, and asks what recourse is available when neighbors are notified of a pending demolition of an older property.

LAMC Section 91.106.4.5.1 cannot completely prevent a property from being demolished and the property being redeveloped or structures being altered so long as an applicant has gone through all necessary processes, including environmental review. As discussed in Section 4.3, Cultural Resources, Impact 4.3-1, impacts related to historical resources are potentially significant. In addition to existing City regulations, the ECTNP includes plan standards that further protect historical and potentially historical resources by requiring additional review by the Cultural Heritage Commission or the Office of Historic Resources. The comment does not address the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-27

The commenter states that the Apple Pan Restaurant on Pico Boulevard near Westwood Boulevard is a cultural landmark in the ECTNP Area and inquiries about protections that can be applied to this property. The comment also questions why this property was not identified as historically significant in the EIR or by SurveyLA.

See Chapter 3.0, Corrections and Additions for a revised Figure 4.3-1 to identify The Apple Pan, located at the intersection of Glendon Avenue and Pico Boulevard, as a historic resource that appears eligible for local listing or designation based on SurveyLA – West Los Angeles Survey findings from 2012.

Response 17-28

The commenter expresses concerns about GHG emissions and questions if there is a way to determine whether those living or working in proximity to transit, and who use transit, actually offset the added greenhouse gases produced by added idling and delay in driving times.

The analysis of GHG impacts is based on models that take in to account vehicle speeds. Please see Section 4.5, Greenhouse Gas Emissions, of the EIR for additional details. Impacts related to generating GHG emissions were found to be less than significant.

Response 17-29

The commenter expresses concerns about bicycle facilities and potential impacts related to traffic speeds on major arterials.

As discussed in Section 4.12, Transportation and Traffic, of the EIR and 4.12-84 and Section 4.14, Cumulative Impacts, on pages 4.14-10 and 4.14-11, of the EIR, the Proposed ECTNP anticipates the bicycle networks identified in the MP 2035 and allows these networks to be accommodated in the future. The EIR identified a significant and unavoidable impact related to the circulation system (Impact 4.12-2). The Proposed Project does not propose any new bicycle facilities or propose any changes to bicycle facilities identified in the MP 2035.

Response 17-30

The commenter expresses concerns about emergency response and emergency evacuation plans and requests that Impact 4.6-7 in Section 4.6, Hazards and Hazardous Materials, of the EIR, be reevaluated in the context of the increased traffic and congestion that would be created by the Proposed Project.

Please refer to **Master Response No. 3 - Emergency Services** and Section 4.12, Transportation and Traffic Impact 4.12-7.

As discussed in Section 4.6, Hazards and Hazardous Materials, of the EIR, LADOT and LAFD would be responsible for ensuring that the Proposed Project (including proposed land uses) does not impair or physically interfere with an adopted emergency response or evacuation plan. This would be accomplished in a number of ways, including ensuring that the land uses developed under the Proposed Project include adequate access and escape routes (clearly marked and delineated) and residents and patrons of on-site businesses are aware of emergency evacuation plans in the event of a major emergency/catastrophe.

The City's Emergency Management Department (EMD) leads the City's effort in the development of a citywide emergency plan.[25] Emergency response plans and emergency evacuation plans specify appropriate actions to be undertaken with regard to emergency situations such as warning systems, evacuation plans/procedures, and emergency action plans. The Safety Element of the City's General Plan also identifies critical facilities and lifeline systems, such as disaster routes. Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Jurisdictional infrastructure, such as roads and emergency services, are interrelated; therefore, the City of Los Angeles coordinates with neighboring jurisdictions, such as the County of Los Angeles. The County of Los Angeles has developed an Operational Area Emergency Response Plan (ERP) to ensure the most effective allocation of resources for the maximum benefit and protection of the public in time of emergency. Towards this end, the County along with the City of Los Angeles have developed a draft Los Angeles Operating Area Mass Evacuation Process Guide to ensure a consistent approach to evacuation.[26] The Proposed Project, including any increase in traffic congestion as a result of the Proposed Project, would not conflict with emergency evacuation plans in the City.

Response 17-31

The commenter states that the map of the study area on page 4.6-16 showing school locations does not include numerous pre-schools and other private schools.

Please refer to **Master Response No. 5 - Schools**. The commenter is correct that numerous pre-schools and other private schools are not shown on the Figure 4.6-16. Please see Chapter 3.0, Corrections and Additions

[25]Los Angeles County, Office of Emergency Management, *Access and Functional Needs Annex,* lacoa.org/misc/Annex%20PubComm.doc.

[26]Los Angeles Operational Area, *Mass Evacuation Process Guide*, https://www.smgov.net/departments/oem/sems/operations/laoa-mass-evacuation-guide.pdf.

for Figure 4.6-1. As discussed Section 4.6, Hazards and Hazardous Materials, of the EIR, on page 4.6-23 individual projects developed as part of the Proposed Project would be required to comply with federal, state, and local hazardous materials regulations. Compliance with all applicable local, state, and federal laws and regulations, as described in Section 4.6, Hazards and Hazardous Materials, of the EIR, under Regulatory Framework, would regulate, control, or respond to hazardous waste, transport, store, disposal, and clean-up in order to ensure that hazardous materials do not pose a significant risk to nearby receptors, including all schools, public or private.

Response 17-32

The commenter states that the new "Mixed-Use: Commercial/Residential" zone has the potential to do the most harm to the Westside. The commenter believes that developers will use this new zone to build the maximum allowed multi-family residential space and minimum neighborhood commercial space.

Chapter 3.0, Project Description, of the EIR, identifies the proposed zoning and reasonably foreseeable development anticipated to occur by the year 2035. The EIR evaluates the impacts associated with this growth. The commenter does not disagree with the identified reasonably foreseeable development or the analyses contained in the EIR.

Response 17-33

The commenter states their opposition to "Hospitals and Nursing and Residential Care Facilities" being allowed in the new "Mixed-Use: Commercial/Residential" zone because of the additional traffic and noise impacts.

Specific uses such as hospitals and nursing and residential care facilities are generally allowed and commonly located in commercially zoned areas as well as areas zoned for higher density residential use. The "Mixed-Use: Commercial/Residential" zone does not newly introduce hospitals and nursing and residential care facilities as allowable uses. The potential impact of a wide range of commercial uses, including hospitals and nursing and residential care facilities, were considered as part of the impact analysis. See Section 4.9, Noise and Section 4.12, Traffic and Transportation, of the EIR.

Response 17-34

The commenter states that the impact discussion on page 4.8-15 of the EIR needs to be updated because the change of zoning from Neighborhood Commercial to RAS4 that had previously been proposed for Pico and Westwood Boulevards has been removed.

See **Appendix N**.

Response 17-35

The commenter states that the summary of zone changes around Westwood Station on page 4.8-18 and Table 4.8-5 of the EIR should be updated to reflect the fact that Pico and Westwood Boulevards have been removed from the Proposed Plan.

See **Appendix N**.

Response 17-36

The commenter states that the impact discussion on page 4.8-15 of the EIR does not include the current proposal to change the zoning on the South side of Pico Boulevard between Westwood Boulevard and Overland Avenue from community commercial to mixed-use. The commenter also states WSSM opposes the proposed zone change of aforementioned site and requests that the existing zoning remain in place.

A discussion of the proposed change to the South side of Pico Boulevard between Westwood Boulevard and Overland Avenue is provided in **Appendix N**, as amended in Chapter 3.0, Corrections and Additions. **Appendix N** contains a discussion of revisions to the Proposed Plan that were made at various stages of the development of the Proposed Plan and therefore not incorporated into the analysis contained in the EIR. These reflect minor modifications that are consistent with the analysis in the EIR and would not generate any new substantial adverse environmental impacts or change any impact conclusions. With regard to the comments expressing opposition to proposed zone changes in the Proposed Plan, such comments are opinions and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-37

The commenter states that the proposed Bonus FAR, with the provision of public benefits, are far too high and unnecessary and request that they be removed from the Plan.

The EIR evaluates reasonably foreseeable development under the Proposed ECTNP. The comment does not disagree with the reasonably foreseeable development assumptions or the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-38

The comment states that the conclusion on page 4.8-21 of the EIR that the Proposed Project would result in a less than significant impact related to land use compatibility and division of an established community must be revised to reflect the proposed zoning change for the Westside Pavilion site, which in the commenter's opinion would result in a significant impact.

As stated in Section 4.8, Land Use and Planning, of the EIR, the Proposed Project would not result in a significant and unavoidable impact related to land use compatibility and division of an established community. The Proposed Project generally allows similar uses as those that currently exist although with a greater mix of uses and building intensity than currently exists, and it does not include new major infrastructure or roadways and, therefore, would not physically divide an existing established community or isolate an existing land use. The types of uses allowed in the proposed zoning for the Westside Pavilion site (Mixed Use: Commercial/Residential) would be similar to those generally allowed in the existing commercial zone contemplated in the EIR analysis. The Mixed-Use: Commercial/Residential zone does not introduce any new uses that would physically divide an established community. The Proposed Project also includes urban design standards that would encourage pedestrian activity and circulation through large sites, linking new uses with the surrounding neighborhood. See **Appendix N**.

Response 17-39

The commenter requests that the Alternative Compliance component be removed from the Proposed Project because it would provide a path to increased residential square footage with a corresponding decrease in non-residential square footage and jobs.

The comment expresses concern associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

Response 17-40

The commenter states that the Mitigation Measures and the Significance of Impacts after Mitigation paragraphs on page 4.8-22 of the EIR need to be updated to reflect mitigations and impact significance related to the change of zone for the Westside Pavilion site.

As discussed in **Response 17-38**, the commenter does not explain why they believe that the proposed zoning of the Westside Pavilion site (Subarea 6 in the Proposed ECTNP) would result in an impact requiring mitigation measures. The EIR evaluates reasonably foreseeable development under the Proposed ECTNP; therefore, no further response is necessary.

Response 17-41

The commenter states that the analysis of Impact 4.8-2 (Consistency with applicable goals, policies and regulations) needs to be revised and updated to reflect the change of zoning for the Westside Pavilion site.

The types of uses allowed in the proposed zoning for the Westside Pavilion site (Mixed-Use: Commercial/Residential) would be similar to those generally allowed in the existing commercial zone contemplated in the EIR analysis. The Mixed-Use: Commercial/Residential zone does not introduce any new uses that would result in inconsistencies with applicable regional, state, and local goals, policies, and regulations. The proposed Mixed-Use: Commercial/Residential zone would be consistent with policies that direct growth to areas around transit. As stated in the EIR, the Proposed Project would have a less-than-significant impact related to conflicting with an applicable land use plan, policy, or regulation. See **Appendix N**.

Response 17-42

The commenter states the analysis of Impact 4.8-2 should be revised to include Westwood/Pico Neighborhood Overlay District.

The Westwood/Pico Neighborhood Overlay District would continue to apply to properties within the boundaries of the Neighborhood Overlay District. The Neighborhood Overlay District is consistent with the adopted community plan. See **Response 11-4**.

Response 17-43

The commenter expresses concern that as the City increases the permitting of projects "by right" (streamlining), it will remove opportunities for residents to make comments and suggestions and to meet and negotiate with developers.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-44

The commenter states that the noise analysis is flawed because no ambient noise measurements were taken in the ECTNP Area. Instead, the preparers have relied on assumptions such as the "presumed" ambient noise levels in the LAMC.

See **Response 73-8**.

Response 17-45

The commenter states that instead of the EIR stating that there are no adopted City standards for vibration, the EIR should reference the Los Angeles County Code vibration limit.

See **Response 73-8**.

Response 17-46

The commenter states that the EIR misrepresents the vibration acceptability criteria published by the Federal Transit Administration (FTA).

See **Response 73-8**.

Response 17-47

The commenter states that the proposed zone change (from commercial to mixed-use) for the Westside Pavilion property would permit/encourage new residential development that would be incompatible with existing ambient noise levels.

Residential uses are generally allowed and commonly located in commercially zoned area. The Mixed Use: Commercial/Residential zone does not newly introduce residential uses as allowable uses on this commercially designated corridor. The potential impact of a wide range of commercial and residential uses were considered as part of the impact analysis for the entire corridor, including this site.

Please refer to Section 4.9, Noise, of the EIR for a discussion of operational noise impacts from potential new development as a result of the Proposed Project.

Response 17-48

The commenter questions what efforts have been made to assess the appropriateness of using freeway adjacent properties as future residential locations related to the exposures to noise and fine particulate air pollution standards.

Please refer to **Response 11-17**. Generally, the analysis of the environment's impact on the Proposed Project, including both air quality and noise impacts from freeways, is not required under CEQA.

Response 17-49

The commenter states that there is a flaw in the analysis for Impact 4.10-1 (substantial population growth) because it does not take into account "the Casden Sepulveda Project."

Please refer to **Master Response No. 8 - Cumulative Impacts**.

Response 17-50

The commenter states that Table 4.10-10 in the EIR shows that, compared to projected (SCAG) 2035 demand for housing along the entire length of the corridor within the City of Los Angeles, existing community plans fall short by 2,425 units; thus, the Casden Sepulveda Project alone would meet a significant portion (25 percent) of the anticipated housing needs for the entire corridor.

Please refer to **Master Response No. 8 - Cumulative Impacts** and **Appendix F** of the EIR.

Response 17-51

The commenter states that the housing impact analysis needs to be revised to reflect that portion of future housing demand that will be met by the Casden Sepulveda Project.

Please refer to **Master Response No. 8 - Cumulative Impacts**.

Response 17-52

The commenter states that the analysis of the demand for jobs in the ECTNP Area does not include the impact of the currently proposed zone change for the Westside Pavilion site from commercial to mixed-use.

See **Appendix N**.

Response 17-53

The commenter states that the Market Study conducted to supplement SCAG growth projections for jobs and housing analysis did not include Westwood Station.

The Market Study was used to inform policy and land use recommendations. The environmental impacts analyzed in the EIR are based on reasonable expected development anticipated by the proposed land use and zone changes, not the Market Study estimates. Please refer to **Appendix F** of the EIR for further detail.

Response 17-54

The commenter states a number of reasons why they believe the fire service analysis is flawed and deficient.

Please refer to **Master Response No. 3 - Emergency Services**.

Response 17-55

The commenter states a number of reasons why they believe the police service analysis is flawed and deficient.

Please refer to **Master Response No. 3 - Emergency Services**.

Response 17-56

The comment states a number of reasons why they believe the analysis of school capacity is flawed, including stating that the EIR failed to account for the Casden Sepulveda Project.

Please refer to **Master Response No. 3 - Schools** and **Master Response No. 8 - Cumulative Impacts**.

Response 17-57

The commenter inquires whether the Proposed ECTNP can include any creative solutions to foster the development of new recreational open space.

The comment expresses concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 17-58

The comment states a number of reasons why they believe the traffic analysis is flawed and questions the potential traffic impacts to first responders and bicyclists.

Please refer to and **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion** and **Master Response No. 3 - Emergency Services**.

Response 17-59

The commenter states a number of reasons why they believe the analysis of utility and service systems is flawed and deficient.

Please refer to **Master Response No. 4 - Utilities**.

Response 17-60

The commenter states that the analysis of electricity supply is flawed given the City's recent experience power outages and brownouts.

Please refer to **Master Response No. 4 - Utilities**.

Response 17-61

The commenter states that Alternative 2 (the Reduced Project Alternative) is more preferable than the Proposed Project.

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

LETTER NO. 18

Lori Allen

Response 18-1

The commenter expresses their opinion that traffic has increased exponentially following the construction of the Expo Line and that the transit line has not created "vehicle trip reductions."

See **Master Response No. 6 – Traffic Analysis Methodology**. The commenter's opinion will be forwarded to the decision-makers for their consideration in taking action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 18-2

The commenter states the new development will raise rents beyond what most Angelenos can afford.

As discussed in Section 4.10, Population, Housing, and Employment, of the EIR, adoption of the Proposed Project is not expected to result in the loss of existing affordable housing because the Proposed Project aims to add, not replace, housing stock. No specific residential units are proposed to be demolished, converted from affordable to market rate, or removed through other means as part of the Proposed Project. Over 85 percent of the existing multifamily built parcels in the Project Area constructed prior to 1978 and therefore potentially subject to the Rent Stabilization Ordinance) are not included in the areas of proposed change, and therefore, will not be impacted by the zone changes of the Proposed Project. Furthermore, the Proposed Project would result in a net gain of approximately 3,450 dwelling units within the areas of proposed change. The Proposed ECTNP incentivizes production of affordable housing through development incentives. Housing affordability is generally not considered to be a physical environmental impact under CEQA. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 18-3

The comment states that building high end clothing stores and trendy restaurants does not make up for the loss of national brand grocery stores and mom and pop services.

The Proposed Project does not preclude the development of national brand grocery stores or encourage the replacement of mom and pop stores. Neither does the Proposed Project specifically promote high-end retail. The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 19

Addy Anggelico

Response 19-1

The comment expresses opposition to the Proposed ECTNP due to "significant increased density on the south side of Pico," allowances for additional housing units and heights, and environmental impacts related to infrastructure and traffic as disclosed in the EIR.

The comments express an opinion in opposition to the Proposed Plan, and do not relate to the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to infrastructure. Also see **Master Response No. 6 - Traffic Analysis Methodology, Master Response No. 7 - Neighborhood Intrusion** and Section 4.12, Transportation and Traffic, of the EIR for a discussion of impacts related to traffic.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

LETTER NO. 20

Melissa Aragon

Response 20-1

The comment contains introductory text and expresses support for the revisions made to the Proposed Project, in particular the removal of zone changes for Pico Boulevard between Sepulveda Boulevard and Overland Avenue. The commenter also requests that additional development should be planned after more time has elapsed after the opening of the Expo Line, and would be best after the West Los Angeles Community Plan is re-written. The comment also expresses concerns regarding the infrastructure, school capacity, and traffic congestion.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR for a discussion of impacts related to transportation system. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

LETTER NO. 21

J. Aueiliach

Response 21-1

The comment states that there is lack of handicapped parking at the Palms Station and that transit stations in general lack access to convenient parking.

The Proposed ECTNP does not include changes to parking for Metro stations. Parking supply is considered a social impact and not an environmental impact addressed by CEQA. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 22

Kathryn Bernstein

Response 22-1

The content of this comment expresses similar concerns regarding infrastructure, school capacity, and traffic congestion as those in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

With regard to potential impacts to adjacent properties, see Section 4.1, Aesthetics, of the EIR. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR for a discussion of impacts related to transportation system. See **Response 43-5** regarding the Blue Line and Expo Line track sharing. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

LETTER NO. 23

Paula Bourges

Response 23-1

The content of this comment is identical to and expresses similar concerns regarding infrastructure, school capacity, and traffic congestion as those in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

With regard to potential impacts to adjacent properties, see Section 4.1, Aesthetics, of the EIR. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR for a discussion of impacts related to transportation system. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

LETTER NO. 24

James Brewer

Response 24-1

The commenter states that changes in the capacity of the roadway network would "exacerbate" existing traffic congestion and also result in more traffic being diverted into residential neighborhoods.

The transportation analysis in the EIR considers changes to roadway capacity and hence vehicular capacity, and disclosed traffic impacts in and around the ECTNP Area at study intersections and on residential roadways; please see **Master Response No. 6 - Traffic Analysis Methodology**. Regarding the potential for

traffic diversion into the local neighborhoods, please see **Master Response No. 7 - Neighborhood Intrusion**.

LETTER NO. 25

Barbara Broide

Response 25-1

The content of this comment is identical to and expresses similar concerns regarding infrastructure, school capacity, and traffic congestion as those in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

With regard to potential impacts to adjacent properties, see Section 4.1, Aesthetics, of the EIR. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR for a discussion of impacts related to transportation system. See **Response 43-5** regarding the Blue Line and Expo Line track sharing. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR. See **Master Response No. 8 – Cumulative Impacts** for a discussion of specific development projects in the vicinity of the ECTNP Area.

LETTER NO. 26

Eric Bruins

Response 26-1

The commenter expresses their opinion that the Proposed Project does not provide enough housing and that the jobs-housing imbalance is the source of regional traffic.

Table 4.10-10 in Section 4.10, Population, Housing, and Employment, of the EIR, presents the reasonably expected population, housing, and employment in the ECTNP Area in 2035 under the Proposed Plan and under the Proposed Plan with Alternative Compliance Scenario. Under the Proposed Plan an additional 4,423 residential units and 14,334 jobs are anticipated. To supplement the SCAG growth forecasts, a Market Study was also prepared for the ECTNP Area to determine the market demand for jobs and housing and supplement the SCAG growth forecasts.[27] See **Response 18-3** regarding the Market Study prepared for the Proposed Project. The comment does not address the adequacy of the analysis in the EIR, or provide substantial evidence supporting the need for different analysis or conclusions. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 26-2

The commenter suggests that lowering parking requirements would reduce construction costs, accommodate more housing and supply housing to households that do not own cars.

[27]Pro Forma Advisors, LLC, *Expo and Crenshaw LRT Station Area Plans Market Analysis*, 2013, **Appendix L** of the EIR.

The comment outlines concerns associated with specific features of the Proposed Project, and does not relate to significant environmental issues or the adequacy of the analysis in the EIR. Additionally, parking supply is considered a social impact and not an environmental impact addressed by CEQA. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please also refer to **Response 1-2** regarding parking.

Response 26-3

The commenter expresses their opinion that although the Proposed ECTNP is trying to do a lot of great things, it does not do enough to address the lack of housing supply.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 27

Rich Calahan

Response 27-1

The commenter states that it is imperative to maintain the Pedestrian Oriented District (POD) overlay zoning on Pico between Sepulveda Boulevard and Overland Avenue.

The regulations of the Westwood/Pico Neighborhood Overlay District would continue to apply to properties within the boundaries of the district. The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 27-2

The commenter asks if there is any way to control traffic speed on Pico Boulevard since excessive speeds are dangerous to children.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 28

Pojen Chen

Response 28-1

The commenter expresses support for the "three-story height limit" on Pico Boulevard. The comment expresses concern about the traffic congestion on Pico Boulevard during the peak commute hours and that the increase in land use density will make traffic conditions worse and that these conditions could impact emergency services.

With regard to the "three-story height limit," the comments is expressing support for specific provisions of the Proposed Plan and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Regarding concerns about traffic congestion, see **Master Response No. 3 - Emergency Services** and **Master Response No. 6 - Traffic Analysis Methodology**.

LETTER NO. 29

Bob Cimiluca

Response 29-1

The commenter expresses support for the "three-story height limit" on Pico Boulevard. The commenter also requests that the City do more planning with regard to infrastructure and schools needed to support increased population.

With regard to the "three-story height limit," the comments is expressing support for specific provisions of the Proposed Plan and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please refer to **Master Response No. 4 - Utilities**, and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to infrastructure. Also see **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR for a discussion of impacts related to schools.

LETTER NO. 30

Alexander DeGood
Cox Castle Nicholson LLP
2029 Century Park East, Suite 2100
Los Angeles, CA 90067

Response 30-1

The comment provides a summary of the approved Martin Expo Town Center Project and states that the EIR incorrectly identifies the General Plan land use and zoning designation of the property.

The land use designations presented in the EIR represent information available at the time the NOP of the Proposed Project was filed on March 14, 2013. The Martin Expo Town Center Project was not approved by City Council until 2016. See also **Master Response No. 8 - Cumulative Impacts** for further discussion of the Martin Expo Town Center Project and how it is evaluated in the EIR.

Response 30-2

The comment states that by incorrectly designating the Martin Expo Town Center Project property's zoning and general plan designation, the EIR inaccurately analyzes a potential zoning and general plan change that would not align with recent City actions.

See also **Master Response No. 8 - Cumulative Impacts** for further discussion of the Martin Expo Town Center Project and how it is evaluated in the EIR.

LETTER NO. 31

Joanne Dadison Dorfman

Response 31-1

The comment identifies certain project characteristics that in the commenter's opinion have merit (e.g., new housing, streetscape improvements and urban design standards, etc.) and requests the City to listen to the views of community residents.

The comment expresses an opinion in support of specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 31-2

The comment expresses concerns over density, height limits, setbacks, and unbundled parking in the Proposed Plan, as well as traffic and infrastructure impacts (including police, fire, schools, water, sewer, libraries, and parks and recreation space). The comment also requests that Subarea 6 (Westside Pavilion) be maintained as commercial, with no added residential.

The comments regarding density, heights, setbacks, parking, and the proposed zoning for Subarea 6 are concerns associated with specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Regarding the concerns about water and sewers, see **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to infrastructure. Regarding the concerns about police and fire services, see **Master Response No. 3 – Emergency Services** and Section 4.11, Public Services, of the EIR. Regarding concerns about traffic, see **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR for a discussion of impacts related to the transportation system. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

Response 31-3

The commenter indicates that emergency service (police and fire) is likely to be impacted as a result of the Proposed Project.

Regarding traffic related impacts to emergency response, please see the discussion of Impact 4.12-7 in the EIR, as well as **Master Response No. 3 - Emergency Services**. The comments do not provide substantial evidence supporting the need for different analysis or conclusions from those in the EIR.

LETTER NO. 32

Marie Doss

Response 32-1

The comment voices the opinion that the upzoning along Pico Boulevard, between Sepulveda Boulevard and Overland Avenue will have a negative impact on residents' quality of life including impacts on small businesses, traffic, schools, and emergency services. The commenter requests that the City maintain the maximum height limit of three stories and not vote for upzoning.

Regarding the comments about impacts small businesses, such concerns do not relate to significant environmental issues or the adequacy of the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Regarding concerns about traffic, please refer to **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion** and Section 4.12, Transportation and Traffic, of the EIR for a discussion of impacts related to the transportation system. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR. **Master Response No. 3 - Emergency Services** provides a discussion of impacts to emergency services.

LETTER NO. 33

Lorna Edmond

Response 33-1

The comment requests that the City not allow the Pico Corridor between Overland Avenue and Sepulveda Boulevard to ever be upzoned.

The comment outlines concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 33-2

The comment states that although the Expo Line is operating well, there are no plans for expanded parking or trains.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 33-3

The comment states that traffic is gridlocked and emergency vehicles are delayed.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR for a discussion of impacts related to the transportation system. **Master Response No. 3 - Emergency Services** provides a discussion of impacts to emergency services.

Response 33-4

The comment states that the schools are overcrowded.

Please refer to **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR for a discussion of impacts related to schools.

Response 33-5

The comment states that hospitals and emergency rooms are overcrowded.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 33-6

The comment states that parks are overcrowded and so are homeless encampments.

Please refer to Section 4.11, Public Services, of the EIR for a discussion of impacts related to parks. As stated under Impact 4.11-4, the impact related to demand for parks and recreation facilities is anticipated to be significant and unavoidable. Issues related to homelessness are generally considered socio-economic issues and are addressed outside the CEQA process. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 33-7

The comment expresses concern about the potential for construction equipment to cause damage to roads, gas and water pipes and the sewer system.

Movement of construction equipment on City streets as well as construction activities within roadway rights of way could result in typical wear and tear of roadway surfaces as well as accidental impacts to pipes and wiring. Wear and tear on City roadways is an anticipated part of typical use and cannot be separately quantified for individual projects. Accidental impacts to City infrastructure will typically be required to be repaired by the party responsible for the accident. Such accidents are not reasonably foreseeable. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, pf the EIR for a discussion of impacts related to infrastructure.

Response 33-8

The comment states that the Westside Pavilion could not accommodate theater parking due to underground water.

Please refer to Section 4.7, Hydrology and Water Quality, of the EIR for a discussion of impacts related to groundwater. The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 33-9

The comment expresses concern over earthquake and fire evacuation response plans.

Please refer to **Master Response No. 3 - Emergency Services** for a discussion of impacts related to emergency services.

Response 33-10

The comment asked if the EIR includes other nearby developments and specifically mentions the Casden Sepulveda Project.

See **Master Response No. 8 - Cumulative Impacts**.

Response 33-11

The comment expresses concerns about how the City will support and maintain the added population and jobs.

The EIR provides an analysis of the how the increase in population and jobs could result in physical environmental impacts. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 33-12

The comment expresses concerns about the water supply.

Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to water supply.

Response 33-13

The comment expresses concerns over the power and utilities to support the Proposed Project.

Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to infrastructure

Response 33-14

The comment expresses concern about air quality impacts due to smog from traffic gridlock and close proximity to the I-405.

Please refer to Section 4.2, Air Quality, of the EIR for a discussion of the Proposed Project's impacts on air quality. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 33-15

The comment expresses concern about affordable housing and generally states that new developments in the area are not affordable.

Please refer to **Response 18-2**.

Response 33-16

The comment requests that the City think intelligently to protect the next generation's quality of life.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 34

Steve Elkins

Response 34-1

The commenter states that parking in the ECTNP Area is terrible and requests that the City increase the availability of parking.

Please refer to **Response 1-2** regarding parking.

LETTER NO. 35

David Friedman

Response 35-1

The comment expresses general opposition to the Proposed Project and voices the opinion that increases in density would decrease the "quality of life" in the neighborhood and that the current infrastructure is inadequate.

The comments expressing general opposition to the project and concerns about quality of life do not relate to significant environmental issues or the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Regarding concerns about infrastructure, please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to infrastructure.

LETTER NO. 36

Marilyn Frost

Response 36-1

The comment states that there has been excessive development between Pico and Olympic Boulevards near the Westside Pavilion and this area experiences high traffic and congestion.

The EIR provides a comprehensive discussion of existing traffic and potential impacts of the Proposed Project; see Section 4.12, Transportation and Traffic, of the EIR and **Master Response No. 6 - Traffic Analysis Methodology**. The comments do not relate to the adequacy of the analysis included in the EIR. Accordingly see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 36-2

The commenter states that the high-rise buildings have no place in the neighborhood and the impact of current density in Century City is "challenging enough." The commenter also requests that the City not increase density in the Rancho Park neighborhood.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 37

Roger Goodman

Response 37-1

The comment expresses support for the revisions made to the Proposed Project, for the areas adjacent to the Westwood and Sepulveda stops on the Expo Line.

The comment expresses support for a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 37-2

The comment states that the community was in support of Proposition U, which limited density along Pico and Westwood Boulevards, and wants to ensure the survival of small local businesses, as an alternative to the Westside Pavilion. The comment also states that rising rents could force out commercial tenants, and has already driven out Coffee Bean, Bouvardia Flowers and Junior's Deli.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. See also **Response 11-10** regarding impacts to individual businesses.

Response 37-3

The comment states that streets (such as Pico and Olympic Boulevards) "already cannot handle the existing traffic."

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**.

Response 37-4

The comment expresses the opinion that more development is not feasible since the City is mandating cutbacks on water usage to the current population.

Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion impacts related to water supply. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 37-5

The comment requests that the City continue with the revised plan that removes Pico Boulevard between Sepulveda Boulevard and Overland Avenue from upzoning.

The comment expresses support for a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 38

Marcas Grant

Response 38-1

The commenter expresses concern about the existing Expo Line bike path and states that the bike path as currently constructed "disappears" at the edge of Cheviot Hills and forces riders to take an unmarked roundabout path through the neighborhood. The comment requests clarification on the status of the bike path to better connect Motor Avenue to Overland Avenue.

The Proposed Project would not disrupt any existing or planned bicycle facilities, or create conflicts or inconsistencies with adopted bicycle system plans, guidelines, policies, or standards. As discussed on page 4.12-44 in Section 4.12, Transportation and Traffic, of the EIR, the Proposed Project seeks to improve the configuration and condition of streets to better promote bicycle circulation. Although the Proposed Project does not include new bike paths, the Proposed Project anticipates the bicycle networks identified in the MP 2035 and allows these networks to be accommodated in the future. To obtain an update on the status of the bike path connecting Motor Avenue to Overland Avenue, please contact the LADOT.

LETTER NO. 39

Dianne Gregora

Response 39-1

The comment requests the City keep the height limit along Pico Boulevard between Sepulveda Boulevard and Overland Avenue to three stories.

The comment expresses support for a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 40

Dianne Gregora

Response 40-1

The commenter thanks the City for keeping the height limit along Pico Boulevard between Sepulveda Boulevard and Overland Avenue to three stories.

The comment expresses support for a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 40-2

The commenter expresses their opinion that the Proposed Project is too big and development will block the sunlight and create a "canyon."

Please see Section 4.1, Aesthetics, of the EIR, for a discussion of building heights compared to existing conditions. The comments do not provide substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 40-3

The commenter makes reference the "Casden Sepulveda Project" and states that the Proposed Project is not sustainable as the Big Blue Bus and the Expo Line have reduced capacity and already experiencing delays.

Regarding the "Casden Sepulveda Project" please refer to **Master Response No. 8 - Cumulative Impacts**.

As discussed in Section 4.12, Transportation and Traffic, of the EIR, Impact 4.12-6, the Proposed Project would result in less than significant impacts related to CMP Transit Impact Review.

Response 40-4

The comment expresses an opinion that the current infrastructure cannot support buildings that are more than three stories, citing water pipe leaks, gridlock, and capacity of transit systems.

Regarding water infrastructure, please refer to **Master Response No. 4 – Utilities** and Section 4.13, Utilities and Service Systems, of the EIR. Regarding traffic gridlock, please see **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Traffic and Transportation, of the EIR. Please see Section 4.12, Transportation and Traffic, of the EIR Impact 4.12-6 for an analysis of the Proposed Project's impact on transit.

Response 40-5

The comment expresses general opposition to the Proposed Project and lists crumbling water infrastructure, insufficient classrooms, budget-cuts to fire and police services, gridlock on roads, and current lack of capacity on transit lines as reasons for opposition.

Please refer to **Master Response No. 3 - Emergency Services**, **Master Response No. 4 - Utilities**, **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and **Master Response No. 5 - Schools**.

LETTER NO. 41

Sue Guiguis

Response 41-1

The comment states that traffic is currently a "disaster," claiming that it can take 30 minutes to travel via car from one light to the next.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**.

Response 41-2

The comment states that congested traffic and high air pollution has led to cases of asthma and breathing problems.

See **Response 11-17**.

LETTER NO. 42

Charles Healy

Response 42-1

The commenter thanks DCP for maintaining the "three-story height limit" on Pico Boulevard between Overland Avenue to Sepulveda Boulevard.

The comment expresses an opinion in support of a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 42-2

The comment expresses an opinion that allowing buildings with five-stories or more would put pressure on parking and crowded trains and buses would prompt more driving. The comment also states that adding more riders to the Expo Line would "hasten its downward spiral."

As discussed in Section 4.12, Transportation and Traffic, of the EIR, Impact 4.12-6, the Proposed Project would result in a less than significant impact related to the CMP Transit Impact Review. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

See **Response 1-2**.

Response 42-3

The comment states that replacing existing structures on Pico Boulevard with five-story buildings would kill the current retail and restaurant businesses frequented by the community.

See **Response 11-10** regarding impacts to individual businesses.

Response 42-4

The comment states that the Proposed ECTNP will create congestion on Pico Boulevard and send traffic into local streets.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology** and **Master Response No. 7 - Neighborhood Intrusion**.

LETTER NO. 43

Margaret Healy

Response 43-1

The comment expresses support for the revisions made to the Proposed Project, with regard to the removal of Pico Boulevard between Sepulveda Boulevard and Overland Avenue from upzoning.

The comment expresses an opinion in support of a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 43-2

The comment states that the density increases from the Proposed Project in addition to the Casden Sepulveda Project and the Westside Pavilion would lead to traffic on residential streets.

Please refer to **Master Response No. 7 - Neighborhood Intrusion** and **Master Response No. 8 - Cumulative Impacts**. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 43-3

The comment states that the if the RAS4 zoning were to be permitted along Pico Boulevard between Sepulveda Boulevard and Overland Avenue, existing small business and restaurants would be forced out due to higher rents.

See **Response 11-10** regarding impacts to individual businesses. The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 43-4

The comment states that within the ECTNP Area there is not adequate infrastructure, including schools, water, sewer, police and fire services to accommodate RAS4 zoning.

Please refer to **Master Response No. 3 - Emergency Services**, **Master Response No. 4 - Utilities**, and **Master Response No. 5 - Schools**.

Response 43-5

The commenter expresses their opinion that track sharing between the Blue Line and Expo Line has resulted in delays to the Expo Line service along with higher ridership will lead to more people using automobiles as opposed to transit.

Future ridership decreases resulting from potential delays along the shared-track portion of the line is speculative and no substantial evidence is provided supporting the need for different analysis or conclusions from those in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 43-6

The comment questions the conclusions in Section 4.14, Cumulative Impacts, of the EIR with regards to the impacts to schools and other public services such as police, fire, and library services.

Please refer to **Master Response No. 5 - Schools**, **Master Response No. 3 - Emergency Services**, and **Master Response No. 8 - Cumulative Impacts**.

Response 43-7

The commenter asks why there would not be a considerable contribution to freeway traffic or transit ridership. The commenter also asks why the impacts of track sharing between the Expo Line and the Blue Line has not been discussed.

As discussed in Section 4.12, Transportation and Traffic, of the EIR, Impact 4.12-6, the Proposed Project would result in a less than significant impact related to the CMP Transit Impact Review. A discussion of the impacts to the freeway system (Impact 4.12-4) can be found on pages 4.12-70 to 4.12-73. See Section 4.14, Cumulative Impacts, of the EIR, for a discussion of the cumulative impact of the Proposed Project.

Regarding the comment of the Blue Line and Expo Line track sharing concern, please refer to **Response 43-5**.

Response 43-8

The comment questions why significant impacts with regard to diversion of traffic to adjacent residential streets, impacts on arterials, degradation of visual character, shade/shadow impacts cannot be mitigated. The comment further questions whether these impacts can be minimized by reducing the size and scope of density.

As discussed in Chapter 5.0, Alternatives, of the EIR, a Reduced Project Alternative (Alternative 2), which increases development capacity of the ECTNP Area over the current community plans, but to a lesser extent compared to the Proposed Project, was considered. Alternative 2 would have reduced impacts as compared to the Proposed Project, but impacts related to visual character, shade/shadow, circulation, neighborhood intrusion, and CMP arterial intersection analysis would remain significant and unavoidable. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 43-9

The comment expresses the opinion that unbundled parking and parking exemptions for businesses smaller than 1,500 square feet is unrealistic.

Please see Response 1-2. The comment outlines concerns associated with a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 43-10

The commenter states that they are grateful to DCP for listening to the community and removing the Overland Avenue to Sepulveda Boulevard segment from the Proposed Plan.

The comment expresses an opinion in support of a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 44

Magaret Healy

Response 44-1

The comment states that they support the plan as currently proposed and states the reasons why they believe keeping buildings to three stories along Pico Boulevard is right decision. The comment states concerns regarding lack of infrastructure to support "5 or more stories on Pico"; concerns about the lot depth along Pico Boulevard; concerns about ridership on the Expo Line already exceeding expectations and the potential for the "Casden Sepulveda" Project to have further impacts on transit ridership; and concern about the limitations to the amount of new passengers the Expo Line can accommodate due to track sharing with the Blue Line. The commenter also notes that a petition with the 790 signatures opposing RAS4 zoning between Overland Avenue and Sepulveda Boulevard has been provided to City staff.

With regard to concerns about transit system capacity and track sharing, please refer to **Response 40-3** and **Response 43-7**. With regard to comments about infrastructure, see **Master Response No. 4 – Utilities**. With regard to comments about the "Casden Sepulveda" Project see **Master Response No. 8 – Cumulative Impacts**. With regard to the concerns related to specific features of the Proposed Plan, including zoning and lot depth, which do not relate to significant environmental issues or the adequacy of the analysis included in the EIR, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 45

Pamela Helvey

Response 45-1

The commenter suggests a "scramble intersection" where cars and pedestrians are not crossing the intersection at the same time at the intersection of Palms and Exposition and National Boulevards (and all major intersections) to reduce pedestrian/vehicle conflicts.

The January 2017 "Policy & Design Guidance" for Los Angeles streets has the following considerations that all need to be met for an exclusive pedestrian phase (commonly referred to as a "scramble"):

- The pedestrian volumes meet or exceed 30 percent of the vehicle volumes during the peak hour (typically in commercial districts, near schools, and major transit stops), or 300 pedestrians crossing per hour during the peak hour in a single crosswalk.
- There are high volumes of turning vehicles across more than one crosswalk (at least 200 vehicles per hour (VPH) per crosswalk during the peak hour).
- There has been a pattern of crashes involving pedestrians and turning vehicles (at least three documented crashes with the last three years of available crash data).

Specific recommendations for traffic control devices would need to be thoroughly evaluated by LADOT before assessing whether it can work operationally or is determined necessary to improve the current intersection operation for pedestrians.

The EIR contains information that would be useful for this assessment but not sufficient. These factors have not been evaluated for the intersection of Palms Boulevard/National Boulevard/Exposition Boulevard. This type of evaluation is not a specific requirement under the LADOT traffic study guidelines or a CEQA requirement. The commenter's suggestion will be forwarded to the decision-makers for their consideration in taking action on the Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

LETTER NO. 46

Lori Huck

Response 46-1

The commenter expresses opposition to the Streetscape Plan for Palms Boulevard (Motor Avenue to National Boulevard) and states that removing a lane of traffic would be disastrous for traffic in the area and cause drivers to cut through residential neighborhoods to avoid traffic congestion.

Please refer to **Master Response No. 7 - Neighborhood Intrusion**.

LETTER NO. 47

R. Hugh

Response 47-1

The commenter cites various concerns related to nearby development projects, existing traffic congestion in the area, and the operation of the Expo Line.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 48

Mike Javadi

Response 48-1

The content of this comment is identical to and expresses similar concerns regarding infrastructure, school capacity, and traffic congestion as those in Response 20-1.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. With regard to potential impacts to adjacent properties, see Section 4.1, Aesthetics, of the EIR. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR, for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system. See **Response 43-5** regarding the Blue Line and Expo Line track sharing. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

LETTER NO. 49

Mitchell Kasdin

Response 49-1

The commenter expresses their opposition to the proposed changes surrounding Bundy Station. The comment discussed the potential traffic impacts of the "Martin Cadillac" Project and the potential for traffic to increase as a result of the Proposed Project. The commenter suggests turning Pico Boulevard and Olympic Boulevard into one-way roads.

The comment expresses an opinion in opposition to specific features of the Proposed Plan, and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. See also **Master Response No. 8 – Cumulative Impacts** for a discussion of the Martin Expo Town Center Project. See **Master Response No. 6 – Traffic Analysis Methodology** and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of the traffic impacts and mitigations.

LETTER NO. 50

Scott Landsbaum

Response 50-1

The commenter expresses concern about an increase in traffic from the Proposed Project and states the Beverlywood and Cheviot Hills neighborhoods north of the Palms Station currently suffer from cut-through traffic. The comment notes that this is particularly problematic on Castle Heights Avenue and around Castle Heights Elementary School on Cattaraugus Avenue and requests that DCP incorporate traffic flow controls to funnel north-south traffic to major streets.

Please refer to **Master Response No. 7 - Neighborhood Intrusion**.

LETTER NO. 51

Ellen Lanet

Response 51-1

The comment requests that City give attention to the streetscape at the Culver City station in order to provide a safe and pleasant experience for pedestrians, including a focus on students using the Expo Line and Venice Boulevard public transit.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 51-2

The commenter states that they would support multi-use developments within a half mile radius of transit stops if all owners, tenants and employees use Zip Cars or public transportation and all developments contribute adequately towards additional public services such as fire trucks, paramedics, schools and green spaces in the immediate area.

The comment does not relate to significant environmental issues or the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 52

David Lee

Response 52-1

The commenter expresses general opposition to the proposed zoning on Pico Boulevard and states threats to school boundaries, strain on emergency services, traffic nightmares and loss of small businesses as reasons for his opposition.

The comments express an opinion in opposition to the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. With regard to concerns about emergency services, see **Master Response No. 3 - Emergency Services**. With regard to concerns about schools, see **Master Response No. 5 – Schools**. With regard to concerns about traffic, see **Master Response No. 6 - Traffic Analysis Methodology**.

LETTER NO. 53

Andrea Leon-Grossman

Response 53-1

The commenter expresses general opposition to the Proposed Project and states that crumbling water infrastructure is the reason for their opposition.

With regard to the comment expressing general opposition to the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR, for a discussion of impacts related to water infrastructure.

Response 53-2

The commenter states that there are no plans to expand roads and traffic is gridlocked.

The comment does not relate to the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please refer to **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to traffic.

Response 53-3

The commenter states that there are no plans to build more classrooms in our schools, expand public transit or increase the number of first responders.

Please refer to **Master Response No. 5 - Schools** for a discussion of impacts related to schools and Section 4.12, Traffic and Transportation, of the EIR, for a discussion of impacts related to transit. Also see **Master Response No. 3 - Emergency Services**.

LETTER NO. 54

Andrea Leon-Grossman

Response 54-1

The comment expresses concern regarding the current state of water infrastructure and the potential impact of the Proposed Project; the comment cites an article from the Los Angeles Times published on February 16, 2015 by Ben Poston and Matt Stevens titled "L.A.'s aging water pipes; a $1-billion dilemma."

Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR, for a discussion of the impacts related water infrastructure. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 54-2

The comment states that the public transportation is "oversubscribed" and there are no plans to expand it or widen roads. The comment also questions how GHG emissions would be mitigated with the increase in density.

As discussed in Section 4.12, Transportation and Traffic, of the EIR, Impact 4.12-6, the Proposed Project would result in less than significant impacts related to the CMP Transit Impact Review. Also, refer to Section 4.5, Greenhouse Gas Emissions, of the EIR, for a discussion of impacts related to GHG emissions. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

LETTER NO. 55

Andrea Leon-Grossman

Response 55-1

The commenter expresses displeasure over the format of the public hearing for the Proposed Project and that the public outreach for the Proposed Project was poor.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 55-2

The commenter expresses concern with regard to the loss of a fire truck at Fire Station 92 and states that response times have increased.

See **Master Response No. 3 - Emergency Services**.

Response 55-3

The commenter states that the significant and unavoidable shadow impacts of the Proposed Project are unacceptable. The commenter also expresses their opinion that since the Proposed Project would exceed SCAQMD localized thresholds, it would expose residents and children to substantial pollutant concentrations. In addition, the commenter points out that the Proposed Project would result in significant and unavoidable noise and ground-borne vibration impacts during construction activities as well as significant unavoidable traffic impacts. The commenter also expresses concern regarding the increased demand for public parks and lack of mitigation as well as the potential loss of historic resources.

As described in Section 4.2, Air Quality, of the EIR, future construction within the Project Area could generate emissions that would exceed the significance thresholds, exposing sensitive receptors to substantial pollutant concentrations, despite implementation of Mitigation Measure **AQ1**. As described in Section 4.1, Aesthetics, of the EIR, future construction within the Project Area could result in significant and unavoidable impact related to development of structures that would shade shadow-sensitive uses. SB 743 instituted changes to CEQA when evaluating environmental impacts of projects in areas served by transit, and provides that aesthetic impacts of a residential, mixed use residential, or employment center project on an infill site within a Transit Priority Area (TPA) shall not be considered significant impacts on the environment. The majority of the Project Area is located within a TPA; however, some portions fall just outside the TPA boundaries. As described in Section 4.9, Noise, of the EIR, the Proposed Project would result in a significant and unavoidable impact related to the generation of construction noise in excess of the LAMC, and would result in significant and unavoidable impact related to construction vibration standards. As described in Section 4.12, Transportation and Traffic, of the EIR, the Proposed Project would result in significant and unavoidable impacts related to circulation, neighborhood intrusion, and CMP arterial intersection analysis.

In regards to impacts to historical resources, the Proposed Project does not introduce any features that would preclude implementation of, or alter existing policies or procedures related to historical resources. In addition, the Proposed ECTNP incorporates standards that will assist in further protecting both designated and eligible historical resources (including a new process that requires historical resource review of projects involving properties in SurveyLA) and the City has an existing Regulatory Framework for the protection of historical resources. Nevertheless, the EIR concluded that the Proposed Project would result in a significant and unavoidable impact related to historical resources. See the discussion in Section 4.3, Cultural Resources, of the EIR, Impact 4.3-1, for additional detail.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

With regard to impacts on parks, future development under the Proposed Project, as explained in the Regulatory Framework discussion in Section 4.11, Public Services, of the EIR, on pages 4.11-24 through 4.11-26, would be subject to LAMC Sections 12.33 and 17.12, which are part of the City's implementation of the Quimby Act. However, population growth associated with the proposed increase in housing capacity would create additional demand for parklands that cannot be accommodated in the ECTNP Area. There are several barriers to the provision of new parks within the ECTNP Area, including cost of land, scarcity of vacant land, and demand for other uses such as housing and jobs. Therefore, as stated in the EIR, there are no feasible mitigation measures and the Proposed Project would result in a significant impact related to public parks.

Response 55-4

The commenter expresses concern that the Proposed Project uses non-renewable resources and the consumption of such resources is not justified. The commenter also inquires why the plan does not require renewable energy and materials for new construction.

The Proposed Project would result in development consistent with state, regional, and local policies – including the SCAG 2012-2035 RTP/SCS – that encourage a dense mixed-use development pattern around transit infrastructure. Such a development pattern results in more efficient use of resources as compared to a more dispersed development pattern. In addition, as discussed in Section 6.3, Significant Irreversible Environmental Effects, of the EIR the Proposed Project's reliance upon nonrenewable natural resources is anticipated to be reduced through conservation measures and new technologies. The Proposed Project meets the multiple Project Objectives as discussed in the EIR. Thus, the use of nonrenewable resources is justified given the multiplicity of additional benefits arising from the Proposed Project.

With regard to the comment about requirements for new construction, this comment relates to a specific feature of the Proposed Plan and does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 55-5

The commenter expresses concerns regarding the City's water infrastructure.

Please refer to **Master Response No. 3 - Utilities**.

Response 55-6

The comment questions why the City would expand or upgrade gas lines if the City is truly committed to a fossil fuel free City. The comment also questions the statement in the EIR that the Proposed Project would reduce VMT per capita. In conclusion the comment expresses concerns about crumbling infrastructure, gridlocked roads, lack of school classrooms, and impacts to emergency service providers.

Please refer to **Master Response No. 3 - Emergency Services**, **Master Response No. 4 - Utilities**, **Master Response No. 5 - Schools**, and **Master Response No. 6 - Traffic Analysis Methodology**.

LETTER NO. 56

Liz Lesan

Response 56-1

The commenter expresses support for the efforts to provide affordable housing, reduce traffic congestion, and improve the street ambiance; however, the commenter requests that the City provide a realistic assessment of impacts of the Proposed Project, and specifically notes traffic impacts on National, Robertson, and Venice Boulevards, and Bagley and Cattaraugus Avenues.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology** and **Master Response No. 7 - Neighborhood Intrusion**. The comment does not address concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR.

LETTER NO. 57

Gay Macdonald

Response 57-1

The content of this comment is similar to and expresses similar concerns regarding infrastructure, school capacity, and traffic congestion as those in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR, for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

Response 57-2

The content of this comment is similar to and expresses similar concerns regarding infrastructure, school capacity, and traffic congestion as those in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR, for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

Response 57-3

The comment expresses concern regarding a five-story mixed-use building that could be built on a vacant property located along Westwood Boulevard and its impact on Westwood Boulevard and Westwood Charter School.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 57-4

The content of this comment is identical to and expresses the same concerns regarding infrastructure, school capacity, and traffic congestion concerns as those raised in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please refer to **Master Response No. 4 - Utilities** and EIR Section 4.13 Utilities and Service Systems for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

Response 57-5

The content of this comment is identical to and expresses the same concerns regarding infrastructure, school capacity, and traffic congestion as those in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR, for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

LETTER NO. 58

Annette Mercer

Response 58-1

The commenter expresses general concern regarding the existing conditions presented in the EIR, since it represents data from 2013. The comment requests that the City update school enrollment numbers and capacities. The comment requests that the City include information regarding location of new schools and/or expansion of existing school campuses.

Please refer to **Master Response No. 5 - Schools**.

Response 58-2

The commenter states that water infrastructure and utility systems are susceptible to earthquake damage and must be upgraded prior to any new development.

Please refer to **Master Response No. 4 - Utilities**.

Response 58-3

The commenter expresses concern that the Proposed Project cannot provide sufficient housing to relieve affordability issues and that allowing granny flats or duplexes in the R1 zone would be an acceptable addition to the Proposed Project.

See **Response 18-2**. The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 58-4

The commenter expresses their opinion that landscaping should consist of native, drought tolerant plants where appropriate, and that reclaimed water should be used to minimize irrigation. The comment also expresses the opinion that the area needs more publicly accessible open spaces and that pocket parks should be added.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

The Proposed ECTNP requires a minimum of 80 percent of new landscaped area within a project to be planted with drought-tolerant shrubs and groundcover. The Proposed ECTNP also includes a public benefit system that creates incentives for the provision of publicly accessible open space, which can include pocket parks. See the discussion of parks in Response 55-3.

Where Projects include new landscaping, the Proposed ECTNP requires a minimum of 80 percent of the landscaped to be planted with drought tolerant shrubs and groundcover identified as "California Friendly" by the Metropolitan Water District's Be Water Wise program (www.bewaterwise.com). If turf is installed, a water-conserving species appropriate for the climate in Los Angles shall be selected.

Response 58-5

The commenter expresses support for the Proposed Plan's emphasis on walking and bicycling. The comment also states that the streetscape plan should minimize the number of poles, bus shelters, traffic boxes, and other obstacles placed in the sidewalk.

The comment outlines concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 58-6

The comment questions the lack of bicycle lanes on Sepulveda Boulevard and Westwood Boulevard, and states that the Proposed Project fails to meet the sustainability goals and other related initiatives of the City.

The cumulative analysis in Section 4.12, Transportation and Traffic, of the EIR, anticipates the bicycle networks identified in the MP 2035. Although the Proposed ECTNP does not propose new bicycle lanes, the Proposed Project anticipates the bicycle networks identified in the MP 2035 and does not preclude identified bicycle lanes from being implemented in the future. The comment outline concerns associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 59

Debbie Millar

Response 59-1

The commenter identifies sufficient infrastructure, acres of parkland, and a fully functioning transit system as the items cities need to support increased density.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

Response 59-2

The commenter expresses their opinion that increased density is not feasible until infrastructure issues are addressed.

Please refer to **Master Response No. 4 - Utilities**.

Response 59-3

The commenter expresses their opinion that people will stop using their cars when it is feasible and not when parking is reduced. The comment also states that the Expo Line was intended to relieve gridlock in the area and "not as an excuse to push the developer's agenda."

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues** and **Master Response No. 6 - Traffic Analysis Methodology**.

LETTER NO. 60

Marion Nataf

Response 60-1

The comment references the Westside Pavilion site and states that the economic benefits of building apartments and condominiums would be good for a select few but not for those who are already overwhelmed by increased traffic caused by the at-grade crossing for the Expo Line and Fox Studios,

Century City, the enlarged Century City Westside Mall, and the Santa Monica airport. The comment requests that the City reconsider allowing large projects consisting of condominiums and apartments in the Westside.

Please refer to **Master Response No. 8 - Cumulative Impacts**.

LETTER NO. 61

Carrie Nedrow

Response 61-1

The comment expresses concern about the lack of bicycle lanes on Bundy Drive and Olympic Blvd as shown in the proposed Streetscape Plan.

As discussed on page 4.12-44 in Section 4.12, Transportation and Traffic, of the EIR, the Proposed Project seeks to improve the configuration and condition of streets to better promote bicycle circulation. The analysis anticipates the bicycle networks identified in the MP 2035 and the Proposed Project provides for these networks to be accommodated in the future. The Proposed Project would not disrupt any existing or planned bicycle facilities, or create conflicts or inconsistencies with adopted bicycle system plans, guidelines, policies, or standards. Although the Proposed Project does not include new bike lanes, the Project anticipates the bicycle networks identified in the MP 2035 and allows these networks to be accommodated in the future.

Response 61-2

The commenter expresses their opinion that Pico Boulevard is impassable during rush hour and that Barrington Avenue is gridlocked.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**.

The commenter's opinions will be forwarded to the decision-makers for their consideration in taking action on the Proposed Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 61-3

The comment states that the bicycle signage on Exposition Boulevard where the bicycle path crosses Pico Boulevard/Gateway Boulevard is poor.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

LETTER NO. 62

Minhlinh Nguyen

Response 62-1

The comment contains introductory text and expresses the commenter's disappointment that they could not attend the public hearing at the Iman Center due to lack of parking and states that the City should have arranged the public hearing at a different location with sufficient parking.

Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

Response 62-2

The comment states that school class sizes have reached their maximum and local schools have sent students to other schools which will cause parents to drive kids to different schools, and thereby add to the already high traffic.

Please refer to **Master Response No. 5 - Schools**.

Response 62-3

The commenter indicates their opinion that emergency access is likely to be impacted due to traffic "gridlock."

The commenter provides no substantial evidence to support these statements. Regarding impacts to emergency response, please see the discussion of Impact 4.12-7 in the EIR. The analysis in the EIR determined that the impact to the emergency services is less than significant. See also **Master Response No. 3 - Emergency Services**.

Response 62-4

The commenter states that parking, traffic, and pollution issues are overwhelming the neighborhood and states that DCP is relying too heavily on the Expo Line to solve these issues. The commenter states that many people will still need to drive for work, school, and groceries and to get to places where transit doesn't reach and that the City should not rush to add density in an already crowded area.

The comments do not relate to the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

See **Response 12-3**.

LETTER NO. 63

Irene Olavarria

Response 63-1

The commenter expresses their opinion that traffic is currently intolerable, particularly on Pico and Olympic Boulevards, and that neighborhood streets such as Midvale and Glendon Avenue are used to avoid traffic. The comment also states that allowing additional housing and tall buildings would worsen traffic, street conditions, and pollution in the area. The commenter also requests that "Overland – Sepulveda" be excluded from any future increase in building heights.

With regard to concerns about traffic, see **Master Response No. 6 - Traffic Analysis Methodology** and **Master Response No. 7 - Neighborhood Intrusion**. With regard to the comment about future increases in building heights, this expresses an opinion regarding a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

LETTER NO. 64

Irene Olavarria

Response 64-1

The comment requests the City limit building height to a maximum of two stories on Westwood Blvd. The comment states that taller buildings would deprive sunlight, impact the quality of life, and compromise noise and privacy.

The comment expresses an opinion regarding a specific feature of the Proposed Plan, and does not relate to the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Noise impacts resulting from the Proposed Project are discussed in Section 4.9, Noise, of the EIR. Impacts related to shade and shadow are discussed in Section 4.1, Aesthetics, of the EIR.

Response 64-2

The comment states a preference for a neighborhood consisting of houses and not two-story mansions or multi-use structures with businesses and residences.

The comment expresses an opinion associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

LETTER NO. 65

James O'Sullivan
Fix The City

Response 65-1

The comment states that DCP cannot study a specific plan covering three community plan areas in a "vacuum" and that the EIR needs to be recirculated while all three community plans are updated. The comment also states that the Fox Studio expansion needs to be incorporated into the Proposed Plan. Lastly, the comment states the "2013 population numbers are about 30 percent higher than California Department of Finance figures."

The Proposed ECTNP was developed in response to the extension of the Expo Line, which represents an immediate-term planning opportunity distinct from other issues in the Community Plan Areas through which the Expo Line passes. The Community Plan Areas within the City of Los Angles are being updated on a schedule that responds to citywide issues in a timely manner with available resources.

Please refer to **Master Response No. 8 - Cumulative Impacts** for a discussion of the analysis of cumulative impacts including the Fox Studio expansion.

In regards to the commenter's statement about the 2013 population numbers, the comment is unclear as to which 2013 numbers in the EIR are being referred to, and for what boundaries. The California Department of Finance produces population estimates at the County and City level. During the development of the EIR, 2013 population numbers for the ECTNP Area were not yet available. Therefore, DCP utilized a methodology by which 2010 U.S. Census data was adjusted to 2013 using average annual growth rates for the City of Los Angeles and other adjacent cities (see Section 4.10, Population, Housing, and Employment, of the EIR). This methodology is detailed in **Appendix F** of the EIR. Subsequently, 2013 data from the U.S. Census Bureau's American Community Survey (ACS), which is a comparable source, has become available.

The ACS 2013 five-year population estimates for the ECTNP area are within one percent of the 2013 estimates found in the EIR, which is well within the error margin of future year analyses and modeling efforts.

LETTER NO. 66

Andrew Park

Response 66-1

The commenter states their opinion that there should be additional housing to support the increase in office/commercial buildings at the Bundy Station and requests that DCP expand RAS4 zoning in the Bundy Station area farther west to accommodate the increase in worker population.

The comment expresses an opinion associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

Response 66-2

The commenter suggests that the "Alternative Compliance Zoning" at the "Martin Expo Center" site should be allocated elsewhere, since the site has already finalized development plans. The comment suggests that the "Alternative Compliance Zoning" be allocated to underutilized spaces like the Sports Chalet site near Trader Joe's to provide an opportunity to build more housing.

The comment expresses an opinion associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

Response 66-3

The comment expresses concern regarding the lack of retail along the Olympic Boulevard corridor. The comment further suggests that there should not be a maximum size limit of 5,000 square feet for individual retail spaces within the New Industry zone of the Proposed ECTNP.

The comment expresses an opinion associated with specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

LETTER NO. 67

Ellen Perlmutter

Response 67-1

The comment expresses concern that development along Pico Boulevard will result in impacts to traffic, schools, and emergency resources, and that there is already inadequate attention to homelessness and petty crime.

Please refer to **Master Response No. 6 – Traffic Analysis Methodology**, **Master Response No. 3 - Emergency Services**, and **Master Response No. 5 - Schools**. Issues related to homelessness are generally considered socio-economic issues and are addressed outside the CEQA process.

Response 67-2

The commenter indicates their opinion that there is "relentless" traffic on Veteran Avenue resulting in difficulty exiting the commenter's driveway, as well as congestion relating to left turn movement on Olympic Boulevard at Sepulveda Boulevard.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**.

LETTER NO. 68

Galen Pindell

Response 68-1

The commenter expresses their opinion that height allowed on Missouri Avenue is too high and that allowing for seven- to 12-story buildings across from R1 single-family homes would destroy views and privacy for those homes. The comment suggests that reducing the height limit to three stories for lots bordering R1 homes would provide true transitions to the residential neighbors.

See **Response 40-2**.

Response 68-2

The commenter expresses their opinion that adding density will negatively impact quality of life for single family residents in addition to air quality, traffic, and privacy impacts due to tall buildings directly across R-1 homes.

The comments express do not relate to the adequacy of the analysis included in the EIR. In addition, privacy impacts are not environmental impacts addressed by CEQA. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 69

Ben Refuerzo

Response 69-1

The commenter expresses their opposition to upzoning along Pico Boulevard and states that the increase in density will have a negative impact on the quality of life of residents by increasing traffic and adversely impacting neighborhood amenities. The comment also describes congested traffic conditions in the neighborhood.

The comments express an opinion in opposition to specific features of the Proposed Plan, and do not raise new significant environmental issues or address the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 70

Mitchell Rice

Response 70-1

The comment states that the concentration of apartment buildings in the Palms and Mar Vista neighborhoods has caused a lack of street parking and that similar over-development is occurring at Overland and Charnock

Avenues and throughout the 90034 and 90066 zip codes. The comment also questions the lack of infrastructure and suggests that a monorail would have been a more intelligent option than the Metro, as the at-grade crossings at Overland Avenue and Westwood Boulevard cause traffic congestion.

The comment expresses concern regarding parking supply, which is considered a social impact and not an environmental impact addressed by CEQA. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR, for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion** and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system.

LETTER NO. 71

Erika Rich

Response 71-1

The content of this comment is identical to and expresses the same concerns regarding infrastructure, school capacity, and traffic congestion as those in Comment 20-1.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion** and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

LETTER NO. 72

Stephen Rogers

Response 72-1

The comment expresses opposition to increased density and states that infrastructure, including streets, police services, schools, and utilities are not equipped to support the increase. The comment also states that the Expo Line is close to reaching capacity and that there is no need to stimulate development.

Please refer to **Master Response No. 3 - Emergency Services**, **Master Response No. 4 - Utilities**, and **Master Response No. 5 - Schools**. Additionally, an analysis of transit service in the ECTNP Area is provided in Section 4.12, Transportation and Traffic, of the EIR, Impact 4.12-6 on page 4.12-75; impacts were found to be less than significant.

Response 72-2

The comment expresses support for the removal of Pico Boulevard between Sepulveda Boulevard and Overland Avenue from "upzoning." The comment also requests the City remove the Westside Pavilion site from the Proposed Project to avoid infrastructure overload.

The comment expresses opinions related to specific features of the Proposed Plan, and does not relate to the adequacy of the analysis contained in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 73

Stephen Rogers

Response 73-1

The commenter expresses opposition to any plan that would increase density in the Westside South/Rancho Park Area, citing the current lack of and underinvestment in infrastructure, including streets, police services, schools, and utilities.

Please refer to **Master Response No. 3 - Emergency Services**, **Master Response No. 4 - Utilities Master Response No. 7 - Neighborhood Intrusion**, and **Master Response No. 5 – Schools**.

Response 73-2

The comment states that existing traffic is congested, particularly along Pico, Westwood, and Olympic Boulevards, and Overland Avenue. The comment further states that the area cannot accommodate additional vehicles and that the increased traffic resulting from the Proposed Project would bring traffic to a "standstill."

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**.

Response 73-3

The commenter states that the Expo Line will soon reach capacity at the current rate of ridership growth, and there is no need to "stimulate development" in the ECTNP Area to reach capacity. The commenter also expresses their opinion that the Proposed ECTNP should include capacity expansion of the Expo Line.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

As discussed in Section 4.12, Transportation and Traffic, of the EIR, Impact 4.12-6, the Proposed Project would result in less than significant impacts related to the CMP Transit Impact Review. The Proposed Project does not propose changes to the operations of the Expo Line. This is under the jurisdiction of Metro.

Response 73-4

The commenter notes that their comments are based on their understanding that the project description in the EIR is "out-of-date" and that most of Pico Boulevard between Sepulveda Boulevard and Overland Avenue has been removed from the Proposed ECTNP, but the Westside Pavilion property (on Pico Boulevard between Westwood Boulevard and Overland Avenue) is now included as a subarea in the Proposed Plan.

Please refer to **Appendix N** as amended in Chapter 3.0, Corrections and Additions, of this Final EIR.

Response 73-5

The comment expresses support for the removal of Pico Boulevard between Sepulveda Boulevard and Overland Avenue from the Proposed Project. The comment also requests the City to remove the Westside Pavilion site from the Proposed Project to avoid shade and aesthetic impacts on nearby single-family homes. The comment reiterates their opinion that the area cannot accommodate additional density or population without unacceptable impacts, and cites growth anticipated by the Casden Sepulveda Project.

Regarding cumulative impacts of the Proposed Project and other projects including the Casden Sepulveda Project, refer to **Master Response No. 8 – Cumulative Impacts**.

The comments expressing opinions regarding specific features of the Proposed Plan do not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

Response 73-6

The comment expresses the opinion that the Alternative Compliance Scenario would compound the significant impacts of the Proposed Project, and requests the City remove the Alternative Compliance Scenario from the Proposed Project.

The EIR evaluates reasonably foreseeable development under the Proposed ECTNP including for the Alternative Compliance Scenario. The comment does not raise concerns regarding the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues**.

Response 73-7

The comment expresses the opinion that the bonus increases in FAR in exchange for public benefits would increase impacts to infrastructure, traffic congestion, air quality, visual blight, and shade, and that the required public benefits are "trivial." The comment requests the City either remove the bonus development rights component from the Proposed Project, or require developers to meet a minimum number of public benefit points to be eligible for Base FARs.

The comment outlines concerns with specific features of the Proposed Plan, and does not relate to the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comment and Non-CEQA Issues** and **Master Response No. 8 – Cumulative Impacts** for a discussion of the incorporation of incentives, such as the Bonus FAR, into development assumptions in the Proposed Project.

Response 73-8

The commenter states that the Proposed Project's noise and vibration impacts have been downplayed because: 1) no ambient noise or vibration measurements were taken in the ECTNP Area; 2) the EIR does not propose significance criteria for vibration, and did not apply the Los Angeles County Code vibration standards; 3) the EIR misrepresents the vibration acceptability criteria published by the FTA; and 4) the proposed zone change (from commercial to mixed-use) for the Westside Pavilion property would permit/encourage new residential development that would be incompatible with existing ambient noise levels.

As discussed in Section 4.9, Noise, of the EIR, existing noise conditions in the Project Area were appropriately characterized, for purposes of preparing a conservative analysis, the City's presumed ambient noise levels set forth in Section 111.03 of the LAMC were used. As stated on page 4.9-10 of the EIR, urban areas typically experience ambient noise levels greater than those set forth in the LAMC. Therefore, use of these more conservative ambient noise levels in the EIR analysis results in assessment of a potentially greater delta between existing ambient noise levels and noise levels generated by the Proposed Project.

Regarding vibration, it is not standard industry practice for land use development projects to monitor existing sources of vibration. The EIR correctly states that the vibration environment is dominated by vehicular movement. Heavy trucks can generate vibrations that vary depending on vehicle type, weight, and pavement conditions. As trucks typically operate on major streets, existing vibration in the Project area is largely related to truck traffic on the surrounding roadway network.

The City of Los Angeles is the Lead Agency and has full discretion to establish the criteria for determining significance under CEQA. There is no legal requirement for the City to use County of Los Angeles standards where City standards do not exist. There are no adopted City standards for vibration.

Although the FTA Transit Noise and Vibration Impact Assessment (May 2006) identifies thresholds for vibration impacts associated with human annoyance, the human annoyance threshold was not used in the analysis, as the City does not consider vibration annoyance a significant impact under CEQA, and is provided for informational purposes only. See Chapter 3.0, Corrections and Additions, of this Final EIR, for page 4.9-9 and 4.9-13 regarding updated/clarified vibration annoyance standards for vibration impacts associated with human annoyance. The impact determination remains the same. As stated under Impact 4.9-4, after mitigation the Proposed Project would result in a significant and unavoidable impact related to construction vibration because of the potential for structural damage. Impacts related to operational vibration were determined to be less than significant without mitigation.

The types of uses allowed in the proposed zoning for the Westside Pavilion site (Mixed-Use: Commercial/Residential) would be similar to those generally allowed in the existing commercial zone contemplated in the EIR analysis. The Mixed-Use: Commercial/Residential zone does not introduce any new uses that would generate noise impacts that were not already analyzed. Traffic is the primary source of noise near Westside Pavilion. Existing (2013) and Future with Project (2035) modeled mobile source noise levels based on traffic are shown in Table 4.14-2 on page 4.14-6 of the EIR. See **Appendix N** for a discussion of any effects the changes to the Plan could have on transportation analysis in the EIR.

CEQA requires that the Proposed Project impacts and noise sources be assessed against the existing environment. The City addresses land use/noise compatibility through City Code requirements. Future development projects that involves residential uses or other noise-sensitive uses within the Project Area are required to comply with current development standards (e.g., double-paned windows associated with Title 24) ensure that interior noise levels would be less than 45 dB.

Response 73-9

The commenter summarizes significant and unavoidable impacts identified in the EIR. The commenter would prefer that total VMT be used as the performance metric instead of VMT per capita.

While the commenter is correct that total VMT is expect to increase in the ECTNP Area as a result of the Project, it is anticipated that by providing housing and employment opportunities near to transit that regionally, total VMT per capita will decrease as people locate in proximity to transit (please refer to the Other Metrics discussion on page 4.12-82 of the EIR). The VMT analysis is provided for informational purposes only as the City does not have a significance threshold for VMT or VMT per capita at this time. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. The comments are noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project.

Response 73-10

The commenter expresses their opinion that the Proposed Project's water supply and wastewater infrastructure needs should be put in place before implementing zone changes, etc. rather than hoping that developers/contractors will solve the issues of increased demand as they arise in the future. The comment also states that since the Proposed Project would exceed BOS criterion for necessitating detailed gauging to determine whether the sewer conveyancing system is capable of safely accommodating the total flow generated by the Project, it should include gauging as mitigation, rather than relying on developers/contractors of future developments to coordinate with LASAN to solve capacity problems as they arise.

Please refer to **Master Response No. 4 - Utilities**, for a discussion of the Proposed Project's impacts on water and wastewater. Also see Comment Letter No. 3 from LASAN and the responses to Comment Letter No. 3 regarding sewer capacity. As noted in the Comment Letter No. 3, LASAN has determined that at this time there are not sufficient details to undertake an analysis of potential impacts on sewer capacity. Sewer gauging is not a mitigation measure as it is already part of the permitting process per LAMC Section 64.15. As discussed in the Regulatory Framework on page 4.13-20 of the EIR, LAMC Section 64.15 requires that a Sewer Capacity Availability Request (SCAR) be performed by the Department of Building and Safety when a sewer permit is sought for a new connection to the City's wastewater system, or in the event that a proposed increase in discharge to a public wastewater line or proposed future development is anticipated to generate 10,000 gallons or more of wastewater per day. See Chapter 3.0, Corrections and Additions, of this Final EIR, for changes to page 4.13-29 to regarding sewer gauging being required when a project generates 10,000 gallons per day of wastewater.

Response 73-11

The commenter expresses their opinion that the conclusion in the EIR that the Proposed Project's electricity increase would be less than significant is not consistent with the recent experience of power outages and advertisements asking the public to avoid running air-conditioners at times of peak demand.

Please refer to **Master Response No. 4 - Utilities** for a discussion of the Proposed Project's impacts on electricity.

Response 73-12

The commenter expresses their opinion that Alternative 2, with reduced allowable FAR is the only variant of the Proposed Project that would provide relief from the negative impacts of the Proposed Project.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 73-13

The comment expresses their opinion that Alternative 3 would exacerbate the negative impacts of the Proposed Project, by minimizing job creation and maximizing residential density, and thereby increasing strain on infrastructure and creating increased traffic.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 74

Elizabeth Rosenson

Response 74-1

The commenter expresses support for the Proposed Project as revised, particularly related to the areas around Westwood and Sepulveda Expo Line stations. The comment states that the community faces existing traffic congestion and acknowledges that the Expo Line was an important step in providing another option for commuters.

The comment expresses support for a specific feature of the Proposed Plan, and does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of

the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 74-2

The commenter expresses their opinion that there is not sufficient infrastructure to support the potential increase in density encouraged by the density bonus provisions in the original plan. The comment also states that the low-density residential in the neighborhood continues to be replaced by larger multi-family buildings.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. With regard to comments regarding infrastructure, see also **Master Response No. 4 – Utilities**.

Response 74-3

The commenter describes the school conditions in the Westwood Charter School and states that the TK (Transitional Kindergarten) program had to be moved to Nora Sterry Elementary last year to accommodate incoming students. The comment expresses the opinion that there is no room for a large influx of additional students at Westwood.

Please refer to **Master Response No. 5 - Schools**.

Response 74-4

The commenter expresses appreciation that DCP incorporated the community's concerns into the revised plan and requests the City not revert back to the original, "extremely dense" plan.

The comment expresses support for a specific feature of the Proposed Plan, and does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 75

Cynthia Saffir

Response 75-1

The commenter states that the assumptions on which the Proposed Project is based on are "fantasy." The commenter further expresses their opinion that workers would not be able to afford new housing in the area because wages in the area would not be sufficient to meet housing rents, and this would result in increased traffic on Olympic, Pico, and Sepulveda Boulevards, and Overland Avenue and contribute to parking issues. The commenter also states that public services are already inadequate and cannot support additional demand without the investment of significant funds, referring specifically to schools, police, fire, water, and the electricity grid.

Please refer to **Response 18-2** for a discussion of housing affordability. See also **Master Response No. 3 - Emergency Services** regarding police and fire services, **Master Response No. 4 – Utilities** regarding water and electricity, **Master Response No. 5 – Schools** regarding schools, and **Master Response No. 6 - Traffic Analysis Methodology** regarding traffic. With regard to concerns about parking, parking supply is not considered an environmental impact addressed by CEQA. Accordingly, see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

LETTER NO. 76

Cynthia Saffir

Response 76-1

The commenter expresses their opinion that the public hearing was disappointing, that the public hearing format was not one that the majority of attendees were familiar with, and that the Proposed ECTNP is based on a number of incorrect assumptions.

The commenter provides no substantial evidence to support statements about the adequacy of the assumptions in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The following responses address the comment about "incorrect assumptions" in more detail.

Response 76-2

The commenter states that it is unlikely that the Project would encourage shorter vehicle trips because the jobs created by new commercial and industrial development would not provide wages to support to the high rents in West Los Angeles. The commenter states that those jobs will be filled by people living outside the area, expressing that there is a lack of north/south transit connections, thereby resulting in additional vehicle trips.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**.

Response 76-3

The commenter states that traffic on Pico Boulevard, Olympic Boulevard, Sepulveda Boulevard, and Overland Avenue is terrible much of the day and questions how these streets are going to be able to accommodate the cars of additional residents.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**.

Response 76-4

The commenter states their opinion that the belief that people will not drive their cars if parking is not available is a fallacy. The commenter believes that the residential streets will be clogged with parked cars and visitors to the areas will be forced to circle the streets in search of non-permit parking.

Please refer to **Response 1-2** regarding parking. Also see **Master Response No. 6 - Traffic Analysis Methodology**.

Response 76-5

The commenter expresses concerns regarding schools and emergency services such as police and fires.

Please refer to **Master Response No. 5 - Schools** and **Master Response No. 3 - Emergency Services**.

Response 76-6

The commenter expresses concerns regarding capacity at Westwood Charter School.

Please refer to **Master Response No. 5 - Schools**.

Response 76-7

The commenter expresses skepticism that the "car culture" is changing and that rents will somehow become affordable to retail and clerical workers. The commenter also expresses their opinion that the public hearing was disrespectful to the public as oral comments were taken but no one else could hear them.

Please refer **Response 18-2** for a discussion of housing affordability. The commenter's opinion regarding the Public Hearing does not relate to significant environmental issues or the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 77

Genie Saffren

Response 77-1

The commenter expresses support for the revisions to the Proposed Project along Pico Boulevard.

The comment expresses an opinion in support of specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 77-2

The commenter expresses concern that the community does not have adequate infrastructure to support the development that would be added through development density bonuses and questions the capacity of the schools. The comment also states that the residential streets will be clogged with parked cars of employees that work in the area.

Please refer to **Master Response No. 4 - Utilities** regarding infrastructure, and **Master Response No. 5 – Schools** regarding schools. With regard to parking, see **Response 1-2**.

Response 77-3

The comment states that while progress and growth is necessary, there is concern that streetscape improvements will not be maintained and will fall into disrepair.

The comment expresses concern about a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 78

Lisa Schechter

Response 78-1

The content of this comment is similar to and expresses the same concerns regarding infrastructure, school capacity, and traffic congestion as those in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR, for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood**

Intrusion, and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system. See **Response 43-5** regarding the Blue Line and Expo Line track sharing. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

LETTER NO. 79

Frederick Schmitt

Response 79-1

The content of this comment is similar to and expresses the same concerns regarding infrastructure, school capacity, and traffic congestion as those in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**, **Master Response No. 4 - Utilities**, and Section 4.13, Utilities and Service Systems, of the EIR, for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion** and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and in Section 4.11, Public Services, of the EIR.

LETTER NO. 80

Linda Smedley

Response 80-1

The content of this comment is similar to and expresses the same concerns regarding infrastructure, school capacity, and traffic congestion as those in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. With regard to potential impacts to adjacent properties, see Section 4.1, Aesthetics, of the EIR. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems, of the EIR, for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system. See **Response 43-5** regarding the Blue Line and Expo Line track sharing. Impacts related to schools are discussed in **Master Response No. 5 - Schools** and Section 4.11, Public Services, of the EIR.

LETTER NO. 81

Ellen Smucker

Response 81-1

The comment states that the presentation at the public hearing was good, although the commenter found it difficult to understand all the boards due to noise from the crowd and demands on the facilitators.

The comment does not address concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 81-2

The comment expresses concern that the Proposed Project increases residential density without sufficiently considering the impact on infrastructure, schools, and emergency services.

Please refer to **Master Response No. 3 - Emergency Services**, **Master Response No. 4 - Utilities**, and **Master Response No. 5 - Schools**.

Response 81-3

The comment expresses concern that increases in population from both residential and business employment could negatively impact the "neighborhood feeling."

The comment does not address concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 81-4

The comment expresses concern that the traffic may impact quiet neighborhood streets and the safety of children and the elderly.

Please refer to **Master Response No. 7 - Neighborhood Intrusion**. Also refer to Section 4.9, Noise, of the EIR.

LETTER NO. 82

Herman Stoller

Response 82-1

The commenter states that the neighborhood does not need upzoning to allow three- to five-story tall buildings since they would bring additional traffic and parking issues.

Please refer to **Master Response No. 7 – Neighborhood Intrusion** and **Master Response No. 6 – Traffic Analysis Methodology**. Also see **Response 1-2** regarding parking regulation.

Response 82-2

The comment inquiries about existing limitations on buildings heights along Pico Boulevard.

The comments do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 82-3

The comment states that traffic is so congested on Pico Boulevard that police and fire services cannot do their job.

Please refer to **Master Response No. 3 - Emergency Services**.

LETTER NO. 83

Nancy Stone

Response 83-1

The commenter expresses support for a maximum height limit of three stories along Pico Boulevard between Sepulveda Boulevard and Overland Avenue and states that the community does not have sufficient infrastructure and elementary schools to support additional housing. The commenter also expresses concern regarding existing traffic congestion and prevention of additional traffic.

Please refer to **Master Response No. 4 - Utilities**, **Master Response No. 5 - Schools**, **Master Response No. 6 - Traffic Analysis Methodology**, and **Master Response No. 7 - Neighborhood Intrusion**.

LETTER NO. 84

Lauren Thomas

Response 84-1

The commenter expresses concern over existing traffic levels and their opinion that the construction at Sepulveda Boulevard and Pico Boulevard will be "enormous." The commenter states that DCP needs to see how these developments affect the area before considering new developments. The commenter also suggests that there be more focus on safe bike trails.

Please refer to Section 4.2, Air Quality, and Section 4.9, Noise, of the EIR for a detailed discussion of construction impacts. See also **Master Response No. 6 - Traffic Analysis Methodology**.

The comment regarding bike trails does not address concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 85

William Timberlake

Response 85-1

The content of this comment is similar to and expresses the same concerns regarding infrastructure and traffic congestion as those in **Response 20-1**.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Please refer to **Master Response No. 4 - Utilities** and Section 4.13, Utilities and Service Systems for a discussion of impacts related to infrastructure. See **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.12, Transportation and Traffic, of the EIR, for a discussion of impacts related to transportation system.

LETTER NO. 86

Grace Ting

Response 86-1

The commenter states that her comments are in addition to the public testimony provided to the public hearing officer.

The comment is noted. Responses to the commenter's public hearing comments are presented in **Response PH-5**.

Response 86-2

The commenter expresses opposition to any upzoning along Pico Boulevard between Overland and Barrington Avenues.

The comment expresses an opinion in opposition to specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 86-3

The commenter states that roads, education, and safety resources are overtaxed. The commenter also states that the current capacity at Westwood Charter School is nearing 1,000 students and "schools like Overland, Fairburn, and Wayburn are closer to 500 to 600 students."

Please refer to **Master Response No. 3 - Emergency Services**, **Master Response No. 5 – Schools**, and **Master Response No. 7 - Neighborhood Intrusion**.

Response 86-4

The comment states that the local hospitals have reached capacity at the census and that elective surgeries are difficult to schedule.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 86-5

The commenter states that driving one to two miles on major arterials in the area during rush hour takes 30-40 minutes. The commenter does not believe people will give up their cars for light rail transit and that this area cannot accommodate additional density.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**. See also **Response 12-3**.

LETTER NO. 87

Pat Tobias

Response 87-1

The commenter requests that the City retain the Pedestrian Oriented District (POD) designation along Pico Boulevard. The commenter indicates their opinion that emergency access on Pico Boulevard has been impacted due to automobile congestion.

Regarding the comment about the Pedestrian Oriented District designation, this does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Regarding impacts to emergency response, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Please see the discussion in the EIR of Impact 4.12-7. The analysis in the EIR determined that the impact to the emergency services is less than significant. Refer also to **Master Response No. 3 - Emergency Services**.

LETTER NO. 88

Robert Tobias

Response 88-1

The commenter states that traffic along Pico, Olympic, and Santa Monica Boulevards is congested and the additional density along the Exposition Corridor would destroy their quality of life.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**.

Response 88-2

The comment requests that DCP retain the Pico Pedestrian Oriented District (POD) designation.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 89

Nancy Walch

Response 89-1

The commenter expresses support for opportunities for additional low-income housing and jobs, but concern about the existing traffic congestion and pollution in the neighborhood and the potential for it to increase.

With regard to the comment expressing support for specific features of the Proposed Plan, this does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. With regard to traffic congestion, please refer to **Master Response No. 6 - Traffic Analysis Methodology**. With regard to pollution, please refer to Section 4.2, Air Quality, of the EIR.

Response 89-2

The comment expresses support for improving existing commercial spaces for jobs and services for the local community.

The comment does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 89-3

The commenter expresses concern about traffic congestion and cars driving through the neighborhood because Pico and Olympic Boulevards are jammed.

Please refer to **Master Response No. 7 - Neighborhood Intrusion**.

Response 89-4

The comment expresses concern regarding pollution as a result of the Proposed Plan and states that there have been three incidents where neighbors have been hit by cars.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. With regard to pollution, please refer to Section 4.2, Air Quality, of the EIR.

LETTER NO. 90

Mary Ann Ward

Response 90-1

The commenter states that a different venue with better parking for the public hearing would have been nice.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 90-2

The commenter expresses doubts about the upkeep of all the green spaces and states that existing green spaces are poorly maintained.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 90-3

The commenter questions if anything could be done to improve the neighborhood without causing more traffic and congestion.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 90-4

The commenter states that a speaker would have been helpful at the public hearing.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 90-5

The comment questions what will happen to businesses on Pico Boulevard if multiple-story buildings are constructed.

See Response 11-10.

Response 90-6

The commenter questions if it is the City's intention to eliminate neighborhoods with single-family homes and expresses the belief that this would eliminate a sense of community.

Please refer to Section 4.8, Land Use and Planning, of the EIR, for a detailed description of the proposed land use changes within the ECTNP Area. The comment expresses an opinion regarding a specific feature of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 90-7

The commenter expresses their opinion that the Proposed Plan will provide too much flexibility for developers.

The comment expresses an opinion regarding specific features of the Proposed Plan, and does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 91

Janet White

Response 91-1

The comment states that there is already a lot of vehicular and pedestrian traffic in the ECTNP Area, and that allowing building heights greater than three stories will add to the traffic congestion. The comment further states that congestion would keep customers away from businesses and will lead to a loss in revenue to the City.

Please refer to **Master Response No. 7 - Neighborhood Intrusion** and **Master Response No. 6 - Traffic Analysis Methodology**.

Response 91-2

The commenter requests the City consider damages caused by delayed emergency response times.

Please refer to **Master Response No. 3 - Emergency Services**.

Response 91-3

The comment states that it is a bad idea to allow for buildings taller than three stories in the area between Overland Avenue and Sepulveda Boulevard.

The comment expresses concern regarding specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 92

Jay Zimmerman

Response 92-1

The commenter states that parking should not be permitted on the portions of Olympic and Pico Boulevards between Sepulveda Boulevard and the I-405 that are designated "Active Streets" in the Proposed ECTNP. The commenter states that there will be buses making turns, and that the existing traffic coming from Century City as well as southbound traffic on Sepulveda Boulevard turning right adds to the traffic.

The comment expresses concern regarding specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues** and **Master Response No. 6 - Traffic Analysis Methodology**.

Response 92-2

The commenter states that 40-foot-wide Southern Pacific Railroad right-of-way should be returned to the zoning classification of the adjacent properties, along with appropriate setback for any future property development. In addition, the commenter states that the zoning of [Q]P-1 was originally done for improper purposes, and presently impairs the future development of the adjoining properties. The commenter states that many court cases have held that such rezoning constitutes a taking of the property, and that owners should be compensated.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 92-3

The commenter states that the Proposed ECTNP Urban Design Standards should not require a minimum street wall height of four stories along any side of an Active Street which is not adjacent to plan Subareas. The commenter further states that on the north side of Olympic Boulevard, west of Sepulveda Boulevard, the four-story minimum would be prohibitively expensive without benefitting from the rezoning of the Proposed ECTNP.

The comment expresses concern regarding specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 93

Amy Zone Miller

Response 93-1

The commenter indicates their opinion that increases in density as a result of the Proposed Project will increase the number of auto and pedestrian accidents.

Safety is discussed under Impact 4.12-1 on page 4.12-44, the EIR concludes that impacts related to public transit, bicycle, and pedestrian facilities under the Proposed Project would be less than significant. See also the discussion under Impact 4.12-8 on page 4.12-79 of the EIR. The commenter provides no substantial evidence to support concerns regarding increasing collisions. The commenters concerns will be forwarded to the decision-makers for their consideration in taking action on the Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 93-2

The commenter states that adding more traffic to this already dense area with such a small local police force is a bad idea.

Please refer to **Master Response No. 3 - Emergency Services**.

Response 93-3

The commenter expresses opposition to the rezoning of the south side of Pico Boulevard to allow multi-story condominiums.

The comment expresses concern regarding specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 94

Tom Stemnock

Response 94-1

The commenter provides background information about two properties located on the southeast corner of Exposition and Sepulveda Boulevards and states the properties should be redesignated Neighborhood Commercial land use. In addition, the commenter states these properties should be rezoned to C2, the allowable floor area ratio changed to 3:1, and the height limit increased to three stories (45 feet) to allow the redevelopment of the site as a grocery store, restaurant, small professional office, pharmacy, or dry cleaning business with residential uses above. Otherwise, the commenter states, the 77-year-old buildings on the site will remain as-is. The commenter states redesignating the properties to Neighborhood Commercial land use would be consistent with the objectives of the Proposed ECTNP.

The comment expresses concern regarding specific features of the Proposed Plan, and does not relate to significant environmental issues or the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 94-2

The commenter states that the EIR does not acknowledge that an existing commercial property (a furniture store) is located at the southeast corner of Exposition and Sepulveda Boulevards.

The EIR correctly describes predominant land use designations within the Sepulveda Station Area on page 4.8-8.

PUBLIC HEARING COMMENTS AND RESPONSES

DEBBIE MILLER - PH-1

Response PH-1

The commenter expresses support for the removal of the previously proposed zone changes along Pico Boulevard from the Proposed Project, but the commenter has concerns regarding the potential redevelopment of the Westside Pavilion site. The commenter also states that Los Angeles cannot be compared to New York City or Chicago, as Los Angeles does not have the transit infrastructure or access to public open space like Central Park. The commenter also states that Los Angeles is not ready for that type of density without the infrastructure in place and has concerns about public benefits. She believes that developers will always opt to get the maximum density and that the public benefits currently proposed offer too little benefit to the community.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Regarding comments about infrastructure, see **Master Response No. 4 - Utilities**.

IRENE OLAVARIAN - PH-2

Response PH-2

The commenter expresses concerns about the impact of new development on Westwood Boulevard, particularly as it relates to height and noise. The commenter believes that single-family homes need to coexist with commercial properties, but that their quality of life needs to be protected. For example, her bedroom faces Westwood so in the future taller building could block sunshine coming through her windows.

Please refer to Section 4.1, Aesthetics and Section 4.9, Noise, of the EIR, for a discussion of impacts related to building heights and noise. The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

TRACY LANDWORTH - PH-3

Response PH-3

The commenter expresses concerns regarding the impact of future development on traffic, schools, and water. Specifically, the commenter expresses concerns about traffic impacts at the intersection of National Boulevard and Manning Avenue, as the commenter believes there is already a traffic impact from the Expo Line at this intersection. The commenter also believes that "shoving more people in limited amounts of space results in quality of life impacts."

With regard to concerns about water infrastructure, please refer to **Master Response No. 4 – Utilities**. With regard to concerns about schools, see **Master Response No. 5 – Schools**. With regard to concerns about traffic, see **Master Response No. 6 - Traffic Analysis Methodology**. See also Section 4.12, Transportation

and Traffic, of the EIR, for a discussion of impacts related to transportation. The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

CRAIG RICH - PH-4

Response PH-4

The commenter states that West Los Angeles already has a good mix of single-family and commercial uses and that the Proposed Plan should address the concerns of current residents rather than catering to future residents. The commenter expresses support for the Expo Line and states that it is well used, but does not believe more housing is needed. The commenter notes current infrastructure issues (limited schools, water, police response times) and believes it is nonsensical to have more density without infrastructure. The commenter also questions why there are not additional affordable housing requirements for the change areas to the west. Lastly, the commenter supports the current mix of commercial uses on Pico Boulevard and wants to keep the character of local and neighborhood-serving businesses.

Regarding concerns about schools, water, and police response times, please refer to **Master Response No. 5 – Schools, Master Response No. 4 - Utilities**, and **Master Response No. 3 - Emergency Services**. Regarding comments about affordable housing and the mix of uses in the Proposed Plan, these relate to specific features of the Proposed Plan and do not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

GRACE TING - PH-5

Response PH-5

The commenter states that the new Zev Yaroslavsky Senior Housing development was built with limited parking because seniors were anticipated to drive less; however, the commenter observed that the residents do drive and that parking is needed. The commenter expresses concern regarding homeless encampments near Metro stations, as well as concerns regarding infrastructure and service demands such as water, schools, and hospitals.

With regard to concerns about infrastructure and schools, please refer to **Master Response No. 4 – Utilities** and **Master Response No. 5 - Schools**. Homelessness is generally considered to be a socio-economic issue and is addressed outside the CEQA process. In addition, parking supply is also considered a social impact and not an environmental impact addressed by CEQA. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. See also **Response 1-2** for a discussion regarding parking.

PAT TOBIAS - PH-6

Response PH-6

The commenter expresses support for the reduction in density of the Proposed Project as compared to what was previously proposed. However, the commenter expresses concerns regarding traffic and notes that the area is already overburdened with traffic and that emergency access vehicles cannot get through during rush hour. The commenter also states that if more RAS3 and RAS4 projects (from Sepulveda Boulevard to Overland Avenue) are built, her neighborhood will have to deal with the construction impacts. Lastly, the commenter expresses concerns regarding school capacity, but is primarily concerned about the price she'll have to pay during construction in regards to quality of life and noise issues.

Please refer to **Master Response No. 3 – Emergency Services**, **Master Response No. 5 - Schools**, **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion**, and Section 4.2, Air Quality and Section 4.9, Noise, of the EIR.

KIMBERLY CHRISTENSEN - PH-7

Response PH-7

Speaking on behalf of the Westwood South of Santa Monica Homeowners Association, the commenter supports some aspects of the plan, including retaining the existing R2 zoning designation along Exposition Boulevard. The commenter also supports the retention of the existing zoning and land use designations for properties on Pico Boulevard and Overland Avenue. The commenter supports regulations that address shade and shadow impacts, but does not agree with the proposed density between Sepulveda Boulevard and the I-405. The commenter also expresses concern regarding proposed changes to the Westside Pavilion site, and would like the residential density to be reduced and have additional neighborhood-serving commercial. The commenter opposes reduced parking, and expresses concerns regarding transitional height requirements and traffic impacts the southeast corner of Sepulveda and Exposition Boulevards. The commenter also thinks that the Alternative Compliance process is too generous, and does not provide sufficient opportunities for public input. Lastly, the commenter expresses discontent regarding the format of the public hearing.

Regarding comments in support or opposition of specific features of the Proposed Plan, as well as comments regarding the public hearing format, these do not relate to significant environmental issues or the adequacy of the analysis in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues.** Regarding concerns about traffic, **Master Response No. 6 – Traffic Analysis Methodology** and **Master Response No. 7 – Neighborhood Intrusion**. See also **Response 1-2** for a discussion related to parking.

MARGARET HEALY - PH-8

Response PH-8a

The commenter thanks Lameese Chang, her team, and Paul Koretz for his support of the community and states that keeping the existing zoning along Pico Boulevard is the right decision because the infrastructure is not there to accommodate five or more stories.

Please see **Master Response No. 4 – Utilities** for a discussion of infrastructure. The comments express an opinion in support of specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response PH-8b

The commenter states that keeping the existing zoning along Pico Boulevard is the right decision because the lots along Pico Boulevard are not deep enough to allow for setbacks from the single-family homes.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response PH-8c

The commenter states that keeping the existing zoning along Pico Boulevard is the right decision because ridership on the Expo Line exceeds expectations even without additional riders from new development, including the Casden Sepulveda Project. The commenter additionally states that there is a limit to the

number of new passengers Expo Line can take due to shared tracks between the Expo Line and the Blue Line. The commenter also notes increasingly longer delays on the Expo Line.

With regard to the Casden Sepulveda Project, please refer to **Master Response No. 8 - Cumulative Impacts**. Regarding the comment of the Blue Line and Expo Line track sharing concern, please refer to **Response 43-5**. Regarding impacts to the transit system, see **Response 40-3**. The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response PH-8d

The commenter states that she would like to enter into the record a petition with 790 signatures opposing Residential Accessory Services (RAS4) zoning between Overland Avenue and Sepulveda Boulevard.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

DIANNE GREGORA – PH-9

Response PH-9

The commenter requests that building heights on Pico and Sepulveda Boulevards be limited to three stories. The commenter notes that the Casden Sepulveda Project will add 600 units and that the Expo Line, Big Blue Bus, and Metro transit services are already are operating at capacity. In addition, the commenter states that the infrastructure will not support any additional growth, and cites setbacks and the City's leaking water pipes. The commenter states that buildings greater than three stories will block the sun and create a canyon effect. Lastly, the commenter states there is already gridlock getting on the freeway, particularly at rush hour.

Please refer to **Master Response No. 8 - Cumulative Impacts** regarding the Casden Sepulveda Project; Section 4.1, Aesthetics, of the EIR regarding shade and shadow impacts; **Master Response No. 6 - Traffic Analysis Methodology** regarding traffic concerns; **Master Response No. 4 – Utilities** regarding infrastructure concerns; and **Response 40-3** regarding impacts to the transit system. The request that building heights be limited relates to a specific feature of the Proposed Plan and does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

DANIEL J. GONZALEZ – PH-10

Response PH-10

The commenter states his support for the Project as currently proposed, and opposes upzoning and heights of four or five stories along Pico Boulevard between Sepulveda and Westwood Boulevards. The commenter expresses concerns about traffic and the burden on schools and believes that his neighborhood has "done its part" by accepting the Casden Sepulveda Project into the community.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Also refer to **Master Response No. 5 - Schools** and **Master Response No. 7 - Neighborhood Intrusion**.

STEPHEN ROGERS – PH-11

Response PH-11a

The commenter states his opposition to increased density in the area, because of a lack of infrastructure to support it. The commenter notes the streets are in disrepair; there are not enough police officers; the schools are overflowing; and basic utilities such as water and power are already strained. The commenter also states that at the current rate of growth, the Expo Line will soon be at capacity, so there is no need to artificially stimulate development in the area to fill up trains.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Also refer to **Master Response No. 3 – Emergency Services**, **Master Response No. 4 - Utilities**, **Master Response No. 5 - Schools**, and **Master Response No. 7 - Neighborhood Intrusion**.

Response PH-11b

The commenter states his support for the removal of previously proposed rezoning of most of Pico Boulevard between Sepulveda Boulevard and Overland Avenue from the Proposed Plan, as it is an important first step toward avoiding infrastructure overload.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. With regard to concerns about infrastructure, see also **Master Response No. 4 - Utilities**.

Response PH-11c

The commenter recommends that the Westside Pavilion property be removed from the Proposed Plan. The commenter also states that public benefits required of projects in exchange for additional development rights seems disproportionate, and recommends that public benefits be a prerequisite for development, rather than incentivized through additional development rights.

The comments relate to specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response PH-11d

The commenter states that he has similar concerns about Proposed Plan's Alternative Compliance process and believes that that discretionary decisions occurring "behind closed doors" will lead to "abuse."

The comments relate to specific features of the Proposed Plan, and do not relate to significant environmental issues or the adequacy of the analysis included in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

JAY ZIMMERMAN – PH-12

Response PH-12a

The commenter states that he only heard of the project three weeks ago and was not properly noticed as an affected property owner. The commenter states that parking should not be permitted on Olympic Avenue and Pico Boulevard, between Sepulveda Boulevard and I-405 that are designated "Active Streets" in the Proposed ECTNP. The commenter states that there will be buses making turns, and that the existing traffic coming from Century City as well as southbound traffic on Sepulveda Boulevard turning right adds to the

traffic. The commenter also states that additional traffic will occur because of increased automobile trips to the newly developing Hybrid Industrial Zone, identified in the Proposed ECTNP as Subarea 5.

With regard to concerns about traffic, please see **Master Response No. 6 - Traffic Analysis Methodology.** The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response PH-12b

The commenter states that the 40-foot-wide former Southern Pacific Railroad right-of-way should be returned to the zoning classification of the adjacent properties, along with an appropriate setback for any future property development. In addition, the commenter states that the zoning of [Q]P-1 was originally done for improper purposes, and presently impairs the future development of the adjoining properties. The commenter states that many court cases have held that such rezoning constitutes a taking of the property, and that owners should be compensated. The commenter states that the dedication of more than five feet along the west side of Sepulveda Boulevard is not feasible because of existing buildings north of the Odyssey Theater and a permanent high-rise just north of Santa Monica Boulevard.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response PH-12c

The commenter also states that the Proposed ECTNP urban design standards in should not require a minimum street wall height of four stories along any side of an Active Street, which is not adjacent to plan Subareas. The commenter further states that on the north side of Olympic Boulevard, west of Sepulveda Boulevard, the four-story minimum is prohibitively expensive to redevelop without benefitting from the rezoning of the Proposed ECTNP.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Mater Response No. 1 - General Comments and Non-CEQA Issues**.

STANLEY ZIMMERMAN – PH-13

Response PH-13

The commenter states that he concurs with the previous commenter's comments (Jay Zimmerman – PH-12).

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. However, the comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Project. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

BRUCE CAMPBELL – PH-14

Response PH-14a

The commenter states that he took a Greyhound bus through the Central Valley, and there is more construction occurring on Overland Avenue than in all of Fresno, Bakersfield, and ten other Central Valley towns combined. The commenter also expresses concern regarding availability of on-street parking in the area.

Please see **Response 1-2** for a discussion of parking. The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response PH-14b

The commenter states that the traffic jams are intense on Overland and Motor Avenues heading to Century City and back, and that seems to be the exact place that the Proposed Plan directs new development. The commenter states that it seems like the area is growing too fast and does not feel that this area needs special zoning.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**. With regard to concerns about traffic, please also see **Master Response No. 6 - Traffic Analysis Methodology**.

Response PH-14c

The commenter believes that developers are proposing luxury developments with very little affordable housing. The commenter states that new development should be 95 percent affordable.

Regarding housing affordability, please see **Response 18-2**. The comment relates to specific features of the Proposed Plan, and does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

ANDREA LEON-GROSSMANN – PH-15

Response PH-15a

The commenter expresses opposition to the Proposed Project due to its "unsustainable density"; and states that the City's water infrastructure is crumbling, and infrastructure is in really bad shape at the area's current capacity. The commenter states that the City is currently replacing water pipes every 300 years when the life span is 100 years.

Please refer to **Master Response No. 4 - Utilities**.

Response PH-15b

The commenter states that budget cuts have impacted emergency first responders, including the loss of a fire truck in West Los Angles that has not been replaced. The commenter further states that first responders in the area are responding to needs in Century City, so there are fewer first responders in the area, and the commenter believes that the area cannot have additional density without first responders.

Please refer to **Master Response No. 3 - Emergency Services**.

Response PH-15c

The commenter states that libraries have been converted in public schools into classrooms, since there isn't enough capacity in our schools. The commenter did not see anything in the Proposed ECTNP or the EIR about increasing school capacity, first responders, or water infrastructure.

As discussed in Section 4.11, Public Services, of the EIR (which analyzes topics including fire protection and emergency services, police protection services, and public schools) and Section 4.13, Utilities and Service Systems, of the EIR (which analyzes topics including water supply and wastewater), impacts related to

schools, emergency services, and water infrastructure were all found to be less than significant. Please also refer to **Master Response No. 3 - Emergency Services**, **Master Response No. 4 - Utilities**, and **Master Response No. 5 - Schools** for further discussion.

Response PH-15d

The commenter states that she did not see anything in the Proposed ECTNP or the EIR about widening roads or anything to deal with the traffic gridlock.

As discussed in Section 4.12, Transportation and Traffic, of the EIR, on page 4.12-58, mitigation measures involving street widening, addition of turning lanes, and increasing pedestrian crossing distances were deemed infeasible as these would be in conflict with multiple Project objectives. However, several mitigation measures are identified in the EIR regarding transportation and traffic (Mitigation Measures **TR1** through **TR16)** that include improvements such as roadway restriping, signalization, and traffic signal modifications. Please also refer to **Master Response No. 6 - Traffic Analysis Methodology** and **Master Response No. 7 - Neighborhood Intrusion**.

Response PH-15e

The commenter states that she did not see anything in the Proposed ECTNP or the EIR about expanding the capacity for the Expo Line or public transit in general. The commenter also states that public transit is difficult during peak hours.

As discussed in Section 4.12, Transportation and Traffic, of the EIR, Impact 4.12-6, the Proposed Project would result in less than significant impacts related to CMP Transit Impact Review.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response PH-15f

The commenter expresses her opinion the Proposed ECTNP is mostly supported by big developers and reiterated that she is not opposed to density so long as it is sustainable.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

BARBARA BROIDE – PH-16

Response PH-16a

The commenter thanks the Department of City Planning for listening to the community's input and for removing the previously proposed RAS zone along Pico Boulevard from the Proposed ECTNP.

The comment does not raise concerns regarding the analysis contained in the EIR or the potential for additional physical environmental impacts of the Proposed Project not addressed in the EIR. Accordingly, see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response PH-16b

The commenter states that traffic congestion in the area is terrible and that Expo Line doesn't even address the current demand. The commenter also notes that Century City was built with the understanding there would be a Beverly Hills freeway along Santa Monica Boulevard which has never been built. Lastly, the commenter notes that the subway to the sea has also not come yet, that there are no north/south connectors in

the area that go through to the Valley, and that additional transit access should be developed prior to any upzoning.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology** and **Master Response No. 7 - Neighborhood Intrusion**.

MITCHELL KASDIN – PH-17

Response PH-17

The commenter expresses opposition to the Proposed Project and specifically the development near the Bundy Station south of Olympic Boulevard. The commenter states that the Proposed ECTNP increases the tax revenue for the City at the expense of the residents. The commenter expresses concern about existing traffic congestion and disagreement that transportation trips will be taken by transit rather than automobile. The commenter also expresses concern that the Martin Expo Town Center Project will substantially impact traffic in the area.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology**, **Master Response No. 7 - Neighborhood Intrusion** and **Master Response No. 8 - Cumulative Impacts**.

ANN PITTEL – PH-18

Response PH-18

The commenter states that weekday traffic in the area is congested, that she has not seen an improvement in the traffic jams since the Expo Line has gone in, and believes the City needs to address traffic congestion prior to implementing the Proposed ECTNP. The commenter also proposes the use of reversible lanes that can change direction during peak traffic periods, similar to the City of Toronto.

Please refer to **Master Response No. 6 - Traffic Analysis Methodology** and **Master Response No. 7 - Neighborhood Intrusion**.

3.0 CORRECTIONS AND ADDITIONS

As required by California Environmental Quality Act (CEQA) Guidelines Section 15088, this chapter provides corrections or clarifications of certain statements in the Draft Environmental Impact Report (EIR). The correction(s) and/or addition(s) do not constitute significant new information or substantial project changes, as defined by CEQA Guidelines Section 15088.5 nor would they result in new significant impacts or an increase in any impact already identified in the Draft EIR. New information is not significant unless the Draft EIR is changing in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. While changes have been made to the Proposed Exposition Corridor Transit Neighborhood Plan (ECTNP, Proposed Project, or Proposed Plan) as a result of comments received regarding the Draft EIR and through the public hearing process, these changes do not constitute significant new information.

3.1 REFINEMENTS TO THE PROPOSED PROJECT

As a result of comments received on the Draft EIR and through the public hearing process, several refinements to the Proposed Project have been identified. None of the refinements to Proposed Project have been found to affect the impact analysis or conclusions in the EIR. These changes do not constitute significant new information per CEQA, and in addition their inclusion remains subject to final adoption by the City Council and Mayor. Each of the refinements and their implications is discussed in the revised Appendix N located at the end of this chapter.

3.2 CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

Corrections or information has been added to the Draft EIR pursuant to CEQA Guidelines Section 15132, as part of the preparation of the Final EIR. Additions to the text of the Draft EIR are shown by underline and deletions to the text of the Draft EIR are shown by ~~strikethrough~~. The following corrections and additions make minor modifications herein and have not been found to affect the impact analysis or conclusions in the Draft EIR.

CHAPTER 2.0 SUMMARY

Page 2-3 – Revise the fourth paragraph, second sentence as follows (as well as any other locations in the EIR where there is a reference to the Proposed Project including modified street standards):

> The Proposed Project would also involve new streetscape plans, ~~modified street standards,~~ and parking strategies that together would enhance the pedestrian experience, promote transit ridership, and encourage a variety of mobility options.

CHAPTER 3.0 PROJECT DESCRIPTION

Page 3-2 – Revise the seventh paragraph, second sentence as follows:

> The Proposed Project would also involve new streetscape plans, ~~modified street standards,~~ and parking strategies that together would enhance the pedestrian experience, promote transit ridership, and encourage a variety of mobility options.

Page 3-5 (Table 3-1) – Revise one row of Table 3-1 as follows (as well as any other locations in the text or tables of the EIR where there is a reference to existing housing units, residential units, or dwelling units):

TABLE 3-1: DWELLING UNITS, POPULATION, EMPLOYMENT, AND NON-RESIDENTIAL SQUARE FOOTAGE FOR THE ECTNP AND THE ALTERNATIVE COMPLIANCE SCENARIO /g/				
	Housing (dwelling units)	Population (persons)	Employment (jobs)	Non-Residential Square Footage
Existing Conditions (2013)	25,010 ~~25,018~~/a/	50,595 /a/	33,962 /b/	11,424,485 /c/

Page 3-38 – Revise Section 3.6, Discretionary Actions and Approvals to delete the sixth bullet:

- ~~Modified Street Classifications and Standards~~

Page 3-18 (Table 3-3) – Revise one row of Table 3-3 as follows:

TABLE 3-3: EXISTING LAND USE AND ZONING WITHIN ECTNP AREAS OF PROPOSED CHANGE					
General Plan Land Use	Acres	Zoning	FAR	Max Allowable Height (Stories) /d/	Max Allowable Height (Feet) /d/
Light Manufacturing	139.1	M2-2	6:1	N/A	N/A ~~75~~

CHAPTER 4.0 ENVIRONMENTAL ANALYSIS

Section 4.3 Cultural Resources

Page 4.3-13 (Figure 4.3-1) – Revise Figure 4.3-1 to identify The Apple Pan, located at the intersection of Glendon Avenue and Pico Boulevard, as a historic resource that appears eligible for local listing or designation based on SurveyLA – West Los Angeles Survey findings from 2012.

Page 4.3-15 (Table 4.3-3) – Revise to add "The Apple Pan, 10801 W. Pico Boulevard, Commercial, Vernacular" under properties that "appear eligible for local listing or designation" with status code 5S3.

Pages 4.3-23 and 4.3-24 (and in Table 2-1) – Revise Mitigation Measures **CR1** and **CR2** as follows:

CR1 A qualified archaeologist shall be required to monitor excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological ~~finds~~ resources or tribal cultural resources during construction. If archaeological resources or tribal cultural resources are uncovered (in either a previously disturbed or undisturbed area), the City Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the project shall not collect or move any archaeological ~~materials~~ resources, tribal cultural resources or associated materials. Construction activity may continue unimpeded on other portions of the project site as approved by the retained archeologist in consultation with the City's Office of Historic Resources. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a qualified archeologist.

CR2 The City shall require that all cultural resources, including archeological and tribal cultural resources, identified on a site be assessed and treated in a manner determined appropriate by a qualified archeologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition.

Section 4.4 Geology and Soils

Page 4.4.5 – Revise the first and second paragraphs as follows:

Four faults are located within two miles of the Project Area – the Overland Avenue Fault, Santa Monica Fault, and Newport-Inglewood-Rose Canyon Fault and Charnock Fault (see Figure 4.4-1). ~~A segment of the~~ The nearest fault to any area of proposed change is the Newport Inglewood-Rose Canyon Fault. As shown in Figure 4.4-1, the easternmost area of proposed change, where increased intensity of development is anticipated, falls just within the boundaries of this fault zone. The Overland Avenue Fault has also been mapped within the Project Area, approximately one half mile southeast of the Westwood/Rancho Park Station. It extends from the northwest flank of Baldwin Hills to Santa Monica Boulevard in the vicinity of Overland Avenue. The next nearest fault to the Project Area is the Santa Monica Fault. This fault is located approximately one-quarter mile north of the Project Area and traverses east-west from the City of Beverly Hills area on the east to the Santa Monica coastline on the west.

~~A segment of the~~ The Newport-Inglewood Fault ~~is located approximately one half mile southeast of the Culver City Station. This fault~~ starts south of the City of Signal Hill, and roughly parallels the coastline until just south of Newport Bay, where it heads offshore and becomes the Newport-Inglewood-Rose Canyon Fault ~~Zone~~. ~~A little further from the Project Area is the Charnock Fault. This fault is a northwest trending fault that runs parallel to the Overland Fault and the Newport Inglewood Rose Canyon Fault Zone and is approximately slightly more than two miles south of the Project Area.~~ Figure 4.4-1 identifies the ~~faults in the Southern California region, including the four~~ faults in the vicinity of the Project Area.

Page 4.4-6 (Figure 4.4-1) – Revise Figure 4.4-1, see the following page.

Page 4.4-11 – Revise the third sentence of the last paragraph as follows:

There are four faults, the Overland Avenue, Santa Monica, Newport-Inglewood-Rose Canyon, and Charnock faults, within two miles of the Project Area. ~~However, none of these faults traverse any of the areas of proposed change.~~ As shown in Figure 4.4-1, the easternmost area of proposed change, where increased intensity of development is anticipated, falls just within the boundaries of the Newport-Inglewood-Rose Canyon Fault zone ~~In addition~~ Nonetheless, due to the high potential for seismic hazards, all development in the Los Angeles area, including development that would occur under the Proposed Project, would be required to adhere to the current seismic design requirements of the CBC and the LABC, which ensure new buildings are designed to withstand seismic events through modern construction techniques.

Section 4.6 Hazards and Hazardous Materials

Page 4.6-16 (Figure 4.6-1) – Figure 4.6-1 identifies 32 schools within 0.25 miles of the Study Area, including the 15 public schools that serve the Study Area. Revise to include a 33rd row and add Westwood Charter School, at the border of the 0.25-mile buffer from the Study Area at the intersection of Mississippi Avenue and Overland Avenue.

Page 4.6-16 (Figure 4.6-1) – Add the following note to the bottom of the figure:

Note: Numerous pre-schools and other private schools within the projects area are not depicted in this figure.

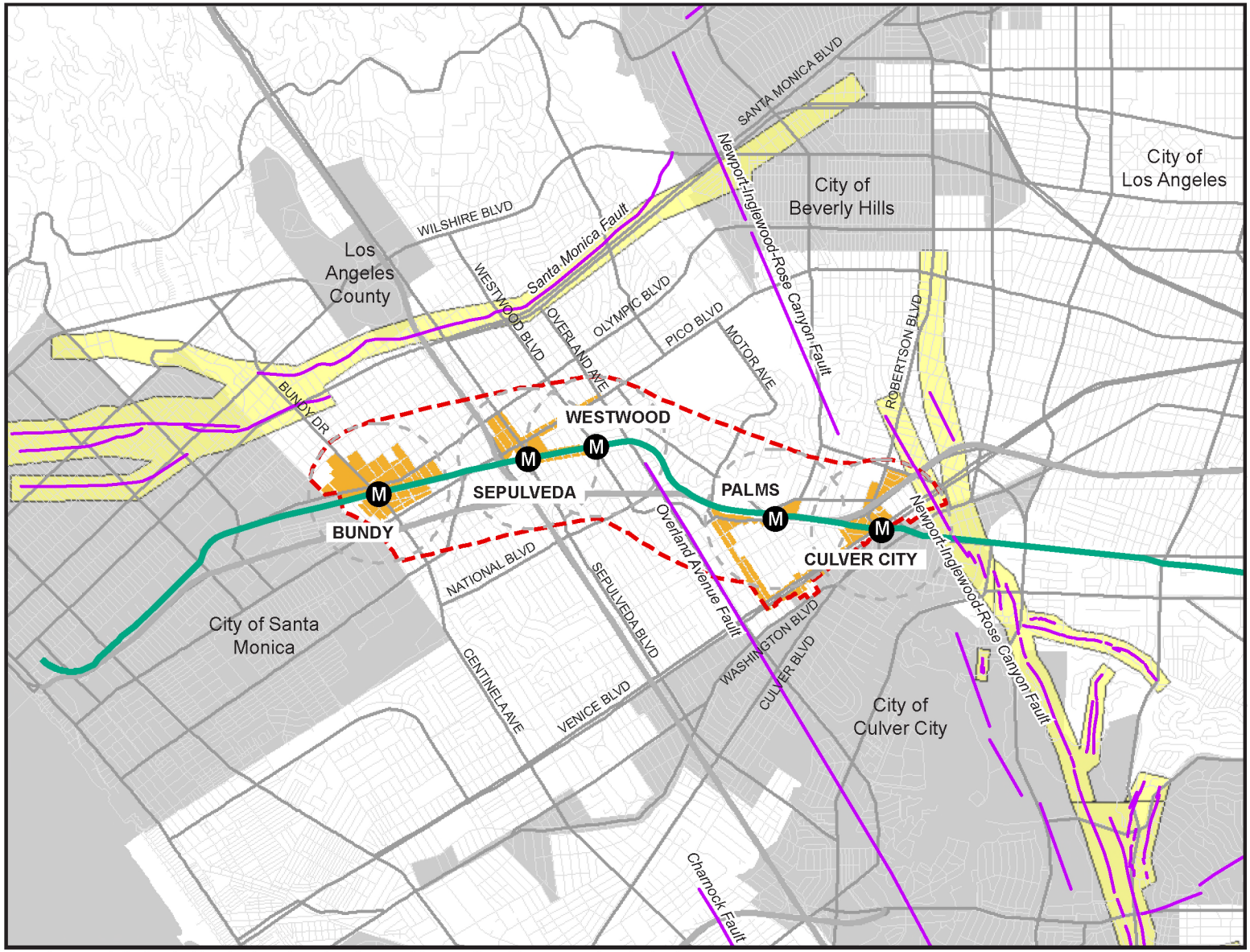
Page 4.6-17 – Revise the second paragraph, second sentence as follows:

As shown in Figure ~~4.6-2~~ 4.6-1, there are over 30 schools, including public schools that serve the Project Area (15 public schools identified in Table 4.11-9 in Section 4.11, Public Services) and other schools that are located within a quarter mile of the Project Area.

Exposition Corridor Transit Neighborhood Plan

Figure 4.4-1 Active Faults

Los Angeles Department of City Planning



LEGEND:

- ECTNP Boundary
- Expo LRT
- Light Rail Station
- 0.5-Mile Radius
- Jurisdictional Boundary
- Earthquake Faults
- Earthquake Fault Zones
- Areas of Proposed Change

Approx. Scale

0 0.25 0.5 1 MILES

N

A project partially funded by the Los Angeles County Metropolitan Transportation Authority.

SOURCE: City of Los Angeles, California Department of Conservation, USGS, and TAHA, 2018.

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LOS ANGELES TRANSIT NEIGHBORHOOD PLAN

Section 4.7 Hydrology and Water Quality

Page 4.7-24 (and in Table 2-1) – Revise Mitigation Measure **HWQ1** as follows:

HWQ1 Buildings within a 100-year floodplain ~~(i.e., the area of proposed change on the north side of Pico Boulevard between Westwood Boulevard and Overland Avenue)~~ shall be designed and constructed a minimum of one foot above the 100-year flood water surface elevation to ensure the protection of structures from all flooding events.

Section 4.8 Land Use

Page 4.8-17 (Table 4.8-3) – Revise two rows of Table 4.8-3 as follows:

TABLE 4.8-3: EXISTING LAND USE AND ZONING WITHIN THE SEPULVEDA STATION AREAS OF PROPOSED CHANGE

General Plan Land Use	Zoning	Acres	FAR	Max Allowable Height (Stories)	Max Allowable Height (Feet)
Low Medium Density I Residential	R2-1	~~6.0~~ 5.4	3:1	N/A	33
Low Medium Density II Residential	RD1.5-1	0.6	3:1	Up to 4	45

Page 4.8-18 (Table 4.8-4) – Revise two rows of Table 4.8-4 as follows:

TABLE 4.8-4: PROPOSED LAND USE AND ZONING WITHIN THE SEPULVEDA STATION AREAS OF PROPOSED CHANGE

General Plan Land Use	Zoning	Acres	FAR	Max Allowable Height (Stories) /a/	Max Allowable Height (Feet)
Hybrid Industrial	Hybrid Industrial: Jobs Emphasis	7.8 ~~5.7~~	2.0:1 to 4:1	Up to 11	148 (118 /b/)
Hybrid Industrial	Hybrid Industrial: Residential Emphasis	4.3 ~~6.4~~	2.0:1 to 4:1	Up to 7	96 (78 /b/)

Page 4.8-19 (Table 4.8-9) – Revise one row of Table 4.8-9 as follows:

TABLE 4.8-9: EXISTING LAND USE REGULATIONS AND ZONING WITHIN THE CULVER CITY STATION AREAS OF PROPOSED CHANGE

General Plan Land Use	Zoning	Acres	FAR	Max Allowable Height (Stories)	Max Allowable Height (Feet)
Limited Manufacturing	M1-1, MR1-1, P-1	6.35	1.5:1	N/A	N/A

Section 4.9 Noise

Page 4.9-9 – Revise the second sentence of the paragraph with the subheading "Federal Transit Administration" as follows:

According to the FTA, vibration impacts associated with human annoyance would be significant if vibration caused by new development exceeds ~~85 VdB~~ 80 VdB for infrequent events, 75 VdB for occasional events, and 72 VdB for frequent events at residences and places where people normally sleep ~~, which is the vibration level that is considered to be acceptable only if there are an infrequent number of events per day.~~

Page 4.9-13 – Revise the last paragraph before the heading "Methodology" as follows:

There are no adopted City standards for vibration. According to the FTA, vibration impacts associated with human annoyance would be significant if vibration caused by implementation of the proposed plans exceeds 80 VdB for infrequent events, 75 VdB for occasional events, and 72 VdB for frequent events at residences

and places where people normally sleep.~~85 VdB, which is the vibration level that is considered to be acceptable only if there are an infrequent number of events per day.~~ The FTA standards are provided for informational purposes only. The City does not consider vibration annoyance a significant impact under CEQA and it is not assessed further within this document. In terms of ground-borne vibration impacts on structures, the FTA vibration damage threshold is approximately 90 VdB for buildings extremely susceptible to building damage (e.g., historic structures) and 98 VdB for engineered concrete and masonry buildings without plaster (e.g., typical urban development).

Section 4.10 Population, Housing, and Employment

Page 4.10-10 (Table 4.10-4) – Revise Table 4.10-4 footnote /b/ as follows:

SOURCES:
/b/ California Department of Finance, Demographic Research Unit, Table 2: E-4, Released May 1, 2013, Revised May 10, 2013.

Page 4.10-11 – Revise the first paragraph, second sentence under the heading "Housing" as follows (this change results in negligible changes to calculations in this EIR that are not updated because it would not substantially change any analyses or conclusions):

According to the U.S. Census, the ECTNP Area had 24,906 housing units in 2010. Applying the average annual growth rate of 0.14 percent, the number of housing units within the ECTNP in 2013 was estimated to be 25,010 ~~25,018~~ housing units. This represents 1.8 percent of the number of housing units in the City of Los Angeles in 2013.

Page 4.10-11 (Table 4.10-6) – Revise one row of Table 4.10-6 as follows:

TABLE 4.10-6: EXISTING HOUSING UNITS

Location	2010 Census Data /a/	Existing Conditions (2013) /b/	Net Housing Growth (2010-2013)	Percent Change (2010-2013)	Average Annual Growth Rate /c/
ECTNP Area	24,906	25,010 ~~25,018~~	112	0.42% ~~0.45%~~	0.14%

Section 4.11 Public Services

Page 4.11-23 – Revise the first paragraph, second sentence as follows:

As shown in Table 4.11-9, existing public ~~(non-charter)~~ elementary and middle schools serving the Project Area currently have the capacity to accommodate an additional 734 elementary and 1,158 middle school students.

Page 4.11-32 – Revise the last paragraph as follows:

Based on the Public Recreation Plan standards~~, with the reasonable anticipated development for the year 2035, the existing deficit of parks and recreational facilities serving the Project Area could grow to 102.88 acres of neighborhood parks for a total deficit of 97.46 acres of parks and recreational facilities~~, the existing (2013) demand for parks and recreational facilities (all types) serving the Project Area is 202.38 acres; when taking into account acres of recreational space available, the existing deficit of parks and recreational facilities is 48.6 acres, as shown in **Table 4.11-15**. ~~Population growth associated with the proposed increase in capacity would create demand for 251.24 acres of recreational facilities, 48.86 acres of which would result from the Proposed Project. Of the anticipated deficit of 97.46 acres of open space in 2035, 48.86 of this is attributed to the Proposed Project.~~ In 2035 with the Proposed Project, demand for parks and recreational facilities would be up to 251.24 acres; this represents an increase of 48.86 acres beyond the existing deficit, to a total deficit of 97.46 acres.

Section 4.12 Transportation and Traffic

Page 4.12-10 – Revise the sixth paragraph, last sentence as follows:

Area neighborhoods also include multi-family homes between Washington ~~Place~~ Boulevard and Venice Boulevard and along other major arterials, as well as single-family homes, which are largely concentrated north of I-10. Streets in the Station Area are under either the jurisdiction of the City of Los Angeles or the City of Culver City, while freeways are under the jurisdiction of Caltrans.

Page 4.12-21 – The City of Culver City Transportation Department provided minor corrections as well as updated information from the EIR base year that is updated here for informational purposes. Revise the bullets as follows:

- Culver City Bus Line 1 - Line 1 is a local east/west line that runs along Washington Boulevard from Venice Beach in the west to Washington Boulevard and Fairfax Avenue in the east. Culver City Bus Line 1 runs seven days a week with ~~Service~~ headways of about 12 to 20 minutes ~~are provided during the weekday peak periods~~. On Saturday, Sundays, and Holidays, Line 1 runs from 6:00 a.m. to 11:40 p.m. This line travels along Washington Boulevard in the study area.

- Culver City Bus Line 3 – Line 3 is a local north/south line that runs from Century City in the north to the Culver City Transit Center in the south. In the study area, the line travels along Westwood Boulevard, National Boulevard, and Motor Avenue. Service hours begin at 5:30 a.m. and end at 11:30 ~~00~~ p.m. Weekday headways are 20 minutes all day until 8:00 p.m. After 8:00 p.m. and on weekends, headways are 30 minutes.

Page 4.12-22 – The City of Culver City Transportation Department provided minor corrections as well as updated information from the EIR base year that is updated here for informational purposes. Revise the bullets as follows:

- Culver City Bus Line 6 – Line 6 provides localized service on Sepulveda Boulevard and Westwood Boulevard between the Metro Green Line Station in Inglewood and UCLA in Westwood. Buses run ~~at 10- to 15-~~approximately 20-minute headways during the peak weekday hours and approximately 20- to 30-minute headways during off-peak periods and weekends.

- Culver City Bus Line Rapid 6 Short Line – ~~Line~~ Rapid 6 Short Line is a short directional service provide between Palms Boulevard and UCLA. Northbound services hour begins 6:45 a.m. and end at 10:34 am and southbound services hours begin at 1:45 p.m. and end at 7:04 p.m. ~~and offers limited stop, express service on Sepulveda Boulevard and Westwood Boulevard between the Metro Green Line Station in Inglewood and UCLA in Westwood. Buses run at 20- to 25-minute headways during the peak weekday hours.~~

- Culver City Bus Line 7 – Line 7 is a local east/west line that runs from Venice Boulevard and Culver Boulevard in the east to Marina del Rey in the west. Line 7 only operates during weekdays with ~~30-~~40- to 45-minute headways. This line travels primarily along Culver Boulevard in the study area only during weekday.

Page 4.12-58 (and in Table 2-1) – Revise Mitigation Measure **TR1** as follows:

TR1 A trip generation analysis, as well as ~~an~~ a site access and circulation plan ~~study~~ per LADOT guidelines, will be required as part of the development application for projects within the Specific Plan boundary that result in net new square footage for purposes of determining consistency of the project with the transportation assumptions in the EIR. The Specific Plan area is divided into five ECTNP station segments, as shown in Figure 3-2 in the Project Description. To be consistent, a project cannot cause the total estimated 2035 trip forecasts (for the station segment in which it is

located) to exceed the number of either AM or PM peak hour net new external trips analyzed in the EIR (see Table 4.12-5). If a project is determined to be consistent, no further traffic analysis will be required. However, if a project causes the number of either AM or PM peak hour net external trips to exceed the cumulative total number of trips in the corresponding station segment analyzed in the EIR, then a project-specific traffic analysis per current LADOT Guidelines will be required.

The City will revise this vehicle trip generation analysis ~~traffic impact consistency determination~~ methodology, if appropriate, to reflect new traffic impact guidance mandated by the State of California, Office of Planning and Research in response to SB 743.

Section 4.13 Utilities & Service Systems

Page 4.13-2 – Add the following to the State Regulatory Framework discussion:

State of Emergency Executive Order B-40-17. On April 7, 2017, this Executive Order ended the drought state of emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne, where emergency drinking water projects will continue to help address diminished groundwater supplies. It maintains water reporting requirements and prohibitions on wasteful practices.

Making Water Conservation a California Way of Life. In May 2016, Governor Brown signed Executive Order B-37-16 that instructed State agencies to help Californians adopt permanent changes to use water more wisely. The Executive Order laid out a framework for moving the state from temporary, emergency water conservation measures to a more durable approach customized to the unique conditions of each local water agency. This report builds upon the Executive Order and provides recommendations for how to implement long-term improvements to water supply management that support water conservation.

Pages 4.13-4 and 4.13-5 – Revise the last paragraph, fourth sentence as follows:

The EWCP contains ~~five~~ six water conservation phases, which correspond with the severity of water shortage.

Page 4.13-7 – Revise the last paragraph, third and fourth sentences as follows:

~~Table 4.13-4 lists the quantities of water that LADWP extracted from the Owens Valley, San Fernando, Sylmar, and Central groundwater basins.~~ A remediation of an environmental conditions occurred in the Owens ~~Valley~~ River and Mono Basin ~~Lake~~ as a result of water diversion for the LAA, in which 182,000-acre feet (af) was used to raise the lake water level and mitigate dust issues.

Page 4.13-8 (Table 4.13-4) – LADWP provided updated information that is updated here for informational purposes. Revise the first paragraph and delete and replace Table 4.13-4 as follows:

Table 4.13-4 presents LADWP's forecast for groundwater production from each basin through fiscal year ending June 30, 2040. The projection accounts for projects that restore capacity of LADWP's existing well fields and the implementation of expanded basin remediation in San Fernando Basin. Although excluded from the figures provided, LADWP anticipates pumping additional volumes in conjunction with enhanced groundwater recharge and replenishment using stormwater and purified recycled water. As detailed in Table 4.13-4, over the course of the 2014-2015 water year, LADWP pumped ~~87,097~~ 80,097 af of water from the San Fernando Groundwater Basin~~, 16,546~~ and 6,948 af of water from the Central Basin.~~, 3,570 af of water from the Sylmar Groundwater Basin, 1,503 af of water from the West Coast Basin and 500 af of water from the Eagle Rock groundwater basin. In accordance with the City's long range water management plan, LADWP plans to continue production from its groundwater basins in the coming years to offset reductions in imported supplies. However, extraction from groundwater basins is limited by the water quality and overdraft protection. Both the LADWP and DWR have programs in place to monitor wells to prevent overdraft. LADWP's groundwater pumping practice is based on a "safe yield" operation. The objective of~~

~~which is to extract an amount of groundwater equal to the native and imported water that recharges the groundwater basins.~~

~~TABLE 4.13-4: LADWP GROUNDWATER EXTRACTIONS (in Acre feet)~~					
~~Water Year (October-September)~~	~~Groundwater Basin~~				~~Total~~
	~~Owens Valley~~	~~San Fernando~~	~~Sylmar~~	~~Central~~	
~~2004-2005~~	~~85,820~~	~~49,085~~	~~1,110~~	~~13,401~~	~~149,416~~
~~2005-2006~~	~~57,412~~	~~38,042~~	~~2,175~~	~~13,725~~	~~111,354~~
~~2006-2007~~	~~58,621~~	~~76,251~~	~~3,919~~	~~13,609~~	~~152,400~~
~~2007-2008~~	~~60,337~~	~~50,009~~	~~2,997~~	~~10,754~~	~~124,097~~
~~2008-2009~~	~~68,149~~	~~52,846~~	~~868~~	~~11,817~~	~~133,680~~
~~2010-2011~~	~~offline~~	~~44,029~~	~~225~~	~~5,099~~	~~49,353~~
~~2011-2012~~	~~offline~~	~~50,244~~	~~1,330~~	~~9,486~~	~~61,060~~
~~2012-2013~~	~~offline~~	~~50,550~~	~~1,952~~	~~6,310~~	~~58,812~~
~~2013-2014~~	~~offline~~	~~68,784~~	~~891~~	~~9,727~~	~~79,402~~
~~GROUNDWATER BASIN CHANGE DUE TO ENVIRONMENTAL MITIGATION PROGRAM FOR OWENS VALLEY~~					
~~Water Year (October-September)~~	~~San Fernando~~	~~Central~~	~~Sylmar~~	~~West Coast~~	~~Eagle Rock~~
~~2014-2015~~	~~87,097~~	~~16,546~~	~~3,570~~	~~1,503~~	~~500~~
				~~Total~~	~~109,216~~
~~SOURCE: Los Angeles Department of Water and Power, *2010 Urban Water Management Plan*, 2011; *2015 Urban Water Management Plan*, 2016.~~					

TABLE 4.13-4: GROUNDWATER PRODUCTION 2014/15 TO 2039/40						
	2014/15 (Actual)	2019/20	2024/25	2029/30	2034/35	2039/40
Basin	Acre Feet per Year (AFY)					
San Fernando /a/	80,097	90,000	88,000	84,000	92,000	92,000
Sylmar /b/	0	4,170	4,170	4,170	4,170	3,570
Central /b/	6,948	18,500	18,500	18,500	18,500	18,500
Total	**87,045**	**112,670**	**110,670**	**106,670**	**114,670**	**114,070**
/a / San Fernando Basin remediation facilities are expected to be in operation in FY 2021/22. Use of groundwater storage credits allows for increased pumping above safe yield. /b/ Use of groundwater storage credits in Sylmar Basin and Central Basin allows for temporary increase in pumping above safe yield until stored water credits have been expended. **SOURCE**: LADWP, *2015 Urban Water Management Plan*, page 6-24.						

Page 4.13-8 – Revise the second paragraph to replace the fifth sentence as follows:

~~However, by 2024, with the completion of the Master Project, LAA delivery will increase to 286,000 due to conserved water at Owens Lake.~~ However, with the anticipated completion of the Master Project by 2024, the projected LAA delivery will increase to 286,000 AFY due to water conserved at Owens Lake.

Page 4.13-9 – Revise the third paragraph as follows:

Recycled Water. Recycled water is produced by the Hyperion Treatment Plant (HTP), Terminal Island Water Reclamation Plant (TIWRP), Donald C. Tillman Water Reclamation Plant (DCTWRP), Edward C. Little Water Recycling Facility (ECLWRF), and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP). Currently, recycled water is provided for landscape irrigation and commercial uses. Table 4.13-5 provides details on these treatment plants services, capacity, and average daily flows. There is no recycled water infrastructure within the Project Area.

Page 4.13-9 (Table 4.13-5) – Add one row to Table 4.13-5 as follows (and add to the source of the table: West Basin Municipal Water District):

TABLE 4.13-5: WASTEWATER TREATMENT PLANTS SUMMARY

Wastewater Treatment Plants	Treatment Level	Capacity (mgd)	Average Flows (mgd)
Edward C. Little Water Recycling Facility	Tertiary to Title 22 Standards; RO; MF/RO; MF with doublepass RO	46.8	40

Page 4.13-10 – LADWP provided updated information that is updated here for informational purposes. Revise Footnote 14 as follows:

[14]Los Angeles Department of Water and Power, ~~*2010*~~ *2016 Drinking Water Quality Report*, ~~2011~~ 2017.

Page 4.13-10 – LADWP provided updated information that is updated here for informational purposes. Revise the second paragraph as follows:

All water coming from the LAA, the California Aqueduct, and the Colorado River Aqueduct is filtered and treated at the LAA Filtration Plant or the Jenson, Weymouth, and Diemer Treatment Plants to ensure a safe drinking water supply. ~~Once at the filtration plant, all water travels through screens that remove environmental debris such as twigs and dead leaves. Bacteria and other impurities that can affect taste, odor, and color are eliminated by ozone injections, a super-charged oxygen molecule with powerful disinfecting properties. Treatment chemicals are then quickly dispersed into the water to make fine particles called "floc", which are subsequently removed via a 6-foot-deep coal filter. The final step is the addition of chlorine and fluoride, which ensure lasting disinfection and strengthen tooth enamel.~~ According to the 2016 Drinking Water Quality Report prepared by LADWP, water flows into the filtration plant by gravity and travels through screens to remove environmental debris suchas twigs and dead leaves. Fluoride is adjusted to the optimal level to promote oral health by strengthening tooth enamel. Ozone, a super-charged oxygen molecule and a powerful disinfecting agent is injected into the water to help particles clump together and to improve the water's taste and appearance. Treatment chemicals are quickly dispersed into the water to make fine particles called "floc." A six-foot-deep filter composed of crushed coal over gravel removes the floc and previously added chemicals. In May 2014, LADWP commissioned a new advanced process at the filtration plant, the Dr. Pankaj Parekh Ultraviolet (UV) Disinfection Facility, which replaces ozone as the primary disinfectant for surface water. The water goes through UV purification which has been identified as one of the most effective methods of drinking water treatment by the USEPA. Then chlorine and ammonia are added during the final step to ensure lasting disinfection and to protect the water as it travels through the city's large distribution system to your tap. The LAA Filtration Plant has a water treatment capacity of up to 600 million gallons per day (mgd). In the mid-2000's, LADWP began a comprehensive modernization of the filtration plant to upgrade and replace equipment. The upgrade program is on-going process and will continue to deliver dependable supply of safe, quality water to its customers in an efficient and responsible manner. Furthermore, LADWP continues to invest in improving drinking water quality through its Capital Improvement Program, in which water quality capital expenditures are approximately $1.4 billion, and 40 percent of the total capital budget.

Page 4.13-10 – Revise the third paragraph, first sentence as follows:

~~The City's groundwater supply in the San Fernando and Central Basins is generally clean.~~ LADWP pumps ~~from the clean parts of the basins~~ and disinfects ~~this~~ groundwater with chlorine as a safeguard against microorganisms to comply with state and federal safe drinking water standards.

Page 4.13-11 – Revise the last paragraph, first sentence as follows:

A WSA was prepared for the Proposed Project and approved on February ~~6~~ 18, 2014.

Page 4.13-15 – LADWP provided updated information that is updated here for informational purposes. Revise Footnote 21 as follows:

[21]LADWP, ~~*2010*~~ *2015 Urban Water Management Plan, Exhibit 2L~~1~~ (Water Demand Forecast ~~and~~ with Passive Conservation Savings from Codes, Ordinances and Conservation Phases for LADWP Service Area ~~Under Average Weather Fiscal Year Ending June 30 [Acres Feet])~~*, ~~January 2011~~ 2015.

Page 4.13-16 – LADWP provided updated information that is updated here for informational purposes. Revise Footnote 22 as follows:

[22]LADWP, ~~*2010*~~ *2015 Urban Water Management Plan, Exhibit 2L~~1~~ (Water Demand Forecast ~~and~~ with Passive Conservation Savings from Codes, Ordinances and Conservation Phases for LADWP Service Area ~~Under Average Weather Fiscal Year Ending June 30 [Acres Feet])~~*, ~~January 2011~~ 2015.

Pages 4.13-20 and 4.13-21 – Revise the last paragraph, third, fourth, and fifth sentences as follows:

LAMC Section 64.15 requires that a Sewer Capacity Availability Request (SCAR) be performed by the ~~Department of Building and Safety~~ Department of Public Works Bureau of Engineering when a sewer permit is sought for a new connection to the City's wastewater system, or in the event that a proposed increase in discharge to a public wastewater line or proposed future development is anticipated to generate 10,000 gallons or more of wastewater per day. A SCAR evaluates the existing wastewater collection system to determine whether adequate capacity exists to convey project-related wastewater to the appropriate treatment plant. If capacity is available, the ~~Department of Building and Safety~~ Department of Public Works Bureau of Engineering accepts project plans and specifications for plan check; otherwise, projects are placed on a waiting list to receive an allocation of forthcoming capacity, or applicants are required to construct a connection to the nearest wastewater line with available capacity. The ~~Department of Building and Safety~~ Department of Public Works Bureau of Engineering accepts project plans and specification for plan check if the project is on the waiting list, although the project may not connect to the City's wastewater system until capacity is available and a sewer permit is available.

Page 4.13-29 – Revise the second sentence of the third paragraph as follows (including the associated footnote):

However, although the existing sewer infrastructure within the Project Area has no conveyance capacity constraints and the sewer infrastructure is in good to very good structural condition, the Proposed Project would exceed ~~20,000~~ 10,000 gpd, which is the BOS criterion for reviewing a SCAR, which ~~necessitating~~ necessitates detailed gauging to determine whether the sewer conveyance system is capable of safely accommodating the total flow generated by the Proposed Project.[44]

[44] ~~Ibid.~~ LAMC Section 64.15(i).

Page 4.13-29 – Revise the first sentence of the fourth paragraph as follows:

Similar to the Proposed Project, development under the Alternative Compliance scenario would exceed ~~20,000~~ 10,000 gpd, which is the LASAN criterion for reviewing a SCAR, which ~~necessitating~~ necessitates detailed gauging to determine whether the sewer conveyance system is capable of safely accommodating the total flow generated by the Proposed Project.

Page 4.13-29 – Revise the second sentence of the fifth paragraph as follows:

Similar to development in the change areas, future development projects in the non-change areas would exceed ~~20,000~~ 10,000 gpd, which is the BOS criterion for reviewing a SCAR, which ~~necessitating~~ necessitates detailed gauging to determine whether the sewer conveyance system is capable of safely accommodating the total flow generated by development projects.

Section 6.0 Other CEQA Considerations

Page 6-1 – Add text to the beginning of the section, as follows:

The California Environmental Quality Act of 1970 (CEQA) requires preparation of an Environmental Impact Report (EIR) when certain specified impacts may result from construction or implementation of a project. CEQA Guidelines Section 15065 identifies four mandatory findings of significance that have to be considered as part of the environmental review process: (1) the project has the potential to: substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory, (2) the project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals, (3) the project has possible environmental effects that are individually limited but cumulatively considerable, "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects, and (4) the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

An EIR has been prepared for the Proposed Plan, which fully addresses all of the Mandatory Findings of Significance.

- In regards to finding (1), the EIR, in its entirety, addresses and discloses all potential environmental effects associated with construction and operation of the Proposed Plan, including direct, indirect, and cumulative impacts, in the following resource areas: Aesthetics (Section 4.1); Air Quality (Section 4.2); Cultural Resources (Section 4.3); Geology and Soils (Section 4.4); Greenhouse Gas Emissions (Section 4.5); Hazards and Hazardous Materials (Section 4.6); Hydrology and Water Quality (Section 4.7); Land Use and Planning (Section 4.8); Noise (Section 4.9); Population, Housing, and Employment (Section 4.10); Public Services (Section 4.11); Transportation and Traffic (Section 4.12); and Utilities and Service Systems (Section 4.13). As summarized in Table 2-1, this EIR discloses all potential environmental impacts, the level of significance, and project requirements that are otherwise required by law or are incorporated as part of the Project. Section 6.6 (Effects Not Found to be Significant) also addresses various possible significant effects that were determined not to be significant or are not discussed in detail in the EIR.

- In regards to finding (2), Section 6.3, Significant Irreversible Environmental Effects of this document addresses the short-term and irretrievable commitment of natural resources to ensure that the consumption is justified on a long-term basis. In addition, Section 6.2 (Significant Unavoidable Impacts) identifies all significant and unavoidable impacts that could occur, thereby creating a long-term impact on the environment. Lastly, Section 6.4 (Growth Inducing Impacts) identifies any long-term environmental impacts caused by the Proposed Plan with respect to economic or population growth.

- In regards to finding (3), Section 4.14, Cumulative Impacts discusses significant cumulative environmental impacts of the Proposed Plan, and finds that the Proposed Project would result in cumulatively considerable impacts related to aesthetics (visual character and shade/shadow), air quality (construction), cultural resources (historic resources), noise (construction), public services (parks), and traffic (circulation, neighborhood intrusion, and CMP arterial facilities).

- In regards to finding (4), while changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, recreation, transportation/traffic, utilities, and climate change, which are addressed in Section 4.2 (Air Quality), Section 4.4 (Geology and Soils), Section 4.5 (Greenhouse Gas Emissions), Section 4.6 (Hazards and Hazardous Materials), Section 4.7 (Hydrology and Water

Quality), Section 4.9 (Noise), Section 4.11 (Public Services), Section 4.12 (Transportation and Traffic), and Section 4.13 (Utilities and Service Systems).

Appendix F Population, Housing, and Employment Methodology

Appendix F, Page 2 – Revise the fifth paragraph as follows:

~~To estimate the existing employment, U.S. Census-based employment data for the Project Area from 2011 was adjusted to 2013 using a method similar to that used for population and housing.~~ Existing employment data for the Project Area in 2013 was obtained through "On the Map," an application of the U.S. Census based on Longitudinal-Employer Household Dynamics (LEHD) Origin Designation Employment Statistics, which makes available employment data on an annual basis. ~~At the time the EIR was being prepared, 2011 was the most recent year available. The 2011 data was adjusted to 2013 using the average annual growth rate for employment for the four neighboring cities noted above and the City of Los Angeles. The growth rates for these cities was obtained from the California Employment Development Department (EDD) Monthly Labor Force Data for the years 2010 to 2012 (2012 being the most recent year available from EDD at the time). Assuming that employment in the Project Area grew at approximately the same rate as the surrounding areas during those years, this average annual growth rate was applied to employment in the Plan Area in 2011 to obtain the baseline employment for 2013.~~

Appendix K - SCAG RTP/SCS Technical Memorandum

Replace Appendix K with the following revised Appendix K.

Appendix N - Revisions to the Specific Plan Technical Memo

Replace Appendix N with the following revised Appendix N.

APPENDIX K

SCAG RTP/SCS Technical Memorandum

SCAG RTP/SCS TECHNICAL APPENDIX

On April 7, 2016, the Southern California Association of Governments ("SCAG") adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy ("SCAG 2016-2040 RTP/SCS"). As part of its preparation of the Draft Environmental Impact Report for the Exposition Corridor Transit Neighborhood Plan, the Department of City Planning has carefully reviewed and analyzed the housing, population and employment estimates contained in the SCAG 2016-2040 RTP/SCS relevant to the Project Area to determine if they are significantly different than the estimates contained in the 2012-2035 RTP/SCS.

The SCAG 2016-2040 RTP/SCS continues the same policies that were included in the 2012-2035 RTP/SCS (encouraging a mix of uses and locating uses near transit). As part of the new RTP, SCAG updated the socioeconomic data (population, housing and employment), with a baseline year of 2012 and a horizon year of 2040. The tables below compare the socioeconomic data from both the 2012-2035 RTP and the 2016-2040 RTP to the existing and proposed population, housing, and employment analyzed in the ECTNP EIR.

For purposes of regional planning and to comply with Federal regulations, SCAG adopts growth data at the jurisdictional level. For purposes of analysis in the RTP, SCAG staff allocates population, housing and employment growth to Transportation Analysis Zones (TAZs) that are typically a geographic subset of Census tracts. The growth allocation to TAZs provides an estimate of subarea population, housing and employment, for the RTP horizon year (2035 for the 2012-2035 RTP and 2040 for the 2016-2040 RTP). Each jurisdiction determines how to allocate growth in accordance with its adopted plans and to achieve effective and appropriate local planning consistent with applicable jurisdiction and regional growth projections, as well as applicable policies including the Sustainable Communities Strategy (SCS) and associated region-wide GHG targets.

The ECTNP base year (2013) population, housing, and employment estimates were derived using data from the 2010 Census, which was then adjusted to 2013 using the average annual growth rate of the City of Los Angeles and other surrounding cities during the period of 2010-2013 (see **Appendix F** for further detail). Now that the 2016-2040 RTP, which has a base year of 2012, is available, it is possible to compare the 2012 data to the 2013 data used in the ECNTP. As shown in **Table A** below, the difference between the 2012 and 2013 data for population, housing, and employment reflects a level of growth that appears reasonable for that one-year period.

TABLE A: BASE YEAR COMPARISONS

	2008 2012 RTP Base Year[1]	2010 Census[2]	2012 2016 RTP Base Year[1]	2013 Proposed Project Base Year[3]
Population	47,515	49,934	48,298	50,595
Housing (Dwelling Units)	23,053	24,906	23,306	25,018[4]
Employment	39,598	32,462	32,322	33,962

1. SCAG Tier 2 Data. Note that for Housing, SCAG data is provided in terms of households. (The SCAG 2012-2035 RTP households for 2008 is 22,188 and the 2016-2040 RTP households for 2012 is 22,431.) In order to compare to Proposed Project housing units, the SCAG forecast households was converted to housing units using the following vacancy rates: 1.5% for single-family units, and 4.5% for multi-family units.
2. US Census 2010
3. Project Base Year (2013) population and housing are derived from 2010 Census adjusted to 2013 using the average annual growth rate of the surrounding cities and the City of Los Angeles.
4. Project Base Year (2013) employment was obtained directly US Census (On the Map application.)

The Proposed Project aims to accommodate the forecasted growth in population, housing, and employment for the horizon year of 2035. Since it also has a horizon year of 2035, the 2012-2035 RTP was used to guide the land use recommendations in the Proposed Project. Localized market demand forecasts for 2035 prepared as part of a market study for the Project area were also used as a guide. As discussed in detail in Section 4.10, Population, Housing, and Employment, the reasonable expected development resulting from the Proposed Project in 2035, shown in **Table B**, would accommodate the 2012-2035 RTP forecast for that year.

TABLE B: FUTURE YEAR COMPARISONS: PROPOSED PROJECT

	2035 (Proposed Project)	2035 (Proposed Project – Alt Compliance)	2035 Forecast[1] (2012-2035 RTP)	2040 Forecast[1] (2016-2040 RTP)
Population	59,571	62,810	54,444	65,176
Housing (Dwelling Units)	29,441	31,060	28,497	32,285
Employment	48,296	43,419	43,097	46,562

1. SCAG Tier 2 Data. Note that for Housing, SCAG data is provided in terms of households. (The SCAG 2012-2035 RTP household forecast for 2035 is 27,427 and the 2016-2040 RTP household forecast for 2040 is 31,046.) In order to compare to Proposed Project housing units, the SCAG forecast households was converted to housing units using the following vacancy rates: 1.5% for single-family units, and 4.5% for multi-family units.

As stated previously, the 2016-2040 RTP/SCS has a horizon year of 2040. This new horizon year provides a perspective on the trajectory of growth anticipated between 2035 and 2040, showing a steady upward trend in population, housing, and employment. As seen in **Table B**, the Proposed Project has available capacity to accommodate this increase in forecast growth for 2040. **Table B** also demonstrates that the Proposed Project with Alternative Compliance also has available capacity to accommodate the growth anticipated by the 2016-2040 RTP for 2040.

Table C illustrates the future reasonable expected development resulting from the three alternatives analyzed in the EIR, comparing the Alternatives to the SCAG growth forecasts for 2040 from the 2016-2040 RTP. Alternative 1 and Alternative 2 would not accommodate the population, housing, and employment forecast for 2040. Although Alternative 3 would meet the 2040 population and housing forecast, this alternative would notably fall short of accommodating the forecasted number of jobs, which is a primary objective of the Proposed Project.

TABLE C: FUTURE YEAR COMPARISONS: ALTERNATIVES

	2035 (Proposed Project)	2035 Alt. 1 (No Project)	2035 Alt. 2 (Reduced Project)	2035 Alt. 3 (Incr Res / Reduced Emp)	*2035 Forecast[1] (2012-2035 RTP)*	2040 Forecast[1] (2016-2040 RTP)
Population	*59,571*	52,447	57,326	65,835	*54,444*	65,176
Housing (Dwelling Units)	*29,441*	26,072	28,336	32,578	*28,497*	32,285
Employment	*48,296*	37,775	44,712	39,693	*43,097*	46,562

1. SCAG Tier 2 Data. Note that for Housing, SCAG data is provided in terms of households. (The SCAG 2012-2035 RTP household forecast for 2035 is 27,427 and the 2016-2040 RTP household forecast for 2040 is 31,046.) In order to compare to Proposed Project housing units, the SCAG forecast households was converted to housing units using the following vacancy rates: 1.5% for single-family units, and 4.5% for multi-family units.

In addition to existing and future socioeconomic data, the travel demand model used in the transportation analysis for the ECTNP is based on network assumptions found in the 2012-2035 RTP. The 2016-2040 RTP does not include significant new transportation projects in West Los Angeles[1], and therefore any changes to the assumptions upon which the transportation analysis is based would be minor.

As documented in this appendix, the minor refinements in policy, updated socioeconomic data, and transportation network assumptions in the 2016-2040 RTP/SCS would not substantially change the analyses contained in the EIR and therefore would not change the associated impact conclusions of the EIR.

[1] Naresh Amatya, Transportation Planning Manager, SCAG, Personal Communication, May 2016.

APPENDIX N

Revisions to the Specific Plan Technical Memo

REVISIONS TO THE PLAN

The following revisions to the ECTNP's zoning and land use were made at various stages of the development of the Proposed Plan. Therefore, these revisions were not incorporated into the Draft EIR analysis or shown in the Draft EIR maps. The purpose of this appendix is to provide a discussion of the effect these changes may have on the analysis and impact determinations in the EIR. As discussed in more detail below, the City performed additional analysis on the net change in population, housing, and employment resulting from these changes, and has determined that the revisions to the zoning and land use for these subareas represent minor modifications to the Proposed Plan which would not substantially affect the analysis or change the conclusions in any of the analyzed impact categories of the EIR.

Proposed Plan (October 2017)

As a result of comments received through the Proposed Project's community engagement process, a policy decision was made to remove two Subareas (areas of proposed change) from and add one new subarea to the Proposed Project. These revisions were incorporated into the Preliminary Draft Plan presented at the Open House and Public Hearing on May 23, 2017 and were reflected in the Proposed Plan presented to the City Planning Commission on November 9, 2017. However, because this decision was made during the development of the Draft EIR, the subarea changes were not incorporated into the main text of the Draft EIR analysis and are not shown on the Draft EIR maps. Hence, the two subareas that have been removed are still shown on the Draft EIR maps, while the added subarea is not indicated as a subarea on Draft EIR maps. These revisions include the following:

- **PICO RAS4**: Eliminated the subarea along the north side of Pico Boulevard from Bentley Avenue to Overland Avenue and on the south side of Pico Boulevard from Military Avenue to the alley westerly of Westwood Boulevard.
- **EXPO R3**: Eliminated the subarea along the north side of Exposition Boulevard from Military Avenue to Midvale Avenue and the south side of Exposition Boulevard from Sepulveda Boulevard to Midvale Avenue.
- **PICO MU(EC)**: Added a subarea along the south side of Pico Boulevard from Westwood Boulevard to Overland Avenue, which would rezone parcels from [Q]C2-1D, C2-1VL, and PB-1-O to MU(EC) and MU(EC)-O generally resulting in a change in allowable height from a range (2 stories to unlimited) to a single height limit of 68 feet; it would also change the maximum allowable floor area ratio from 1.5:1 to 3.6:1, contingent upon the provision of public benefits.

In addition, the following minor technical revisions to land use and zoning were made in response to comments received on the Preliminary Draft Plan. These revisions were reflected in the Proposed Plan presented to the City Planning Commission on November 9, 2017. They make minor modifications to the Draft Plan and do not constitute significant new information per CEQA and have not been found to affect the impact analysis or conclusions in the Draft EIR.

- **New Subarea 15**. Added a subarea at 2414 Wellesley Avenue, adjacent to the I-10 freeway within the Bundy Station Area, which would rezone parcels from R1-1 to M1-1 and change the General Plan land use designation from Low Residential to Limited Manufacturing to make the General Plan land use designation and zoning consistent with the current uses of the property and allow building heights and intensities similar to the current development on the site.
- **Revised Subarea 1**. Eliminated a 0.7-acre portion of Subarea 1 at the southwest corner of Granville Avenue and La Grange Avenue; this would retain existing zoning and generally reduce allowable height, development density and intensity when compared to the proposed New Industry zoning that was analyzed in the Draft EIR.

The analysis in **Table A** summarizes the change in 2035 reasonable expected population, housing, and employment as a result of the revisions to the Proposed Plan (October 2017). **Table B** compares the 2035 reasonable expected population, housing, and employment for the total Proposed Plan analyzed in the Draft EIR with the 2035 reasonable expected population, housing, and employment for the Proposed Plan (October 2017).

TABLE A: Proposed Plan (October 2017) Revisions /a, b/

	Subareas Eliminated Pico RAS4 and EXPO R3 and Part of Subarea 1	**Subareas Added** Pico MU(EC) and Subarea 15	**Net Change**
Subarea Acres	-16	+13	-3
Population	-447	+799	+352
Housing (DU)	-225	+386	+160
Employment (Jobs)	-2	-1,139	-1,140

/a/ The 2035 reasonable expected population, housing, and employment anticipated in these Subareas, with the zone changes described above, was calculated following the methodology described in **Appendix F** of this Draft EIR.
/b/ Numbers shown have been rounded to the nearest whole number.

TABLE B: Proposed Plan (October 2017) – Total Plan Area /a/

	Future (2035) with Proposed Plan analyzed in Draft EIR	**Future (2035) with Proposed Plan** (October 2017)	**Net Change**
Population	59,571	59,923	+352 (+0.6%)
Housing (DU)	29,441	29,601	+160 (+0.5%)
Employment (Jobs)	48,296	47,156	-1,140 (-2.4%)

/a/ The 2035 reasonable expected population, housing, and employment anticipated in these Subareas, with the zone changes described above, was calculated following the methodology described in **Appendix F** of this Draft EIR.

The revised Proposed Plan (October 2017) results in a Future (2035) reasonable expected population, housing and employment that is comparable to that of the Proposed Plan analyzed in the EIR.

PICO RAS4, EXPO R3, and PICO MU(EC). Given the fact that the types of land uses and the scale of buildings contemplated for the added Pico MU(EC) subarea would be similar to those contemplated in the EIR analysis, and that the geographic location of this added subarea is proximate to the eliminated Pico RAS4 and Expo R3 subareas, the revisions would not alter the impact analysis contained in the Draft EIR, necessitate any additional analysis or change any of the conclusions in any of the impact areas. The removal of the Pico RAS4 and Expo R3 subareas would retain existing zoning and generally would reduce allowable height, development density and intensity when compared to the proposed zoning analyzed in the EIR. The addition of the new Pico MU(EC) subarea would potentially increase the height, development, and intensity on the subject properties. However, those increases are largely offset by the reductions resulting from the eliminated Pico RAS4 and Expo R3 subareas.

New Subarea 15 and Revised Subarea 1. The addition of Subarea 15 would make the General Plan land use designation and zoning consistent with the current uses of the property, and thus would not result in new or increased impacts when comparing existing conditions to future anticipated development under the proposed zone. The proposed zone would allow building heights and intensities similar to the current development on the site. The removal of the portion of the Subarea 1 would retain existing zoning and generally would reduce allowable height, development density and intensity when compared to the proposed New Industry zoning that was analyzed in the Draft EIR. Together, the refinement of Subarea 1 and the addition of Subarea 15 would not alter the impact analysis in the Draft EIR or change any of the conclusions, as these changes generally maintain existing conditions.

In order to consider any effects these changes could have on the transportation analysis in the EIR, revised population, housing, and employment data for the Proposed Project (October 2017) were analyzed applying the same methodology that was utilized in the transportation analysis in Section 4.12, Transportation and Traffic, of the Draft EIR. The model was used to calculate the net changes in trip generation estimates (by station area) as a result of these revisions to the Plan. For the Bundy Station, Sepulveda Station, and Westwood Station areas, the revisions would result in fewer trips overall (for both AM and PM peak hours) than were studied in the Draft EIR. Hence the changes in land use are not expected to worsen the results or change the impact conclusions reached in the Draft EIR.

Additionally, future projects will continue to be subject to Mitigation Measure **TR1** (Section 4.12, Transportation and Traffic, of the Draft EIR) and the corresponding Specific Plan requirement, which requires projects to remain within the trip estimates analyzed in the Draft EIR for each station area in order to obtain approval. Projects that exceed these trips estimates would be required to do project-specific traffic analysis per LADOT guidelines. Thus, implementation of this mitigation measure for future projects will ensure that no additional environmental impacts are created beyond those identified in the Draft EIR.

Proposed Plan as Modified by CPC (November 2017)

The Proposed Plan as Modified by CPC (November 2017) reflects the following modifications made by the City Planning Commission at their meeting on November 9, 2017:

- **PICO RAS4**: Restore the subarea along the north side of Pico Boulevard from Bentley Avenue to Overland Avenue and on the south side of Pico Boulevard from Military Avenue to the alley westerly of Westwood Boulevard (This is technically not a revision to the Plan analyzed in the Draft EIR, as it was already included in the original analysis and maps).
- **EXPO R3**: Restore the subarea along the north side of Exposition Boulevard from Military Avenue to Midvale Avenue and the south side of Exposition Boulevard from Sepulveda Boulevard to Midvale Avenue (This is technically not a revision to the Plan analyzed in the Draft EIR, as it was already included in the original analysis and maps).
- **BUNDY R3(EC)**: Within the subarea south of the Bundy Station, modify the proposed RD1.5 zone to a new R3(EC) zone, which allows a residential density of one dwelling unit per 1,200 square feet of lot area.

The Proposed Plan as Modified by CPC (November 2017) also assumes the following revisions, which were included in the October 2017 version of the Proposed Plan and are discussed above: the addition of the Pico MU(EC) subarea, the addition of Subarea 15, and the revision to Subarea 1.

The analysis in **Table C** summarizes the change in 2035 reasonable expected population, housing, and employment as a result of revisions to the Proposed Plan as modified by CPC (November 2017). **Table D** compares the total 2035 reasonable expected population, housing, and employment for the Proposed Plan analyzed in the Draft EIR with the 2035 reasonable expected population, housing, and employment for the Proposed Plan as modified by CPC (November 2017).

TABLE C: Proposed Plan as Modified by CPC (November 2017) Revisions /a/

	Subarea Eliminated Part of Subarea 1	**Subareas Added** Pico MU(EC) and Subarea 15	**Subarea Revised** Bundy R3(EC)	**Net Change**
Subarea Acres	-0.7	+13	13.9	+12.3
Population	0	+742	+115	+857
Housing (DU)	0	+358	+58	+416
Employment (Jobs)	-71	-1,234	0	-1,305

/a/ The 2035 reasonable expected population, housing, and employment anticipated in these Subareas, with the zone changes described above, was calculated following the methodology described in **Appendix F** of this Draft EIR.

TABLE D: Proposed Plan as Modified by CPC (November 2017) - Total Plan Area /a/

	Future (2035) with Proposed Plan analyzed in Draft EIR	**Future (2035) with Proposed Plan** as Modified by CPC	**Net Change**
Population	59,571	60,428	+857 (+1.4%)
Housing (DU)	29,441	29,857	+416 (+1.4%)
Employment (Jobs)	48,296	46,991	-1,305 (-2.7%)

/a/ The 2035 reasonable expected population, housing, and employment anticipated in these Subareas, with the zone changes described above, was calculated following the methodology described in **Appendix F** of this Draft EIR.

In order to consider any affects these changes could have on the transportation analysis in the EIR, revised population, housing, and employment data for the Proposed Plan as Modified by CPC (November 2017) were analyzed applying the same methodology that was utilized in the transportation analysis in Section 4.12, Transportation and Traffic, of the Draft EIR. The model was used to calculate the net changes in trip generation estimates (by station area) as a result of these revisions to the subareas in the Plan.

For the Bundy Station area, the revisions would result in fewer or the same number of trips overall (for both AM and PM peak hours) than were studied in the Draft EIR. Hence the changes in land use are not expected to worsen the results or change the impact conclusions reached in the Draft EIR.

For the Westwood Station area, the revisions would result in fewer trips overall (for both AM and PM peak hours) than were studied in the Draft EIR. Hence the changes in land use are not expected to worsen the results or change the impact conclusions reached in the Draft EIR.

Additionally, future projects will continue to be subject to Mitigation Measure **TR1** (Section 4.12, Transportation and Traffic, of the Draft EIR) and the corresponding Specific Plan requirement, which requires projects' trip generation to remain within the trip estimates analyzed in the Draft EIR for each station area in order to obtain approval. Projects that exceed these trips estimates would be required to do project-specific traffic analysis per LADOT guidelines. Thus, implementation of this mitigation measure for future projects will ensure that no additional environmental impacts are created beyond those identified in the Draft EIR.

Conclusion

In sum, the revisions to both the Proposed Plan (October 2017) and the Proposed Plan as Modified by CPC (November 2017) reflect minor modifications to the Proposed Project, and result in minimal changes that would not substantially alter the reasonably expected population, housing, and employment anticipated in 2035 in the Project Area. Furthermore, with regard to transportation impacts, Mitigation Measure **TR1** and the corresponding Specific Plan requirement would ensure that trip estimates analyzed in the Draft EIR would not be exceeded. The revisions would not alter or worsen the results or change the impact conclusions of any other impact category analyzed in the Draft EIR. Thus, the revisions are consistent with the analysis in the Draft EIR and would not generate any new substantial adverse environmental impacts or change the impact conclusions in the Draft EIR.

4.0 MITIGATION AND MONITORING PROGRAM

The California Public Resources Code (PRC) Section 21081.6 and California Environmental Quality Act (CEQA) Guidelines Section 15097 require adoption of a Mitigation and Monitoring Program (MMP) for all projects for which an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND) has been prepared. This requirement was originally mandated by Assembly Bill (AB) 3180, which was enacted on January 1, 1989 to ensure the implementation of all mitigation measures adopted through the CEQA process. Specifically, PRC Section 21081.6 states that "…the agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment [and that the program] shall be designed to ensure compliance during project implementation."

AB 3180 provided general guidelines for implementing monitoring and reporting programs, which are enumerated in more detail in CEQA Guidelines Section 15097. However, specific monitoring requirements to be enforced during project implementation shall be defined prior to final approval of the Exposition Corridor Transit Neighborhood Plan (ECTNP, Proposed Project, or Proposed Plan) by the decision maker. In response to established CEQA requirements, the MMP shall be submitted to the City of Los Angeles (Lead Agency) for consideration prior to certification of the EIR. Although the Lead Agency may delegate monitoring responsibilities to other agencies or entities, the Lead Agency "…remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program."

The MMP describes the procedures for the implementation of the mitigation measures to be adopted for the Proposed Project as identified in the EIR. The MMP for the Proposed Project will be in place through the planning horizon of the Plan (2035) or until the Plan and EIR are updated again, whichever is later. The City of Los Angeles Department of City Planning (DCP) and other City Departments (e.g., Department of Building and Safety) shall be responsible for administering the MMP activities or delegating them to staff, other City departments (e.g., Department of Building and Safety [DBS], Department of Public Works [DPW], etc.), consultants, or contractors. The Monitoring or Enforcing Agencies identified herein, at their discretion, may require an applicant or operator to pay for one or more independent environmental monitor(s) (hired by the City or the applicant or operator at the City's discretion) to be responsible for monitoring implementation of mitigation measures (e.g., City building inspector, project contractor, certified professionals, etc., depending on the requirements of the mitigation measures).

Each mitigation measure is identified in **Table 4-1** and is categorized by environmental topic and corresponding number, with identification of:

- The Implementing Agency – this is in most cases, the DCP, DBS, or the City Council.
- The Enforcement Agency and Monitoring Agency – this is the agency or agencies that will monitor the measure and ensure that it is implemented in accordance with this MMP.
- Monitoring Phase / Monitoring Actions – these are the criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure is implemented.

All agencies and departments are in the City of Los Angeles, unless otherwise noted. By adopting this MMP, the City Council hereby authorizes and delegates the implementing, enforcement, and monitoring agencies the responsibility to determine the applicability and compliance of all mitigation measures in their reasonable discretion. A number of mitigation measures apply to subsequent development projects.

A number of mitigation measures are implemented through the adoption of standards in the ECTNP. In implementing those mitigation measures, the ECTNP shall provide that:

(1) the decision-maker for approval of individual projects within the ECTNP Area shall review for substantial conformance with the environmental standards, as applicable to subsequent projects; and

(2) for any individual projects within the ECTNP Area, the decision-maker may modify or not require an environmental standard for any project when:

   a. the decision-maker determines in writing, based upon substantial evidence, the environmental standard is not necessary to mitigate the impact identified in the EIR, including on the basis of the existence of a similar or more effective regulation that applies to the project (such as an Air District rule) or a project design feature;

   b. the decision-maker determines in writing, based on substantial evidence, that the environmental standard is infeasible, and the decision-maker has adopted a new equally or more effective measure and the new measure will not result in any new significant impact and the decision-maker finds under CEQA Guidelines Section 15162, the new mitigation measures does not require a subsequent environmental clearance to the EIR;

   c. the City complies with CEQA Guidelines Section 15162 and/or 15164, including by preparing an addendum or subsequent environmental clearance to the EIR to analyze the impacts from the modifications to the mitigation measure in the EIR; or

   d. the City prepares a new CEQA clearance for the Proposed Project that supports the modification or deletion of the mitigation measure in the EIR.

TABLE 4-1: MITIGATION AND MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase / Monitoring Actions**
AESTHETICS				
AE1	The City shall require that glare effects be limited by using non-reflective building and construction materials, such as concrete, wood, composite materials, coated metal, non-reflective glass, and stone. This shall include, but not be limited to, art installations, fencing material, and recreational equipment.	Department of City Planning	Department of City Planning Department of Building and Safety	Once at plan check and once at field inspection verification / Issuance of Certificate of Occupancy.
AIR QUALITY				
AQ1	The City shall require all applicants to include in the agreements with contractors and subcontractors the following best management practices in contract specifications: • Use properly tuned and maintained equipment. • Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations. • Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g., engine catalysts) to the extent they are readily available and feasible. • Use heavy duty diesel-fueled equipment that uses low NO_X diesel fuel to the extent it is readily available and feasible. • Use construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible. • Maintain construction equipment in good operating condition to minimize air pollutants. • Project applicants shall ensure that all construction equipment meets or exceeds equivalent emissions performance to that of U.S. Environmental Protection Agency (USEPA) Tier 4 standards for non-road engines. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine, or an engine that is equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides and diesel particulate matter to no more than Tier 3 levels unless certified by engine manufacturers or the on-site air quality construction mitigation manager that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices is "not practical" for the following, as well as other, reasons: - There is no available retrofit control device that has been verified by either the CARB or USEPA to control the engine in question to Tier 3; - The construction equipment is intended to be on site for five days or less; or	Department of Building and Safety	Department of Building and Safety	Ongoing Regulatory Compliance Measure - City Practice at Construction / Compliance certification report submitted by project contractor

TABLE 4-1: MITIGATION AND MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase / Monitoring Actions
	- Relief may be granted from this requirement if a good faith effort has been made to comply with this requirement and that compliance is not practical. • The use of a retrofit control device may be terminated immediately, provided that a replacement for the equipment item in question meeting the required controls occurs within ten days of termination of the use, if the equipment would be needed to continue working at this site for more than 15 days after the use of the retrofit control device is terminated, if one of the following conditions exists: - The use of the retrofit control device is excessively reducing the normal availability of the construction equipment due to increased down time for maintenance, and/or reduced power output due to an excessive increase in back pressure; - The retrofit control device is causing or is reasonably expected to cause engine damage; - The retrofit control device is causing or is reasonably expected to cause a substantial risk to workers or the public; or - Any other seriously detrimental cause which has the approval of the project manager prior to implementation of the termination. • Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible. • Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic. • Construction contractors shall utilize super-compliant architectural coatings as defined by the South Coast Air Quality Management District (Volatile Organic Compound standard of less than ten grams per liter). • Construction contractors shall utilize materials that do not require painting, as feasible. • Construction contractors shall use pre-painted construction materials, as feasible.			

TABLE 4-1: MITIGATION AND MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase / Monitoring Actions**
CULTURAL RESOURCES				
CR1	A qualified archaeologist shall be required to monitor excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological resources or tribal cultural resources during construction. If archaeological resources or tribal cultural resources are uncovered (in either a previously disturbed or undisturbed area), the City Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the project shall not collect or move any archaeological resources, tribal cultural resources or associated materials. Construction activity may continue unimpeded on other portions of the project site as approved by the retained archeologist in consultation with the City's Office of Historic Resources. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a qualified archeologist.	Department of City Planning, Office of Historic Resources	Department of Building and Safety	Pre-construction of subsequent development approvals / Approval from Department of City Planning Office of Historic Resources approval, Issuance of a building permit
CR2	The City shall require that all cultural resources, including archeological and tribal cultural resources, identified on a site be assessed and treated in a manner determined appropriate by a qualified archeologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition.	Department of City Planning, Office of Historic Resources	Department of Building and Safety	To be applied to subsequent development approvals that involve excavation and construction at construction/ Inclusion in grading permit specifications, submittal of paleontological remains, reports and surveys to the Los Angeles County Natural History Museum
CR3	A qualified paleontologist shall be required to monitor excavation and grading activities in soils that have not been previously disturbed. If paleontological resources are uncovered (in either a previously disturbed or undisturbed area), the City Department of Building and Safety shall be notified immediately, and all work on the project site shall cease until a qualified paleontologist evaluates the find. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. Halted construction activities on the project site may commence once the identified resources are properly assessed and processed by a qualified paleontologist.	Department of Building and Safety Department of City Planning, Office of Historic Resources	Department of City Planning, Office of Historic Resources Department of Building and Safety	Periodic, to be determined by a qualified archaeologist if resources are discovered / If resources are found, submission to LADBS and LADCP of report documenting appropriate treatment of resources by a qualified archaeologist.

TABLE 4-1: MITIGATION AND MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase / Monitoring Actions**
CR4	The City shall require that all paleontological resources identified on a project site be assessed and treated in a manner determined by a qualified paleontologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition. Any reports and surveys shall be submitted to the City's Office of Historic Resources and the Natural History Museum of Los Angeles County.	Department of Building and Safety Department of City Planning, Office of Historic Resources	Department of City Planning, Office of Historic Resources Department of Building and Safety	Periodic, to be determined by a qualified archaeologist if resources are discovered / If resources are found, submission to LADBS and LADCP of report documenting appropriate treatment of resources by a qualified archaeologist.
HAZARDS AND HAZARDOUS MATERIALS				
HM1	The City shall require that future development that involves new construction and soil disturbance document that the site is not on any government list of sites containing hazardous waste or hazardous materials (including lists prepared pursuant to Government Code, section 65962.5). A report setting forth the results of this database search (e.g. historical environmental reports prepared by Enviroscan, EDR, or similar firms) shall be provided to the City. If the report indicates the project site, or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, a Phase I Environmental Site Assessment (ESA) shall be prepared. The Phase I assessment shall be prepared by an appropriately qualified individual (with experience in the identification and mitigation of hazardous materials and wastes) in accordance with state standards and guidelines to evaluate whether the site or the surrounding area is contaminated from the past or current uses including storage, use, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, state, and federal regulations and policies. Any further study found necessary by an appropriately qualified individual or relevant federal, state, or local agency shall be performed prior to project approval or made a condition of project approval. Prior to the Department of Building and Safety's issuance of any permits that allow for grading or construction on the project sites that were on a government list or within one-quarter mile of a site on a government list, the appropriately qualified individual or relevant agency shall provide written confirmation to the City that any necessary remediation has been completed to the satisfaction of the lead agency responsible for cleanup including confirmation that required site remediation was completed consistent with the relevant federal, state, or local requirements.	Department of City Planning	Department of Building and Safety	Pre-construction of subsequent development approvals **/** Preparation of Phase I Environmental Site Assessment, investigation by REA and remediation; further studies and remediation as necessary by qualified contractors

TABLE 4-1: MITIGATION AND MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase / Monitoring Actions**
HYDROLOGY AND WATER QUALITY				
HWQ1	Buildings within a 100-year floodplain shall be designed and constructed a minimum of one foot above the 100-year flood water surface elevation to ensure the protection of structures from all flooding events.	Department of Building and Safety	Department of Building and Safety	Pre-construction of subsequent development approvals
NOISE AND VIBRATION				
N1	The City, as a condition of any approval for applicable projects within the ECTNP, shall require all contractors to include the following best management practices in contract specifications: • Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences. • The construction contractor shall locate construction staging areas away from sensitive uses. • When construction activities are located within 500 feet of noise-sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses. • Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving. • Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements. • The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.	Department of Building and Safety	Department of Building and Safety	Ongoing Regulatory Compliance Measure - City Practice at Construction / Inclusion in grading permit specifications
N2	The following conditions shall apply to future development within New Industry, Hybrid Industrial: Jobs Emphasis, Hybrid Industrial-Residential Emphasis, and Mixed Use: Commercial/Residential zones with direct line-of-site to adjacent residential and other sensitive land uses: • Industrial activity yards that include the operation of heavy equipment shall be shielded by sound barriers that block line-of-sight to sensitive receptors. • Mechanical equipment (e.g., HVAC Systems) shall be enclosed with sound buffering materials. • Truck loading/unloading activity shall be prohibited between the hours of 10:00 p.m. and 7:00 a.m. when located within 200 feet of a residential land use.	Department of City Planning	Department of Building and Safety	Pre-construction and construction of subsequent development approvals / Identification of historic buildings, preparation of a Vibration Control Plan, issuance of a follow-on letter

TABLE 4-1: MITIGATION AND MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase / Monitoring Actions**
	• Parking structures located within 200 feet of any residential use shall be constructed with a solid wall abutting the residences and utilize textured surfaces on garage floors and ramps to minimize tire squeal.			
N3	As part of project conditions for new development within the ECTNP Area, the City shall require all contractors to include the following best management practices in contract specifications: • The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment where possible to avoid construction vibration impacts. • The construction contractor shall utilize alternatives to impact pile drivers, such as sonic pile drivers or caisson drills. If geotechnical limitations require the use of pile driving, control measures shall be used to reduce vibration levels. These measures may include, but are not limited to: - Predrilled holes; - Cast-in-place or auger cast piles; - Pile cushioning (i.e., a resilient material placed between the driving hammer and the pile); - Jetting (i.e., pumping a mixture of air and water through high-pressure nozzles to erode the soil adjacent to the pile); and - Non-displacement piles (i.e., piles that achieve capacity from the end bearing rather than the pile shaft).	Department of City Planning	Department of Building and Safety	Pre-construction for subsequent development approvals
TRANSPORTATION AND TRAFFIC				
TR1	A trip generation analysis, as well as a site access and circulation plan per LADOT guidelines, will be required as part of the development application for projects within the Specific Plan boundary that result in net new square footage for purposes of determining consistency of the project with the transportation assumptions in the EIR. The Specific Plan area is divided into five ECTNP station segments, as shown in Figure 3-2 in the Project Description. To be consistent, a project cannot cause the total estimated 2035 trip forecasts (for the station segment in which it is located) to exceed the number of either AM or PM peak hour net new external trips analyzed in the EIR (see Table 4.12-5). If a project is determined to be consistent, no further traffic analysis will be required. However, if a project causes the number of either AM or PM peak hour net external trips to exceed the cumulative total number of trips in the corresponding station segment analyzed in the EIR, then a project-specific traffic analysis per current LADOT Guidelines will be required. The City will revise this vehicle trip generation analysis methodology, if appropriate, to reflect new traffic impact guidance mandated by the State of California, Office of Planning and Research in response to SB 743.	Los Angeles Department of Transportation	Los Angeles Department of Transportation Department of Building and Safety	Pre-construction for subsequent development approvals/ Preparation of a traffic study if needed

TABLE 4-1: MITIGATION AND MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase / Monitoring Actions
TR2	**Centinela Avenue & Exposition Boulevard (Intersection 6)**. Signalize the intersection.	Los Angeles Department of Transportation	Los Angeles Department of Transportation	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.
TR3	**Bundy Drive & Olympic Boulevard (Intersection 16)**. Restripe the northbound and southbound approaches. The northbound restriping would add one northbound left-turn lane. This would result in a northbound approach of one right-turn lane, two through lanes, and two left-turn lanes. The southbound restriping would add one southbound left-turn lane and change one through lane and the right-turn lane into a shared through/right lane. This would result in a southbound approach of one shared through/right lane, one through lane, and two left-turn lanes.	Los Angeles Department of Transportation	Los Angeles Department of Transportation City of Santa Monica	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.
TR4	**Barrington Avenue & Pico Boulevard (Intersection 27)**. Restripe the existing northbound curb lane to provide one through lane and one right-turn lane. This improvement would require the removal of one on-street parking space.	Los Angeles Department of Transportation	Los Angeles Department of Transportation	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.
TR5	**Barrington Avenue & Gateway Boulevard (Intersection 28)**. Restripe the existing northbound shared through/right-turn lane to provide one through lane and one right-turn lane. This improvement would require the removal of four on-street parking spaces.	Los Angeles Department of Transportation	Los Angeles Department of Transportation	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.
TR6	**Sepulveda Boulevard & Exposition Boulevard (Intersection 43)**. Restripe the existing eastbound shared left/through/right lane to provide one shared through/left-turn lane and one right-turn lane.	Los Angeles Department of Transportation	Los Angeles Department of Transportation	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.
TR7	**Sepulveda Boulevard & Palms Boulevard (Intersection 46)**. Restripe one existing northbound shared through/right-turn lane to provide one through lane and one right-turn lane. This improvement would require the removal of two on-street parking spaces.	Los Angeles Department of Transportation	Los Angeles Department of Transportation	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.
TR8	**Military Avenue & National Boulevard (Intersection 47)**. Restripe one existing southbound shared through/right-turn lane to provide one shared through/left-turn lane and one right-turn lane. This improvement would require the removal of four on-street parking spaces.	Los Angeles Department of Transportation	Los Angeles Department of Transportation	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.

TABLE 4-1: MITIGATION AND MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase / Monitoring Actions
TR9	**Overland Avenue & National Boulevard / I-10 Westbound On- and Off-Ramp (Intersection 53)**. Restripe the existing eastbound shared through/left-turn lane to a shared left-/through/right-turn lane.	Los Angeles Department of Transportation	Los Angeles Department of Transportation	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program as determined by the City through a capital improvement program.
TR10	**La Cienega Boulevard & Venice** Boulevard **(Intersection 76)**. Remove the median to provide a second westbound left-turn lane.	Los Angeles Department of Transportation	Los Angeles Department of Transportation Caltrans	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.
TR11	**Sepulveda Boulevard & Venice Boulevard (Intersection 84)**. Remove the medians on Venice Boulevard and restripe both the eastbound and westbound approaches to add one left-turn lane to each approach.	Los Angeles Department of Transportation	Los Angeles Department of Transportation City of Culver City	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.
TR12	**Stewart Street & Olympic Boulevard (Intersection 3)**. Modify the existing signal phasing to change eastbound left-turn signal phasing from permitted to protected and change westbound left-turn signal phasing from protected/permitted to protected.	Los Angeles Department of Transportation	Los Angeles Department of Transportation City of Santa Monica	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.
TR13	**Barrington Avenue & Mississippi Avenue (Intersection 25)**. Restripe the existing eastbound shared left/through/right lane to provide one shared through/left-turn lane and one right-turn lane. This improvement would require the removal of two on-street parking spaces.	Los Angeles Department of Transportation	Los Angeles Department of Transportation	Pre-construction for subsequent development approvals or at a time as determined by the City through a capital improvement program.
TR14	In areas where implementation of the Proposed Project could result in diversion of traffic to adjacent residential streets, LADOT shall monitor traffic on identified residential streets, upon request submitted through the Council Office, to determine if traffic diversion occurs. If traffic on residential streets is found to be significantly impacted in accordance with current LADOT guidelines, LADOT will work with the project applicant and neighborhood residents to survey and monitor the residential street segment/s before and after project occupancy to assess the need for appropriate traffic calming measures. These measures could include the following (but are not limited to): • Traffic circles • Speed humps • Roadway narrowing effects (e.g. raised medians, traffic chokers etc.) • Landscaping features • Roadway striping changes • Stop signs	Los Angeles Department of Transportation	Los Angeles Department of Transportation	Periodically during Project development, upon request submitted through the Council Office.

TABLE 4-1: MITIGATION AND MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase / Monitoring Actions
	In addition to the aforementioned traffic calming measures, neighborhood improvements can offset the effect of adding traffic. These could include (but are not limited to) measures such as street trees, sidewalks, landscaping, neighborhood identification features, and pedestrian amenities. It would be the project applicant's responsibility to implement any of the approved measures through the Bureau of Engineering's permit process.			
TR15	**Arterial Monitoring Station #70 (Venice Boulevard and Centinela Avenue)**. Restripe one existing northbound shared through/right-turn lane to provide one through lane and one right-turn lane and restripe one existing shared through/right-turn lane to provide one through lane and one right-turn lane. This improvement would require the removal of four on-street parking spaces on Venice Boulevard and the relocation of the bus stop on Centinela Avenue from the south side to the north side of the intersection.	Los Angeles Department of Transportation	Los Angeles Department of Transportation Caltrans	To be determined by the City and Caltrans
TR16	Projects that require a worksite traffic control plan per current LADOT guidelines shall submit to LADOT for review and approval a plan that mitigates the impact of traffic disruption and ensures the safety of all users of the affected roadway. The plan shall address construction duration and activities and include measures, such as operating a temporary traffic signal, using flagmen adjacent to construction activities, or providing a dedicated pedestrian walkway, as appropriate.	Los Angeles Department of Transportation	Los Angeles Department of Transportation	Pre-construction for subsequent development approvals / Preparation of a worksite traffic control plan

SOURCE: TAHA, 2017.

APPENDIX A

Comment Letters

COMMENT LETTER NO. 1

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
www.dot.ca.gov

Serious Drought!
Making Conservation
a California Way of Life.

June 5, 2017

Lameese Chang
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

RE: Exposition Corridor Transit
Neighborhood Plan
Draft Environmental Impact Report
Vic: LA-10 / PM: various
GTS# 07-LA-2017-00827
SCH# 2013031038

Dear Ms. Chang,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project consists of crafting a Specific Plan to guide future development in vicinity of Exposition light rail corridor within the City of Los Angeles west of Washington Boulevard. The Plan would encompass five light rail stations within the plan boundaries.

Upon reviewing the Draft Environmental Impact Report (DEIR), Caltrans has the following comments:

The Exposition Corridor Transit Neighborhood Plan (ECTNP) has several objectives, primarily pertaining to implementing local and regional policies that encourage growth in transit-oriented areas and fostering more sustainable development while also reducing automobile dependence. Objectives also include elements such as promoting transit-oriented economic development and affordable housing opportunities along the Expo corridor. These objectives are consistent with, and complement, State-level policies and goals to promote active transportation, reduce greenhouse gas emissions, and addressing climate change. 1-1

Caltrans' Strategic Management Plan has set a target of tripling trips made by bicycling, doubling trips made by walking and public transit by 2020. The Strategic Plan also seeks to achieve a 15% reduction in statewide per capita vehicle miles traveled (VMT) by 2020. Similar ambitious goals are put forward in Caltrans' 2040 Transportation Plan, and the Southern California Association of Governments' Regional Transportation Plan. Statewide legislation such as AB 32 and SB 375 further echo the need to pursue more sustainable development and transportation. Please note these climate change related goals can only be achieved through support on every level of planning, including from our local partners.

One area of concern in reviewing the ECTNP relates to parking regulation. Existing research on parking suggests that free and plentiful car parking spaces in new developments not only encourages and enables more driving, but also increases the cost of housing. If abundant parking is supplied for new developments along a transit rich corridor such as the ECTNP, there can be unintended consequences that disproportionately promote automobile use over other more sustainable modes while undermining the region's multi-billion investment in public transit.

Similarly, recent research analyzing transit-oriented development has indicated car ownership and use is reduced more by components such as lower parking availability, more destinations within walking distance, higher employment density, and smaller housing units than by mere proximity to rail. The same research also indicates that only when combined with low parking can rail more effectively reduce automobile use for commuting and grocery trips. As such, the City should be mindful of the role parking plays in generating car use and employ parking policies that further restrict parking. This is especially opportune because the ECTNP recommends Transportation Demand Management (TDM) measures that discourage automobile use and ownership. Some consideration should also be given measures absent from the current plan, such as converting parking minimums into parking maximums as a means of reducing the amount of parking supplied. 1-2

The DEIR states that there will be no street widenings instituted as mitigation to potential transportation impacts. Street widening is deemed infeasible and undesirable, in part because widening streets typically promotes driving and does so at the expense of comfort of other modes (walking, bicycling). Specifically, the ECTNP states "Physical intersection improvement mitigations that require widening travel lanes, adding turn lanes, and increasing pedestrian crossing distances would be in conflict with multiple Project Objectives…". However, the ECTNP proposes mitigations that involve re-striping several intersections and streets to increase the number of travel lanes and turn pockets. This effectively creates the same situation as street widening- increasing capacity and throughput for automobiles at the expense of other, more sustainable modes. It is unclear how, for example, restriping a street to add a right-turn pocket is in any meaningful way different from widening a street accommodate a right-turn pocket. While only the latter increases the physical distance one must cross, both increase the number of lanes a pedestrian must cross and potentially affect traffic safety as a result. 1-3

If an intersection is restriped to increase the number of lanes, the City foregoes potential treatments that may be more consistent with the ECTNP's Primary Objectives, such as curb extensions or pedestrian refuge islands. The Final Environmental Impact Report (FEIR) should clarify how restriping a street to add lanes is actually different from the street widening with respect to affecting the pedestrian experience and overall traffic safety. Further, the FEIR should clarify how restriping to add lanes is consistent with the Plan's objectives and ultimately how it is consistent with broader regional and State-level policy goals. Some lane restriping may be deemed necessary, but it should be critically evaluated, viewed in a broader context, and other alternatives considered.

The stated focus of the ECTNP is on compact, mixed-use development. The Plan acknowledges that it can take decades for changes in land-use and transportation policies to result in tangible changes, including those related greenhouse gas emission reductions. However, despite this much of the land within the Plan would go unchanged because it is omitted altogether despite its 1-4

proximity to rail stations. Given that tangible changes - including the potential benefits associated with the ECTNP - take decades to be realized, we recommend the boundaries where changes in land-use/zoning are proposed be expanded. If the ECTNP anticipates per capita reductions in VMT and GHG emissions as a result of the project, greater consideration should be given to such land-use changes.

1-4 cont.

Finally, because the ECTNP supports mixed-use development and greater density, the per capita use of resources, emissions, and traffic impacts are expected to be lower with the ECTNP. This is because development will be more compact and oriented toward sustainable transportation options. The FEIR should better clarify whether any studied impacts are worse relative to preserving the existing, automobile-oriented status quo. If more areas within the ECTNP catchment can promote sustainable transportation and development, then the Plan may more effectively achieve local, regional, and State policies/goals related to reducing greenhouse gas emissions and addressing climate change.

1-5

Be aware that any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommends that large size truck trips be limited to off-peak commute periods. Additionally, work performed within State right-of-way will need an encroachment permit. Finally, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Be mindful that project needs to be designed to discharge clean run-off water.

1-6

Please continue to keep us informed of future projects or developments that are in close proximity to, and may affect, State facilities. If you have any questions regarding these comments, please contact project coordinator Severin Martinez at (213)-897-0067, or at severin.martinez@dot.ca.gov, and refer to GTS# 07-LA-2016-00827.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

COMMENT LETTER NO. 2

Culver CITY
PLANNING DIVISION

(310) 253-5710
FAX (310) 253-5721

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

June 5, 2017

Lameese Chang
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Re: Notice of Availability (NOA) of a Draft Environmental Impact Report (EIR) for the Exposition Corridor Transit Neighborhood Plan (ENV-2013-622-EIR)

Ms. Chang,

Please find attached comments in response to the Notice of Availability (NOA) of a Draft Environmental Impact Report (EIR) for the above noted project. The attachments provide comments from the Traffic Engineering Division and from the Planning Division. Please contact me by phone (310.253.5736) or email (gabriela.silva@culvercity.org), should you have any questions regarding the attached documents.

2-1

Sincerely,

gsilva

Gabriela Silva
City of Culver City Planning Division

Attachments:

1. Exhibit A: Comments from Culver City Traffic Engineering, Public Works Department
2. Exhibit B: Comments from Culver City Planning Division

Exposition Corridor Transit Neighborhood Plan (ECTNP) DEIR - Comments by Public Works June 1, 2017

City EIR No. ENV-2013-622-EIR

The following are Public Works' comments on 4.12 Transportation and Traffic portion of the ECTNP DEIR: 2-2

On Page 4.12-10 under Culver City Station, correct the sentence, *Station Area neighborhoods also include multi-family homes between Washington* ***Boulevard*** *and Venice Boulevard…*

The DEIR incorrectly used Culver City's thresholds for significant impact to analyze intersections in Culver City. According to Culver City's criteria and as stated in the attached October 31, 2006 letter to the General Manager of the Los Angeles Department of Transportation, developments in the City of Los Angeles are required to use thresholds of significant transportation impact identified in LADOT's traffic impact analysis guidelines to analyze the impact on intersections and streets in Culver City.

Using LADOT's impact analysis guidelines the ECTNP result in additional impacts at the following intersections in Culver City:

Table 4.12-12: 2015 AND 2035 INTERSECTION LEVEL OF SERVICE ANALYSIS, and

Table 4.12-12: 2015 AND 2035 INTERSECTION WITH MITIGATION LEVEL OF SERVICE ANALYSIS

No. 59, Overland Ave/Culver Blvd 2015 PM and 2035 PM 2-3

No. 65, Duquesne Ave/Culver Blvd 2035 PM

No. 73, National Blvd/Washington Blvd 2035 AM

No. 81, Ince Blvd/Culver Blvd 2035 AM

No. 82, Washington Blvd/Irving Pl/Watseka Ave Culver Blvd 2015 PM

No. 83, Duquesne Ave/Washington Blvd 2035 AM and 2035PM

No. 84, Sepulveda Blvd/Venice Blvd 2015 AM

No. 85, Sepulveda Blvd/I-405NB On-/Off Ramps 2015 PM, 2035 PM

No. 86, Sawtelle Blvd/I-405 SB On-/Off Ramps 2015 PM

Revise the Table 4.12-13: SUMMARY OF NUMBER OF INTERSECTIONS SIGNIFICANTLY IMPACTED to reflect the additional impacted intersections in Culver City. 2-4

The DEIR on Page 4.12-70 indicated that the Proposed Project would result in a significant impact related to neighborhood intrusion. As such Cattaragus Avenue between Venice Boulevard and Washington Boulevard and other residential streets in the area could be impacted. It is pointed out that residents of Cattaragus Avenue have already complained about neighborhood intrusion. 2-5

Transportation may provide input regarding Impact 4.12-6 related to transit service. 2-6

The DEIR on Page 4.12-79 stated, *Therefore, the Proposed Project would have less-than-significant impact on emergency access.* However, the Culver City Fire Department will provide comments on this matter separately.

2-7

Attachment 1: Letter Regarding Traffic Impact Analysis for Development Projects in the City of Los Angeles that Potentially Impact Culver City dated October 31, 2006

Attachment 1

Culver CITY
PUBLIC WORKS DEPARTMENT
9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507
(310) 253-5635 • FAX (310) 253-5626

CHARLES D. HERBERTSON
Public Works Director
and City Engineer

October 31, 2006

Ms. Gloria J. Jeff
General Manager
City of Los Angeles Department of Transportation
100 S. Main Street
Los Angeles, CA 90012

TRAFFIC IMPACT ANALYSIS FOR DEVELOPMENT PROJECTS IN THE CITY OF LOS ANGELES THAT POTENTIALLY IMPACT CULVER CITY

Dear Ms. Jeff:

For developments in the City of Los Angeles that potentially impact intersections in Culver City, the City of Los Angeles Department of Transportation (LADOT) presently refers the traffic consultants to Culver City, and we do the same for developments in Culver City. This process has benefited both the City of Los Angeles and Culver City as it has resulted in development projects being responsible to mitigate their impact regardless of jurisdictional boundaries. To strengthen this arrangement, we request that the LADOT require developers to include Culver City in the scoping process for the traffic impact analysis of any City of Los Angeles development that could potentially impact locations in Culver City. Culver City will do the same for developments in our City that could potentially impact locations in the City of Los Angeles.

The City of Culver City is in the process of updating our guidelines for preparing traffic impact studies. In the interim, for development projects in the City of Los Angeles, we request that as of this date, the LADOT require traffic consultants to use thresholds of significant transportation impact identified in LADOT's traffic impact analysis guidelines to analyze the impact on intersections and streets in Culver City. This will simplify the preparation and review of traffic impact studies, since we share jurisdiction of many intersections with the City of Los Angeles. We have sent similar letters to the County of Los Angeles Department of Public Works, the City of Inglewood and several traffic consultants.

2-8

If you have any questions please call our traffic engineering consultant, Mr. Barry Kurtz at (310) 253-5625.

Sincerely,

Charles Herbertson
Director of Public Works and City Engineer

Bc: Thomas Gorham
Barry Kurtz
Max Paetzold
Joseph Montoya

COMMENT LETTER NO. 3

FORM GEN. 160 (Rev. 9-16)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

RECEIVED
CITY OF LOS ANGELES
MAY 16 2017
CITY PLANNING DEPT.
EXECUTIVE OFFICE

DATE: April 28, 2017

TO: Vincent P. Bertoni, Director of Planning
Department of City Planning

Attn: Lameese Chang, City Planner
Department of City Planning

FROM: Ali Poosti, Division Manager for
Wastewater Engineering Services Division
LA Sanitation

SUBJECT: **EXPOSITION CORRIDOR TRANSIT NEIGHBORHOOD PLAN – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT**

This is in response to your April 6, 2017 letter requesting a review of your proposed transit project located around five stations: Exposition/Bundy (Bundy), Exposition/Sepulveda (Sepulveda), Westwood/Rancho Park (Westwood), National/Palms (Palms), and Culver City. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to planning of the development in a manner consistent with state, regional and local policies to encourage infill around transit stations as a means to accommodate growth.

Based on the project description, we have determined the project is unrelated to sewer capacity availability and therefore do not have sufficient details to offer an analysis at this time. Should the project description change, please continue to send us information so that we may determine if a sewer assessment is required in the future. 3-1

If you have any questions, please call Eduardo Perez of my staff at (323) 342-6207.

STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on Stormwater Low Impact Development (LID) requirements. The projects that are subject to LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant 3-2

documents can be found at: www.lastormwater.org. It is advised that input regarding LID requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. 3-2 cont.

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction. 3-3

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Floor, Station 18.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees. 3-4

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to

the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers the Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of $1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

3-4 cont.

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

3-5

EP/AP:as

c: Kosta Kaporis, LASAN
Daniel Hackney, LASAN
Eduardo Perez, LASAN

COMMENT LETTER NO. 4

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

June 5, 2017

Lameese Chang
City of Los Angeles
Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA, 90012

RE: Preliminary Exposition Corridor Transit Neighborhood Plan (Expo TNP) and corresponding Environmental Clearance - Notice of Open House and Public Hearing

Dear Ms. Chang:

Thank you for the opportunity to comment on the Notice of Open House and Public Hearing for the preliminary Exposition Corridor Transit Neighborhood Plan located in West Los Angeles. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Description

4-1

The Expo TNP is a specific plan, which establishes new zoning and development standards and review process for select properties within the Plan Area. The City is preparing the Plan to foster a mix of uses around transit stations that will encourage transit use and improve mobility for all transportation modes. Directing new housing and jobs to transit-served areas is an overarching principle of the City's General Plan. The Plan Area includes all properties located approximately within a half-mile of the following Exposition Line Light Rail Transit stations: Culver City, Palms, Westwood, Sepulveda, and Bundy (see map). The Expo TNP regulates allowable land uses; building intensity/floor area ratio (FAR) and height; open space requirements; and building form and design.

The Expo TNP also includes a Streetscape Plan for five street segments with the Plan Area: Bundy Drive, Olympic Boulevard, Sepulveda Boulevard, National Boulevard, and Palms Boulevard. The Streetscape Plan provides specifications for landscaping and trees, street furniture, paving, and other amenities in the public right-of-way to improve the quality of the street environment for all users.

Metro Comments

Bus Adjacency

Several Metro bus lines operate within the Expo TNP area. Metro has standard language that relates to construction activity adjacent to bus transit facilities. The Expo TMP is specifically serviced by lines 234, 734, and 778 with stops and layovers at the Expo/Sepulveda Station. As a result, we want to be sure to maintain Metro bus stop zones as well as Metro bus layover zones during and after all construction. Metro recommends that the Expo TNP include language that informs future development activity within the Expo TNP area of Metro's notification procedures and considerations for projects located in close proximity to a Metro facility that may impact Metro bus operations. 4-2

Metro Expo Line

The Metro Expo Line light rail currently operates weekday peak service as often as every twelve minutes in both directions and trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the ROW proximate to the proposed project. Metro has an Adjacent Construction Design Manual that describes the Metro's development project review process and considerations for project siting as it relates to Metro facilities. Metro suggests that the project sponsor include policy language or guidance in the Expo TNP that clearly denotes development occurring within 100 feet of a Metro facility will require Metro review and approval, including compliance with Metro's Development Guidelines. In particular, because of the proximity to the Metro Expo light rail, increased traffic at railroad grade crossings must be considered in the Expo TNP. Provisions for transit priority treatments should be considered to make the development welcoming to transit access. 4-3

Metro strongly recommends that the Expo TNP include a minimum five (5) foot setback from the Metro ROW to assure that property owners can maintain their property without entering Metro property, as well as policies encouraging transit-supportive public realm improvements, such as wide sidewalks, bus shelters, comfortable seating, pedestrian-scaled lighting, landscaping (i.e., street trees that provide continuous shade along transit access routes); way finding signage (directing pedestrians to transit stops and stations, and from transit facilities to points of interest in the surrounding neighborhood); and enhanced, ADA-compliant street crossing elements adjacent to transit stops and stations (i.e., enhanced crosswalks, crossing signals, and accessible ramps).In addition, the Expo TNP has various policies in place that support active transportation and multi-modalism.

If a proposed development project has the potential to impact Metro bike facilities and/or parking facilities, project sponsor must coordinate with Metro. Please note that any impact to Metro bike facilities or parking facilities at any time during construction must be replaced at a ratio of 1:1.

Metro looks forward to continuing to collaborate with the City to effectuate policies and implementation activities that promote transit and active transportation supportive communities. If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net. Metro looks forward to reviewing the Final EIR. Please send it to the following address: 4-4

Metro Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,

Elizabeth Carvajal
Sr. Manager, Transportation Planning
Attachments: Adjacent Construction Design Manual

ADJACENT CONSTRUCTION DESIGN MANUAL

1.0 INTRODUCTION

1.1 Parties planning construction over, under or adjacent to ~~a~~ Metropolitan Transportation Authority (MTA) facilit**ies**~~y~~ or structure**s** are advised to submit for review ~~seven (7)~~**two (2) hard** copies **and one (1) electronic copy** of their **design** drawings and ~~four (4) copies of their~~ calculations showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.

1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments ~~(usually includes Construction, Operations, Maintenance, and Real Estate)~~**for MTA departments review**. Parties shall be responsible for all costs related to **MTA**~~drawing~~ reviews ~~by MTA~~. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:

A. Site Plan

B. Drainage Area Maps and Drainage Calculations

C. Architectural drawings

D. Structural drawings and calculations

E. Civil Drawings

F. Utility Drawings

G. Sections showing Foundations and MTA Structures

H. Column Load Tables

I. Pertinent Drawings and calculations detailing an impact on MTA facilities

J. A copy of the Geotechnical Report.

K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.

L. Drawings and calculations should be sent to:

MTA Third Party Administration (Permits Administration)
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

1.3 If uncertainty exists on the possible impacts a project may have on the MTA facilities, and before submitting a formal letter requesting a review of a construction project adjacent to the Metro System, the party or his agent may contact the MTA Third Party Administrator (Permits). The Party shall review the complexity of the project, and **contact MTA to** receive an informal evaluation of the amount of detail required for the MTA review. In those cases, whereby it appears the project will present no risk to MTA, the Third Party Administrator (Permits) shall immediately route the design documents to **Engineering,** Construction, Operations, Maintenance, and Real Estate departments for a preliminary evaluation. If it is then confirmed that MTA risk is not present, the Administrator shall process an approval letter to the party.

1.4 A period of 30 working days should be allowed for review of the drawings and calculations. Thirty (30) work days should be allowed for each successive review as required. It is noted that preliminary evaluations are usually produced within 5 working days.

1.5 The party shall reimburse the MTA for any technical review or support services costs incurred that are associated with his/her request for access to the Metro **Transit**~~Rail~~ System

1.6 The following items must be completed before starting any construction:

A. Each part of the project's design may be reviewed and approved by the MTA. The prime concern of the MTA is to determine the effect of the project on the MTA structure and its transit operations. A few of the other parts of a project to be considered are overhead protection, dust protection, dewatering, and temporary use of public space for construction activities.

B. Once the Party has received written acceptance of the design of a given project then the Party must notify MTA prior to the start of construction, in accordance with the terms of acceptance.

1.7 Qualified Seismic, Structural and Geotechnical Oversight

The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

2.0 REVIEW PROCEDURE

2.1 All portions of any proposed design that will have a direct impact on an MTA facility or structure will be reviewed to assure that the MTA facility or structure is not placed in risk at any time, and that the design meets all applicable codes and criteria. Any portion of the proposed design that is to form part of an MTA controlled area shall be designed to meet the MTA Design Criteria and Standards.

2.2 Permits, where required by the local jurisdiction, shall be the responsibility of the party. City of L.A. Dept. of Bldg. and Safety and the Bureau of Engineering permit review shall remain in effect. Party shall refer to MTA Third Party Administration policies and procedures, THD5 for additional information.

2.3 Monitoring of the temporary support of excavation structures for adjacent construction shall be required in all cases for excavations within the geotechnical zone of influence of MTA structures. The extent of the monitoring will vary from case to case.

2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tiltmeters, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.

2.5 The calculations submitted for review shall include the following:

A. A concise statement of the problem and the purpose of the calculation.

B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.

C. References to articles, manuals and source material shall be furnished with the calculations.

D. Reference to pertinent codes and standards.

E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.

F. The source or derivation of all equations shall be shown where they are introduced into the calculations.

G. Numerical calculations shall clearly indicate type of measurement unit used.

H. Identify results and conclusions.

I. Calculations shall be neat, orderly, and legible.

2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:

A. Program Name.

B. Program Abstract.

C. Program Purpose and Applications.

D. Complete descriptions of assumptions, capabilities and limitations.

E. Instructions for preparing problem data.

F. Instructions for problem execution.

G. List (and explanation) of program acronyms and error messages.

H. Description of deficiencies or uncorrected errors.

I. Description of output options and interpretations.

J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.

K. Computer printout of all supporting calculations.

L. The "User's Manual" shall also include a certification section. The certification section shall describe the methods and how they cover the permitted options and uses of the program.

2.7 Drawings shall be drawn, to scale, showing the location and relationship of proposed adjacent construction to existing MTA structures at various stages of construction along the entire adjacent alignment. The stresses and deflections induced in the existing MTA structures should be provided.

2.8 The short-term and long-term effects of the new loading due to the adjacent construction on the MTA structures shall be provided. The soil parameters and other pertinent geotechnical criteria contained in existing contract documents for the affected structure, plus any additional conditions shall be used to analyze the existing MTA structures.

2.9 MTA structures shall be analyzed for differential pressure loadings transferred from the adjacent construction site.

3.0 MECHANICAL CRITERIA

3.1 Existing services to MTA facilities, including chilled water and condenser water piping, potable and fire water, storm and sanitary sewer, piping, are not to be used, interrupted nor disturbed without written approval of MTA.

3.2 Surface openings of ventilation shafts, emergency exits serving MTA underground facilities, and ventilation system openings of surface and elevated facilities are not to be blocked or restricted in any manner. Construction dust shall be prevented from entering MTA facilities.

3.3 Hot or foul air, fumes, smoke, steam, etc., from adjacent new or temporary facilities are not to be discharged within 40 feet of existing MTA ventilation system intake shafts, station entrances or portals. Tunnel ventilation shafts are both intake and discharge structures.

3.4 Clear access for the fire department to the MTA fire department connections shall be maintained at all times. Construction signs shall be provided to identify the location of MTA fire department connections. No interruption to fire protection water service will be permitted at any time.

3.5 Modifications to existing MTA mechanical systems and equipment, including ventilation shafts, required by new connections into the MTA System, shall only be permitted with prior review and approval by MTA. If changes are made to MTA property as built drawings shall be provided reflecting these changes.

At the option of MTA, the adjacent construction party shall be required to perform the field tests necessary to verify the adequacy of the modified system and the equipment performance. This verification shall be performed within an agreed time period jointly determined by MTA and the Party on a case by case basis. Where a modification is approved, the party shall be held responsible to maintain original operating capacity of the equipment and the system impacted by the modification.

4.0 OPERATIONAL REQUIREMENTS

4.1 GENERAL

A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.

B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:

1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.

2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis**, with the approval of Construction Work Plan by MTA Construction Safety Department**.

3. All cranes must be stored and secured facing away from energized tracks, when appropriate.

4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity. **All members of the work crew will be required to attend MTA Safety Training.**

5. In order to provide a safe zone to maintain adjacent developments. All developments adjacent to Metro At-Grade Stations, Aerial Stations or Track Guideways shall provide a minimum 5 foot setback from the Metro and developer's shared property line to the outside face of the proposed structure at Metro or the developer's property for maintenance to be performed or installed from within the zone created by this setbacks.

4.2 OVERHEAD PROTECTION - Station Entrances

A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.

1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.

2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the

shield shall be constructed and maintained watertight.

B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.

C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.

D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:

1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".
2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.
3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.
4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.

E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be constructed of four (4") inch thick Portland cement concrete or four (4") inches of asphaltic concrete placed **over a minimum four (4") inches of untreated base material,** and finished by a machine.

4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

A. MTA Rail Operations Control Center shall be informed of any intent to work above, on, or under the MTA right-of-way. Crews shall be trained and special flagging operations shall be directed by MTA Rail Operations Control Center. The party shall provide competent persons to serve as Flaggers. These Flaggers shall be trained and certified by MTA Rail Operations prior to any work commencing. All costs incurred by MTA shall be paid by the party.

B. A construction project that will require work over, under or adjacent to the at grade and aerial MTA right-of-way should be aware that the operation of machinery, construction of scaffolding or any operation hazardous to the operation of the MTA facility shall require that the work be done during non-revenue hours and authorized through the MTA Track Allocation process.

C. MTA flagmen or inspectors from MTA Operations shall observe all augering, pile driving or other work that is judged to be hazardous. Costs associated with the flagman or inspector shall be borne by the Party.

D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.

4.4 OTHER METRO FACILITIES

A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See Exhibit A for details.

B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.

C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.

D. Isolation of MTA Facilities from Blast

Subsurface areas of new adjacent private buildings where the public has access or that cannot be guaranteed as a secure area, such as parking garages and commercial storage and warehousing, will be treated as areas of potential explosion. NFPA 130, Standard for Fixed Guideway Transit Systems, life safety separation criteria will be applied that assumes such spaces contain Class I flammable, or Class II or Class III Combustible liquids. For structural and other considerations, isolation for blast will be treated the same as seismic separation, and the more restrictive shall be applied.

E. Any proposed facility that is located within 20 feet radius of an existing Metro facility will require a blast and explosion study and recommendations to be conducted by a specialist who is specialized in the area of blast force attenuation. This study must assess the effect that an explosion in the proposed non-Metro facility will have on the adjacent Metro facility and provide recommendations to prevent any catastrophic damage to the existing Metro facility. Metro must approve the qualifications of the proposed specialist prior to commencement of any work on this specialized study.

4.5 SAFETY REGULATIONS

A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual (Part F) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required

B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, (Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.

C. Party and contractor personnel while within the operating MTA right-of-way shall coordinate all safety rules and procedures with MTA Rail Operations Control Center.

D. When support functions and electrical power outages are required, the approval MUST be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

5.0 CORROSION

5.1 STRAY CURRENT PROTECTION

A. Because stray currents may be present in the area of the project, the Party shall investigate the site for stray currents and provide the means for mitigation when warranted.

B. Installers of facilities that will require a Cathodic Protection (CP) system must coordinate their CP proposals with MTA. Inquiries shall be routed to the Manager, Third Party Administration.

C. The Party is responsible for damage caused by its contractors to MTA corrosion test facilities in public right-of-way.

End of Section

COMMENT LETTER NO. 5

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

May 23, 2017

Lameese Elqura
City of Los Angeles
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Subject: Exposition Corridor Transit Neighborhood Plan
SCH#: 2013031038

Dear Lameese Elqura:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on May 22, 2017, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

5-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2013031038
Project Title Exposition Corridor Transit Neighborhood Plan
Lead Agency Los Angeles, City of

Type EIR Draft EIR

Description The City of Los Angeles is preparing a Specific Plan and other regulatory changes for the Exposition Light Rail corridor, which would guide the future development of the area within the boundaries indicated in Figure 1. This Project Area is located within City Council Districts 5, 10, and 11, and comprises portions of the West Los Angeles, Palms-Mar Vista-Del Rey, and West Adams, Baldwin Hills-Leimert Community Plan areas. The Project Area is located entirely within the incorporated City of Los Angeles, and abuts the City of Culver City and the City of Santa Monica. Note that not all properties shown in the Project Area will be affected.

Lead Agency Contact

Name Lameese Elqura
Agency City of Los Angeles
Phone 213 978 1178 **Fax**
email
Address 200 N. Spring Street, Room 667
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of, Culver City, Santa Monica
Region
Lat / Long 34° 2' 12" N / 118° 25' 31.79" W
Cross Streets Corridor along Exposition Light Rail Line between Culver City & Exposition/Bundy stations
Parcel No. Multiple
Township **Range** **Section** **Base**

Proximity to:

Highways I-10; I-405
Airports Santa Monica
Railways Exposition Light Rail
Waterways Ballona Creek
Schools various
Land Use

Project Issues Air Quality; Archaeologic-Historic; Coastal Zone; Drainage/Absorption; Economics/Jobs; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Air Resources Board, Transportation Projects; Department of Toxic Substances Control; Native American Heritage Commission; California Energy Commission; Public Utilities Commission; State Lands Commission

Date Received 04/06/2017 **Start of Review** 04/06/2017 **End of Review** 05/22/2017

Note: Blanks in data fields result from insufficient information provided by lead agency

COMMENT LETTER NO. 6

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

June 6, 2017

Lameese Elqura
City of Los Angeles
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Subject: Exposition Corridor Transit Neighborhood Plan
SCH#: 2013031038

Dear Lameese Elqura:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on May 22, 2017. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

6-1

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2013031038) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

late
5-22-17
t

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
www.dot.ca.gov

Serious Drought!
Making Conservation
a California Way of Life.

June 5, 2017

Governor's Office of Planning & Research
JUN 05 2017
STATE CLEARINGHOUSE

Lameese Chang
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

RE: Exposition Corridor Transit
Neighborhood Plan
Draft Environmental Impact Report
Vic: LA-10 / PM: various
GTS# 07-LA-2017-00827
SCH# 2013031038

Dear Ms. Chang,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project consists of crafting a Specific Plan to guide future development in vicinity of Exposition light rail corridor within the City of Los Angeles west of Washington Boulevard. The Plan would encompass five light rail stations within the plan boundaries.

Upon reviewing the Draft Environmental Impact Report (DEIR), Caltrans has the following comments:

The Exposition Corridor Transit Neighborhood Plan (ECTNP) has several objectives, primarily pertaining to implementing local and regional policies that encourage growth in transit-oriented areas and fostering more sustainable development while also reducing automobile dependence. Objectives also include elements such as promoting transit-oriented economic development and affordable housing opportunities along the Expo corridor. These objectives are consistent with, and complement, State-level policies and goals to promote active transportation, reduce greenhouse gas emissions, and addressing climate change.

6-2

Caltrans' Strategic Management Plan has set a target of tripling trips made by bicycling, doubling trips made by walking and public transit by 2020. The Strategic Plan also seeks to achieve a 15% reduction in statewide per capita vehicle miles traveled (VMT) by 2020. Similar ambitious goals are put forward in Caltrans' 2040 Transportation Plan, and the Southern California Association of Governments' Regional Transportation Plan. Statewide legislation such as AB 32 and SB 375 further echo the need to pursue more sustainable development and transportation. Please note these climate change related goals can only be achieved through support on every level of planning, including from our local partners.

One area of concern in reviewing the ECTNP relates to parking regulation. Existing research on parking suggests that free and plentiful car parking spaces in new developments not only encourages and enables more driving, but also increases the cost of housing. If abundant parking is supplied for new developments along a transit rich corridor such as the ECTNP, there can be unintended consequences that disproportionately promote automobile use over other more sustainable modes while undermining the region's multi-billion investment in public transit.

Similarly, recent research analyzing transit-oriented development has indicated car ownership and use is reduced more by components such as lower parking availability, more destinations within walking distance, higher employment density, and smaller housing units than by mere proximity to rail. The same research also indicates that only when combined with low parking can rail more effectively reduce automobile use for commuting and grocery trips. As such, the City should be mindful of the role parking plays in generating car use and employ parking policies that further restrict parking. This is especially opportune because the ECTNP recommends Transportation Demand Management (TDM) measures that discourage automobile use and ownership. Some consideration should also be given measures absent from the current plan, such as converting parking minimums into parking maximums as a means of reducing the amount of parking supplied.

The DEIR states that there will be no street widenings instituted as mitigation to potential transportation impacts. Street widening is deemed infeasible and undesirable, in part because widening streets typically promotes driving and does so at the expense of comfort of other modes (walking, bicycling). Specifically, the ECTNP states "Physical intersection improvement mitigations that require widening travel lanes, adding turn lanes, and increasing pedestrian crossing distances would be in conflict with multiple Project Objectives…". However, the ECTNP proposes mitigations that involve re-striping several intersections and streets to increase the number of travel lanes and turn pockets. This effectively creates the same situation as street widening- increasing capacity and throughput for automobiles at the expense of other, more sustainable modes. It is unclear how, for example, restriping a street to add a right-turn pocket is in any meaningful way different from widening a street accommodate a right-turn pocket. While only the latter increases the physical distance one must cross, both increase the number of lanes a pedestrian must cross and potentially affect traffic safety as a result.

6-2 cont.

If an intersection is restriped to increase the number of lanes, the City foregoes potential treatments that may be more consistent with the ECTNP's Primary Objectives, such as curb extensions or pedestrian refuge islands. The Final Environmental Impact Report (FEIR) should clarify how restriping a street to add lanes is actually different from the street widening with respect to affecting the pedestrian experience and overall traffic safety. Further, the FEIR should clarify how restriping to add lanes is consistent with the Plan's objectives and ultimately how it is consistent with broader regional and State-level policy goals. Some lane restriping may be deemed necessary, but it should be critically evaluated, viewed in a broader context, and other alternatives considered.

The stated focus of the ECTNP is on compact, mixed-use development. The Plan acknowledges that it can take decades for changes in land-use and transportation policies to result in tangible changes, including those related greenhouse gas emission reductions. However, despite this much of the land within the Plan would go unchanged because it is omitted altogether despite its

proximity to rail stations. Given that tangible changes - including the potential benefits associated with the ECTNP - take decades to be realized, we recommend the boundaries where changes in land-use/zoning are proposed be expanded. If the ECTNP anticipates per capita reductions in VMT and GHG emissions as a result of the project, greater consideration should be given to such land-use changes.

Finally, because the ECTNP supports mixed-use development and greater density, the per capita use of resources, emissions, and traffic impacts are expected to be lower with the ECTNP. This is because development will be more compact and oriented toward sustainable transportation options. The FEIR should better clarify whether any studied impacts are worse relative to preserving the existing, automobile-oriented status quo. If more areas within the ECTNP catchment can promote sustainable transportation and development, then the Plan may more effectively achieve local, regional, and State policies/goals related to reducing greenhouse gas emissions and addressing climate change.

6-2 cont.

Be aware that any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommends that large size truck trips be limited to off-peak commute periods. Additionally, work performed within State right-of-way will need an encroachment permit. Finally, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Be mindful that project needs to be designed to discharge clean run-off water.

Please continue to keep us informed of future projects or developments that are in close proximity to, and may affect, State facilities. If you have any questions regarding these comments, please contact project coordinator Severin Martinez at (213)-897-0067, or at severin.martinez@dot.ca.gov, and refer to GTS# 07-LA-2016-00827.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

COMMENT LETTER NO. 7

CITY OF CULVER CITY

TRANSPORTATION DEPARTMENT

4343 DUQUESNE AVENUE, CULVER CITY, CA 90232

(310) 253-6500 • FAX (310) 253-6513

Art A. Ida

Transportation Director

June 5, 2017

Lameese Chang
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012

Dear Mr. Chang,

Please see below for comments from Culver City Transportation Department on 1). Draft Environmental Impact Report for the Exposition Corridor Transit Neighborhood Plan, 2). The Exposition Corridor Transit Neighborhood Plan, and 3). The Exposition Corridor Streetscape Plan.

Exposition Corridor Transit Neighborhood Plan DEIR

1. On page 4.12-21:
   a) Information on Culver City Bus Line 1 - Please revise and indicate that Culver City Bus Line 1 runs seven days a week with a headway of about 12 to 20 mins. Line 1 has a weekday service hour from 5:40 AM to 11:27 PM. On Saturdays, Sundays, and Holidays, Line 1 runs from 6 AM to 11:40 PM.
   b) Information on Culver City Bus Line 3 - Please revise as indicated below. Line 3 is a local north/south line that runs from Century City in the north to the Culver City Transit Center in the south. In the study area, the line travels along Westwood Boulevard, National Boulevard, and Motor Avenue. Service hours begin at 5:30 a.m. and end at ~~11:00~~ 11:30 p.m. Weekday headways are 20 minutes all day until 8:00 p.m. After 8:00 p.m. and on weekends, headways are 30 minutes. 7-1
2. On page 4.12-22:
   a) Information on Culver City Bus Line 6 - Please revise as indicated below. Line 6 provides localized service on Sepulveda Boulevard and Westwood Boulevard between the Metro Green Line Station in Inglewood and UCLA in Westwood. Buses run ~~at 10- to 15-minute~~ approximately 20-min headways during the peak weekday hours and approximately 20- to 30-minute headways during off peak periods and weekends.
   b) Please add information on Culver City Bus Line Rapid 6 Short line – Rapid 6 Shortline is a short directional service provided between Palms Blvd and UCLA. Northbound trips operates during AM peak hour from 6:35 AM to 10:34 AM, and the Southbound trips operates during PM peak hour starting from 1:45 PM to 7:04 PM.
   c) Culver City Bus Line 7 – Please revise as indicated below. Line 7 is a local east/west line that runs from Venice Boulevard and Culver Boulevard in the east to Marina Del Rey in the west. Line 7 only operates during weekdays with 40 to 45-minute

headways. This line travels primarily along Culver Boulevard in the study area only during weekdays. 7-1 cont.

3. On page 4.12-34
   a) Detailed analysis on impacts to the bus service that service each of the station areas in the Neighborhood Plan should be conducted to evaluate the impacts on bus circulation, travel/run time, and bus capacity.
4. On page 4.12-35 SAFETY
   a) The determination of significance of safety impact should also include the following factor:

      The intensity of bus service in the area, sufficient bus pull-in and pull-out zones, height clearance, side clearance on the sidewalk (adjacent to the bus stop zone) should be provided for bus parking and passengers loading zones. This is especially important at stops served by multiple bus lines.
5. On page 4.12-75 (Impact 4.12-6)
   a) Detailed analysis on impacts to the bus service that service each of the station areas in the Neighborhood Plan should be conducted to evaluate the impacts on bus circulation, travel/run time, and bus capacity. 7-2
6. On page 4.12-80 (Impact 4.12-9)
   a) LADOT shall notify and coordinate with all applicable transit providers on all constructions within the Plan area that are adjacent and/or at bus stop(s) that will impact the use of and access to the bus stop(s). LA should require the responsible construction contractor/developer to prepare a transit handling plan for the work zone in the public right-of-way and detailing the type and content of transit related construction warning and wayfinding signage and location. LA should ensure that the use of the existing bus stops be maintained during construction, if possible, and that there is safe and convenient access to/from these bus stop zones during construction. The transit handling plan should be provided to the transit providers as part of LA's coordination with transit providers on all relevant construction in the Plan area.

<u>Exposition Corridor Transit Neighborhood Plan (Plan Document)</u>

7. On Page 2-27 of the ECTNP, the Plan indicates Transit Benefit requirements for non-residential uses that have at least 50 employees.
   a) Transit benefits should also be required for non-residential uses that have fewer than 50 employees to maximize people's use of transit. 7-3
   b) The station areas in the Plan are also serviced by other transit agencies such as Culver City, and a "B-TAP+Green" transit pass (that will allow people to use both Metro and Culver CityBus service) should be established and provided.
8. Vehicle Trip Reduction Requirement (page 3-11, ECTNP):

   The Plan indicates that projects must demonstrate either a 10% reduction in AM or PM peak-hour weekday vehicle trips from baseline vehicle trip level, or an AVR of 1.75 for AM peak-hour weekday vehicle trips. (In other words, if AVR is being used to demonstrate the trip reduction, then a Vehicle Trip Generation Study is not required.) 7-4
   a) What happens if the AVR is still lower than 1.75 after the 10% reduction in peak-hour vehicular trips? Are there additional measures that will require the developers to implement in order to achieve the AVR goal?

b) The 10% reduction requirement should be achieved through implementing TDM strategies. Trip reductions caused by internal caption should not be counted toward the 10% reduction.

9. Environmental Review Procedures (Page 6-8, ECTNP):
   a) In the section above (Page 3-11), the document indicated that if AVR is being used to demonstrate the trip reduction, then a Vehicle Trip Generation Study is not required. However, on page 6-8, the documents indicates that projects that result in net new square footage must submit a Vehicle Trip Generation Study. Please clarify. Does an AVR of 1.75 exempt projects that result in new net square footage from conducting a Vehicle Trip Generation Study?
   b) Mobility Amenities below should be added to the plan:
      - Dedicated Kiss-and-Ride area
      - Private shuttle area
      - Taxi area

7-4 cont.

Exposition Corridor Streetscape Plan

10. Sepulveda Boulevard from Olympic to Exposition (Draft Expo Corridor Streetscape Plan Page 5-10):
    a) The Plan erroneously shows that there is a northbound stop on Sepulveda south of Pico Boulevard (nearside of Sepulveda/Pico intersection). However, the existing bus stop is located on Sepulveda north of Pico Boulevard (farside of Sepulveda/Pico intersection).
    b) The Plan currently doesn't shown the northbound bus stop under the Train track after Exposition Blvd. This northbound bus stop on Sepulveda just north of Exposition Boulevard should be indicated on the plan.
    c) There should be a southbound bus stop in front/adjacent of the Exposition Line Sepulveda Station. In the last several years, there have been discussions between Council District 5, LADOT, Culver CityBus, and the developer of the property on the west side of Sepulveda immediately north of the Expo station to establish a bus stop north of the southbound right turn pocket. The Plan should establish a bus stop at this location to accommodate for the demand for a southbound stop in front/adjacent to the light rail station.

7-5

11. Sepulveda Boulevard from Olympic to Exposition (Draft Expo Corridor Streetscape Plan page 5-13):
    a) Have other bus lane configurations been studied for Sepulveda Boulevard?
    b) Culver CityBus provides bus service on Sepulveda Boulevard from Wilshire Boulevard to LAX, which includes the Sepulveda Boulevard corridor in the Plan area. Based on regional funding rules, any implementation of the bus lane on this corridor that would have impacts to the bus service would require coordination with and concurrence from Culver CityBus.

If you have any questions, please contact me at diana.chang@culvercity.org.

Best Regards,

Diana Chang

COMMENT LETTER NO. 8

Los Angeles Department of Water & Power

ERIC GARCETTI
Mayor

Commission
MEL LEVINE, *President*
WILLIAM W. FUNDERBURK JR., *Vice President*
JILL BANKS BARAD
CHRISTINA E. NOONAN
AURA VASQUEZ
BARBARA E. MOSCHOS, *Secretary*

DAVID H. WRIGHT
General Manager

June 2, 2017

Lameese Chang
City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Subject: Comment Letter Regarding Notice of Availability of a Draft Environmental Impact Report for the Exposition Corridor Transit Neighborhood Plan (ENV-2013-622-EIR)

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for the Exposition Corridor Transit Neighborhood Plan. The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. In reviewing your proposed project, the LADWP has determined that the project may have impacts to utility resources. The following comments reflect our review for matters related to both water and power resources for the project. 8-1

Water Resources Comments

1. **General Comments**

- Please consider updating information throughout the DEIR using the 2015 Urban Water Management Plan (UWMP), available at http://www.ladwp.com/2015uwmp. 8-2
- Please include page numbers on all LADWP references.

2. **Specific Comments by Page**

- *Page 4.13-2, Second paragraph*: Recommend including Governor Brown's end of the drought State of Emergency through Executive Order B-40-17 on April 7th, 2017, and long-term plan ***Making Water Conservation a California Way of Life***. 8-3

Putting Our Customers First

111 N. Hope Street, Los Angeles, California 90012-2607 *Mailing Address:* Box 51111, Los Angeles, CA 90051-5700
Telephone (213) 367-4211 www.LADWP.com

- *Page 4.13-5, Top paragraph and continuation from end of previous page*: Please update to six water conservation phases instead of five. Refer to Exhibit 3E of the 2015 UWMP, which summarizes all six phases.

- *Page 4.13-7, Last paragraph*: Change "Owens Valley River" to "Owens River." Also, please make the distinction between the lake level issue on Mono Lake and the dust mitigation issue on Owens Lake. See Chapter 5 of the 2015 UWMP for more information.

- *Page 4.13-8:*

    - *In reference to table 4.13-4 and related references in second paragraph:*

        - Sources shown at the bottom of the table do not support the table's numerical values. The values for San Fernando, Sylmar and Central Basins for the years 2010/11 to 2013/14 are fiscal year values (July 1 to June 30), not water year values (October 1 to September 30). Please correct all values and labeling in the table for all basins shown (Owens Valley, San Fernando, Sylmar and Central Basins), and provide corrected supporting references with page numbers.
        - The premise of the title GROUNDWATER BASIN CHANGE DUE TO ENVIRONMENTAL MITIGATION PROGRAM FOR OWENS VALLEY is incorrect. Please remove.

        - Note that 2010 GW extraction acre-foot values are missing.

    - *First paragraph under Table 4.13-4:* Please replace the last sentence of the paragraph, with the following from page 5-15 of the 2015 UWMP: "However, with the anticipated completion of the Master Project by 2024, the projected LAA delivery will increase to 286,000 AFY due to water conserved at Owens Lake." To clarify, the anticipated project completion date is 2024, while the projected supply of 286,000 AFY is for the year 2040 (end of 25-year period beginning in 2015).

- *Page 4.13-9, Fourth Paragraph titled Recycled Water*: Please include Edward C. Little Water Recycling Facility (ECLWRF). Refer to Chapter 4 of the 2015 UWMP.

- *Page 4.13-10:*

    - Please consider updating Footnote 14 and related information in the preceding paragraphs to the 2016 Drinking Water Quality Report. Please see following link to report:

8-3 cont.

- https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-wqreport?_afrLoop=168568172817399&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D168568172817399%26_afrWindowMode%3D0%26_adf.ctrl-state%3D187dibspbv_4

  - First sentence of the second paragraph: Please note that a small portion of the water supplied to LADWP through the California Aqueduct and all of the water supplied to LADWP through the Colorado River Aqueduct is treated by Metropolitan Water District of Southern California at the Jenson, Weymouth and Diemer Treatment Plants. Refer to Exhibit 12N of the 2015 UWMP and revise accordingly.

  - Throughout the second paragraph, please consider updating to the current treatment process per the 2016 Drinking Water Quality Report.

  - First sentence of the third paragraph: Please consider revising the statement, "generally clean." LADWP treats and blends water to comply with State and Federal safe drinking water standards. Please refer to Chapter 6 of the 2015 UWMP as well as the 2016 Drinking Water Quality Report for more information.

8-3 cont.

- *Page 4.13-11, First Sentence of the Last Paragraph*: Please change date of approval of WSA from February 6, 2014, to February 18, 2014.

- *Page 4.13-15:* Please consider updated Footnote 21 and related reference values in the paragraph above to the 2015 UWMP, Exhibit 21.

- *Page 4.13-16:*

  - Please consider updating Footnote 20, related verbiage at top of the page, and Table 4.13-9 to the 2015 UWMP.

  - Please be aware that Ordinance 184248, effective June 2016, contains requirements that supersede some of the listed voluntary conservation measures.

Power Resources Comments

3. **General Comments**

- LADWP's West Los Angeles District Yard, Distribution Station 145, Receiving Station K, underground transmission lines, and overhead distribution lines are within the ECTNP boundary. More detailed design in required to determine any impacts to LADWP Power facilities/lines.

8-4

- Section 4.13 Utilities and Service Systems and descriptions of LADWP Power Resources were correct at date of reference. Power System improvements and changes since the date of reference would cause changes to Table 4.13-20 on page 4.13-43.

- LADWP no longer owns any interest in the Navajo Generating Station and continues to rebalance toward more renewables. Other references within this section would be modified accordingly.

- LADWP has power facilities within the proposed scope area that may be impacted. A detailed design in required to determine the impacts on LADWP Power facilities. Expected conflicts, depending on the proposed improvements, may include one or more of the following:

    - Maintenance holes, vaults, transformer pads, and/or hand hole adjustments
    - Vent relocations
    - Pole relocations
    - Power conduit duct bank relocations

8-4
cont.

For any questions regarding the above comments, please contact Ms. Nadia Parker of my staff at (213) 367-1745 or at nadia.parker@ladwp.com.

Sincerely,

Nadia Parker for

Charles C. Holloway
Manager of Environmental Planning and Assessment

BG:rc
c: Ms. Nadia Parker

COMMENT LETTER NO. 9

BRENTWOOD Community Council

149 S. Barrington Ave., Box 194, Los Angeles, CA 90049
www.brentwoodcommunitycouncil.org

June 2, 2017

Lameese Chang
City Of Los Angeles
Department of City Planning
201 N. Figueroa St, #600
Los Angeles, CA 90012
Sent Via Email: lameese.chang@lacity.org

RE: Draft Exposition Corridor Transit Neighborhood Plan, ENV-2013-622-EIR

Dear Ms. Chang,

The Brentwood Community Council ("BCC") is the broadest based Brentwood community organization, representing approximately 50,000 stakeholders of the 90049 community. BCC includes 13 homeowners associations, multi-family residential dwellers, business organizations, schools, religious groups, volunteer service groups, public safety and environmental organizations.

Bundy Drive is one of two north-south arteries that link Brentwood to the I-10 freeway and other areas south of Brentwood. All of our comments on the Draft Exposition Corridor TNP are specific to the Bundy Expo station as this the only one that has a direct impact on our area.

9-1

The Brentwood Community Council supports the Draft Exposition Corridor TNP proposals for the Bundy Expo station, particularly the rezoning of the area south of Olympic Blvd. to allow multifamily residential buildings. Given the overwhelming need for housing in LA, we could support even higher density of housing in this section than R1.5 if not opposed by West LA neighborhood groups.

However, we feel strongly that any retail space included in the mixed development be truly "neighborhood serving" and not be of such a size that establishments would draw in car trips from outside of the immediate area. In particular, we strongly oppose the addition of any large supermarket. As we noted in our comments on Martin Town Expo, there are already 10 large grocery stores within 1.5 miles of

Bundy/Olympic and no more "destination markets" that would generate additional car trips are needed.

In addition, we also strongly oppose adding any more commercial office space to this area, whether "creative" or otherwise. All of the major streets in Brentwood and West LA are gridlocked during peak traffic periods. A lot of this traffic is due to an overabundance of commercial office space on the Bundy Corridor in Los Angeles and further west in Santa Monica, combined with a lack of housing. This plan is an opportunity to correct this imbalance. 9-1

We notice that the DEIR calls for adding a median to Olympic Blvd. west of the I-405. We request that any median be small enough that no lanes on Olympic Blvd. need to be eliminated as this would worsen the area's traffic problems. 9-2

We request that the City consider asking any developers who build large projects as part of the TNP be required to contribute to the funding of measures to encourage the use of active transportation in the area. These measures could include improvements to the pedestrian environment and transit options such as a DASH bus that could bring residents and commuters from the Bundy Expo stop to destinations such as Sawtelle, Wilshire Blvd, and Pico Blvd. Having this bus would further reduce the need for people to get into their cars. 9-3

Thank you for including our comments.

Sincerely,

Larry Watts

Larry Watts, BCC Chairman

COMMENT LETTER NO. 10

BRENTWOOD HOMEOWNERS ASSOCIATION

PO Box 49427 • Los Angeles CA 90049 • info@brentwoodhomeowners.org

June 2, 2017

Lameese Chang
Department of City Planning
200 N. Spring St, #667
Los Angeles, CA 90012

Via Email: lameese.chang@lacity.org

RE: Preliminary Exposition Corridor Transit Neighborhood Plan (Expo TNP), CPC-2013-621-ZC-GPA-SP; ENV-2013-622-EIR

Dear Ms. Chang,

Our comments relate to the proposed Expo TNP new zoning and development standards for properties near the Bundy Expo stop. Just as you have already done with the Pico Boulevard area in Westwood, we request that you acknowledge the fact that the Bundy/Olympic area already has significant density coupled with crippling traffic.

The Brentwood Homeowners Association encompasses a territory of approximately 3,200 single-family homes west of the 405 and north of San Vicente Boulevard. The proposed new zoning near the Bundy Expo stop is on roads that our residents use each day for access to the I-10 and the Expo line.

We strongly suggest that the Specific Plan for the Bundy area refrain from the tendency to encourage mixed uses that would include office space and retail. **New development should be limited to only housing, and only locally serving retail** intended for use by adjacent residents who need not drive to the retail. Also, the success of the Expo line requires realistic estimates of unused capacity, after taking into account new development apart from a TNP, before blindly adding density. Further, in view of the plan to revise Community Plans, serious consideration should be given to simultaneously working on the TNP and Community Plan, something that may even be required by CEQA in order to evaluate cumulative environmental impacts.

10-1

The recently approved Martin Town Center mixed use, transit adjacent, project at Bundy/Olympic that includes 150,000 sqft of office space and 99,000 sqft of retail space, is estimated to generate additional daily car trips between 7,000 and

10-2

15,000, and have significant adverse impacts on over a dozen intersections in the proposed Bundy Expo TNP area. There is no doubt that the additional congestion will divert traffic north through the Brentwood area that originates in Santa Monica and is headed to the 405. Enough is enough!

10-2 cont.

Please add our contact information in our letterhead above to receive all further notifications regarding this project.

Sincerely,

Raymond Klein

Raymond Klein, President

COMMENT LETTER NO. 11

Fix The City

Lameese Chang
City Planner

Sent via email to lameese.chang@lacity.org

RE: Comments on the Draft Exposition Corridor Transit Neighborhood Plan (ENV-2013-622-EIR)

June 6, 2017

Please accept the following comments as part of the record for the Exposition Corridor Transit Neighborhood Plan ("ECTNP").

The ECTNP is wholly lacking as an environmental document under CEQA and as an informative document for the public. Worse, it seeks to remove public involvement from the planning process. Key issues are: 11-1

West L.A. Community Plan

The ECTNP is irreparably inconsistent with the West L.A. Community Plan with regard to at least infrastructure. The West L.A. plan states:

> "…if this monitoring finds that population in the Plan area is occurring faster than projected; and, that infrastructure resource capacities are threatened, particularly critical ones such as water and sewerage; and, that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls should be put into effect, for all or portions of the West Los Angeles Community, until land use designations for the Community Plan and corresponding zoning are revised to limit development."

The ECTNP makes no attempt to disclose infrastructure capacities as required, make a determination if they are adequate and/or threatened and to provide for funding in the event of inadequacy. The City has made no commitment to restoring adequacy while critical infrastructure capacities for schools, parks, libraries, police, fire, streets, sidewalks, curbs, gutters, water delivery and the urban forest are inadequate – by the City's own admission. 11-2

General Plan Framework

The ECTNP is irreparably inconsistent with the General Plan Framework with regard to the City-mandated mitigation restricting increases in density unless and until there is adequate infrastructure. No effort has been made to provide the required analysis or make the necessary findings supported by substantial evidence.

The City has defined the meaning of those polices and designated those policies as CEQA mitigations calling them "Mitigation Through Framework Policy." Specifically:

- The City has stated the policy "*requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services.*"
- That *"What became clear was that a crucial feature of dealing with growth impacts was contained in the General Plan Framework – its program for timing allowable development with available infrastructure…"*
- "*Allowable increases in density … would not occur until infrastructure and its funding was available*"
- That the City chose the GPF because "*it had the best combination of land use policies tied to mitigation measures tied to annual reporting and selective amendments of community plans only when consistent with GPF policies.*"

The GPF EIR explicitly relied on these mitigations to ensure adequate public safety. The City cannot now abandon those mitigations as unnecessary or infeasible having already argued that the mitigations are both necessary and feasible.

Police

The Framework Element's economic development policy targets an employment base that exceeds SCAG's jobs forecast to maintain the City's 1990 jobs/housing ratio through the year 2010. This increased economic base will provide additional revenue necessary to pay for added police protective services. Additionally, the Framework Element includes a policy that requires the City to correlate the type, amount, and location of development with the provision of adequate supporting infrastructure and public services.

Fire

2.10.5 *Mitigation Measures*

2.10.5.1 Mitigation through Framework Policy

Policies 3.3.2, 7.10.1, 9.17.1, 9.18.1 through 9.18.4, 9.19.1, 9.20.1 through 9.20.3 contained in the General Plan Framework represent measures that would serve to lessen impacts relative to fire/EMS.

Policy 3.3.2 directs monitoring of infrastructure and public service capacities to determine need within each CPA for improvements based upon planning standards. This policy also directs determinations of the level of growth that should correlate with the level of capital, facility, or service improvement that are necessary to accommodate that level of growth. In addition, the policy directs the establishment of programs for infrastructure and public service improvements to accommodate development in areas the General Plan Framework targets for growth. Lastly, the policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services. **Policy 7.10.1** focuses available implementation resources in targeted areas or "communities in need." **Policy 9.17.1** addresses the monitoring and forecasting of demand for existing and future fire facilities and service for the purpose of assuring that every neighborhood would have the necessary level of fire protection service and infrastructure.

11-2 cont.

Expo FEIR

The ECTNP is Inconsistent with Expo FEIR findings that "growth-inducing impacts (of Expo) are less than significant." ("Such development would be subject to existing zoning and would be considered by local jurisdictions as part of their project approval process to ensure visual compatibility. As such, the cumulative impacts associated with other planned or approved projects are expected to be less than significant.")

11-3

Westwood/Pico NOD

The ECTNP is inconsistent with the purpose, assurances and protections in the Westwood/Pico NOD and overrides those protections or is at least unclear as to which protections remain in place. The Westwood Pico NOD states as its purpose:

> *"WHEREAS the Director of Planning has conducted a study and has found that the portions of Westwood Boulevard, Pico Boulevard, and Overland Avenue identified in this Ordinance have a variety of commercial uses and activities and have a majority of structures of a similar size and with architectural details such as the location of windows, building walls and pedestrian entrances which if preserved and enhanced would encourage people in the surrounding neighborhoods to walk and shop along these streets;"*

11-4

Fix The City

Additional ECTNP DEIR Faults

- Public safety impacts are neither discussed nor studied. 11-5
- School impacts are neither discussed nor studied, especially with regard to capacity. 11-6
- Growth inducing aspects are neither discussed nor studied. 11-7
- Pre-Expo traffic analyses are no longer valid just as transit ridership data are no longer valid. 11-8
- Areas targeted for increased density are located along potentially active fault lines, at least including the Overland Avenue Fault. 11-9
- Displacement of existing businesses is neither discussed nor studied. 11-10
- Displacement of existing residents is neither discussed nor studied, especially those in rent-controlled housing. 11-11
- Cut-through traffic as a result of plan buildout is not studied, including impacts on the Motor Avenue trip cap. 11-12
- There appears to be piecemealing of certain policies and procedures with regard to the West LA Timp. 11-13
- There is no discussion of air quality issues as a result of increased congestion. 11-14
- There is no discussion of the impact on mass transit if density is increased around stations, thus making them less accessible to more remote stakeholders. 11-15
- The ECTNP, including the goal of decreasing congestion, is inconsistent with stated goals of the General Plan/Mobility Plan 2035. 11-16
- There is no Health Impact Assessment, discussion or guidelines with regard to the health impacts of building near freeways, especially with regard to outdoor amenities. (https://www.cdc.gov/healthyplaces/hia.htm) 11-17
- There is no analysis on traffic patterns in the area, especially with regard to at-grade crossings and increased pedestrian volume. 11-18
- There is no analysis or assessment of impacts of homelessness in the project area. 11-19
- Proper assessment by the public is impossible without a fully detailed mitigation monitoring plan. 11-20
- The elimination of site plan review removes a key assurance for the public, the loss of which has not been adequately disclosed to stakeholders. 11-21
- The elimination of the requirements of LAMC 12.22 A.18 has not been adequately disclosed. 11-22
- The removal of conditional use permit requirements per 12.24.V eliminates local input into planning decisions, the loss of which has not been adequately disclosed to stakeholders. 11-23
- The removal of conditional use permit requirements for major projects per 12.24.U.14 eliminates a critical point of engagement in planning decisions, the loss of which has not been adequately disclosed to stakeholders. 11-24
- The impact of the statement in 1.1.3.B has not been adequately disclosed and its meaning is unclear when taken with other statements in the DEIR such as the statement made in 1.1.3.C. 11-25

We incorporate by reference:

- Response time statistics found on FireStat for stations 19, 37, 43, 59, 92, 63. (http://www.lafd.org/fsla/stations-map)
- The Grand Jury findings on LAFD Response Times. (http://documents.latimes.com/l-county-grand-jury-audit-lafd-response-times/)
- LA City Controller Response Time Audit and other published documents (http://documents.latimes.com/lafd-data-controversy/)
- LAFD and LAPD findings with regard to the project at 11122-11150 Pico Boulevard.
- Street PCI assessment (http://bss.lacity.org/NeighborhoodCouncils/street_assessment_map/map.html)
- Parks assessment (http://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_085.pdf)
- Sidewalk status (http://graphics.latimes.com/la-sidewalks-map/)
- Water pipe status (http://graphics.latimes.com/la-aging-water-infrastructure/)

11-26

We look forward to a thorough review of these critical issues as well as a recirculation of the DEIR.

Sincerely,
Fix The City

COMMENT LETTER NO. 12

Fix the City Comments on Expo Specific Plan

Laura Lake

Laura@FixTheCity.org

June 6, 2017

INTRODUCTION

1. Potential for significant adverse impacts must include other major proposed projects (cumulative impacts) within the Community Plans. In order to avoid significant impacts, and to keep all the elements of the General Plan internally consistent, these proposals must be part of updating Community Plans rather than piecemeal, incremental increases to the community plans. (p. 1.) For example, the Expo plan must address the Fox Studio Expansion proposal to see if the provision of additional density and entitlements is required and how the two specific plans would impact each other. 12-1

2. The EIR must include a Supplemental Recirculated EIR with the revisions of deleting and adding subareas, as well as cumulative impacts near the Expo Corridor.

3. The traffic analysis is stale. The project began in 2013 (p. 1). The data and analysis must be updated. 12-2

4. The premise of the plan is to "promote transit ridership" but there is no evidence that merely increasing density will accomplish this goal, especially with increased fairs, scheduling problems, etc. Rather, the plan appears to be premised on *an ideology that high-density market-rate housing will magically convert auto drivers into rail commuters*. In the absence of an origin-destination study, this is not supported by substantial evidence. Please provide substantial evidence that high density rail corridors will mass transit use. 12-3

5. The Primary Objective 1 is to implement the GPF. But this GP Framework Policy 3.3.2 mandates that development not be intensified and may be halted unless and until adequate infrastructure and public services are provided. This specific plan EIR does not provide substantial evidence that Police, Fire, for example are adequate and can accommodate intensified development. The DEIR failed to provide analysis of facilities and response times for LAFD, for example. An origin-destination study must be provided and recirculated to support the premise that this specific plan will reduce auto dependence. 12-4

6. Impact on visual character and shade conflicts with the preservation and conservation of existing residential communities. (p. 3) 12-5

7. Public services also include Police and Fire, which are understaffed now, have substandard response times and facilities. What is the basis for the DEIR to conclude that there are no significant adverse impacts on police and fire? (pp. 2-3, 2-4) 12-6

8. Please provide an additional alternative for self-driving vehicles versus intensification of land-use adjacent to the Expo line. 12-7

9. **The DEIR failed to adequately analyze the risks associated with increased development near the Overland Fault/Newport-Inglewood Fault.** Please revise and recirculate the DEIR with an analysis of this significant seismic hazard and correct the summary of impacts 4.4-3, 4.4-2. For example, homes located along Overland Avenue near Santa Monica Boulevard were red-tagged during the 1994 Northridge Earthquake. The EIR is deficient in analyzing the impact of this fault and increased risk to the public. 12-8

10. LAFD Response Time at the stations serving the Expo Corridor is not presently meeting the City's NFPA 1710 standard of an EMS response time of within 5 minutes 90% of the time, and a non-EMS response time of 5:20 minutes within 90% of the time. Expansion is therefore required, but there are no plans or funding available. Literally, new facilities are required to meet the city's standard. This constitutes an unfunded mandate with significant adverse public safety impacts that are not analyzed in the DEIR. For example, are there truck companies adjacent to the corridor to respond to fires in highrise buildings? Please provide substantial evidence to conclude that a new fire station or expansion is not required in order to maintain acceptable service ratios, response times, etc. Due to inadequate LAFD service and facilities, there is a need to require additional staff, facilities, etc. But that is a different question of whether there are plans to provide these needed facilities. Implementation of the proposed project would intensify the need for expanded facilities. Please analyze response time, facility adequacy, and staffing levels. 12-9

11. Impact 4.12-1 conflicts with the statement made in the Draft Specific Plan that the project was not required to comply with MP 2035. Please analyze potential conflicts, and how a conflict with a General Plan Framework Element is permitted. 12-10

12. There is already neighborhood intrusion, and more predicted if there are road diets in the vicinity. Thus there is a need for substantial evidence to support the conclusion that the project will not increase neighborhood intrusion, per 4.12-3. 12-11

13. Impact 4.12-4 is unsupported by substantial evidence that the project will not impact the Congest Management Plan for Freeways. To reach this conclusion, an origin-destination study is required. Please provide in a recirculated EIR. 12-12

14. Cumulative impacts from major projects proposed subsequent to 2008 are not analyzed here and must be included, e.g., Fox Studio Expansion, Martin Cadillac, Casden, etc. Also, please include analysis of the VA Masterplan on the Community Plan's infrastructure, population, jobs. 12-13

15. Does the project comply with the mitigations mandated in the EIR certified for the Fire Service Element of the General Plan Framework? That is, no intensification unless there is adequate capacity and service to accommodate new development. Does it comply with the mandate in the WLA Community Plan to balance development with adequate emergency services and traffic capacity? 12-14

16. To augment and encourage ridership, does the project propose to provide park and ride facilities? 12-15

17. Does the EIR provide a comparison between baseline FAR, proposed base FAR and bonus FAR? For example, changing commercial FAR from 1.5:1 to 4:1 is a significant increase that assumes the city's infrastructure and public services can accommodate this increase. The degree of increase is masked if not based on current FAR. 12-16

18. Table 4.8-1 fails to provide the height permitted around Bundy Station. In the absence of the height for light industrial, the ability to determine how much FAR can be accommodated is impossible. Please provide heights for these land uses. This is particularly true for mixed-use projects. 12-17

19. Table 4.8-2 fails to include the additional entitlements available to developers under SB1818, including additional FAR, dwelling units, and height. Thus, the cumulative analysis of the proposed project fails to include the cumulative impacts of other regulations, especially if developers seek off-menu incentives. How is this included in this EIR? Likewise, how are SB 374, 743 and other state laws factored into the cumulative growth projections? Does these laws obviate the need for the Specific Plan? 12-18

20. Since LAFD response times are already below the city's standard NFPA, there is no substantial evidence to support the conclusion that the goal/objective of a safe, secure and residential environment for all economic, age and ethnic segments of the community is feasible. The goal is inconsistent with the intensification of development in an underserved neighborhood. Goal 1. 12-19

21. There is no substantial evidence that increasing development near Expo will decrease use of vehicles. That would require an origin-destination study. (Objective 1-2). 12-20

22. Housing Policies: the premise of increased density is that it will mitigate the affordable housing crisis. There is no substantial evidence provided to support this premise, particularly because these projects are not required to provide affordable housing, but merely provide an in-lieu payment for off-site housing that is speculative. No analysis is provided of vacant housing in the community plan areas that could be rehabilitated, e.g., through urban homesteading. The EIR also does not show the potential for new housing without increased density. The justification for increased density is not based on substantial evidence of need. In other words, can population growth be accommodated within existing community plans? Is there a need to intensify development entitlements to accommodate population growth, or rather, as an alternative to the project, direct new development to areas that have the capacity to 12-21

accommodate it? The EIR needs to be updated and recirculated to provide an alternative that examines how much development potential already exists within each community plan, as well as how many habitable properties are vacant. (p. 4.8-39)

12-21 cont.

CHAPTER 4.11 PUBLIC SERVICES

FIRE

LAFD's heroes are understaffed, have inadequate facilities and equipment, and are therefore unable to meet established response times. They are already overburdened, based on FireStat data available from LAFD online.

The EIR fails to forecast demand for existing and projected fire facilities and service. Repeatedly, the city has certified EIRs by stating that there are no plans to expand, and that a new deployment plan provides adequate service. But the response times are not adequate. Therefore, there is a failure in the city's fire service analysis, a failure to mitigate added demand, and a failure to meet established standards. This constitutes a significant adverse impact that is not analyzed or mitigated in this EIR. Failure to meet the city's response times is an admission that fire protection services are inadequate, and under General Plan Framework 3.3.2, and several community plans, increases in development intensity may not be permitted until service is made adequate. Mitigation cannot be postponed until the city wins the lottery and can fund new staff and facilities. Mitigation cannot wait for traffic to improve so that LAFD can improve its response times. Mitigation at a minimum, requires not making things worse, that is, increasing demand for service. The stations shown on Figure 4.11-1 not only serve the residents and businesses, but also the VA, the Federal Building, and UCLA. They are severely understaffed and lack the equipment, facilities and staffing to meeting the city's response time requirements.

12-22

Given the severity of this inadequacy, intensification of development is reckless and unsupported by substantial evidence that it is required (see above discussion of vacant units and available building potential using existing entitlements). The claim made on p. 4.11-8 that as demand changes, staff assignments and equipment are changed is unsupported by substantial evidence. If there is a shortage, as the LAFD has admitted, moving staff and equipment around means another area is losing coverage. Please provide substantial evidence that new demand is met with new resources, not a shell game. Likewise, the statement is made that these deployments are made to maintain acceptable service ratios and response times when there is almost no station in the city that is meeting acceptable service ratios and response times, and no substantial evidence is provided to support this claim. It is a goal, but not a reality, due to budget limitations.

Please analyze the need for new or physically altered fire or emergency service facilities now and with the projected build-out of the community plans and in addition, the proposed specific plan.

The specific plan does contain specific regulations that would affect fire protection and emergency services: by permitting increased density, the specific plan further strains LAFD beyond its staffing, equipment and facilities. The EIR must provide baseline data for current facilities, response time, etc. and the incremental increase of the proposed specific plan.

The fact that there is no budget to construct new fire stations does not mean that the proposed project will not increase the need for such facilities. CEQA imposes a duty to mitigate. If the current service is

inadequate, and the project makes it more inadequate, this must be disclosed to decision-makers. Thus the statement on p. 4.11-11 that "the proposed project would not cause the construction of a new fire station since growth in the ECTNP Area has been accounted for by the LAFD" is deceptive and unsupported by baseline data and analysis of whether there is a need, a budget and a plan to meet established response times. The city has failed to meet current demand for fire service, no less increased demand. Response times are required to support the claim that service is adequate.

12-22 cont.

Appendix M

1. The Specific Plan is inconsistent with implementing the Community Plans (p. 1-3) because it does not protect stable single-family neighbors. There are no mechanisms provided in the plan that promote transit ridership, e.g., employers providing free transit passes. 12-23
2. Exemption from CUPs for hotel use will deny residents within 500 feet notice and a public hearing to condition the hotel, as presently provided by city code. This is not a transparent process. 12-24
3. There is no required notice or input/approval by a Neighborhood Council. This must be provided to assure that there is full transparency for the community. 12-25
4. Conflicting Regulations (p. 1-4) creates inconsistencies with the Community Plans. The public right of way requirements mandated by MP 2035 cannot be overridden by this Specific Plan. MP 2035 is a General Plan Element. The Elements of the General Plan must be internally consistent. The exemptions permitted in this specific plan may be in conflict with the General Plan Framework. It may also create inconsistencies with other specific plans that permit additional density. Thus it may compound the overdevelopment and impacts of those plans. For example, the Fox Studio Expansion project that has been noticed by the city but not yet analyzed, proposes over one million square feet beyond the plan's capacity. Has the Expo Corridor Plan factored in this and other projects that would overwhelm the infrastructure of the area? 12-26
5. Likewise, the Base FAR and Bonus FAR tables do not provide the current permitted FAR to determine the actual increase in density/intensity. (p. 2-13). 12-27
6. Exempting projects from Site Plan Review directly violates the Friends of Westwood Decision upheld by the California Supreme Court. Site Plan Review was adopted to comply with that decision. (p. 1-4). 12-28
7. The Director's authority to approve alternative compliance has no standards to determine whether or not the Director is being arbitrary and capricious. (p. 2-15, p. 4-3). 12-29
8. Public Benefits appears to be what should be required as part of project approval and not an extra, with the exception of affordable housing units. 12-30
9. Do the setbacks for front yards conflict with the sidewalk requirements of the Mobility Plan 2035? Do they permit for outdoor dining without encroaching into the pedestrian walking area, and will a revocable encroachment permit be required for such outdoor seating and service? 12-31

Will alcohol be served outdoors? How will this comply with ABC requirements? Especially since the specific plan appears to exempt projects from the CUP process? (p. 4-6). 12-31 cont.

10. Pedestrian bridges across public rights of way: is there a width limitation? Is it permitted to be used for retail or dining? Is it included in FAR calculation? This was a very major issue with the Westside Pavilion. An alley is a public right of way, so this does not make sense (see p. 4-10). 12-32
11. Paseos should be 20 feet minimum in order to permit late or early morning deliveries that do not impact street capacity and movement (p. 4-12). Please analyze. 12-33
12. Landscaping surface parking areas: has this been evaluated by LAPD with regard to public safety and crime prevention? (p. 4-14 to 4-15). 12-34
13. Parking structures should not be visible from the street and should be required to have ground floor retail/office/residential uses to shield pedestrians from this visual blight. Please address how permitting 3 levels of above ground parking enhances the walkability of streets (p. 4-15). Does this conflict with MP 2035? If so, this would create an unlawful inconsistency between the specific plan and the General Plan Framework. 12-35
14. Monument signs need to be scaled-down from 24 SF per side, and the location of the sides must be within the building's footprint and not the public right of way (p. 4-17). 12-36
15. Environmental review requirements appear to exempt projects with potentially significant impacts, in violation of CEQA. (p. 6-3). If there is an impact, whether it is related to the scope of activities, is irrelevant. Environmental impacts must be analyzed if significant or potentially significant, and mitigated, per CEQA. 12-37
16. Permitting a cumulative maximum of 1200 du within the plan area in excess of what is allowed by the zoning is confusing. Is that per project, or for all du for entire specific plan area? (p. 6-5). 12-38
17. Is Table M supported by analysis of current conditions as well as proposed increases in traffic? This is confusing. (p. 6-8) 12-39
18. The points for streetscape projects appears to reward development projects that are already required to provide these amenities under the city's adopted design standards. Planting trees, for example, is an essential requirement, not a bonus. 12-40
19. Has the city considered requiring rooftop gardens to promote cooling and community gardens (which would require additional structural support)? If not, why not? 12-41
20. Has the city considered mandating graywater for all landscaping and water features? If not, why not? 12-42
21. Has provision of parklets been analyzed with regard to impacts on local businesses (urban decay analysis?). (p. A-6). 12-43
22. Noncompliance with MP 2035 roadway widths requires a GPA (p. B-3). Please address and analyze. 12-44
23. Public open space should have minimal hardscape. The examples provided show maximum hardscape. Please address the need to minimize hardscape. (p. C-14). Likewise, the outdoor seating in an open space appears to be a sidewalk that would violate the ADA requirements to permit a disabled person to traverse the area. (Ibid.) 12-45
24. Publicly Access Open Space: privately owned and maintained open space: who is liable for crime control, and occupancy by for example, injuries, public nuisances? (p. C-19). 12-46

APPENDIX N REVISIONS

1. Why wasn't there a supplemental EIR to address these changes?
2. The additional Subarea on Pico must be analyzed in a Supplemental EIR. (p. 2) since it is limited to internal increases in density/intensity and does not address other proposed increases in population, employment in the area, such as the Fox Studio Expansion.
3. The subarea revisions do not take into account other proposed increases in units or FAR such as the Fox Studio Expansion (p.3).

12-47

APPENDIX H TRAFFIC

1. Provide analysis of impacts of at-grade Expo line on traffic congestion. Provide these impacts and analyze mitigation by elevating Expo or placing it below-grade for Overland and other at-grade crossings. Consider these improvements as public benefits with points awarded.
2. Provide analysis of falling bus ridership with overall mass-transit use. Measure impacts on traffic as a result of both bus and Expo ridership rates.

12-48

COMMENT LETTER NO. 13

Marshall P. Riddick Youth Center
2634 Overland Avenue
Los Angeles, CA 90064
501c3 est. 1945

Ms. Lameese Chang
City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
email: lameese.chang@lacity.org

June 4, 2017

Re: Exposition Corridor Transit Neighborhood Plan
City Planning Case: CPC-2013-621-ZC-GPA-SP
Environmental Case: ENV-2013-622-EIR

Dear Ms. Chang:

I am writing on behalf of The Marshall P. Riddick Youth Center, a non-profit youth facility serving over twelve-hundred children and families, located within the boundaries of the new plan. In our 72 years of operation, we have seen demand for our facility and services grow as the population increases. Under the new plan, the neighborhood population will grow by a significant margin. Several areas of the plan are of concern to us such as; increase in traffic, lack of other new recreational facilities, increased demands on neighborhood infrastructure - police, fire, water, and the sewer system. There is nothing in the plan to address how these new demands can be met. The EIR clearly states that absolutely no measures are even considered for library services. The Marshall P. Riddick Youth Center requests that we be the recipient of some public benefit funds that are planned to flow as the new developments are permitted. In order to serve the neighborhood youth, and families properly with the new increased population, we would plan to remodel our outdoor playground. Our facility of 5400 square feet of indoor and outdoor recreation for the local youth is second only to Palms Park in the amount of recreation programs to the neighborhood children. With increased funding we can offer more services to our community. 13-1

The EIR states that the local public schools are under-enrolled. We serve the youth of the neighborhood, and work closely with the Overland Avenue Elementary School community. The outdated school enrollment study of 2012 cited in the EIR is very misleading. Only by tweaking data in a self-serving way could Overland or Westwood Charter Elementary Schools be classified as under-enrolled. With the increase in the population that the new plan would bring, enrollment will grow and the schools will be over-capacity. 13-2

There is no plan to accommodate this increase. For this point, we request that the density of the developments be modified to a more absorbable level. This would include keeping Pico Blvd at commercial zoning- not to be up zoned to RAS4, no mixed use on Westwood Blvd between Pico and National, and lower heights/density for the Sepulveda/Pico area. The Westside Pavilion Mall should remain a commercial zone, not a residential zone. 13-3

We hope your department will consider our requests and recommendations, as we have helped to shape the youth of the community for 72 years, and hope to continue to do so in a thoughtful and practical manner.

Sincerely,

Maura Howe

President, Marshall P. Riddick Youth Center

COMMENT LETTER NO. 14

PALMS WESTMINSTER PRESBYTERIAN CHURCH
2908 Robertson Place
Los Angeles, California 90039

June 5, 2017

Via Email Only

Lameese Chang
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Re: Draft EIR, Case No. ENV-2013-622-EIR

Dear Ms. Chang:

I am writing on behalf of the Session of Palms Westminster Presbyterian Church (the "Church") regarding the Draft EIR referenced-above. The church only recently became aware of the proposed redistricting because we were contacted by Andrew Park of Marcus & Millichap, brokers for proposed developers and investors in the redevelopment area. Andrew Park contacted us to ascertain whether the church would be willing to sell its property located on Robertson Place between Helms Avenue and Cattaraugus Avenue. The church owns the largest parcel of land in zone 13 of the project plan. 14-1

We are still in the process of conducting research regarding the plan and understand that the plan is in phase 3. Unfortunately, because we were unaware of the plan until recently, we have been unable to participate in meetings or provide you with our concerns/questions prior to this letter.

At this time, we would like to provide the following comments/concerns to the plan:

1. We have concerns regarding traffic congestion and street infrastructure if multi-level commercial/residential buildings are developed in zone 13. Primarily, because of the traffic congestion already existing during Hamilton High School drop off/pick up hours. Many students are dropped off/picked up in front of the Church, which places a heavy burden on our parking lot and makes it difficult for members to park in front of the Church for weekday meetings and gatherings. We do not mind high school students meeting their parents in front of the Church; however, we have concerns about what would happen to congestion if several commercial/residential buildings are built in zone 13. What would happen to the students? How will Helms Avenue, Cattaraugus Avenue and Robertson Place handle the additional motor vehicle traffic?; and 14-2

2. We have concerns about the availability of street parking and the misuse of the Church's parking lot. Our first priority is to our members and their ability to find parking and easily ingress/egress from the Church. The street parking in front of the Church is already burdened because of the used car lot in front of the Church. We also have concern for our neighbors, many of which have lived next door to the church for over 25 years. 14-3

We thank you for the opportunity to provide you with our comments. Please feel free to reach me directly by phone (310-779-6740) or email (mpark511@yahoo.com). You may also leave a message for the Church at 310-838-8208. Please direct any inquiries to me or to the Session.

Very truly yours,

Mary M. Park
Elder, Session Member
Palms Westminster Presbyterian Church

COMMENT LETTER NO. 15

West Of Westwood
Homeowners Association

June 3, 2017

Ms. Lameese Chang
City of Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
(email: lameese.chang@lacity.org

Re: Exposition Corridor Transit Neighborhood Plan
City Planning Case: CPC-2013-621-ZC-GPA-SP
Environmental Case: ENV-2013-622-EIR

Dear Ms. Chang:

I am writing to you on behalf of the Board of Directors of the West of Westwood Homeowners Association (HOA), representing approximately 1,200 households in the Rancho Park area. The West of Westwood HOA has several concerns relating to protecting the quality of life of its residents and preserving the existing neighborhoods in the West Los Angeles (WLA) Community Plan area.

The following comments provide a detailed discussion of issues and areas of concern that affect the West of Westwood HOA and reflect aspects of the plan that we support and areas that we do not support and recommend alternative regulations.

Please note that many of our comments also reflect our experience living with the negative impacts (as well as the positive impacts) that have occurred since the Exposition Light Rail Line began operating with a lot of new development in our residential neighborhood, noise impacts, light impacts, parking impacts, traffic impacts, increased neighborhood cut through traffic utilizing Exposition Boulevard and Military Avenue to get around the obstruction of the Expo trains crossing the north south streets (especially during rush hour AM and PM peak periods) including dangerous high speed traffic well above posted speed limits, and restrictions on access in and out of our neighborhoods for our residents and for emergency service (police and fire vehicles including ambulances). This is not an exhaustive list but reflects how our neighborhood has been impacted without any new development being allowed above existing zoning and General Plan regulations and without the construction and operation of the Casden development project adjacent to the Expo Light Rail Station at Sepulveda (the largest on the entire Westside). The Casden development project was already approved at more than 4 times the allowed density of development currently allowed and already accounts for about a third of the total housing units allocated in the Exposition Corridor Transit Neighborhood Plan. We are concerned that we are being required to absorb a significantly

15-1

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disproportionate amount of development immediately adjacent to our neighborhood in comparison to citywide density regulations. 15-1 cont.

We also have concerns that groups that are comprised of individuals that do not reside in our neighborhood are attempting to disproportionately up-zone our neighborhoods particularly in the area of housing. While we understand that we need housing and need to absorb our fair share of housing, such groups should not have the ability to influence up-zoning of our R1 and R2 properties and to allow a disproportionate and concentrated share of housing in our neighborhoods in comparison to adding housing density in all of the neighborhoods throughout Los Angeles. 15-2

Support

The West of Westwood Homeowners Association supports the following regulations within the Exposition Corridor Transit Neighborhood Plan and associated Streetscape Plan.

1. **Land Uses:`**
   a) We support retaining low density multiple-family residential (R-2) zoning along Exposition Boulevard corridor from Sepulveda to Overland Avenue to preserve and to provide a buffer to the single-family residential (R-1) uses in the Exposition Corridor Transit Neighborhood Plan. Do not restore the R3 subarea along the Exposition Boulevard between Sepulveda and Westwood Boulevard which we continue to oppose.
   b) We support retaining the existing zoning on Pico Boulevard between Sepulveda Boulevard and Overland Avenue. Do not restore the RAS4 subarea as we continue to oppose it.
2. **Transitional Height:** We support the requirements in the Exposition Corridor Transit Neighborhood Plan for Transitional Height as specified in Section 2.4.2 (B) that requires a maximum 50 foot height restriction for the portions of Projects (building envelopes) less than 100 feet from R2 or more restrictive residential zones (R-1) and a maximum height limit of 25 feet for portions of Projects that are within 50 feet of R2 or more restrictive residential zones (R1). 15-3
3. **Shade and Shadow:**
   We support the requirements for shade and shadow studies as specified in the Exposition Corridor Transit Neighborhood Plan in Section 6.2.2 Aesthetics.
4. **Streetscape Plan:** West of Westwood HOA supports the two Sepulveda Boulevard streetscape plan alternatives in the Exposition Corridor Streetscape Plan but requests that clarification be added as to what would trigger the implementation of the transit-oriented design (bus transit corridor in the middle lanes of Sepulveda Boulevard) in the illustrative plans. We strongly support and encourage that the right-turn only lanes depicted in the illustrative plans for the Pico intersection (and at all Sepulveda intersections at major corridors within the plan area) be implemented and that all development along Sepulveda be required to provide right-of-way dedication and pay for actual implementation costs as part of their development project requirements to ensure the implementation of these

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roadway and right-of-way improvements. Dedication requirements should be increased further if necessary to ensure the ability to allow free flow dedicated right turn lanes at these intersections.

5. **Increased Job Opportunities and Increased Housing:** West of Westwood HOA supports an increase in job opportunities and housing generally, however we retain concerns about the quantity of housing and amount of new commercial and industrial development proposed for our area and our neighborhood and support a lower amount which we discuss in our opposition section below.

15-3 cont.

Oppose

The West of Westwood Homeowners Association opposes certain proposed regulations within the Exposition Corridor Transit Neighborhood Plan and associated Streetscape Plan as specified below. Our comments below also reflect any specific alternate requests to replace the proposed regulations.

1. **Land Uses:**
   a) West of Westwood HOA objects to certain land uses specified as allowable uses in Table B on page 2-11 of the Exposition Corridor Transit Neighborhood Plan.
   b) Specifically, we object to "Hospitals and nursing and residential care facilities" in the **Mixed-Use Commercial Residential Zoning District** which would be located where the current Westside Pavilion is located on the block bounded by Pico Boulevard, Westwood Boulevard, Overland Avenue and Ashby because of the potential traffic and noise impacts (ambulances, etc.) that would impact the single-family residents on Ashby and surrounding R-1 zoned streets in the neighborhood. We have similar objections and concerns with recreation facilities and gyms, commercial hotels and colleges and vocational/technical schools or programs. Recreation facilities and colleges and vocational/technical schools have a high volume of turnaround traffic in a neighborhood and at the Pico intersections at Westwood and Overland that are already heavily impacted with high traffic volume and backed up traffic (especially during AM and PM peak periods created by vehicular traffic having to wait for the Expo Light Rail train that is not grade separated as our HOA requested when the Expo Light Rail was being designed and reviewed). Veterinary Clinics and Animal services should not be allowed adjacent to the residential uses on Ashby and if allowed at all should be limited to the Pico Boulevard frontage with a buffer of other uses in between and no outdoor areas where animals could be heard on Ashby.
   c) We also object to colleges and vocational/technical schools or programs in the **Hybrid Industrial: Residential Emphasis Zoning District** unless limited to small facilities under 25,000 square feet in size due to traffic and noise impacts to our neighborhood.
   d) West of Westwood HOA opposes any increase in mixed-use density along Westwood Boulevard and adjacent to the Westwood Station as proposed by

15-4

Abundant Housing and other groups. This would significantly impact the quality of life of our neighborhood with noise, light, traffic, circulation, parking, privacy and shade and shadow impacts in our already overburdened neighborhood. Additionally, this would eliminate valuable existing single-family housing.

e) West of Westwood HOA also opposes the proposed residential density for the Mixed-Use Commercial Residential Zoning District (where the Westside Pavilion shopping center is currently located) and the reduction and/or potential elimination of neighborhood serving retail uses at this location. The reduction of neighborhood serving retail uses will increase traffic in our neighborhood and adjacent commercial streets as residents will have to travel farther out of the neighborhood to other community retail facilities (such as Century City, Santa Monica and other locations). Additionally, the proposed density of residential dwellings at this location (that is disproportionate to the citywide increase) will significant exacerbate existing traffic impacts in our neighborhood. 15-4 cont.

2. **Floor Area Ratio:** West of Westwood HOA is concerned about the Bonus FAR proposed in the Plan. The proposed zoning districts all have proposed Bonus FAR standards that double the Base FAR or nearly in the case of the Mixed Use: Commercial/Residential District). The Bonus FAR proposed in the Plan should be significantly reduced or eliminated even with the Public Benefits that are proposed to be required. The West of Westwood HOA requests that the Bonus FAR be reduced to a maximum of 25% (State standard). 15-5

3. **Minimum Non-residential Use:** The West of Westwood HOA requests that the minimum required percentage of non-residential use for the **Hybrid Industrial:Residential Emphasis Zoning District** and the **Mixed Use: Commercial/Residential Zoning District** be reduced. Specifically, we request that the **Mixed Use: Commercial/Residential Zoning District** maintain at least a 50% minimum of non-residential uses. We request that the **Hybrid Industrial: Residential Emphasis Zoning District** maintain a minimum of 40% for the base FAR and 30% for the Bonus FAR. 15-6

4. **Alternative Compliance Eligibility:** West of Westwood HOA does not support the proposed alternative compliance eligibility regulations including for the site of the Casden Project for the parcels adjacent to and north of the Expo Light Rail Line Station on the west side of Sepulveda Boulevard. Projects should not have the ability to increase the number of residential dwelling units within the Plan area in excess of what is allowed by the zoning. Additionally, for clarification the Plan as currently drafted, Map E on page 2-20 of the Transit Neighborhood Plan does not depict the **Mixed Use: Commercial/Residential Zoning District** where the Westside Pavilion shopping center is located (on Pico Boulevard in the block between Westwood and Overland) as eligible for alternative compliance. West of Westwood HOA supports the Map as now drafted and does not support alternative compliance eligibility for the Westside Pavilion property. 15-7

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5. **Director's Determination for Alternative Compliance:** West of Westwood objects to the ability of the Director of Planning to be able to allow up to a maximum of 1,200 additional residential dwelling units within the Plan area in excess of what is allowed by the zoning as specified in Section 6.1.4(E). No excess residential dwelling units should be approved outside of what is allowed by the Neighborhood Plan and especially under the sole authority of the Director of Planning. If any excess residential dwelling units are proposed outside of what is allowed by the Neighborhood Plan, it should require a) noticed public hearings; b) decision by the Planning Commission and the City Council; c) and require public benefits that include significant tangible trip reduction measures of at least 25%, substantial community benefits and public right-of-way improvements and street widening as necessary. 15-8
6. **Maximum Building Heights:** The West of Westwood HOA opposes the maximum building heights for the property located in the superblock of Sepulveda Boulevard to Military Avenue from Pico Boulevard to the Exposition Light Rail Line right-of-way and the maximum building height for the maximum building heights for the property within the proposed **Mixed Use: Commercial Residential Zoning District** (Height Area 4) where the Westside Pavilion shopping center is located. The West of Westwood HOA requests that the Sepulveda Boulevard to Military Avenue superblock be reduced to a maximum height of 70 feet regardless of the combination of uses on the site in conjunction with the proposed transitional height limits (for the area currently shown in Height Areas 7 and 9) which is more compatible with the adjacent residential uses and less impactful than the proposed height limits. The height limits proposed will create light, shade and shadow, privacy, noise and traffic impacts on the West of Westwood residential neighborhood. The West of Westwood HOA requests that the maximum height limit be reduced to the height of the existing buildings on the property and a maximum of 4 stories for the **Mixed Use: Commercial Residential Zoning District** for the Westside Pavilion shopping center. West of Westwood also opposes a height limit in excess of 78 feet for parcels on the west side of Sepulveda to the I-405 freeway. 15-9
7. **Transitional Heights:** The West of Westwood HOA would oppose the elimination of the proposed transitional height limits. This is critical to reducing impacts on our neighborhood. 15-10
8. **Parking:** West of Westwood HOA opposes reducing the parking minimums in the proposed new zoning districts. Parking impacts are still a reality in our community even with the addition of the Expo Light Rail Project. It is unrealistic to rely solely on the addition of this mode of transportation to the existing public bus network to meet all of our community's transportation needs. Cars are still essential in Los Angeles for most individuals and existing deficiencies are not solved simply by reducing parking requirements which will simply exacerbate existing conditions. Additionally, most commercial land uses along the Pico Boulevard corridor and other neighborhood commercial corridors are severely underparked from their original development and add to the parking and 15-11

circulation problems of drivers looking for parking along the boulevards and in our neighborhoods. 15-11 cont.

9. **Public Benefit Requirements**: The West of Westwood HOA believes that even the Base FAR should provide some minimal public benefits because of the significant increase in FAR proposed. At a minimum some community amenities should be incorporated into the requirements. The West of Westwood HOA also requests that community amenities be required for bonus FAR regardless of what percentage of non-residential uses are in the project and that the vehicle trip reduction percentage should be increased from 10% to 15%. A significant percentage of Public benefit point money should be used for Palms Park and Riddick Youth Center where there is the greatest need and greatest impact from the proposed additional Plan development. 15-12
10. **Affordable Housing Requirements:** Table G Base Residential Density Standards should be decreased. The base residential density for the **Mixed Use: Commercial/Residential Zoning District** should be reduced from 1 DU for every 400 SF of Lot area to 1 DU for every 1000 SF of Lot area to reduce the neighborhood impacts. 15-13
11. **Community Amenities and Streetscape Plan:** In addition to emphasis on public benefit points and money be used for the Riddick Youth Center and Palms Park discussed in the Public Benefit Requirements section above, West of Westwood HOA requests that the City require more evergreen trees in landscape plans in front of and adjacent to these tall buildings, and along the parkways. The requirement for Evergreen trees should be further incorporated into the Streetscape Plan where applicable. 15-14
12. **Setbacks and Yards:** West of Westwood HOA requests that a minimum setback requirements of 25 feet be added and proposed for any street setback adjacent to or across the street from residential uses in Section 4.2.1. 15-15
13. **Vehicular Access:** Projects in the proposed **Hybrid Industrial: Residential Emphasis** and **Hybrid Industrial: Jobs Emphasis Zoning Districts** located on the superblock between Sepulveda and Military from Pico to the Expo Light Rail should be prohibited from taking any vehicular access to or from Military Avenue. West of Westwood opposes vehicular access to or from Military Avenue. 15-16
14. **Truck Hauling:** West of Westwood HOA opposes truck hauling on residential streets except for residential projects. West of Westwood HOA requests that the Neighborhood Plan and Mitigation Measures should prohibit truck hauling from residential streets including but not limited to residential corridors of Military Avenue and Exposition Boulevard (for Sepulveda Development projects) and Ashby for the proposed Mixed-Use Commercial Residential Zoning District proposed to be located on the property currently occupied by the Westside Pavilion shopping center. 15-17
15. **Design Standards:** West of Westwood HOA requests that the design standards and Neighborhood Plan prohibit balconies, patios or other outside active open 15-18

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email: wowhoa@verizon.net website: www.wowhoa.com
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space areas above the ground floor that face Military Avenue and the R1 and R2 neighborhoods to the east. 15-18 cont.

16. **Q Conditions:** The driveway design standards in Table 1of the Q conditions specifies a maximum limit of one 10-foot wide driveway for a building frontage of 150 feet or less along a public street. This condition is poorly written and is not logical in that if a property is only 150 feet wide there is not an allowance for sufficient driveway width. A 10-foot wide driveway only allows for one-way traffic or requires that on-site traffic must take turns entering and exiting a property which will create congestion and traffic problems that are greater than the benefit of 10 feet of additional street frontage for parking. We suggest that the limit should allow a maximum of 20 feet or 2 10-foot wide one way driveways as a better standard. 15-19
17. **EIR: School Issues:** The draft EIR dismisses schools as being impacted. The study used for schools is outdated from 2012-2013. It lists Overland, Westwood and Clover schools as being under-enrolled. It is false because it only counts neighborhood enrollment. For example, Overland is an SAS school that takes kids with high achieving scores from outside the neighborhood and these schools are actually overcrowded. 15-20

These concerns affect the health, welfare, safety, and overall quality of life of the households we represent. The Board of Directors of the West of Westwood Homeowners Association respectfully requests that the issues raised in this letter be addressed in the Exposition Corridor Transit Neighborhood Plan and the EIR for the Exposition Corridor Transit Neighborhood Plan. 15-21

Sincerely,

Terri Tippit

Terri Tippit, President
West of Westwood Homeowners Association

Kimberly Christensen

Kimberly Christensen, Land Use Chair and Board Member
West of Westwood Homeowners Association

COMMENT LETTER NO. 16

Westwood Gardens Civic Association
Since 1948
P.O. Box 642001 Los Angeles, Ca. 90064
westwoodgardens@gmail.com
www.westwoodgardens.net

VIA: email June 1, 2017

Lameese Chang, lameese.chang@lacity.org
City of Los Angeles Planning Dept.
200 North Spring Street, Room 667
Los Angeles, CA 90012

RE: EXPOSITION CORRIDOR TRANSIT NEIGHBORHOOD PLAN
ENV-2013-622-EIR, CPC-2013-621-ZC-GPA-SP

As President of Westwood Gardens Civic Association, Inc., I am writing on behalf of our Board of Directors and the entire Association, a well- established single family residential neighborhood of over 600 homes. We wish to fully **support** the above listed Preliminary Exposition Corridor Transit Neighborhood Plan. Our entire Association is located within a ½ mile radius of the Westwood/Rancho Park Expo Station and is zoned R-1-1, low residential. 16-1

The statement in your report, **"Property in single and two family residential zones will not be subject to new development regulations"** is welcomed by our community. However we are deeply troubled by those outside interests who desire to permit more mixed use density along Westwood Blvd. adjacent to the Westwood Station. We are totally against this idea – or even a slight hint of it – and urge you – do not allow/permit this to occur – ever! It would be most beneficial to have your statement emphasized in even stronger terms. 16-2

We urge you to support keeping the Exposition and Westwood Blvds. zoning as it currently is. Do not permit increased density along these two streets around the Westwood Expo Station.

We support the transitional height requirements, and the shade and shadow study requirement.

We support the Plan's Revisions to remove Pico Blvd. between Sepulveda and Overland from up-zoning to a RAS4 zone. Our community does not have adequate infrastructure to support the construction that would be created by additional development. We need our local small business community along Pico Blvd. 16-3

The outdated conclusion that our local schools are under-enrolled is troublesome, as they are not, when all the children are counted, including those who attend from outside the geographic school boundaries. This needs to be readdressed using up to date and recent school population figures. 16-4

Any use for public benefit points should be directed to our local centers such as the Palms Park and Library, the Riddick Youth Center and the future Neighborhood Greenway. 16-5

Since the building of the homes in Westwood Gardens in 1944, the prime goal of our Association has been to preserve and protect our quality of life and peaceful enjoyment of all our single family homes, all zoned R-1-1 Low Residential. This Plan will greatly affect our neighborhood for many years to come. We wish to see the very best plan come forth which must have as its #1 priority the protection of single-family neighborhoods from any up-zoning. 16-6

Thank you for your time and consideration of these comments. We are pleased that you have been listening to our community.

Sincerely,

Marilyn Tusher, President

c.c. Paul.koretz@lacity.org

COMMENT LETTER NO. 17

Westwood South of Santa Monica Blvd
Homeowner's Association
Incorporated November 8, 1971
P. O. Box 64213
Los Angeles, CA 90064-0213

June 5, 2017

Ms. Lameese Chang
Los Angeles Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012
Via email: lameese.chang@lacity.org

Re: Exposition Corridor Transit Neighborhood Plan
City Planning Case: CPC-2013-621-ZC-GPA-SP
Environmental Case: ENV-2013-622-EIR

Dear Ms. Chang:

This letter is written on behalf of the Board of Directors of the Westwood South of Santa Monica Blvd. Homeowners Association (WSSM), representing approximately 3,800 single-family and condominium households in the area between Westwood and Rancho Park. Our geographic area falls within the boundaries of the WLA Community Plan and we are represented by the Westside Neighborhood Council (WNC), the sponsors of the Pico Beautification grant program to be administered by the WNC to strengthen our community's local business core on Pico Blvd. The grant initiative and other activities including the Annual "Pick Pico" and a large community tree planting along Pico demonstrate our commitment to support our local business corridor and its merchants and our desire to further promote the walkability of the Pico-Westwood corridor that falls under the Westwood/Pico Neighborhood Oriented District (NOD) established January 24, 1998.

We are grateful to have this opportunity to provide comment on the DEIR for the proposed Exposition Corridor Transit Neighborhood Plan (Plan) that was released earlier this spring. Members of our Board and community attended the many outreach meetings that have been conducted by the Planning Department that have led up to the publication and release of the DEIR document currently under review. 17-1

This community has seen much change and added density since recovery from the last real estate downturn. As anyone going through our area can see, what used to be duplex, triplex and four-plex properties have been and are being replaced with large multi-story multi-family residences. Santa Monica Blvd. has seen numerous residential projects replace smaller residential properties and some commercial properties. Whether on the larger Santa Monica Blvd. or the smaller grid-style residential streets that are predominant in our area, "affordable"/workforce housing stock has been replaced by primarily higher-end housing. We have voiced our concern that any selected upzoning of properties in close proximity to transit will result in an artificially incentivized "land rush" that will trigger the immediate inflation of land values and trigger the eviction of current tenants. Under such circumstances, any new construction will be anything but affordable!

We are very pleased to note that the Planning Dept. has reviewed public comment and documentation submitted to date in support of retaining the current zoning on Pico Blvd. between Sepulveda Blvd and Patricia Ave. - thank you!

The WSSM Board was one of the few Associations in the vicinity of the EXPO Light Rail Line (the only local HOA) to have supported EXPO Line construction along the Exposition railway right-of-way (although we did support grade separation of the Overland and Westwood crossings noting that the addition of a temporary traffic lane at the tracks would do little more than comply with the EXPO Grade Crossing Criteria while failing to resolve the congestion to be created by the at-grade crossings). Unfortunately our concerns and those of others on this issue were not heeded. EXPO has resulted in added traffic delays, and significant concerns about emergency vehicle access.

As you are no doubt aware, traffic is always at the top of the list of community concerns due to our location. Our area contains all the major east-west arterials that service the Westside: Pico, Olympic and Santa Monica Blvds. We lie between the 405 and Century City, Beverly Hills and West Hollywood destinations. In addition we find ourselves on the route of those seeking to access Century City and UCLA from points south and from the I-10 Freeway. We have seen the increases in traffic as commuters seek to access the growing numbers of jobs located west of the 405 and in Santa Monica.

Many ask what impact EXPO has had on relieving that traffic. While the DEIR notes that locating growing populations near transit will reduce the vehicle miles traveled PER CAPITA, it does not address what is to be done with the fact that there will be thousands of additional daily trips as a result of the growing population figures. We will see more car trips! We cannot accept increases in density that cannot be supported by the City's sometimes failing infrastructure. Further, we fear that the increased density around our transit stops will serve as a disincentive to those riders who experience increasing difficulties in reaching the station of their choice

17-1 cont.

We have very serious concerns about the City's ability to service the thousands of new residents envisioned in this Plan. We are reminded every day of the City's inability to meet the service demands of the existing population and yet here is yet another proposal that would add more density and people as a way of raising the funds to pay for infrastructure delivery. With any luck, the new funds will hopefully provide adequate resources to satisfy the unmet current needs, but there will be little (if anything) left over to provide services for the new residents. And so the cycle swirls on. Unethical financial services people and the legal professionals who bring them down refer to this practice as a "Ponzi scheme." Sadly, this flawed philosophy is not unique to the Expo TNP; it is a constant that undermines the City's whole approach to addressing the housing and mobility challenges before us.

We trust that our comments related to the proposed EXPO Corridor Neighborhood Traffic Plan will be seriously considered by the City. We are concerned that those who do not live in or near our community are soliciting comments to counter the recommendations made in the DEIR. We are aware of online form letters in circulation that may bring in responses of those who are unaware of the dynamics of the area and care only to increase housing density at any cost. These "YIMBY" groups also advocate for the abolition of any zoning regulations which is a completely unacceptable concept to those of us who believe in and have faith in the practice of good urban planning.

We have limited our comments to the areas and impacts around the Westwood and Sepulveda Blvd. (east of the 405) stations. We defer to those living and working nearest the Palms and Bundy stations to take the lead on comments pertaining to those station areas. Our input is provided in two parts:

- A general commentary on the Exposition Corridor Transit Neighborhood Plan itself - as it is presented the Draft project description document dated March 2017 prepared by the Los Angeles Department of City Planning.
- More specific comments on the Draft Environmental Impact Report for the Exposition Corridor Transit Neighborhood Plan, also dated March 2017, prepared by Tarry A. Hayes and Associates, Inc. While the DEIR document is lengthy, our comments focus on the key issues of greatest importance and concern to our community. It should be noted that the DEIR is out-of-date, in that it does not reflect some recent changes to the Plan - namely the removal of most of Pico Pico Boulevard between Sepulveda and Overland and the addition of the Westside Pavilion property (on Pico between Westwood and Overland) which is now included as an ECTNP Sub-Area.

17-1 cont.

1. <u>General Comments on the ECTNP</u>

a) SUPPORT

WSSM supports the following aspects and features of the Exposition Corridor Transit Neighborhood Plan:

- We strongly support the removal of Pico Boulevard between Sepulveda Boulevard and Overland Avenue from the TCNP and agree that the existing zoning should remain.
- We support the requirements in the ECTNP for Transitional Height, including a 50-foot height limit within 100 feet of R1 or R2 uses and a 25-foot height limit within 50-feet of R1 or R2 uses.
- We support the requirements for shad and shadow studies as specified in the Plan Section on Aesthetics (6.2.2).

17-2

- Prior to the inclusion of a Streetscape Plan for Sepulveda Blvd. in the EXPO Plan, WSSM had suggested that the Sepulveda Blvd. corridor be the focus of a pre-planning WLA Community Plan exercise so that the community could come together to define a vision and a plan for the Sepulveda corridor which has long been in need of improvements. It was our thought that the process of creating a land use plan for the Sepulveda corridor would give us the experience and skills to then go forward with review of our WLA Community Plan. It was our hope and thought that following the exercise of creating a vision for the Sepulveda corridor that we would have interested and trained core of volunteers then ready to move on to the WLA Community Plan development process. We support the plan for Sepulveda in our area and support and encourage the implementation of the right-turn only lanes for the Pico intersection and all Sepulveda major corridor intersections.

b) OPPOSE

WSSM opposes the following aspects and features of the Exposition Corridor Transit Neighborhood Plan:

- We oppose the dramatic increase in density and population that the ECTNP would bring to our Westwood South area because there is simply not the infrastructure here to support it.

17-3

- We oppose the currently-proposed upzoning of the Westside Pavilion site to the new Mixed-Use: Commercial/Residential zone. This change would compound the already-serious impacts we will face from the Casden project at Pico and Sepulveda (adjacent to

the Sepulveda Station), which has already been approved, and impose significant shade and aesthetic impacts on the nearby single-family streets. We request that the Westside Pavilion site be removed from the Plan, so that the existing community commercial zoning can remain.

- We oppose the 8.9% increase in traffic that the ECTNP would create on our streets, which are already amongst the most congested in the City. Near-gridlock conditions are a regular occurrence at major intersections on weekday afternoons and we have zero capacity for any additional cars, buses or trucks. The added volume that the ECTNP is expected to introduce to our area would surely bring traffic here to a standstill.
- We disagree with the idea that development in our area needs to be artificially stimulated development in our area, to be sure of filling trains on the Expo Line. At the current rate of ridership growth (which has outpaced original projections), the Expo Line will very soon be at capacity - even without the project. And the Casden project, will add still more riders. So the Expo Line does not justify the greatly increased density and population that would be created by the ECTNP. Any plan to increase density and population in our area MUST include expansion of the capacity of the Expo Line (more frequent service, longer trains and platforms, additional track and the exploration of the eventual grade separation of the Overland Avenue crossing, etc.). Since there is no plan to expand the Expo Line in the foreseeable future, we feel that the whole premise of the Expo TNP is flawed.
- We oppose the Bonus FAR system proposed as part of the ECTNP, which would allow massive increases in the allowed FAR (80 - 100%) in return for basic Public Benefits. Without doubt, the bonus component of the ECTNP is a gift to would-be developers. However, the pay-back to the neighborhood (and city as a whole for that matter) seems almost insignificant - because the so-called Public Benefits themselves are so trivial. We request that the Bonus component be eliminated from the Proposed Project. Alternatively, Public Benefits could be included as a pre-requisite; in other words, a would-be developer of a site with the new Mixed Use: Commercial/Residential zoning would need to score a certain minimum number of Public Benefit points in order to qualify for an FAR of 2.0.
- If FAR bonuses are offered, community amenities should be required regardless of the percentage of non-residential uses in the project. And under no circumstances should FAR bonuses exceed the State standard of 25 percent.
- We oppose the Alternative Compliance aspect of the ECTNP which would allow greatly increased residential development and reduced commercial/jobs in certain eligible areas. If would-be developers are handed the option to build more apartments/condos and less commercial space, they will surely take it because residential development is a bigger profit opportunity for them in the current market. This is the wrong direction for the Westside. It should not be applied to the Casden Project site and/or to parcels adjacent to and north of the Expo Line Station on the west side of Sepulveda. Projects should not be allowed to increase the number of residential dwelling units in excess of what is permitted by the zoning. We do not support Alternative Compliance Eligibility for the Westside Pavilion property.
- We strongly oppose giving the Director of Planning the ability to permit up to a maximum of 1,200 additional residential dwelling units in the Plan area that would exceed what is allowed by the zoning as specified in Section 6.1.4(E). The behind-the-scenes awarding of discretionary development rights undermines the credibility of the planning and land use entitlement process. The Neighborhood Plan should clearly describe what is

17-3 cont.

allowed and what is not allowed and if any additional units are proposed, a clear, open and transparent process must be available for the public review of such requests, appealable to the Area Planning Commission and the City Council. Further, any recipient of such bonus entitlements should be required to provide significant public benefits that include significant trip reduction measures, public right-of-way improvements and street improvements as deemed necessary.

- We oppose the current proposal that requires as little as10% non-residential use in the Mixed Use: Commercial/Residential zone and request that this figure be increased to 50%.
- We oppose the maximum building heights for Height Areas 4 (Westside Pavilion) 7 and 9 (Sepulveda Boulevard, at and north of Pico Boulevard), which are all excessive, out of scale and completely inappropriate.
- We object to the locating of colleges and vocational/technical schools or programs in the Hybrid Industrial: Residential Emphasis Zoning District greater than 25,000 square feet in size.
- We oppose any increase in (mixed-use) density along Westwood Blvd. and adjacent to the Westwood Station as proposed by Abundant Housing and other housing advocacy groups. When our community voiced support for the EXPO Line, it was with the understanding that we were responding to the region's need for improved access to the educational and job opportunities in the Westside. We did it to provide for a reliable alternative transportation mode for transit riders while hoping that it would also prove to be an attractive option to get people out of their cars. We did not support the EXPO Line with the expectation that its presence in our community would result in the undermining of the General Plan pledge to preserve R1 communities.

17-3 cont.

- We oppose measures to reduce or eliminate parking minimums in the proposed new zoning districts. The City does not yet have adequate data or experience to show that parking demands for transit adjacent properties near EXPO Phase II will be markedly decreased. While an important component of the regional rail system, the availability of the Expo Line still does not offer many potential public transit users with an attractive alternative to driving. We have already seen the impacts of reduced parking at the Menorah Senior Housing project on West Pico Blvd. (between Veteran and Greenfield Avenues) in our community. While the project is a low income senior housing facility for those 55 and over, the demand for parking spaces from the tenants moving into the facility far outpaced the availability of spaces in the building. The residents, living on Pico Blvd. could not obtain preferential parking permits for Pico with its peak hour parking restrictions and parking meters. They could not obtain preferential parking permits for Veteran Avenue as Veteran only has parking on one side of the street (and it is a fairly heavily traveled street). That left Greenfield Avenue to the west of the project as the street on which preferential permits were sought with obvious impacts on the Greenfield residents whose street often provides parking for Pico business customers and staff. (Our WSSM association purposely has advocated for time-limited parking on our streets adjacent to businesses so that there would be parking available in support of the businesses. This is quite different from some areas that ban all parking times. However, the point is that assumptions about parking needs and the ability to reduce or eliminate parking near transit accessible locations is, at this time, an unproven hypothesis for development on the Westside. Policy cannot be based upon wishful thinking. It should be based on data whenever possible. For that reason we recommend that mechanisms to gather data related to parking, car

ownership/registration for residents in the Plan area, etc. be designed to provide for future planning work.

17-3 cont.

c) RECOMMEND/REQUEST:

- That haul routes for projects to be constructed under the EXPO Plan be prohibited from using residential streets except for residential projects. Staging of trucks should be limited to commercial locations – not adjacent to residences. Trucks hauling shall carry visible identification of the location of the project for which they are hauling.
- That the driveway design standards in Table 1 of the Q Conditions be increased from the maximum limit of one 10-foot wide driveway for a building frontage of 150 feet or less along a public street to allow for a maximum of 20 feet or 2 – 10 foot wide driveways. While we advocate for providing trees and open space rather than driveways on properties, it is potentially a dangerous situation to have a single 10 foot driveway located on a busy street to manage both incoming and outgoing traffic without causing avoidable congestion on street traffic.

17-4

2. <u>Comments on the ECTNP DEIR</u>

a) Project Description/Objectives (Section 3.0)

- The West Los Angeles Community Plan has strived to preserve industrial/light manufacturing land. That is one of its goals. The ECTNP also includes secondary objectives that "aim to promote well-designed, cohesive, and sustainable neighborhoods around the EXPO Corridor transit stations." It is very common to find industrially zoned land adjacent to railroad lines and/or highways. Our community has always enjoyed easy access to our service providers in the light industrial/light manufacturing zone adjacent to the 405/Sepulveda corridors – as well as adjacent to the Expo Line. With the construction of the EXPO line, we lost access to some of those vendors located near the tracks. With the construction of the Casden property, we will lose a large piece of land that could have best been used to provide a Westside Mobility Hub (Now that the Casden property is being developed as housing, where could such a Mobility Hub be located to help connect different travel modes such as LAX Flyaway, EXPO, Culver City Green Bus, Santa Monica Blue Bus, METRO buses, AMTRACK buses, etc. Even more important, where does our community go to purchase lumber for a home improvement project? Where do we go to kennel a dog, get auto body work done, store wine, etc? It would seem to be a waste of time and energy to need to drive miles away from the area in order to access what should be accessible service providers. Once residential uses begin to occupy the current light industrial zone we will find that the long-term survival of the service providers is doomed. The businesses that require a light industrially zoned use will find that they are viewed as a noxious use poorly tolerated by their neighbors. Then what? Then where do we go to find services that should be a part of every community?

17-5

- Section 2.2: What defines a "vibrant" neighborhood? How was it determined the neighborhoods around the stations are now not vibrant and in need of becoming vibrant? Is there an example of another neighborhood in Los Angeles (rail-transit adjacent or not) which was identified as in need and transformed by a similar approach? What are the long-term effects of an area being made "vibrant?"

17-6

- Primary Objective 3: Tax revenues can be generated for the city by development in any part of the city. Not just in areas around transit stations.

17-7

- Primary Objective 4: Is it true that "emerging environmentally oriented and clean industries" are clustered on the Westside? The best examples are seen in Playa Vista and in Venice. The most visible example in West LA is the locating of Riot Games on Olympic Blvd. near Bundy. However, such businesses seek creative space most notably on large parcels of land. There are few, if any large parcels available in the target area beyond the Sepulveda/Pico/Military lots. 17-8

- Primary Objective 5: Transit ridership does not seem to need to be increased. By Planning Dept. presentations, ridership is already greater than 75%. Placing affordable housing near the transit line assumes the jobs for those in need of affordable housing are also near the transit line. But as objective 4 states, the goal is to draw jobs types which would to seem to fall into the category of needing affordable housing. 17-9

- Primary Objective 6: By the Planning Dept.'s own estimates, vehicle miles traveled will "increase" with addition of housing near the line. This is diametrically opposed to the state objective. 17-10

- Section 3.1: The stated focus of the Plan is only on Phase 2 of the Expo Line. Why only Phase 2? 17-11

- Without the Plan it is anticipated that development would occur in an ad hoc, disorganized fashion. What basis is there for this anticipation? Why assume an ad hoc development would be disorganized? Could it be more organic, developing in response to the needs of the local area and its residents? (Just because requests for zone changes, etc. are made, does not mean that they need to be accepted!) 17-12

- Section 3.4: If the figures in table 3-1 on population growth and job growth are valid, then why isn't the city planning for the public facilities (fire, police, schools, water, sewage conveyance, etc.) needed to address this growth "independent" of the existence of this Expo Plan? Given the population projections from 2013 to 2035 range from 16% to 24%, perhaps a primary objective of the Plan should be zone changes dedicated to sites for public facilities (schools, fire, police, etc.). 17-13

- Page 3-13: If we take the population density figures presented, RAS4 allows 1 dwelling unit per 400 square feet of lot area (108 units per acre). If 1 square mile = 640 acres, then this Plan will see the potential realization of 640 x 108 = 69,120 dwelling units per square. 17-14

- Project Features: One of the project features of the Proposed Plan is a "streamlined processes" for projects that comply with the ECTNP. Oftentimes a "streamlined process' means that community members, neighborhood councils and other concerned and/or interested groups lose the opportunity to review pending projects and to provide sometimes valuable input. If our input is not incorporated into the review process and entitlements area granted "by right", *then the projects will have missed a very important opportunity to hear feedback and improve their final product. "Streamlining" can too easily be translated into the removal of public input. 17-15

- Page 3-37 notes that projects will require "pedestrian-friendly and quality urban design" by creating "safe, interesting and inviting buildings that improve the pedestrian experience. Set maximum front yard setbacks….." If the purpose is to enhance the pedestrian experience and much-needed open space why is the front yard setback established as a "maximum" number of square feet? Why doesn't the EIR seek to establish a minimum instead and encourage as large a front setback as the site and project can accommodate? 17-16

b) Aesthetics (Section 4.1)

- In the discussion of aesthetics, we would like to seek reinforced protection from the threat of digital signage in our community. Billboards inhabit our community's open space and detract from our ability to enjoy the natural beauty around us. We have long been at the forefront in the fight against sign pollution, digital billboards and digital signage. These signs are a tremendous danger to the public health and safety and their ability to distract those on the road compromises Mayor Garcetti's goals to reduce deaths from bike/pedestrian traffic accidents in his VISION ZERO program.

- Reference in the DEIR is made to the City's LAMC that regulates lighting with a notation from *Chapter 9, Article 1, Section 91.6205 (K) 4:* Signs are prohibited if they contain flashing, mechanical and strobe lights in conflict with the provisions of Section 80.08.4 and 93.6215 of this code. It has been our experience that despite having similar language in the Westwood/Pico NOD, the City has had difficulty enforcing what we believed to be a prohibition against digital off and digital on site advertising on our Pico/Westwood commercial corridors. As there have been problems in the past with this issue in our area, what can be stated in the EXPO Plan that will provide for stronger language that would reduce the possibility that any digital billboards or onsite digital signs would be erected in our community? We are especially vulnerable with the 10 and 405 freeways in our area which are especially attractive to outdoor advertising companies. (Despite laws that prohibit signs within a specified distance of freeways, they can still be seen and While it is clear to us that lights that contain "flashing, mechanical and strobe lights" or any appearance of movement are digital signs and are therefore not permitted, outdoor advertisers have challenged that interpretation (whether or not they believed that they would prevail). The resulting litigation often results in a halt to enforcement. 17-17

- Our community would like this Plan to contain language that makes it 100 percent clear that there is to be no new digital signage in the area. The project area, with its high volume traffic corridors, is especially vulnerable to becoming the recipients of digital billboards should a mechanism to permit them be approved by the Council. Digital billboards are a blight on their surroundings (particularly when adjacent to residential areas), create dangerous driver distraction, promote night light pollution and alter the character of the streetscape beneath. It is not just the intensity of the light that is being produced that is problematic; it is the cumulative impact of having a large electronic screen with changing images positioned in such a place as to affect all those around it. Residents living in proximity to digital billboards report that the light pollution or strobe effect during daytime hours is just as disturbing (though different) as the night time negative impacts. How can this Plan be used to strengthen our community's defenses against digital signage – regardless of the policies adopted at City Hall in their con

- Aesthetics and Trees: An important part of our community's character is the contribution that our urban forest / tree canopy plays in gracing our streets, shading our sidewalks and helping to cool our homes and businesses. While the DEIR sites ordinances that seek to protect a rather limited number of important tree species, we would hope that there could be a mechanism defined in this Plan that would help our community to defend our street trees from illegal trimming, maiming or removal. At the current time, residents and business people are unable to seek enforcement action against those "caught in the act" trimming or removing a street tree without a permit. Is there some way for this planning document to define a process or to strengthen the ability of a citizen to help the city to enforce its laws that protect the common (and not-so-common) street tree. Because of the important role that trees play in combatting the Greenhouse 17-18

effect/global warming, it is critical that the Expo Plan require additional evergreen trees in the landscape ;plans in front of and adjacent to the proposed tall buildings and along the parkways. The requirement for Evergreen trees should be further incorporated into the Streetscape Plan where applicable. Additionally, because of our experiences with tree removals and inappropriate pruning, we would like to suggest that the City develop a "tree tag" that would be attached to the tree in some manner or incorporated into the tree well that identifies the tree as a part of the ___ Streetscape Plan and provides relevant information about trimming, etc. Perhaps project entitlement paperwork can also include information about the street trees at the property so that the owner(s) can be considered to have been informed of their rights and responsibilities vis-a-vis tree care.

17-18 cont.

- Building height, land use and aesthetics: When commercial corridors are directly adjacent to residential streets, special care must be taken to protect the adjacent and nearby residents from the negative impacts of a potentially overwhelming structure re-defining the character of the neighborhood by drastically altering the scale and blocking any views. We are supportive of the Plan's language that will place a 50 foot height limit for the 100 foot transitional area protecting R1 and R2 properties. Such a scenario is very possible (even with proposed rear tiering) for the residents living on Bentley Avenue where the height of Sepulveda Blvd. is proposed to allow heights up to 83 feet. That height even with a transitional setback for those directly adjacent in R1 or R2 parcels will have an overwhelming impact on the aesthetics of the affected blocks and will also have a strong impact on the adjacent block beyond Bentley to Camden as well. A building of 83 feet is out of scale with the neighborhood. It will be taller than the tallest trees, will block afternoon sunlight for long periods of time, etc. Further, Sepulveda Blvd. itself is not an especially wide street and the presence of buildings of up to 83 feet in height on the east side coupled with buildings of up to 148 feet is difficult to imagine. If even a small portion of those living and/or working there have or drive cars, the added congestion to this designated freeway alternate route will render the street unpassable. While current planning practice looks to increase building height and population density, it is worth noting the issues related to quality of life and human health of those who live nearby such developments, but of those who live within. We refer to an article on human health effects related to land use planning and high density housing: http://www.human.cornell.edu/outreach/upload/CHE_DEA_NaturalEnvironments.pdf

17-19

- The height and size of housing also has health effects on residents—high-rise housing is associated with psychological stress, particularly among low-income mothers of young children (Evans, et al., 2003). Children who lived in 14-story public housing were found to have greater behavioral problems than children living in three-story public housing (Saegert, 1982). Social isolation may be one reason for this, because parents are less likely to let their kids play outside if they live high up in a large building (Kim, 1997). And, finally, crowding has detrimental effects on both mental and physical health (Evans, 2001)."

- Aesthetics and Utility Installations: One additional factor could have a strong impact on the aesthetics of a street and that has to do with the coming of small cell technology that the cellular telephone companies seek to install city/statewide. With the growing demand for new cellular devices, telecommunications companies seek to install hundreds and thousands of antennae on the public right-of-way. What kind of regulation, if any, could this ordinance include that would give the community some mechanism to review proposed installations (and the "ground" equipment that comes along with the antennae) to reduce their negative impact on adjacent properties? (A

17-20

statewide bill to take away the rights of cities to regulate on these is pending in the state legislature!) 17-20 cont.

- Is it possible for this planning effort to include the removal of utility poles and power lines as a community benefit to be provided to the community when there is an opportunity to provide such benefits? 17-21

- Scenic Resources: On page 4.1-9 the DEIR makes reference to the nearest State-designated Scenic Highway, State Route 2, north of State Route 201 in LaCanada-Flintridge. It was our understanding that State Route 2 (Santa Monica Blvd.) from Century City to the 405 freeway is designated as a scenic roadway. 17-22

c) Air Quality (Section 4.2)

- All of the considerations seem focused on air quality during construction. There don't seem to be any related to air quality "after" the changes have been made (e.g. the addition of new high density housing and/or employment centers). Since planning department calculations have shown an increase in VMT, there should be consideration as to the impacts of increased air pollution. Were delivery trucks coming and going to these buildings considered? Deliveries will continue to be made by truck (or drone?) even with close proximity to transit. How can air quality be adequately mitigated when emissions from autos will increase as a result in increases in total miles traveled? 17-23

- From a public health perspective, there is a solid body of knowledge that has identified the health dangers to those living in close proximity to major transit arterials due to fine particulate air pollution. Much of the area directly east of the 405 is not only in close proximity to the 405, but it is also downwind from the ocean breezes that are part of the coastal influence that cools our area. Should there be testing of these areas as part of the DEIR evaluation process? 17-24

- Developers have stated in the past that their residents are in no danger from fine particulate pollution because their buildings will be equipped with state of the art air filters. However, how do the City and the developer provide the building's tenants with the City's required open space if the open space to be provided is not USABLE open space?

- Has the City considered the creation of a mechanism to provide for the creation of community open space outside of the fine particulate contaminated areas where not only residents of the areas subject to fine particulate pollution could recreate without the risk of being exposed to potential debilitating future respiratory disease? 17-25

d) Cultural Resources (Section 4.3)

- The DEIR does not identify any specific historic/cultural resources in our Westwood and Sepulveda (east of the 405) Plan areas that appear to be eligible for preservation under Federal or State Historic guidelines. However, the DEIR does make reference to the LAMC Article 1 Chapter IX Section 91.106.4.5.1. which states that permits for the demolition of a building over 45 years old will not be issued unless abutting properties owners and the Council Office are notified in writing and a public notice of application for demolition has been posted at the site at least 30 days prior to the date of issuance. We were not aware of this ordinance and have never been notified by the City of the pending demolition of any structures that should fall under this code. How can the Plan help to preserve neighborhood character by advocating for the preservation and/or re-use of older properties that lend significantly to community character? If a neighbor is notified of 17-26

the pending demolition of an older property, what is the recourse available to preserve the property? (What does this measure accomplish?) 17-26 cont.

- There is a cultural landmark in our community that we do not see mentioned in the DEIR document and that is the Apple Pan Restaurant on Pico Blvd. near Westwood Blvd. (at the corner of Glendon and Pico). It is one of the few storefronts that has remained unchanged over the many years since it opened. What protections can be offered to this business/location? We would suspect that so long as the current long-time owners maintain ownership, the restaurant will be "safe." However, under any change of ownership and the reassessment of the property for property taxes, there would likely be a trigger to demolish. Why didn't this property/business appear in Survey LA or the DEIR? 17-27

e) Greenhouse Gas Emissions (Section 4.5)

- We remain concerned over the impacts of added vehicular congestion, and, in particular, time spent idling in slowed or stopped traffic and the resulting Greenhouse Gas Emissions created.
- In the Mobility 2035 Plan EIR they noted that for the Westside, LOS will be significantly worse with the project in the future (40.37% pm peak traffic at LOS E or F) compared with 28.6% LOS E or F pm peak traffic, without the project in the future. The project was approved and with the increase in congestion will come an increase in greenhouse gas emissions. That is to be coupled with added delays resulting from this EXPO Plan currently under review. Can there be a method to attempt to determine whether those living or working in proximity to transit and who use transit actually offset the added greenhouse gases produced by added idling and delay in driving times? We do not know. 17-28
- While California State now exempts bicycle facilities from CEQA review, it is critical that land use and transportation planners recognize the importance of working to maintain reasonable traffic speeds on major arterials for those who, for whatever reason(s), chose to drive and/or cannot or do not avail themselves of public transit or alternative modes of transportation. 17-29

f) Hazards & Waste (Section 4.6)

- The DEIR's analysis of Impact 4.6-7 (emergency response and emergency evacuation plans) is less-than-significant. However, this analysis does not take account of the 8.9% increase in street traffic volume that is expected to be produced by the Project. Surely increased density and congested traffic would make it harder for emergency services to get into the area - or residents to flee - in the event of a disaster. This impact is especially concerning as Sepulveda Boulevard is the designated alternate route for the 405 freeway. We request that Impact 4.6-7 be reevaluated in the context of the greatly increased traffic and congestion that would be created by the Project. 17-30
- Page 4.6-16: The map of the study area showing school locations does not seem to include numerous pre-schools and other private schools (for example Chalk on Westwood Blvd at La Grange or St. John's Presbyterian pre-school at Military and National). There may be many others. It also *does not* show Westwood Charter as a school "within 0.25-mile buffer from study area". 17-31

g) Land Use & Planning (Section 4.8)

- Of the zones that would be created as part of the Proposed Project, the new "Mixed-Use: Commercial/Residential" has the potential to do the most harm to the Westside. Its name - and the way it is described in the DEIR (page 4.8-13) - is also somewhat misleading. In the current real estate market, would-be developers will take full advantage of this new zone by building the maximum allowed multi-family residential space and minimum neighborhood commercial space. So the term "mixed-use" usually means "mostly high-density residential" and to the developers, it has the added attraction of reduced setbacks and height bonuses. These so-called mixed use projects have a particularly devastating effect on efforts to create pedestrian friendly environments. Instead of a vibrant ground floor presence, we will see residential space and the occasional outdoor patio on Sawtelle Blvd., historically had interesting small businesses along the street between Santa Monica and Olympic Blvds. Today a walk down Sawtelle finds huge gaps in the street life where large housing developments have been located – without any attempt to introduce any shops that might engage those passing on the street. The Plan should be true to its goals to stimulate vibrancy and activity and the creation of a sense of place within each station area. Without that the neighborhoods in the Plan area will blur together and lose the special qualities that distinguish one from another. If the Plan is successful in attracting jobs and residents from the high tech industries, they will expect that the place where they live or where they locate their business will be more than a run-of-the-mill commercial strip with non-descript mixed use buildings hugging the sidewalks with little landscaping or setbacks. 17-32

- While the DEIR does not make it clear what uses would be allowed in the new Mixed Use: Commercial/Residential zone, the Draft report describing the project (dated March 2017) shows that allowed uses would include "Hospitals and Nursing and Residential Care Facilities". We object to this use because of the additional traffic and noise impacts (ambulances, possibly even helicopters) that would impact the surrounding residential streets. Hospitals and medical office buildings are among the greatest trip generating uses possible. Nursing and residential facilities where the residents require regular nursing care are also intensive traffic generating uses. There is a large difference between a senior residential facility and those with medical uses. It should be noted that a large joint UCLA Medical Center-Cedars Rehabilitation Hospital facility opened at the site of the former Century City Hospital not long ago. The area likely has adequate hospital coverage at this time. (Attempts to locate a hospital and/or medical office facilities at the Bundy / Olympic corner (Bundy Village/Lombardi) were met with strong organized opposition from communities across the Westside who feared the impacts that such a facility would have on local traffic.) 17-33

- The discussion of impacts to the Change Areas on page 4.8-15 of the DEIR needs to be updated because the change of zoning from Neighborhood Commercial to RAS4 that had previously been proposed for Pico and Westwood Boulevards has been removed from the Expo TNP. Further, the DEIR incorrectly asserts that the (previously proposed) change "would not disrupt existing land use patterns as the RAS4 zone would continue to allow ground floor commercial development on Pico Boulevard, and the neighborhood-serving uses within RAS4 development would serve the adjacent residential community." This is not true. The previously proposed change of zoning would have caused historic commercial uses - dependent upon existing low rents - to cease operations and new commercial entities would be required to pay rent imposed by land and construction costs at the current market rate. Moreover, the anticipated multi-floor residential uses above the ground-floor commercial would have created a visual 17-34

wall on the north side of Pico Boulevard creating a canyon-like aesthetic and microclimate to this section of Pico. In total, the neighborhood would have lost existing longstanding businesses, a structural wall will effectively divide the north and south sides of Pico Boulevard and the result violates basic principles of good land use planning in existing communities. WSSM HOA strongly supports the Planning Department's decision to remove Pico and Westwood Boulevards from the Expo TNP. 17-34 cont.

- The summary of zone changes around Westwood Station on page 4.8-18 (including Table 4.8-5) should be updated to reflect the fact that Pico and Westwood Boulevards have been removed from the Plan. 17-35

- The discussion of impacts to the Change Areas on page 4.8-15 does not include the current proposal to change the zoning of the Westside Pavilion property (on Pico between Westwood and Overland) from community commercial to mixed-use. Unlike similar changes being proposed around Palms and Culver City Stations, this latest proposal for the Westside Pavilion site would allow mixed-use development immediately adjacent to single-family (R1) residential uses on the streets to the south, resulting in significant impacts including: increased density, building height, shadow, and visual blight. WSSM opposes the proposed upzoning of the Westside Pavilion site and requests that the existing community commercial zoning remain in place. 17-36

- At first glance, the Public Benefits described on page 4.8-20 appear to be a welcome benefit of the ECTNP. However, the proposed 80 - 100% FAR bonuses that would-be developers could "earn" from provision inclusion of Public Benefits are far too high. They are also unnecessary. Surely, our community should expect these features to be included in every new development as a matter-of-course, so there should be no special reward to developers for providing them. We request that the FAR bonuses be removed from the Plan; instead, Public Benefits should be a pre-requisite - something that must be included in order to qualify for the base FAR. 17-37

- The conclusion on page 4.8-21 of the DEIR that "implementation of the Proposed Project would result in a less than significant impact related to land use compatibility and division of an established community" must be revised to reflect the proposed zoning change for the Westside Pavilion site, which would surely result in significant impacts. 17-38

- The Alternative Compliance Scenario described on page 4.8-21 (and also in Chapter 3.0) is a potentially damaging feature of the TNP, because it would provide a path to increased residential square footage - with a corresponding decrease in non-residential square footage and jobs. And while would-be developers will surely take full advantage of this profitable loophole, the payback to the community seems almost negligible. We request that the Alternative Compliance component be removed from the Proposed Project. 17-39

- The "Mitigation Measures" and "Significance of Impacts after Mitigation" paragraphs on page 4.8-22 need to be updated to reflect mitigations and impact significance related to the change of zone for the Westside Pavilion site. 17-40

- The analysis of Impact 4.8-2 (consistency with applicable goals, policies and regulations) on pages 4.8-22 through 4.8-35 needs to be revised and updated to reflect the change of zoning for the Westside Pavilion site that is now included in the Proposed Project. It seems likely (if not certain) that high-density mixed-use development on the Westside Pavilion site would create conflicts with Regional, State and Local goals, policies and regulations, which would change the impact analysis to "significant". 17-41

- The analysis of Impact 4.8-2 should be revised to include Westwood/Pico Neighborhood Overlay District (which was established by ordinance and remains in effect). 17-42

- A major concern of our community relates to our ability to seek conditions on projects having an impact on our community. As the City seeks to increase the permitting of projects "by right" (streamlining) and removes opportunities for residents to make comments and suggestions and to meet and negotiate with developers, we fear that our ability to seek mitigations for impacts will be lost. Even in large projects we face challenges seeking mitigations because all too often the EIR traffic studies fail to identify future project impacts. When no impacts are documented, no mitigations are deemed necessary. This process leaves the City with the later responsibility of having to respond to those impacts and to bear the expense of future mitigation. 17-43

h) Noise (Section 4.9)

The DEIR correctly identifies "significant and unavoidable impacts" with noise and vibration. However, the analysis in Section 4.9 downplays the true extent of these impacts in several key ways:

- Firstly, the analysis has been done without a single ambient noise or vibration measurement in the Project Area. Instead, the preparers have relied on assumptions (such as the "presumed" ambient noise levels in the LAMC). This approach seems substandard and less than is required for good faith compliance with the CEQA guidelines. For the Final EIR, the impact analysis should be supported by actual measured ambient noise and vibration data to better quantify these important impacts. 17-44

- Secondly, the DEIR proposes no clear significance criteria for vibration, arguing that "there are no adopted City standards for vibration". This is inadequate. Normal practice would be to fall back on the County Code in any areas not adequately covered by the LAMC. So, for better compliance with CEQA guidelines and to better quantify the vibration impacts, the analysis in the FEIR should reference the LA County Code vibration limit. 17-45

- Thirdly, the DEIR misrepresents the vibration acceptability criteria published by the FTA, by quoting a vibration limit of 85 VdB. That figure is incorrect; according to the FTA publication "Transit Noise and Vibration Impact Assessment" (2006) the impact criterion for residential property is 80 VdB for infrequent events (fewer than 30 per day). For more frequent vibration events - such as those associated with heavy construction work, which could occur more than 70 times per day - the FTA criterion is 72 VdB. The analysis in the FEIR should include correct references to the FTA criteria. 17-46

- And finally, the proposed zone change (from commercial to mixed-use) for the Westside Pavilion property would permit/encourage new residential development that would be incompatible with existing ambient noise levels, which exceed 70 dBA (CNEL) on the Overland side of the site and almost certainly also exceed 70 dBA (CNEL) on the Pico and Westwood sides too (this should be verified by long-term noise monitoring on all three sides of the site). Such a high noise exposure level exceeds the upper limits for residential land use compatibility prescribed by Federal, State and Local agencies - namely: HUD, State Department of Health Services, State Department of Housing and Community Development, City of Los Angeles (General Plan). In other words, this site is simply too noisy to be compatible with the proposed residential use/zoning. Yet another compelling reason to remove the Westside Pavilion site from the Plan. 17-47

- Similarly, what efforts have been made to assess the appropriateness of using the freeway adjacent properties as future residential locations related to the exposures to noise and fine particulate air pollution standards? For those properties located between Sepulveda and the 405 freeway, was modeling done to determine the noise levels that residents would be exposed to there – particularly if sound bounced off any new tall structures on Sepulveda to "trap" noise between those buildings and the 405 and/or any 405 sound walls. It is possible that with construction of buildings anywhere from 83 to 161 feet high that excessive ambient sound levels would result? 17-48

i) Population, Housing & Employment (Section 4.10)

- The analysis in the DEIR finds Impact 4.10-1 (substantial population growth) to be less than significant. However, there is a flaw in the analysis because it does not take into account the 600 (approx.) residential unit Casden project at Pico and Sepulveda - right next to the Sepulveda Station - that was approved by City Council in June 2013. In fact, the Pico/Sepulveda project is not acknowledged anywhere in the DEIR. 17-49
- Table 4.10-10 shows that, compared to projected (SCAG) 2035 demand for housing along the entire length of the corridor within the City of Los Angeles, existing community plans fall short by 2,425 units. Thus, the Sepulveda Station housing project alone would meet a significant portion (25%) of the anticipated housing needs for the entire corridor yet is not acknowledged in the DEIR (Page 4.10-15). 17-50
- The housing impact analysis needs to be revised to reflect that portion of future housing demand that will be met by the Casden project at Pico and Sepulveda. 17-51
- The analysis of demand for jobs in the Project Area does not include the impact of the currently proposed change of zone for the Westside Pavilion site from commercial to mixed-use (i.e. mostly residential), which would surely result in a net loss of jobs. 17-52
- 4.10-15, the DEIR notes that a market study was conducted by Pro Forma Advisors, LLC entitled Expo and Crenshaw LRT Station Area Plans Market Analysis, 2013 to supplement SCAG growth projections for jobs and housing. However, this market analysis did not include Westwood Station. 17-53

j) Public Services (Section 4.11)

- The analysis in the DEIR finds Impact 4.11-1 (requirement for a new fire station) less than significant, in spite of the dramatic increase in development capacity, housing, population and employment in the Project Area that would be created by the Proposed Project. On page 4.11-11, the DEIR states that "…an increase in population, by itself, would not increase demand for fire protection services." This assertion makes no sense and doesn't appear to be supported by any evidence. Experience tells us that the demand for fire protection services absolutely will increase with increased population. Worse still, the projected 8.9% increase in traffic that would result from the Proposed Project would impede the progress of firefighting vehicles trying to make their way along our ever more congested streets - further increasing response times to emergencies that are distant from the existing fire stations. The analysis of Impact 4.11-1 must surely be revised to "significant", unless the DEIR can be supplemented with some hard evidence that increased development capacity, population and traffic congestion does not trigger a need for an additional fire station. LAFD station location is based on the geographic distribution of physical structures, access to trucks, ambulances, and other equipment, and the location of the Proposed Project rather than only on population increases. 17-54

- There is only 1 LAFD station (#92 on Pico near Overland) located on the same side of the 405 and 10 freeways to the study areas around the Westwood and Sepulveda stations. Station 92 is "assessment light force, paramedic." It does not have an "engine." And that station is on the far north-eastern edge of the Expo corridor. If that station is occupied with other emergencies, response from other stations will require potentially significant additional travel time.

17-54 cont.

- We take exception to the DEIR's analysis, which concludes that Impact 4.11-2 (impacts related to construction of new or altered police facilities) would be less than significant. Like Impact 4.11-2, the increase in density and population the Proposed Project would create in the Project Area would certainly increase the demand on police protection services. The DEIR agrees, stating on page 4.11-16 that "…the number of calls for police response to home and retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents and crimes against persons would be anticipated to increase with the increase in people, commercial and retail land uses and dwelling units in the ECTNP Area.". Since our area is already under-policed and has a growing burglary problem at our current population and density, how can the increase in police services necessary to adequately support the Proposed Project be provided without a substantial expansion of police facilities/staffing? The analysis of Impact 4.11-2 must be revised to more fairly and accurately reflect the need for additional police facilities to address the increase in crime that would surely result from the Proposed Project.
- The WLA Community Police station services the project area with the West Bureau serving the entire Phase II route of Expo. (The West Bureau consists of the WLA Division and the Pacific Division.) The WLA Division covers 63.14 square miles and serves a population of approximately 230,288 people. Staffing includes: 238 sworn officers, 20 reserve officers, 18 civilians, and 23 volunteers. The Project Area could accommodate an additional 12,216 residents and 9,457 jobs under the proposed project with Alternative Compliance scenario when compared to existing conditions and an additional 10,364 residents and 5,644 jobs when compared to the current plan.

17-55

- The police department tells us now, there are not enough officers. 238 for 65 square miles and not all on duty at same time. How can adding more people to the area, more housing units, more office space mean you need *less* officers per unit of office/housing? While additional police service demands can be accommodated through a variety of methods, including overtime or provision of substations in existing structures, which would increase police protection without the need for construction of new stations, where is the budget increase to pay for the overtime for these now regularly over taxed officers and/or to hire new officers?

- We must take exception to the DEIR's analysis, which concludes that Impact 4.11-3 (ability of existing public schools to accommodate increased demand for enrollment) would be less than significant. The analysis relies on data from 2012 and 2013 and does not reflect present-day overcrowding problems - nor the increased enrollment demand of the 600-unit mixed-use Casden project at Pico and Sepulveda. Further population increases resulting from the Project will surely exacerbate the problem, forcing students to travel to surrounding neighborhoods (possibly a significant distance away) to attend school. The analysis of Impact 4.11-3 must be revised using present-day enrollment figures. Our local elementary schools have been at capacity (and above) for a number of years. Average capacity for Westwood Charter over the past three years is 870 students.

17-56

- We question the assumption presented in the DEIR: "While the increase in student

enrollment resulting from the Proposed Project could be accommodated by the current capacity for the middle schools and high schools serving the Project Area, the current capacity at elementary schools serving the Project Area would not accommodate the number of new students that could be generated by the Proposed Project. However, student population may change during the intervening years, and LAUSD may need to expand existing schools and/or provide new facilities in order to accommodate the additional students generated by the Proposed Project." Table 4.11-9 shows current total elementary available capacity of 734 seats. And from tale 4.11-10 the anticipated number of added elementary students is 1051. That seems to assume an even distribution of children across all the schools (which we know does not reflect reality as many residences and schools are separated by the 405/10. How can a capacity of 731, and a demand of 1051 be interpreted as an impact "Less than significant?"

- We question the following as an unproven assumption:

  The DEIR acknowledges that impacts that divide a community are of particular concern/importance. The lack of space to accommodate new students from newly zoned residential projects could very well trigger a division of the community currently served by Westwood Charter Elementary. LAUSD has considered changing the boundaries of Westwood Charter Elementary School. If a portion of the WSSM community were to be removed from Westwood Charter's boundary, it was once proposed that students from the western portion of our community would be sent to Nora Sterry Elementary which is located west of the 405 Freeway. The contemplation of sending students to a school west of the 405, which is inaccessible to those east of the 405 after 3 pm each workday, would be to shatter the community which for many residents is focused around their children and Westwood Charter. Many residents purchased or rented their home, condo or apartment specifically to live in the Westwood Charter district area. Social circles are built around friends met at school, parent activities centered at the school, etc. A closer look at enrollment figures coupled with a plan as to where the children who may live in newly created residential zones must be made. (Sending WSSM area children to Nora Sterry would assure that they could not walk to their elementary school and would need to be driven. (And once driven, significant time would be lost in the return home after school whether by individual car, carpool or arranged van/bus transportation.

17-56 cont.

- It would seem reasonable to assume, since the focus of the ECTNP is to build affordable housing, the public school system would be the most likely destination for children living in affordable housing units. So it's almost certain, new elementary school construction would be needed. So how is the impact on public school access "less than significant"? Additionally, it should be noted that two nearby schools, Richland Elementary and Webster, are so close to the 10 freeway that they rightfully should be shut down. Certainly no new school construction would occur on land next to the 10/405. So where is the land to build these new schools?

- The DEIR finds Impact 4.11-4 (ability of existing parks and recreation facilities to accommodate the additional demand created by the Proposed Project) significant and unavoidable. We concur with this analysis. In an area that is already underserved by public parks, any further reduction in access to such essential facilities is surely unacceptable.

  What creative solutions to foster the development of new recreational open space have been considered? As permitted building heights increase, one would expect/hope to find that land at the base of such buildings would be set aside to provide needed open space. This plan considers granting extraordinary height where such height has not

17-57

been granted previously yet makes no allowances to create open space or greenbelts in proximity to these developments and communities. (The construction of balconies provides very limited opportunity for recreational enjoyment or activity but is permitted to be "counted" as open space. Perhaps the buildings adjacent to R1 and R2 residential properties should not be permitted to have balconies at all as they further degrade residential quality of life by robbing neighbors of their privacy, and the open space that would have been allocated to the balconies should be required to be invested in true usable open space—such as neighborhood pocket parks (on land as opposed to converted parking spaces in the street). Any open space created on private property should be open to the public within reasonable operating hours.

17-57 cont.

k) Transportation & Traffic (Section 4.12)

- The DEIR correctly identifies "significant and unavoidable impacts" with traffic circulation in the Project Area, concluding that the Proposed Project would increase traffic volumes to levels above applicable thresholds (Impact 4.12-2). We cannot overstate how damaging this particular impact would be to Westwood South. Still more vehicles on our already-congested streets would stifle all aspects of life here, turning our vibrant neighborhood into a giant parking lot.
- The traffic analysis in the DEIR underscores yet again the flawed thinking behind the Expo TNP, because the claimed objective is to reduce vehicle miles traveled (VMT) per capita, rather than reduce total VMT. So, while the Proposed Project is projected to result in a modest (3.1%) reduction in VMT per capita, the total VMT is expected to increase by 8.9%.
- The General Plan Transportation Element calls for improving, not worsening, mobility. The 1999 General Plan Transportation Element also said that "promotes conserving the existing character of its residential neighborhood" (p.3) by preventing neighborhood intrusion. Is there a process defined in this Plan that will protect neighborhoods from intrusion? How will this be monitored and evaluated? It is important that the EIR document capture baseline conditions for all infrastructure so that Plan impacts can be assessed.

17-58

- What impacts will increasing traffic have on first responders working in the area? Does this plan in any way increase delay in response time and, if so, what risks does that pose to public safety?
- The traffic analysis in the DEIR is based on counts and projections dating back to 2013 - before the Expo Line began operations in 2016. This is a significant flaw, because - for all its benefits - the Expo Line has worsened street traffic, especially during peak hours. To capture the true impact of the Proposed Project on traffic, the analysis must be updated to reflect traffic volumes and flows post-Expo Line. This will also provide for the identification of the Expo Line's impact on traffic patterns in the area.
- What has been Expo Light Rail's at-grade crossings' impacts on LOS, VHT and VMT?
- Traffic intrusion onto residential streets by commuters seeking to bypass congested major and secondary highways is of continuing and increasing concern. Historically, the City has failed to identify traffic impacts of residential buildings consisting of less than 50 units. However, the cumulative impacts of many larger unit buildings on residential streets has taken its toll and added to congestion on these streets that have been experiencing cut-through traffic. No neighborhood traffic management plan for the

WSSM area was required for the large Casden project even though it lies diagonally across from our area.

- Has a mechanism been proposed that will require developers on Sepulveda Blvd. to provide right-of-way dedication and to pay for actual implementation costs of the Streetscape Plan as part of their project development requirements? Will there be a defined process to ensure that the implementation of these roadway and right-of-way improvements takes place? Dedication requirements should be increased as needed to ensure the free flow dedicated right turn lanes described in the Streetscape Plan as well as any bicycle facilities to be incorporated on Sepulveda Blvd.
- Development impact fees do not pay to improve traffic congestion caused by the existing traffic or by the cut-through traffic with destinations outside of a given specific plan area. While the development impact fees may be leveraged to secure outside transportation grants to help pay to address existing infrastructure problems, those funds are not guaranteed
- Are construction impacts of the Casden project taken into account in the traffic projections in the DEIR? Are the impacts of the Casden project taken into consideration upon occupancy?
- While TDM programs are looked to as a mechanism to reduce traffic impacts, we are unaware of any successful residential TDM programs in operation in our area. Past environmental analysis of the Casden project stated that "the TOD/TDM trip reductions alone would not reduce any of the impacts to less-than-significant levels…" (DEIR page IV.N-147).

17-58 cont.

- How can a system be developed to monitor and evaluate the travel behaviors of those living in the Project area? How can accurate information be captured pertaining to personal travel habits?
- The Mayor and Department of Transportation have launched "Vision Zero," an initiative intended to reduce deaths and serious injuries experienced by pedestrians and bicyclists involved in traffic accidents. The philosophy behind the Vision Zero initiative relies on the intention efforts of the City to SLOW traffic so that if and when a pedestrian or bicyclist is hit, they will be injured and not killed. While it is most certainly laudable to work toward reducing and eliminating preventable deaths, there has been little work done to evaluate the impacts of slowing traffic on major arterials such that the drivers abandon those streets in favor of other better moving routes. Too often this change of driver behavior will see traffic moved to smaller residential streets where children play and walk to school, and where the casual bike rider feels more comfortable to ride—away from heavy traffic. The City cannot abandon its responsibility to move traffic while balancing the needs of pedestrians and bicyclists. At the current time, however, it feels as if the pendulum has gone from one extreme to the next. The costs of delay, in time, lost productivity, in the vehicular emissions created, etc. must be considered when evaluating street treatments and in locating bicycle facilities.
- If Transit Neighborhood Plans are needed to address cut-through intrusions or other traffic-related problems that threaten neighborhood safety and quality of life, who will pay for those programs?
- The DEIR notes that worksite traffic disruptions are to be mitigated. However, when lane closures have been implemented on Sepulveda Blvd., for example, it was necessary to do the required work during night hours. When major work is being done

during the night, there are other noise related factors that must be taken into account. It will be difficult to significantly restrict traffic on Sepulveda Blvd. due to its role as a designated freeway alternate route (and due to the heavy traffic it carries and the fact that there are no other north/south roadways that reach over the Santa Monica Mountains and into the valley). 17-58 cont.

l) Utilities & Service Systems (Section 4.13)

- In its analysis of impacts on the water supply and wastewater infrastructure, the DEIR notes that Proposed Project would result in increased demand - necessitating new water and waste lines - but nonetheless concludes that these impacts are less than significant. The logic is that any future developments would need to comply with existing City policies and, specifically, that "each Applicant/Contractor would be required to identify specific on- and off- site improvements needed to ensure that impacts related to water (and wastewater) conveyance… are addressed prior to issuance of a certificate of occupancy". This approach seems backwards and irresponsible. Surely, the City must put the water supply and wastewater infrastructure needed to support the Proposed Project in place BEFORE implementing zoning changes etc., rather than "kicking-the-can-down-the-road" and hoping that developers/contractors (who will be looking for the cheapest and most expedient way to get their projects approved) will solve the issues with significantly increased demand as they arise in the future.
- The analysis in the FEIR should be revised to include the necessary upgrades to water supply and wastewater conveyance infrastructure as required mitigations, and then Impacts 4.13-2 and 4.13-6 should be revised to read "less than significant with mitigation". It is essential that the costs of required infrastructure upgrades to support the Proposed Project are factored into the impact analysis. 17-59
- The DEIR notes that "the Proposed Project would exceed 20,000 gpd, which is the BOS criterion for necessitating detailed gauging to determine whether the sewer conveyancing system is capable of safely accommodating the total flow generated by the Project". However, the DEIR does not propose or even suggest implementing any such gauging as a mitigation - relying instead on future developers/contractors of future developments to "coordinate with LASAN" to solve capacity problems as they surface.
- The DEIR states that the existing sewer infrastructure in the Project Area is in "good to very good" condition. According to Table 4.13-11, sewer pipes in "good" condition have only light, localized cracks, corrosion or root damage, while pipes in "very good" condition are "almost like-new". Neither of these descriptions seems to align with the reality of the sewer pipe network in our Westwood South area, much of which is over 80 years old and in need of frequent repair (see this LA Times article from 2015: http://graphics.latimes.com/la-aging-water-infrastructure/).
- The DEIR should be revised to more accurately describe the aging sewage conveyance systems in our area, which are not compatible with the increased demand that would be precipitated by the Proposed Project. There was mention in the Casden project EIR documents that the Casden project may be using up the last remaining capacity for added sewer service on the line servicing the area. What is the update on that line? What are current assessments of available capacity?
- Electricity supply. The DEIR shows that the Proposed Project would increase demand for electricity in the Project Area by 52%. However, this translates into an increase of only 0.4% citywide, which - according to the analysis in the DEIR - can easily be accommodated by existing electricity infrastructure and therefore the Proposed Project 17-60

would have no significant impact on the City's electricity supply. This is encouraging, but doesn't seem to jibe with recent experience power outages and brownouts (which seem to occur every summer) not to mention the billboards and radio ads which tell us to avoid running air-conditioners and the like at times of peak demand.

17-60 cont.

m) Alternatives (Chapter 5.0)

- Our misgivings about the whole premise of the ECTNP notwithstanding, Alternative 2 (the Reduced Project Alternative) is the variant of the Plan that would do the least damage to the Westside. The 25% reduction in allowable FAR (with commensurate reductions in height, increased setbacks, etc.) would provide at least some relief from the serious negative impacts of the Proposed Project.
- The far-reaching negative impacts caused by the Proposed Project would be exacerbated by the Alternative 3 variant, which would reduce job creation and further increase maximize residential density (and thereby strain on infrastructure, worsened traffic etc.). We cannot how damaging Alternative 3 would be to the Westside.

17-61

We thank you for your consideration of our thoughts and look forward to the continuing dialogue to address some of the issues raised in the DEIR and our letter.

Sincerely,

Barbara Broide

Barbara Broide

President

COMMENT LETTER NO. 18

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: Lori Allen

Email: sirensong6@aol.com

Mailing Address: 9405 Harlow Ave LA 90034

Phone: (310) 839-6080

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

I have several concerns regarding development around the Palms & Culver City stations:

1) Traffic: Traffic increased exponentially during the construction of the Expo line. I expected it to return to normal (or improve) upon completion of construction-it did not. National, Harlow, Exposition, Bagley & Venice are all bumper to bumper at peak hrs w/ no way to mitigate this congestion w/ traditional methods. Clearly the line has not created vehicle trip reductions - development will only make it worse 18-1

2) Affordability: New development is charging rents well beyond the means of most angelenos. Pulled from websites 5/28/17 18-2

	~~Metro~~ Waterstone	Culver City Access
Single	$2130 - $2470	$3162
1 Bdrm	$2630 - 3370	$3487
2 Bdrm		$4353 - $5320
3 Bdrm		$7196

This will drive rents up for all of us

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

Sincerely
Lori Allen

3) Building high end clothing stores & trendy restaurants does not make up for the loss of national brand grocery stores & mom & pop services 18-3

COMMENT LETTER NO. 19

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR

A Anggelico <aanggeli@yahoo.com> Mon, Jun 5, 2017 at 11:59 PM
Reply-To: A Anggelico <aanggeli@yahoo.com>
To: "lameese.chang@lacity.org" <lameese.chang@lacity.org>
Cc: "info@lamayor.org" <info@lamayor.org>

Ms. Chang:

I oppose the exposition corridor transit neighborhood plan.

The revised plan still has allows significant increased density on the south side of Pico.

The change in zoning will allow 100's of condos and apartments in blocks higher than any buildings currently in the neighborhood. 19-1

The Environmental Impact reports shows many negative impacts from infrastructure overload to significantly increased traffic.

Addy Anggelico
aanggeli@yahoo.com

COMMENT LETTER NO. 20

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR Exposition Corridor Transit Neighborhood Plan

1 message

Melissa Aragon <melissacaragon@gmail.com>
To: lameese.chang@lacity.org

Wed, Jun 7, 2017 at 10:36 AM

Dear Ms. Chang:

I am not sure if it is too late to submit, however I hope you are able to consider my comments on the above-referenced plan. As a resident of the area north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations), just north of Pico Blvd., I wish to submit my strong support for the revised plan for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

The EXPO TNP Specific Plan with its revisions to remove Pico Blvd. between Sepulveda and Overland from "upzoning" addresses our community's strong opposition to the plan as originally proposed. We are supportive of the revisions along Pico Blvd. that acknowledge the fact that our community already has significant density coupled with crippling traffic. We have large employment centers in this area including UCLA, the UCLA Medical Center, Westwood Village and Century City. These centers more than justify the investment made in the EXPO Line and serve commuters as well as local residents. Our area was long overdue for a major public transit investment given our congestion, the growing density of our housing stock, and the many jobs and educational opportunities provided in our area.

The Pico Blvd. business corridor is the center of our community. We frequent the businesses along Pico and Westwood Blvds. Our Westside Neighborhood Council has invested significant time and resources in the improvement of Pico Blvd. and will soon be implementing a new streetscape plan from Sepulveda to Patricia Ave. And just this weekend we celebrated the fifth "Pick Pico" event to promote local businesses and organizations. The rezoning of Pico would doom the overwhelming majority of the existing shopkeepers – many independent business owners. The rezoning would usher in a period not unlike the urban renewal of the 1960's—where entire neighborhoods were demolished. We do not wish to invite that kind of destruction here. 20-1

Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. Those added development opportunities would have served to create a "land rush" along Pico—further inflating already expensive land. No affordable housing would have resulted from such upzoning.

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide low income housing. This area has grown in population and continues to do so. With the completion of the Casden project at Exposition and Sepulveda, we will add nearly 600 new units nearby. We have a high proportion of renters – many of whom have located to be in the Westwood Charter Elementary School area. That said, our local Westwood Charter Elementary School is at capacity.

As is well known, our area suffers from significant traffic congestion. Some of that congestion relates to the fact that there are nearly no north-south through arterials to carry traffic (and/or transit). Sepulveda Blvd. is one of the few and is also the 405 freeway alternative route; it will be further slowed with the addition of new development along its street. We have long requested DASH transit service from LA DOT but have been refused for many years as the priority for DASH goes to "transit dependent" areas. While we understand the need to prioritize, it seems to us that additional value can be realized from the EXPO line if more people were easily able to access its stations. Having reliable transit connections to EXPO from throughout our community (which goes north to Santa Monica Blvd.) would better spread development instead of creating a bottleneck/canyon along Pico Blvd.

Further, as the EXPO Line has been open only a year in our area, we believe it wise to consider where added development should occur after additional time has passed, and best to consider it when the WLA Community Plan is re-written and all our community assets and resources can be reviewed.

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

20-1 cont.

Sincerely,
Melissa Aragon

COMMENT LETTER NO. 21

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: J. Auerbach

Email: jauer212@gmail.com

Mailing Address:

Phone:

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

It's a disservice to disabled local residents that there is no handicapped parking at the Palms Station. Living uphill in Cheviot Hills, I cannot walk up and downhill from my home to use the Metro. (In fact, there's no parking for anyone). When I used the Expo Line, I had to park blocks away in an already crowded multi-unit neighborhood rather than my own. Not everyone is mobile but would use the train more if parking were convenient!

21-1

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 22

Lameese Chang <lameese.chang@lacity.org>

EXPO TNP

Kathryn Bernstein <kebernstein@earthlink.net> Thu, Jun 1, 2017 at 8:44 AM
To: lameese.chang@lacity.org
Cc: lpbernstein@earthlink.net

Lameese Chang

LA City Planning Dept.

Via email: lameese.chang@lacity.org

RE: **ENV-2013-622-EIR**

Exposition Corridor Transit Neighborhood Plan

Dear Ms. Chang:

Please accept my comments on the above-referenced plan. As a resident of the area north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations), just north of Pico Blvd., I wish to submit my **strong support** for the revised plan for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

The EXPO TNP Specific Plan with its revisions to remove Pico Blvd. between Sepulveda and Overland from "upzoning" addresses our community's strong opposition to the plan as originally proposed. We are supportive of the revisions along Pico Blvd. that acknowledge the fact that our community already has significant density coupled with crippling traffic. We have large employment centers in this area including UCLA, the UCLA Medical Center, Westwood Village and Century City. These centers more than justify the investment made in the EXPO Line and serve commuters and students, as well as local residents. Our area was long overdue for a major public transit investment given our congestion, the growing density of our housing stock, and the many jobs and educational opportunities provided in our area. 22-1

The Pico Blvd. business corridor is the center of our community. We frequent the businesses along Pico and Westwood Blvds. Our Westside Neighborhood Council has invested significant time and resources in the improvement of Pico Blvd. and will soon be implementing a new streetscape plan from Sepulveda to Patricia Ave. And just this month we celebrated the fifth "Pick Pico" event to promote local businesses and organizations. The rezoning of Pico would doom the overwhelming majority of the existing shopkeepers – many independent business owners. The rezoning would usher in a period not unlike the urban renewal of the 1960's—where entire neighborhoods were demolished. We do not wish to invite that kind of destruction here.

Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. Those added development opportunities would have served to create a "land rush" along Pico—further inflating already expensive land. No affordable housing would have resulted from such upzoning. Adjacent properties would be severely negatively impacted.

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide low income housing. This area has grown in population and continues to do so. With the completion of the Casden project at Exposition and Sepulveda, we will add nearly 600 new units nearby. We have a high proportion of renters – many of whom have located to be in the Westwood Charter Elementary School area. That said, our local Westwood Charter Elementary School is at capacity.

As is well known, our area suffers from significant traffic congestion. Some of that congestion relates to the fact that there are nearly no north-south through arterials to carry traffic (and/or transit) thus placing tremendous burdens on those few streets that do provide north-south access. Sepulveda Blvd. is one of the few and is also the 405 freeway alternative route; it will be further slowed with the addition of new development along its street. We have long requested DASH transit service from LA DOT but have been refused for many years as the priority for DASH goes to "transit dependent" areas. While we understand the need to prioritize, it seems to us that additional value can be realized from the EXPO line if more people were easily able to access its stations. This particularly true for those who wish to give up their vehicles and for the young and elderly. Having reliable transit connections to EXPO from throughout our community (which goes north to Santa Monica Blvd.) would better spread development instead of creating a bottleneck/canyon along Pico Blvd. The reality is that EXPO will not even be able to resolve the **current** traffic issues—much less absorb all the traffic to be created by new development, a great deal of which will occur *without* any upzoning to our community. And, we must remember that EXPO's capacity to carry passengers is limited due to the sharing of track with the Blue Line as the train nears downtown.

22-1 cont.

Further, as the EXPO Line has been open only a year in our area, we believe it wise to consider where added development should occur after additional time has passed, and best to consider it when the WLA Community Plan is re-written and all our community assets and resources can be reviewed.

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

Best Regards

Larry and Kathryn Bernstein

10463 Tennessee Avenue

Los Angeles, CA 90064

310-613-8465

COMMENT LETTER NO. 23

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR

1 message

Paula <paula.bourges@gmail.com> Mon, Jun 5, 2017 at 3:49 PM
To: lameese.chang@lacity.org

Dear Ms. Chang:

Please accept my comments on the above-referenced plan. As a resident of the area north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations), just north of Pico Blvd., I wish to submit my **strong support** for the revised plan for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

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Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. Those added development opportunities would have served to create a "land rush" along Pico—further inflating already expensive land. No affordable housing would have resulted from such upzoning. Adjacent properties would be severely negatively impacted. 23-1

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide low income housing. This area has grown in population and continues to do so. With the completion of the Casden project at Exposition and Sepulveda, we will add nearly 600 new units nearby. We have a high proportion of renters – many of whom have located to be in the Westwood CharterElementary School area. That said, our local Westwood Charter Elementary School is at capacity.

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23-1 cont.

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

Sincerely,
Paula Bourges
2377 Selby Ave.
L.A.,90064

COMMENT LETTER NO. 24

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: JAMES BREWER

Email: JBREWER7@GMAIL.COM

Mailing Address: 3561 CLARINGTON AVE. #101 LOS ANGELES CA 90034

Phone: 310 528-8392

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

I AM A 26 YEAR RESIDENT AND HOMEOWNER IN THE PALMS NEIGHBORHOOD AND I AM VERY OPPOSED TO WHAT I HAVE SEEN HERE TONIGHT. THE STREETSCAPE PLAN WHERE LANES WOULD BE REMOVED FROM PALMS & NATIONAL BOULEVARDS WOULD BE A DISASTER. THOSE STREETS ARE ALREADY NEAR GRIDLOCK AND THE REDUCTION OF EXISTING LANES WOULD ONLY EXACERBATE THESE PROBLEMS. 24-1

WE ALL LIKE TO DREAM OF A CITY WHERE EVERYONE CAN WALK OR BIKE TO WORK, BUT THAT IS JUST NOT THE REALITY OF L.A. REDUCING THE CAPACITY OF THROUGHFARES JUST FORCES MORE TRAFFIC INTO RESIDENTIAL NEIGHBORHOODS CAUSING MORE NOISE POLLUTION AND INJURY TO PEDESTRIANS.

PLEASE DEVISE A MORE REALISTIC PLAN.

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

THANKS FOR YOUR ATTENTION,

James Brewer

COMMENT LETTER NO. 25

Lameese Chang
LA City Planning Dept.
Via email: lameese.chang@lacity.org

RE: **ENV-2013-622-EIR**
Exposition Corridor Transit Neighborhood Plan

Dear Ms. Chang:

Please accept my comments on the above-referenced plan. As a resident of the area north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations), just north of Pico Blvd., I wish to submit my **strong support** for the revised plan for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

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Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. Those added development opportunities would have served to create a "land rush" along Pico—further inflating already expensive land. No affordable housing would have resulted from such upzoning. Adjacent properties would be severely negatively impacted.

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide low income housing. This area has grown in population and continues to do so. With the completion of the Casden project at Exposition and Sepulveda, we will add nearly 600 new units nearby. These units do not seem to have been accounted for in the DEIR. We have a high proportion of renters – many of whom have located to be in the Westwood Charter Elementary School area. That said, our local Westwood Charter Elementary School is at capacity.

As is well known, our area suffers from significant traffic congestion. Some of that congestion relates to the fact that there are nearly no north-south through arterials to carry traffic (and/or transit) thus placing tremendous burdens on those few streets that do provide north-south access. Sepulveda Blvd. is one of the few and is also the 405 freeway alternative route; it will be further slowed with the addition of new development along its street. We have long requested DASH transit service from LA DOT but have been refused for many years as the priority for DASH goes to "transit dependent" areas. While we understand the need to prioritize, it seems to us that additional value can be realized from the EXPO line if more people were easily able to access its stations. This particularly true for those who wish to give up their vehicles and for the young and elderly. Having reliable transit connections to EXPO from throughout our community (which goes north to Santa Monica Blvd.) would better spread development instead of creating a bottleneck/canyon along Pico Blvd. The reality is that EXPO will not even be able to resolve the **current** traffic issues—much less absorb all the traffic to be created by new development, a great deal of which will occur *without* any upzoning to our community. And, we must remember that EXPO's capacity to carry passengers is limited due to the sharing of track with the Blue Line as the train nears downtown. The DEIR uses traffic figures that were taken BEFORE the EXPO Light Rail Line went into service. Therefore conclusions drawn cannot be accepted as accurate/valid as the operation of the light rail may have had a significant impact on patterns of travel in the area. The traffic study analysis should be updated to incorporate recent traffic counts and related project data.

25-1 cont.

It is difficult to understand the relationship between this Transit Corridor Neighborhood Plan and how Measure JJJ's "Transit Oriented Communities" (TOC) program will be implemented. The current Planning Dept. recommendations that were sent to the City Planning Commission recommended that areas that fall under a Transit Corridor Plan would be exempted from the TOC/Measure JJJ program. We support this interpretation but do not know whether it will be adopted as such by the City Council. And, of course, we all look forward to the time when the WLA Community Plan will be rewritten so that we can make community-wide decisions as to our collected vision of the community. It appears to be an impossible task to attack these initiatives in some sensible order when all our community assets and resources can be reviewed.

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

25-1 cont.

Sincerely,

Barbara Broide
2001 Malcolm Ave.
LA 90025

COMMENT LETTER NO. 26

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: Eric Bruins

Email: ejfbruins@gmail.com

Mailing Address: 3845 Motor Ave #5, LA 90232

Phone: 650-823-9713

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

This plan does not provide enough housing capacity to meet the expected job growth, let alone make up for the current shortage. The LA region is between 500k and 1 million housing units below what we need to restore affordability. That shortage is most acute on the westside due to our healthy job base. This jobs-housing imbalance is the primary source of our regional traffic, yet this plan makes that balance worse, not better. Once the regional connector opens in 2021, the eastside will bear the brunt of the westside's lack of housing. This plan will fuel gentrification and displacement in Boyle Heights. That has VMT/GHG impacts that should be mitigated with more housing capacity. 26-1

There should also be much lower parking requirements — or none — near the stations. There are a huge number of households in Palms that do not own cars, and many more people in the region that are willing to live in no-parking units. We should be providing more housing options for them. Also, much of the bulk that is perceived as density in Palms is actually parking (e.g. Palms/Motor building). Reducing 26-2

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

parking will lower construction costs, increase the number of units that can fit on a property, and reduce the ugly bulkiness of newer construction that degrads our neighborhood aesthetics.

26-2 cont.

Overall the plan is trying to do a lot of great things on transit-orientation and walkability. But the greatest challenge for sustainability and livability is housing, and this plan doesn't do nearly enough to address our lack of supply.

26-3

COMMENT LETTER 27

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: Rich Cahalan

Email: rich@cahalan.biz

Mailing Address: 2336 Greenfield Ave, LA 90064

Phone: 310-473-9146

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

It is imperative that the P.O.D. zoning overlay on Pico between Sepulveda + Overland (+ up Westwood Blvd north of Pico) be preserved + enforced. Many of us have fought for many, many years To have the P.O.D. and we want it maintained. 27-1

Also, is there any way to get the City to control traffic speeds on Pico better? Cars now speed at 50+ mph + endanger kids trying to cross the street or walk near the gutters. 27-2

Thank you.

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 28

Lameese Chang <lameese.chang@lacity.org>

Re: Pico upzoning

POJEN P. Chen <ppchen@g.ucla.edu> Sun, May 14, 2017 at 9:30 PM
To: lameese.chang@lacity.org
Cc: Paifei Chen <mrs.pchen@gmail.com>

Lameese Chang

City Planner (Exposition Line)

Re: Pico upzoning

Dear Ms. Chang,

I am writing to express the serious concerns of my wife and I about Pico upzoning. While we are relieved to learn that Pico between Sepulveda and Overland will keep the 3-story height limit, we are concerned that this decision may be changed to even more than 5-story height limit. I have been living at 2320 Midvale since June 1998, and have been frustrated by the terrible traffic on Pico during the traffic hours (8-10 AM, and 3-7 PM) on weekdays. I am sure that any increase above the current 3-story height limit will make the traffic during traffic hours on Pico even much worse. Along this line, I am seriously concerned that the above traffic situation will affect the emergency service when our life is on the line. Of note, I have been with on-going thyroid cancer since 1999, and the daily medications have led to two serious GI bleedings in 2006 and 2008; both took me to emergency rooms and hospitalization. I hope that you will consider life safety as the most important issue for the current residents around Pico and will keep the 3-story height limit on Pico.

28-1

Sincerely yours,

Pojen P. Chen

COMMENT LETTER NO. 29

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: Bob Cimiluca

Email:

Mailing Address: 2210 Overland Ave, Los Angeles, CA 90064

Phone: (310) 475-3826

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

I support the current three story height limit on Pico. It is the right thing to do. It will significantly increase housing along the Pico Corridor without burdening the area with overdevelopment. In conjunction with this decision, City Planning should take this opportunity to do more detailed planning. For example, the infrastructure needed to support the increased population. How many new schools will be needed for those families with children, and where will the schools be built. 29-1

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 30

COX CASTLE NICHOLSON

Cox, Castle & Nicholson LLP
2029 Century Park East, Suite 2100
Los Angeles, California 90067-3284
P: 310.284.2200 F: 310.284.2100

Alexander M. DeGood
310.284.2205
adegood@coxcastle.com

File No. 068209

June 5, 2017

VIA EMAIL

Lameese Chang
City of Los Angeles Department of City Planning
200 N. Spring Street
Room 667
Los Angeles, CA 90012

Re: Exposition Corridor Transit Neighborhood Plan Draft Environmental Impact Report, Case No. ENV-2013-622-EIR

Dear Ms. Chang:

This office represents the owner of the property located at 12101 West Olympic Boulevard (the "Property"), which is located immediately north of the Expo/Bundy light rail station within the proposed Exposition Corridor Transit Neighborhood Plan (the "Plan").

I. The Martin Expo Town Center (METC) Project

In September 2016, the Los Angeles City Council unanimously approved, among other entitlements, a general plan amendment changing the Property's general plan designation from Light Industrial to General Commercial and a zone change changing the Property's zoning from M2-1 Light Industrial to (T)(Q)C2-2D with a 4.0:1 FAR (the "Martin Expo Town Center" or "METC project"). The METC project is a leading transit-oriented mixed-used development that will consist of approximately 150,000 square feet of creative office space, over 500 residential units, a 35,000 square foot grocery store, 46,000 square feet of retail space, and 18,000 square feet of restaurant space for a total of approximately 807,000 square feet of development. The City approved the METC project after years of analysis and extensive community input.

30-1

II. The Exposition Corridor Draft EIR Does Not Properly Identify the METC Project Site

The draft EIR for the Plan incorrectly lists the Property's current general plan designation as Light Industrial and ignores the City Council's September 2016 action. This is perplexing given that the METC project is one of the largest mixed-use projects approved by the City in recent years. I request that the Plan's final EIR correctly reflect the current general plan designation and zoning for the Property.

III. The EIR Should Take Into Account Recent Planning Decisions

By incorrectly designating the Property's current zoning and general plan designation, the EIR inaccurately analyzes a potential zoning and general plan change that would not align with recent City actions. The Plan proposes a Hybrid Industrial general plan designation and Hybrid Industrial: Jobs Emphasis zoning for the Property, which would permit a base FAR of 2.0:1 and a maximum FAR of 4.0:1 with the provision of certain community benefits, and would limit residential uses. However, per the City's recent actions, the Property already has a 4.0:1 FAR and zoning that permits residential use that exceeds the residential FAR that would be permitted under the Plan.[1] At a minimum the EIR must analyze the proposed change in zoning relative to the Property's current zoning. This is particularly important given that the Property appears to be the largest site in the Plan for the proposed Hybrid Industrial designation and zoning. 30-2

More broadly, as a policy matter it makes little sense for the City to expend years of effort analyzing and approving legislative entitlements for the Property (including a development agreement) only to turn around a few months later and propose entirely different zoning. While the METC project is vested and may develop according to its entitlements regardless of the Plan's final form, the Plan should acknowledge the City Council's policy decision of September 2016 and propose a general plan designation and zoning for the Property that align with the City's recent action.

Thank you for your consideration of these comments. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Alexander M. DeGood

AMD/amd

068209\8880254v1

[1] The METC project will provide significant affordable housing and numerous other community benefits, including substantial traffic infrastructure improvements and payments for various social services.

COMMENT LETTER NO. 31

Lameese Chang <lameese.chang@lacity.org>

Exposition Corridor Transit Neighborhood Plan-comments

Joanne Dorfman <evenik@yahoo.com> Mon, Jun 5, 2017 at 2:09 PM
Reply-To: Joanne Dorfman <evenik@yahoo.com>
To: Lameese Chang <lameese.chang@lacity.org>

Re: Exposition Corridor Transit Neighborhood Plan
City Planning Case: CPC-2013-621-ZC-GPA-SP
Environmental Case: ENV-2013-622-EIR June 3, 2017

Dear Ms. Chang,

I am a 17 year resident of West Los Angeles 90064. I have studied the ETNP, and the EIR.
My comments are as follows:

-Good points of the plan:
-new housing
-guidelines for streetscape improvements, evergreen trees please.
-urban design standards- good and will help aesthetics.
-Pico Blvd - keep it commercial, 2-3 stories max- no RAS4.
-Exposition Blvd- keep it R-2, No change to R-3.
-transitional heights between different zones, makes for a harmonious community.
-shadow & shade study- good to integrate tall buildings with least impact on established neighbors.
-community benefits- please fund local Marshall P. Riddick Youth Center, they serve the kids of the neighborhood.
-Listen to the residents of the community-we live here, our kids go to school here, we want it to be done well.

31-1

-Unfavorable points of the plan:
-sub area #4 is too tall/dense, please lower height. Setback across from R-1 needs to be deep, 60 ft or more.
-unbundled parking- goes against human nature and real life practice.
-traffic will get worse no matter what measures are taken, so density needs to be lessened in sub areas 1,2,3.
-infrastructure to accommodate new developments needs to be defined; police, fire, schools, water, sewers, libraries, parks & recreation/open space.
-school study is 5 years old, not valid for today or for the future.
-westside pavilion sub area #6- please keep this commercial and not add residential.

31-2

General comments:
It is my belief that our city is very desirable and there will never be enough affordable housing for all those that wish to live here. The new developments will have a small fraction of affordable units. I do not believe housing prices will be lowered by the implementation of this plan.
To densify the neighborhood in an attempt to satisfy demand will result in a more crowded neighborhood, with residents squeezing in to share the same roads, same schools, same parks, calling the same police, and the same fire trucks- and currently we are still on a sharing basis between fire Station #92 on Pico Blvd and Station #34 in Palms. I have personally witnessed fire

31-3

trucks/ambulances waiting at at-grade train crossings on Overland and Westwood Blvd. while sirens blaze and someone waits in desperate need of help. At minimum this plan should mandate the elimination of any fire stations sharing service areas where the train intersects their boundaries. Therefore, I strongly urge LA Dept. of Planning to modify some of the heights/densities of the plan. It is noble that some form of relief for housing is addressed here, but it will result in the overtaxing of our community's police, fire, water, sewer, power, schools, roads, parks, libraries, and our air.

31-3 cont.

-Joanne Dadison Dorfman
11015 Exposition Blvd
Los Angeles, CA 90064

COMMENT LETTER NO. 32

Lameese Chang <lameese.chang@lacity.org>

Against Pico Upzoning

1 message

mary doss <music2mom@hotmail.com> Mon, Jun 5, 2017 at 4:13 PM
To: "lameese.chang@lacity.org" <lameese.chang@lacity.org>
Cc: "faisal.alserri@lacity.org" <faisal.alserri@lacity.org>, "jack.sripoona@lacity.org" <jack.sripoona@lacity.org>

Hello,

I am a long term resident of the area. Upzoning Pico between Sepulveda and Overland will negative impact the quality of life for residents like me. Increasing building density to 5 story from the current 3 story limit shall:

- eliminate/kill the small business which makes this area desirable
- add traffic to an already very congested streets and parking nightmares
- threaten school boundaries
- strain emergency services by not adding resources

32-1

Keep the story limit to 3 and DO NOT VOTE FOR UPZONING.

Regards,

Marie Doss

Veteran Ave resident and voter.

COMMENT LETTER NO. 33

Lameese Chang <lameese.chang@lacity.org>

FOR revised plan - no upzoning for pico Expo corridor plan

Lorna Edmond <lorna2003@hotmail.com> Fri, Jun 2, 2017 at 4:42 PM
To: "lameese.chang@lacity.org" <lameese.chang@lacity.org>
Cc: Paul Koretz <paul.koretz@lacity.org>, jay greenstein <jay.greenstein@lacity.org>

Dear Ms Chan - City Planning Department

We hope that you will stand strong for the little people as you are their voice in city hall and do not allow the Pico corridor between Overland & Sepulveda to ever be 'upzoned' 33-1

Present living in our area had many problems with no solutions

Known

Expo is operating well but no plans for expanded parking or trains 33-2

Traffic- grid lock- emergency vehicles delayed 33-3

Schools/ overcrowded- 33-4

ER and Hospitals overcrowded - if you are in ER no beds in hospital 33-5

Parks are overcrowded /homeless encampments/fewer small businesses The list goes on 33-6

Unknown

Damage to roads from construction heavy equipment 33-7

Damage to very old Gas & water pipes/ ancient sewer system

Underground water - We remember way back when Westside pavilion could not go down to accommodate proposed cinema parking due to underground water 33-8

Earthquake / fire / evacuation response plans 33-9

Environmental impact report specifically for this area- does it include other nearby developments (Casden project) 33-10

At the WNC meeting 5/11/17 there was an excellent informative presentation I have concerns with the plan as it is missing how the City plans to Support & Maintain this expansion

Projected added density would bring 10,000 new jobs? How does every one get to work? 33-11

Approximately 12,000 new housing units = 2 persons =24,000 people go to work /schools/Dr visits/recreation as no local services ?How does this all work?

Support/ Maintain /Conserve

Water supply - support sewers /pipes/plans for using recycle water for building and maintenance ? 33-12

Power supply - support for use of solar power /wireless communication/ more towers and wires? 33-13

Air quality - smog increase with traffic gridlock / fog pocket / close proximity to 405 33-14

Affordable housing was a concern for UCLA graduating students and everyone -local apartment new developments already approved are no way affordable in this area 33-15

We had hoped we could be brief but there are so many issues to address

We have lived here since 1969 and we know change is coming but ask for our city leaders think intelligently to protect the next generation's quality of life in this great City 33-16

Sincerely

Lorna & John Edmond

2235 Veteran Ave

LA CA90064

COMMENT LETTER NO. 34

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: STEVE ELKINS

Email: SJE@DSLEXTREME.COM

Mailing Address: 3220 CHEVIOT VISTA PL

Phone: 310-339-3093

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

Parking in the areas affected by the plan is terrible. I request that the city take steps to increase the availability of parking, at reasonable or no cost to the consumer. And make it easier to find and access parking throughout all affected areas, and all areas in the vicinity of the plan area.

34-1

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 35

Lameese Chang <lameese.chang@lacity.org>

Exposition Corridor Transit Neighborhood Plan

David H. Friedman <dhfriedman@dslextreme.com> Mon, Jun 5, 2017 at 8:16 AM
To: lameese.chang@lacity.org

We would like to express our opposition to the Exposition Corridor Transit Neighborhood Plan. Increasing the density in our neighborhood would further greatly decrease our quality of life. The infrastructure in this neighborhood is already woefully inadequate. 35-1

Sincerely,

David H. Friedman, M.D.

Laura Schwimmer

10752 Ashby Ave.

Los Angeles, CA 90064

310-474-1393

dhfriedman@dslextreme.com

COMMENT LETTER NO. 36

Lameese Chang <lameese.chang@lacity.org>

Exposition Corridor Transit Neighborhood Upzoning negative feedback

Marilyn Frost <frostmarilynj@gmail.com> Mon, Jun 5, 2017 at 3:13 PM
To: lameese.chang@lacity.org

To Whom It May Concern:

I happen to live between Pico and Olympic near the current Westside Pavillion. Our area is the latest target by developers to unduly add to the traffic issues, pollution, noise and otherwise change the character of this stable community. This area, situated between currently between 2 malls is hard hit with excess east west traffic that already causes unbelievable congestion at peak hours. Even at midday it's slow going and even a challenge for pedestrians. 36-1

High rise buildings have no place here. Century City is all that we can currently bear and their projects which add to the current density are challenging enough. Once the height limit is changed to allow for multiple stories over what is currently there, it will erosion of any future argument to build more on the north side of Pico Boulevard. 36-2

Please help those of us living in this community to preserve what what we have by not increasing the density of Rancho Park any further.

Thank you,

Marilyn Frost
2208 Patricia Avenue
Los Angeles, CA 90064

COMMENT LETTER NO. 37

Lameese Chang <lameese.chang@lacity.org>

Case number ENV-2013-622-EIR -- Expo Corridor Plan

1 message

Roger M Goodman <goodman@alumni.caltech.edu> Mon, May 29, 2017 at 5:24 PM
To: Lameese Chang <lameese.chang@lacity.org>

Ms. Lameese Chang
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012
213-978-1178 (phone)
213-978-1477 (fax)
lameese.chang@lacity.org

RE: ENV-2013-622-EIR
Exposition Corridor Transit Neighborhood Plan

Dear Ms. Chang:

A previous commitment kept me from the hearing last week, so please accept my comments in this email. I live just north of Pico and just east of Westwood Blvd, so I have a real concern about the outcome of this proposed plan. I emphatically support the revised plan for the areas adjacent to the Westwood and Sepulveda stops on the Expo Line.

37-1

My whole family is glad that the plan was revised to keep a 3-story limit along Pico from Overland to Sepulveda. We do not want the RAS-4 zone here, with a 5-story limit. Thank you for responding to our concerns!

First, years ago our community was very much in favor of Proposition U, which limited density along Pico and Westwood, so that the longstanding assortment of small local business could survive, in competition with but an alternative to the Westside Pavilion. This has not changed, and we are really concerned that rising rents might force out these commercial tenants. This has already started at Pico and Midvale, with the loss of Coffee Bean and Bouvardia Flowers, and on Westwood with rising rents driving out Juniors Deli. This trend must be stopped. The only reason that the beloved Apple Pan still exists is that they own their parcel. We are not a downtown.

37-2

Second, I hope you have had a chance to go to Pico and Olympic Blvds, between Barrington and Westwood Blvd, during the evening rush hour. It's plainly obvious that the streets already cannot handle the existing traffic. It's nice to dream that 100% of residents, and both owners and customers of businesses, in towering mixed-use projects will use public transportation. But that's totally not realistic. Every single additional square foot of development in our area means more gridlock and longer commute times.

37-3

Third, their already are major business centers along the Expo Line, such as Westwood Village and Century City. The Expo Line is indeed providing some traffic relief to our area, with the development we already have. But if you allow major increases along Pico, it will make things worse, not better.

Finally, I don't see how the City of Los Angeles can promote ANY more development anywhere when there already isn't enough water to serve even the people we already have. How can the City mandate 10% or 20% water usage

37-4

cutbacks for the current population on the one hand, while encouraging more people to live and work here on the other hand?

37-4 cont.

For all these reasons, I urge the City to continue with the revised EXPO TNP Specific Plan, which removes Pico Blvd. between Sepulveda and Overland from "upzoning."

37-5

Please keep me informed of the decisions, and thank you very much for considering this letter.

Sincerely,

Roger M. Goodman
2346 Glendon Ave
Los Angeles CA 90064
310-569-4399 (mobile)
310-446-4968 (home)
goodman@alumni.caltech.edu

COMMENT LETTER NO. 38

Lameese Chang <lameese.chang@lacity.org>

Expo TNP

2 messages

Marcas Grant <marcasg@gmail.com> Sun, May 7, 2017 at 11:02 AM
To: lameese.chang@lacity.org

My name is Marcas Grant and I am a resident in the Palms neighborhood. Unfortunately, I won't be able to attend the open house and public hearing scheduled for May 23, but I did want to voice my concern about the Expo bike lane that currently runs west toward Santa Monica.

As it is currently constructed, the bike path disappears at the edge of Cheviot Hills and forces riders to take an unmarked, roundabout path through the neighborhood. Are the discussions about a way to more easily connect Motor Ave to Overland where the path resumes to Santa Monica? Hopefully this is under consideration as part of the Metro station improvements. Thank you.

38-1

Marcas Grant

Lameese Chang <lameese.chang@lacity.org> Mon, May 8, 2017 at 3:53 PM
To: Marcas Grant <marcasg@gmail.com>

Hello Marcus,

My understanding is that the gap in the Expo Bike Path between Motor and Overland is still being discussed by LADOT. I recommend contacting someone there for more specific information. Unfortunately this has been an issue that the Expo Corridor TNP is not able to address, as the Plan does not propose new bicycle facilities or regulate anything within the roadway.

Here is the contact page for the LADOT Bike Program:
http://bike.lacity.org/contact/

Let me know if you have any other questions.

--
Lameese Elqura Chang
Transit Neighborhood Plans | www.latnp.org
Los Angeles Department of City Planning
200 N Spring Street, Room 667
Los Angeles, CA 90012
213.978.1178
lameese.chang@lacity.org
[Quoted text hidden]

COMMENT LETTER NO. 39

Lameese Chang <lameese.chang@lacity.org>

Keep height limit to 3 stories on Pico Blvd. from Sepulveda Blvd. to Overland Ave.

Dianne Gregora <cassiopiajane@hotmail.com> Wed, May 17, 2017 at 8:00 AM
To: "lameese.chang@lacity.org" <lameese.chang@lacity.org>

Please keep height limit to 3 stories on Pico Blvd from Sepulveda Blvd. to Overland Avenue.
Thank You,
Dianne Gregora

39-1

Sent from my iPad
Dianne Gregora

COMMENT LETTER NO. 40

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: DIANNE GREGORA

Email: Cassiopiajane@hotmail.com

Mailing Address: 2237 PROSSER AVE, LOS ANGELES, CA 90064

Phone: 310-474-1417

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

DEAR Lameese Chang:

Thank you for keeping 3 stories on Pico. From Overland to Sepulveda on the Transit Neighborhood plan. 40-1

1. It's too big and it will block the Sun and create another Canyon between the Canyons. 40-2

2. The Casden Project adds 600 units! The increased density is NOT sustainable with the Expo line and Big Blue BUS which has Reached Capacity already. Delays are already happening 40-3

3. The Infrastructure can't support more than 3 STORIES — The SET BACKS, The WATER leaks from The city Pipes, Gridlock, and expo + Public Buses - BBB and METRO. 40-4

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

I Totally endose This.

Top 6 Reasons to Oppose the Exposition Corridor Transit Neighborhood Plan

1. Our water infrastructure is crumbling. We are on track to upgrade our pipes every 300 years when they have a lifespan of 100. From 2010 to 2014 we had nearly 400 water leaks in our neighborhood.

2. Budget cuts & impact on first responders. Years ago we lost a fire truck and it has NOT been replaced. Crime is up and hiring of new police officers is not being considered.

40-5

3. Insufficient classrooms. Schools are at capacity and even libraries are being adapted as classrooms. There are no plans for expansion.

4. Gridlock on our roads. Our streets are beyond capacity and putting more cars on the road without a plan for expansion is irresponsible.

5. Expo Line and other transit is beyond capacity. During rush hour, the public can wait up to an hour to get into a train or bus, and there are no plans for expansion.

6. Mostly Big Developers and those who have been brainwashed support the plan. A front group called "Abundant Housing" is one of the main proponents and their main goal is to eradicate single-family homes to enrich themselves.

Diane Gregorz 2237 Prosser Ave, LA 90064

COMMENT LETTER NO. 41

latnp.org

Exposition Corridor Transit Neighborhood Plan
CPC-2013-621-ZC-GPA-SP
ENV-2013-622-EIR
Comment Form

Name: Sue Giurgius
Email:
Mailing Address: 2443½ Purdue Ave Los Angeles 90064
Phone: 310-478-2253.

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

The way it is right now, the traffic in this area is a disaster, imagine if you add more buildings it will be a 100 times more a nightmare than it is right now. It takes ½ an hour, for cars to move from one light to the next on Pico Blvd. Maybe you can also invent flying cars, because this will bring traffic to a complete halt. 41-1

Also because of the congested traffic in this area, the air pollution is extremely high, everybody has asthmas and breathing problems. Please do not add to our miseries as it is. Thank you so much. 41-2

Please return completed form to Planning Staff or email, mail, or fax the form to:
Lameese Chang, Department of City Planning
200 N. Spring Street, Room 667, Los Angeles, CA 90012
Lameese.chang@lacity.org
Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 42

PUBLIC HEARING ON TRANSIT NEIGHBORHOOD PLAN May 23rd 2017 Iman Center
CPC-2013-621-ZC-GPA-SP ENV-2013-622-EIR

Thanks to the Planning Department and to Paul Koretz for maintaining the 3-story height limit on Pico between Overland and Sepulveda. A 3-story limit allows appropriate increases in residential space 42-1

Under a 5-story or higher scenario renters in such buildings would find ways to have cars, even without adequate parking in their buildings. Crowded trains and buses that experience delays will prompt even more driving. Expo is not handling its ridership well now. Adding many more riders will hasten its downward spiral. 42-2

Replacing existing structures on Pico with 5-story buildings will kill the retail businesses and restaurants we now frequent. They will have to move out during construction and with increased rent they will be forced to close. 42-3

Traffic from the added density will create even more congestion on Pico and send traffic into local streets even more than it does now when drivers apply the WAZE app. Reminiscent of Yogi Berra those of us who live on the nearby streets will look at Pico and say; "Nobody goes there anymore; it's too congested." 42-4

In conclusion, it's becoming clear...the Westside cannot take on all the increased density.

Charles Healy

Charles Healy, Ph.D.
2370 Midvale Avenue;
LA, CA 90064

COMMENT LETTER NO. 43

Lameese Chang <lameese.chang@lacity.org>

Exposition Corridor Transit Neighborhood Plan / ENV-2013-622-EIR

1 message

Margaret <thehealyfamily1@verizon.net> Sun, Jun 4, 2017 at 9:01 PM
To: lameese.chang@lacity.org

Lameese Chang
LA City Planning Dept.
Via email: lameese.chang@lacity.org

RE: ENV-2013-622-EIR
Exposition Corridor Transit Neighborhood Plan

Dear Ms. Chang:

We strongly support, and are grateful for, the ***revised*** plan for the areas adjacent to the Westwood and Sepulveda EXPO stations. Our home is located just north of Pico in close proximity to both stations.

The removal of Pico between Sepulveda and Overland from upzoning addresses our community's strong opposition to the plan as originally proposed. Community meetings attended by overflow crowds, as well as a petition opposing the upzoning on Pico and signed by nearly 800 people, are indicative of this opposition. (The petition was given to the hearing officer on May 23rd 2017 at the public hearing at the Iman Center: it was also given earlier to CD 5). 43-1

Even the revised plan will bring a great deal of new density to our already-impacted area. We already anticipate increased density from the 600 units the Casden project will bring. We expect further, very significant density from land now occupied by Westside Pavilion, in addition to other developments to be permitted by the revised plan. Currently we experience crippling delays on our arterials in the area. These delays send traffic speeding through our residential streets in every direction (to and from Pico, Olympic, Sepulveda and Westwood) endangering children at play, adult pedestrians, and drivers going to and from their homes in the area. 43-2

If RAS4 were to be permitted on the Sepulveda to Overland section of Pico, the small businesses/restaurants we now frequent would be forced out and would not be able to afford the rents once the new buildings would be completed. 43-3

Our community does not have adequate infrastructure to accommodate RAS4 zoning.
The schools in the area are already overcrowded. With added densification, very young children would need to go to distant schools across very busy streets, rather than attend local school within walking distance as they now do. Other elements of the infrastructure- roads, water delivery, sewer capacity, police and fire services - would be inadequate to support a RAS4 scenario. 43-4

As for transportation, the delays on the EXPO line are now proving to be problematic, There is already higher than expected ridership on EXPO, causing delays on the Blue Line as the two lines share track near the downtown area. A February 15th article in the LA Times (by Scott Wilson) details the problem and has caused him to start driving to work again. Likewise, with the arrival of the Regional Connector "this system is going to get more complicated and 43-5

increasingly difficult to manage." (LA Times, August 9th 2016; Ben Poston, Laura Nelson). More boardings from this area will obviously further exacerbate the delay problems to a point where more and more people will go back to driving their cars to work.

With regard to the DEIR, there are several instances where there is failure to acknowledge the adverse consequences to the community. Among them are:

Impact on schools (Section 4.14-9 and Section 4.14-8),,,,"Cumulative impact related to public schools would not be significant." How is this possible given the number of new units envisioned, bringing renters or condo owners who will undoubtedly have children who will be attending schools in our area? The same claim, that there will be no significant impact, is made with regard to libraries, fire and police resources, emergency resources, as well as water delivery. Again, will it not follow that more people would mean more demand on all elements of the infrastructure? 43-6

The DEIR claims (4.14-11) there will be "no considerable contribution to freeway or transit services." Why would there not be more crowded freeways with more people in the area? As mentioned above, there is again clearly a failure to recognize the EXPO/BLUE LINE track -sharing issue. Why has this not been discussed in the DEIR? 43-7

The DEIR does admit that there will be significant impacts in the following but claims they cannot be mitigated. These include:

Diversion of traffic to adjacent residential streets (4. 12-3).
Impacts on arterials (4. 12-4)
Degrading of existing visual character
Shade/Shadow impacts
Are these serious impacts truly unmitigable? Can they not be lessened by reducing the size and scope of the density this community is being asked to bear? 43-8

Parking is also an issue to be faced with the amount of density envisioned. People who would move here will still drive cars even if they take the train to work. Where will they park when not at work? The unbundling proposal and the plan to exempt businesses of fewer than 1500 square feet in size from providing any parking because it is felt that only people living within walking distance will patronize them is unrealistic. Where will these tenants/business patrons park? There will surely not be enough spaces for them on local streets. 43-9

In conclusion, we in this community are very grateful to the Planning Department for listening to us and exempting the Overland to Sepulveda segment of Pico from having RAS4 buildings overwhelm our single family homes and for keeping a 3-story height limit here on Pico and retaining the POD designation. 43-10

Sincerely.

Margaret Healy (Board Member WSSM - Westwood South of SM Blvd. HOA)

COMMENT LETTER NO. 44

CPC-2013-621-ZC-GPA-SP ‖ ENV-2013-622-EIR

PUBLIC HEARING ON TRANSIT NEIGHBORHOOD PLAN May 23rd. 2017 Iman Center

I I fully support the Plan as currently proposed. Thanks to Lameese Chang, her team, and Paul Koretz for his support of the community in this. Keeping 3 stories along Pico is the right decision because:

1) The infrastructure is not there to accommodate 5 or more stories.
2) Lots along Pico are not deep enough to allow for setbacks from the single-family homes.
3) Ridership on Expo already exceeds expectation and people now taking the train clearly are already in homes. And we know that we will be getting increased density: 600 units from Casden plus the increased number of units called from in the Plan.
4) There is a limit to the number of new passengers Expo can take on because at the point where the Expo Line and the Blue Lines share a track there are increasingly longer delays, causing some to wonder if they are really saving time by taking the train. Two recent articles in the LA Times testify to this.

44-1

Finally I would like to enter into the record a petition with 790 signatures opposing RAS 4 between Overland and Sepulveda. Thank you.

Margaret Healy
Board Member WSSM
2370 Midvale Ave
LA, Ca 90064
thehealyfamily1@verizon.net
↑
this is the number/digit 1

M. Healy

COMMENT LETTER NO. 45

Exposition Corridor Transit Neighborhood Plan
CPC-2013-621-ZC-GPA-SP
ENV-2013-622-EIR
Comment Form

5-23-17

Name: PAMELA HELVEY
Email: pamelahelvey@SBCGLOBAL.NET
Mailing Address: 3535 DUNN DR #202, LA, CA 90034
Phone: 310-836-0948

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

05-23-17: PUBLIC MEETING: PALMS BLVD @ Exposition & National BLVD, IN FRONT OF PALMS STATION, SHOULD BE MADE INTO A "SCRAMBLE INTERSECTION" WHERE NO PEDESTRIAN & AUTO VEHICLE ARE USING THE INTERSECTION AT THE SAME TIME. (SEE Hollywood & Highland Intersection).

(1) (2) THIS CHANGE WOULD REDUCE POTENTIAL PEDESTRIAN, BIKERS, SKATEBOARDS ETC FROM BEING HIT BY VEHICLES AND WOULD SPEED UP TRAFFIC THRU PALM, NATIONAL & EXPOSITION ROADWAYS.

(3) SCRAMBLE INTERSECTIONS SHOULD BE CONSIDERED AT ALL MAJOR INTERSECTIONS NEAR METRO STATIONS.

45-1

Please return completed form to Planning Staff or email, mail, or fax the form to:
Lameese Chang, Department of City Planning
200 N. Spring Street, Room 667, Los Angeles, CA 90012
Lameese.chang@lacity.org
Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 46

Exposition Corridor Transit Neighborhood Plan
CPC-2013-621-ZC-GPA-SP
ENV-2013-622-EIR
Comment Form

Name: Lori Huck
Email: LLHUCK@SBCGLOBAL.NET
Mailing Address: 3561 Clarington Ave., # 101, LA CA 90034
Phone: 310 - 202 - 0611

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

I am opposed to the Streetscape Plan for Palms Blvd (Motor to National Blvd.) Eliminating a lane of traffic (both sides) would be disastrous. If you have ever traveled on this section Mon - Fri at Rush Hours you would see how congested it is. This would make life in our neighborhood so much worse.

~~The~~ People would try to take alternative routes through our neighborhood, ~~making~~ causing accidents to increase.

I am a former resident of Miracle Mile and can say first hand that when Wilshire had construction, people would cut through 6th Streets & 8th Streets. This ~~will happen~~ caused so many more accidents, including pedestrian deaths.

I strongly oppose this plan for Palms Blvd.

Respectfully, Lori Huck

46-1

Please return completed form to Planning Staff or email, mail, or fax the form to:
Lameese Chang, Department of City Planning
200 N. Spring Street, Room 667, Los Angeles, CA 90012
Lameese.chang@lacity.org
Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 47

P.O. Box 64145
L.A. 90064
MAY 4 2017

To whom it may concern.

You have developers who pay people to be on homeowners Assn. neighborhood Councils Save Ballona Creek was run by developers in Playa Vista. This Mansionization of Westwood is a joke the literature sent out is by people with money DEVELOPERS who live all the time, in 1975 WSSM homeowners got a 45 foot height limit in their area Century City was running rampant which it still is promises made broken two more high rises in progress now, the traffic has been terrible for seven years on the westside we cannot take it anymore The Ahole shawn Bayliss with help from the other Ahole Paul Koretz now have made Pico Blvd from Santa Monica city to Beverly Glen five stories also from SM city all the way along S.M. blvd to century city five stories. Venice and Overland seven stories. They do not widen the roads Casden propert Rico Sepulveda, lawsuit filed against them stopped who was paid off. There are two big projects in S.M. on Colorado and Stewart and 2930 Colorado already being developed. That stupid train should have gone overhead from Culver City all the way to the beach where there is ample parking. There were three cars running every 12 minutes MTA decided to run two cars every 6 minutes. All it does is tie up traffic overland Westwood Military barrington 20th street S.M. Stewart Lincoln blvd all the streets with access to freeways. We have morons running the cities and MTA. No one cares for the little guy anymore.

Sincerely
R. Hugh

47-1

COMMENT LETTER NO. 48

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR Exposition Corridor Transit Neighborhood Plan

1 message

Mike Javadi <javadim@hotmail.com> Fri, Jun 2, 2017 at 6:02 AM
To: "lameese.chang@lacity.org" <lameese.chang@lacity.org>

Dear Ms. Chang:

Please accept my comments on the above-referenced plan. As a resident of the area north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations), just north of Pico Blvd., I wish to submit my **strong support** for the revised plan for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

I take the EXPO from my house all the way to JPL at a personal inconvenience. It takes 1hr longer to get to work at JPL to help reduce my impact on the neighborhood. The train waits for minutes at a time near downtown as it is negotiating track rights with the cars and the blue line in downtown.

The EXPO TNP Specific Plan with its revisions to remove Pico Blvd. between Sepulveda and Overlandfrom "upzoning" addresses our community's strong opposition to the plan as originally proposed. We are supportive of the revisions along Pico Blvd. that acknowledge the fact that our community already has significant density coupled with crippling traffic. We have large employment centers in this area including UCLA, the UCLA Medical Center, Westw ood Village and Century City. These centers more than justify the investment made in the EXPO Line and serve commuters and students, as well as local residents. Our area was long overdue for a major public transit investment given our congestion, the growing density of our housing stock, and the many jobs and educational opportunities provided in our area.

The Pico Blvd. business corridor is the center of our community. We frequent the businesses along Pico and Westwood Blvds. Our Westside Neighborhood Council has invested significant time and resources in the improvement of Pico Blvd. and will soon be implementing a new streetscape plan from Sepulveda to Patricia Ave. And just this month we celebrated the fifth "Pick Pico" event to promote local businesses and organizations. The rezoning of Pico would doom the overwhelming majority of the existing shopkeepers – many independent business owners. The rezoning would usher in a period not unlike the urban renewal of the 1960's—where entire neighborhoods were demolished. We do not wish to invite that kind of destruction here. 48-1

Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. Those added development opportunities would have served to create a "land rush" along Pico—further inflating already expensive land. No affordable housing would have resulted from such upzoning. Adjacent properties would be severely negatively impacted.

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide low income housing. This area has grown in population and continues to do so. With the completion of the Casden project at Exposition and Sepulveda, we will add nearly 600 new units nearby. We have a high proportion of renters – many of whom have located to be in the Westwood Charter Elementary School area. That said, our local Westwood Charter Elementary School is at capacity.

As is well known, our area suffers from significant traffic congestion. Some of that congestion relates to the fact that there are nearly no north-south through arterials to carry traffic (and/or transit) thus placing tremendous burdens on those few streets that do provide north-south access. Sepulveda Blvd. is one of the few and is also the 405 freeway alternative route; it will be further slowed with the addition of new development along its street. We have long requested DASH transit service from LA DOT but have been refused for many years as the priority for DASH goes to "transit dependent" areas. While we understand the need to prioritize, it seems to us that additional value can be realized from the EXPO line if more people were easily able to access its stations. This particularly true for those who wish to give up their vehicles and for the young and elderly. Having reliable transit connections to EXPO from throughout our community (which goes north to Santa Monica Blvd.) would better spread development instead of creating a bottleneck/canyon

along Pico Blvd. The reality is that EXPO will not even be able to resolve the **current** traffic issues—much less absorb all the traffic to be created by new development, a great deal of which will occur *without* any upzoning to our community. And, we must remember that EXPO's capacity to carry passengers is limited due to the sharing of track with the Blue Line as the train nears downtown.

Further, as the EXPO Line has been open only a year in our area, we believe it wise to consider where added development should occur after additional time has passed, and best to consider it when the WLA Community Plan is re-written and all our community assets and resources can be reviewed.

48-1 cont.

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

Sincerely,
Masih Amirjavadi
2035 Kelton Ave
Los Angeles, CA 90025

COMMENT LETTER NO. 49

Exposition Corridor Transit Neighborhood Plan
CPC-2013-621-ZC-GPA-SP
ENV-2013-622-EIR
Comment Form

Kasdin

Name: Mitchell Kasdin
Email: Yowzor@Yahoo.com
Mailing Address: 2117 Colby Ave West LA
Phone: 310 948-0405

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR): I Am Vehemently opposed to the residential re-development surrounding the Bundy station simply increases the tax revenue for the city and density of residents. At the corner of Bundy and Olympic you have ~~a the~~ Martin Cadillac that's proposing to build a huge commercial residential that will substantially increase the overall traffic. The traffic pattern during rush hour times is beyond reproach, this redevelopment of R1 to R1-5 is a broach and an afront to my well being. Traffic will increase exponentially and there's no way to mitigate the use of cars in your urban/residential plan. a make-over or re-do is more than colored boxes ~~on~~ with dots and hashmarks. you need hard statistics and data popolutations in these areas to comprehend EIR. DMV car registrations and licensed car ownership and CAR TRIPS will increase. The train is cute but its not free and most of the times simply impractical. A car trip is point A to point B. of course people commute but not necessarily in a straight line and then return. there are errands and other agendas that simply dont meet the scope of a train. not everyone commutes by train. You need a (over)

49-1

Please return completed form to Planning Staff or email, mail, or fax the form to:
Lameese Chang, Department of City Planning
200 N. Spring Street, Room 667, Los Angeles, CA 90012
Lameese.chang@lacity.org
Phone (213) 978-1178 / Fax (213) 978-1477

Spreadsheet to fully intectualize the proposal. When I asked Craig Weber how many ~~households~~ residents lived by the adjacent Bundy Station he didnt know; his guess was 120 homes. Knowing the area myself the number is probably closer to 300-400 homes personally I haven't taken the time to count, perhaps the city of LA should.

49-1 cont.

Other then turning Pico & Olympic into one-way roads, the plan in that area, perhaps other surrounding ~~st~~ train station redevelopments, would also be negatively impacted. My understanding the previous Westside council member was against turning Pico/Santa Monica/ and Olympic Blvd into one-way ~~thoro~~ thoroughfares

COMMENT LETTER NO. 50

Lameese Chang <lameese.chang@lacity.org>

Expo TNP

Scott Landsbaum <scottlandsbaum@sbcglobal.net> Mon, May 1, 2017 at 6:44 PM
Reply-To: Scott Landsbaum <scottlandsbaum@sbcglobal.net>
To: "lameese.chang@lacity.org" <lameese.chang@lacity.org>

City Planning Case: CPC-2013-621-ZC-GPA-SP
Environmental Case: ENV-2013-622-EIR

Dear Ms. Chang,

I am writing to express my concern about the increased traffic that will come with the added density surrounding the Palms Metro station. The Beverlywood and Cheviot Hills neighborhoods north of the station currently suffer from an onslaught of cut-through traffic. Castle Heights Ave, Beverly Drive, Club Drive and Selby Drive are particularly impacted with drivers making illegal turns and running stop signs. This is particularly dangerous on Castle Heights Ave at the convergence of Beverwil and Kincardine and around Castle Heights Elementary School at Cattaraugus. It is critical that the planning incorporate more effective traffic flow controls to funnel north-south traffic onto the major streets of Robertson, Overland and Motor. 50-1

Thank you.

Regards,

Scott Landsbaum
3035 Castle Heights Ave
LA, CA 90034
310 815 1845

COMMENT LETTER NO. 51

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: Ellen Lanet

Email: ellenilanet@gmail.com

Mailing Address: 2413 Guthrie Dr. LA 90034

Phone: 310 287 1888

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

1) Please (DEMAND) give some attention & LOVE to Streetscape Plan @ Robertson (Culver City) station. SORO & Robertson Great Streets needs to be tied into the Robertson (CC) ~~EXPO~~ stop. There are +thousands students using EXPO & Venice Blvd public transit & then walk across Venice Hwy under I10 dirt, narrow sidewalk, unsafe on/off ramps, no lighting no air to ~~[illegible]~~ school 2x day. Protect these kids. Provide public transportation (Robertson frequent bus or shuttles) from Pico & Robertson through S. Robertson to EXPO & contribute to safe & pleasant pedestrian access from EXPO to HAMI & support w/power, # & love S Robertson Great Street

51-1

2) I'm happy to support all multiuse developments in 1/2 mile radius if — all owners, tenants, & employee use zip cars &/or public transportation. And all developers contribute adequately to ~~public~~ additional public services: ie: Fire trucks, paramedics, schools construction & open green space in immediate area

51-2

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 52

Lameese Chang <lameese.chang@lacity.org>

Picó upzoning

David Lee <david.lee@gmail.com> Sun, May 21, 2017 at 11:24 AM
To: lameese.chang@lacity.org

We live at 2223 Malcolm ave

I am writing to protesting the zoning on Pico

It threatens school boundaries, overwhelms homes, strains emergency services, brings traffic nightmares, and kills small businesses. 52-1

Please make this stop!

Sent from 650-269-8621.

COMMENT LETTER NO. 53

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: Andrea Leon - Grossmann

Email: ladigicom@aol.com

Mailing Address: 10757 Ashby Ave L.A. CA 90064

Phone: 310 621 22 91

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

This plan is NOT sustainable. While density is not a negative thing, the fact that there are no plans to upgrade our aging & crumbling water infrastructure is enough reason to stop it on its tracks. We have 100 water leaks on average per year in our neighborhood, and our water pipes are on track to be changed every 200 years when they have 100 year lifespan. There are also no plans that were shown to upgrade / expand our roads and gridlock is already an issue. There are also no plans to build more classrooms in our schools, expand public transit or increase the number of first responders. Just a few years ago we lost a fire truck due to budget cuts and there are no plans to bring it back, even though we are now sharing services with Century City and spread way too thin.

53-1

53-2

53-3

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 54

Lameese Chang <lameese.chang@lacity.org>

Exposition Corridor Transit Neighborhood Plan

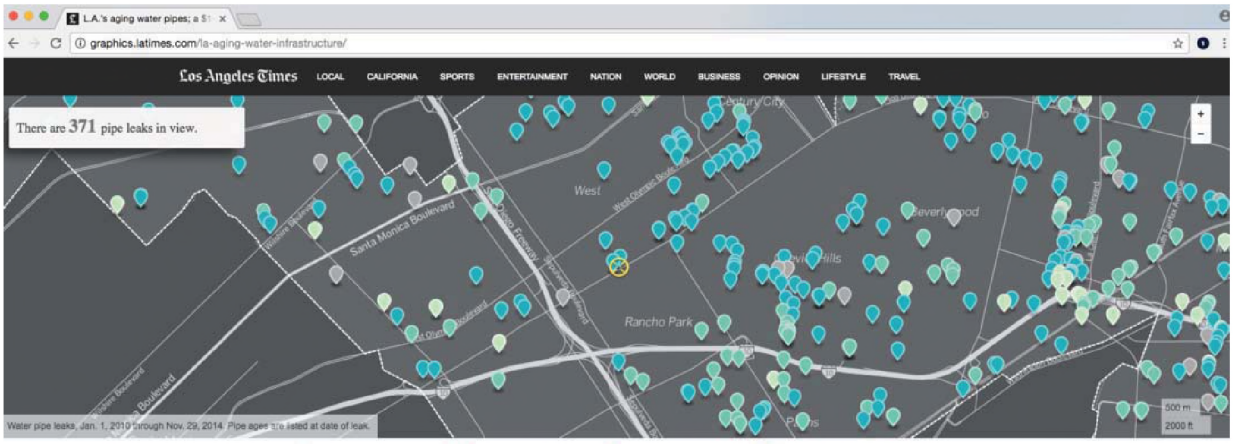
Andrea Leon-Grossmann <strategicandvisual@icloud.com> Thu, May 25, 2017 at 4:18 PM
To: Lameese Chang <lameese.chang@lacity.org>

Hello Lameese,

My concerns are about the current state of our water infrastructure. We are on track to replace water pipes with a lifespan of 80-100 years every 300 years! That was not addressed on the EIR, or the fact that we have on average 100 water main breaks a year. (Please see the map below from the LA Times for your reference). Adding more density will add more pressure to our crumbling water infrastructure. That was not addressed on the EIR, and it needs to be. 54-1

The public transportation system is already oversubscribed and there are no plans to expand it, or widen the roads. How are GHG emissions going to be mitigated with so much more density? 54-2

Thank you,
Andrea Leon-Grossmann



L.A.'s aging water pipes; a $1-billion dilemma

By BEN POSTON and MATT STEVENS

[Quoted text hidden]

COMMENT LETTER NO. 55

Lameese Chang <lameese.chang@lacity.org>

Draft EIR for Exposition Corridor Transit Neighborhood Plan

Andrea Leon-Grossmann <strategicandvisual@icloud.com> Mon, Jun 5, 2017 at 4:43 PM
To: lameese.chang@lacity.org
Cc: paul.koretz@lacity.org

Dear Ms. Chang,

Please see my comments below to the draft EIR for the Plan . I will also like to comment on the awful format of the not so public forum held a couple of weeks ago at the IMAN center where "public" comment had to be given in private behind a curtain so we could not hear what developers and those who they hired to come were saying. It was one of the most undemocratic hearings I have ever attended, and I have attended many.

55-1

Outreach to the community has been very poor, most of my neighbors do not know about this issue and the stakes are too high to keep this project in motion while the community is in the dark and big developers are ready to make deals.

Comments on the Expo TNP DEIR, March 2017

(June 5, 2017)

4.11 – Public Services

Under fire protection and emergency services is not addressed the fact that we lost a fire truck at station 92 a few years ago and with the increase density in Century City, response times are up.

At the not so public meeting at the IMAN center, the person in charge of the EIR stated, "it doesn't really matter as buildings are now built better and with sprinklers"! When I questioned her about firefighters responding to other emergencies such as cardiac arrests and car accidents, she said that "fire departments just need to be more efficient on how they respond, that sometime they exaggerate with the amount of vehicles they show up at the scene and they just need to change their protocol," but none of that is defined in this document.

55-2

6.2 – Significant Unavoidable Impacts (CEQA)

This section includes very appalling, troubling and unacceptable effects of this project.

55-3

Restricting sunlight from "shadow sensitive" uses for extended periods of time during the day is significant and unacceptable.

The fact that air quality will exceed the already loose South Coast Air Quality Management District localized thresholds should be a deal breaker; especially with multiple schools and parks in the area. We should not expose our residents and especially our children to substantial pollutant concentrations.

Historic preservation and existing regulations will be bypassed setting a dangerous precedence to ensure our city can do away with historic buildings in favor of big development and gentrification.

To compound the adverse effects, this project would result in significant unavoidable noise and ground-borne vibration impacts during construction activities and ambient noise during operation of the Proposed Project. This will add noise pollution to air pollution.

Public parks that are already oversubscribed will take another hit as the increase in density will increase demand and this plan has no mitigation measures to address this issue. It is mostly concerned with building more and less on open spaces and green areas.

As if all the aforementioned was not enough, transportation and traffic will also be affected significantly and in a way that won't be mitigated. This project will result in a significant impact to neighborhood intrusion.

55-3 cont.

The person in charge if the DEIR station at the not so public meeting in the IMAN center, told me that this plan would take away three trips in the morning by having more coffee shops and dry cleaners at the proposed mix-used buildings. She said that in the morning the average worker goes to the dry cleaner, comes back home, goes get coffee, comes back home and then goes to work. So, by having mix use buildings, all those three trips would be combined – every day. That just shows how flawed this project is. I am yet to meet someone who goes every day to the dry cleaning, or who makes three trips in the morning to run errands. Moreover, she stated that the fact that the EXPO line was already oversubscribed was a "good" thing because "people use it," but she could not answer my question about how METRO will expand service to address the demand we currently have, much less the one we would have with even more density.

The fact is that the commercial portion of the building may include restaurants, coffee shops, dry cleaners and a grocery store and none of those businesses will pay their employees wages to be able to live in the residential luxury apartments above them, so those employees will have to travel from far away, while the tenants of the luxury apartments commute to Santa Monica, Downtown or Downtown Los Angeles.

6.3 – Significant Irreversible Environmental Effects (CEQA)

If the adverse effects on 6.2 are not enough for this project to be stopped, this section should. Any responsible regulator and legislator would not allow the environment and those living in it to be subjected to this boondoggle.

55-4

We have a city that is studying getting off fossil fuels and starting an efficiency program as 4% of buildings in the city use 50% of the electricity, albeit really slowly. This project however uses the "nonrenewable resources during the initial and continued phases of the project." Why would the city allow such a wasteful project to be done? Why isn't the city requiring renewable energy and materials for new construction?

Section 15126.2(c) of CEQA is also considered in section 6.3 as "the proposed consumption of resources is not justified" such as "the project involves the wasteful use of energy." Energy waste is already a huge issue in our city, why must we add another source of waste?

6.4 – Growth Inducing Impacts (CEQA)

It is mentioned that "future development under the proposed plan would require localized expansion and/or upgrades to sewer, water and gas laterals lines in the project area" but LADWP has not addresses the fact that we have an aging infrastructure and we are on track to upgrade pipes every 300 years when they have a lifespan of 80-100 years. In the area, we have an average of 100 water main breaks a year with the current density, and there are no plans or budget to upgrade those pipes. http://graphics.latimes.com/la-aging-water-infrastructure/ 55-5

The other question is why will we expand or upgrade gas lines? If we are truly committed to a fossil free city, expanding fossil fuel infrastructure is not the way to achieve 100% clean renewable energy.

The last paragraph states that this project would reduce the vehicle miles traveled per capita, which is a fallacy. As the EIR person at the forum at the IMAN center states, this is based on eliminating three trips in the morning that currently don't exist, and the EXPO line is already oversubscribed. This paragraph needs to be revised to indicate more miles per capita and more emissions. 55-6

In conclusion, adding density does not always have a positive effect in a city, and this is a clear example. The infrastructure is clearly lacking and the planning goes right up against what the city has set up to achieve, a more sustainable place to live, work and play. Our roads are gridlocked, our public transit already oversubscribed, the water infrastructure is crumbling, the libraries in the local schools have been converted to classrooms, we have fewer first responders and this project does not call on contractors to use renewable energy and/or supplies for its development. The draft environmental report needs to be taken back to planners who care about Angelenos' health and our environment.

Respectfully,

Andrea Leon-Grossmann
Resident and environmentalist
10757 Ashby Ave
Los Angeles, CA 90064-3300

COMMENT LETTER NO. 56

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: Liz Lesan

Email: erlesan@zilchik.com

Mailing Address: 9409 Kincardine Ave LA 90034

Phone:

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

I totally support efforts to provide additional affordable housing, reduce traffic congestion and improve the street ambience. I would like to see a realistic assessment of the impact of making the needed changes. We are given an overview of the steps involved - from talking to residents and businesses to formal proposals to approval. No where do I see anything about how much disruption will occur during the actual change process. Of course it will happen in stages, over time. But I can't get out of my neighborhood now with the crazy traffic on National, Robertson, Bagley, Cattaraugus & Venice. Residents need to have a realistic idea of how much worse the situation will get before it actually improves.

56-1

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 57

June 2, 2017

Lameese Chang
LA City Planning Dept.
Via email: lameese.chang@lacity.org

RE: **ENV-2013-622-EIR**
Exposition Corridor Transit Neighborhood Plan

Dear Ms. Chang:

Please accept my comments on the above-referenced plan. As a resident of the area north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations), just north of Pico Blvd., wish to submit my **strong support** for the revised plan for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

The EXPO TNP Specific Plan with its revisions to remove Pico Blvd. between Sepulveda and Overland from "upzoning" addresses our community's strong opposition to the plan as originally proposed. We are supportive of the revisions along Pico Blvd. that acknowledge the fact that our community already has significant density coupled with crippling traffic. We have large employment centers in this area including UCLA, the UCLA Medical Center, Westwood Village and Century City. These centers more than justify the investment made in the EXPO Line and serve commuters as well as local residents. Our area was long overdue for a major public transit investment given our congestion, the growing density of our housing stock, and the many jobs and educational opportunities provided in our area. 57-1

The Pico Blvd. business corridor is the center of our community. We frequent the businesses along Pico and Westwood Boulevards. Our Westside Neighborhood Council has invested significant time and resources in the improvement of Pico Blvd. and will soon be implementing a new streetscape plan from Sepulveda to Patricia Ave. In May we celebrated the fifth "Pick Pico" event to promote local businesses and organizations. The rezoning of Pico would doom the overwhelming majority of the existing shopkeepers – many independent business owners. We walk to local businesses including stores, restaurants and movies in part because already we can get there faster by walking – and because parking can be hard to find if we arrive by car.

Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. Those added development opportunities would have served to create a "land rush" along Pico—further inflating already expensive land. No affordable housing would have resulted from such upzoning.

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide 57-2

low income housing. This area has grown in population and continues to do so. With the completion of the Casden project at Exposition and Sepulveda, we will add nearly 600 new units nearby. We have a high proportion of renters – many of whom have located to be in the Westwood Charter Elementary School area. That said, our local Westwood Charter Elementary School has exceeded its capacity. 57-2 cont.

We are particularly alarmed by the demolition permit for the vacant property at _____ Westwood Boulevard and the information that a permit will be sought to replace it with a 5 story mixed-use commercial and apartment building. The impact on Westwood Charter and on Westwood Boulevard would be intolerable. Westwood Boulevard, which ends at UCLA, is already impassible at peak times. Having lived in this neighborhood since 1974 and seen two daughters and, 35 years later 2 granddaughters at Westwood Charter, we can chronicle the degradation of the neighborhood with extra levels added to apartment buildings, the "mansionization" of new houses, and the overcrowding of the school property to the point where there is not nearly enough outside space for outdoor activities, classes and play time. Inner city schools have more space. And we do believe that city politicians have profited by these changes which do not affect them or their children personally. 57-3

As is well known, our area suffers from significant traffic congestion. Some of that congestion relates to the fact that there are nearly no north-south through arterials to carry traffic (and/or transit). Sepulveda Blvd. is one of the few and is also the 405 freeway alternative route; it will be further slowed with the addition of new development along its street. We have long requested DASH transit service from LA DOT but have been refused for many years as the priority for DASH goes to "transit dependent" areas. While we understand the need to prioritize, it seems to us that additional value can be realized from the EXPO line if more people were easily able to access its stations. Having reliable transit connections to EXPO from throughout our community (which goes north to Santa Monica Blvd.) would better spread development instead of creating a bottleneck/canyon along Pico Blvd. 57-4

Further, as the EXPO Line has been open only a year in our area, we believe it wise to consider where added development should occur after additional time has passed, and best to consider it when the WLA Community Plan is re-written and all our community assets and resources can be reviewed. 57-5

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

Sincerely,

Alaistair and Gay Macdonald
2007 Pelham Avenue,
Los Angeles, CA 90025

COMMENT LETTER NO. 58

Annette Mercer
2647 Glendon Ave.
Los Angeles, CA 90064

May 23, 2017

Expo Corridor TNP
ENV-2013-622-EIR
CPC-2013-621-ZC-GPA-SP

I have the following comments on the Draft EIR for the Expo Corridor TNP:

1. The existing conditions are described as of five years ago and should be updated. Specifically, the elementary school enrollment numbers and capacities seem very low (Westwood Charter and Overland ES) and should be updated. Adding more residents to the area while not specifically identifying how those new school students would be accommodated is a significant impact. It is not enough to say that money will be given to LAUSD without identifying new school sites, how buildings will be added to existing campuses, etc. For walkable, vibrant communities, we need neighborhood schools. 58-1
2. The earthquake survivability of our water and utilities systems in a major quake is unlikely. Any evaluation of infrastructure (water capacity, utilities, etc.) is likely old and understated as well, or non-existent. Adding additional development without addressing this issue would create a significant impact, both to existing users but also to occupants of new development who would be subject to months without running water or utilities after a major quake. It is not enough to say that the new development would meet code requirements. The pipes in the streets throughout the City must be upgraded prior to any new or upgraded connections. 58-2
3. The Plan has done a good job of identifying locations for increased residential density and mixed use. I like keeping Pico Blvd. to the 3 story height limit. However, I don't see how it can provide enough housing to relieve the affordability issues and homelessness that face West LA. While I understand the pressure for the presumed sanctity of the R1 zone, I think that allowing building granny flats or duplexes in the R1 zone (in keeping with neighborhood character and off street parking requirements) would be an acceptable addition to the plan. 58-3
4. For sustainability and biodiversity reasons, all landscaping should use native plants, drought tolerant where appropriate. Reclaimed water should be used for irrigation, and irrigation should be minimal. The area needs more open space accessible to everyone (not within a development). Add more pocket parks! 58-4
5. I appreciate the emphasis on walking and biking. There are certainly stretches now where sidewalks are so narrow or nonexistent as to be unusable (east side of Sawtelle south of Exposition, Sepulveda north of Pico, north side of National under the 405, etc.). Extra care should be taken in all the streetscape plans to minimize the number of poles, bus shelters, traffic boxes, and other obstacles placed in the sidewalk. 58-5
6. You state that bicycling will increase 11%. You state that streetscape plans for key corridors will improve the configuration of streets…to facilitate…bicycle… circulation. You say the plan encourages alternative modes of transportation. 58-6

You say that public benefit amenities will address the first/last mile linkage to transit stations. AND YET THERE IS NO BIKE LANE on either Sepulveda or Westwood, both of which connect stations to UCLA and other major destinations. This is a significant flaw in the plan and is inexcusable. It does not meet other city goals and initiatives, and does not help with community or sustainability. How can you possibly claim to be encouraging bicycling without providing a safe place to ride? How will kids ride and families ride without a safe place to do so? Bike lanes also encourage walking since there is now a place for bicycles to be that is not the sidewalk. It is not enough to provide a bike rack.

58-6 cont.

Thank you for your attention to these issues,

Annette Mercer

COMMENT LETTER NO. 59

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: Debbie Millar

Email: debbie.m.millar@gmail.com

Mailing Address: 2255 Pelham Ave

Phone: 310-266-2449

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

Supporters of increased density often cite other cities as examples of how it can work. - London, New York, San Francisco etc.
I have lived in some - and they have differences.
① A long history of planned density with sufficient infrastructure
② Acres of Park land - every few blocks - Central Park, Hyde Park in London.
③ They have a full functioning transit system to move people around. Expo line is great, but very limited.

59-1

We are not at the stage where we can increase density until we address the infrastructure.
- continued over -

59-2

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

People will stop using their cars when it is feasible - not when someone reduces parking or tells them they should.

Expo was intended to help relieve the gridlock in our area - not as an excuse to push the developers agenda.

59-3

COMMENT LETTER NO. 60

Lameese Chang <lameese.chang@lacity.org>

Westside pavilion site plans

Marion Nataf <marionnataf@icloud.com> Mon, Jun 5, 2017 at 3:46 PM
To: lameese.chang@lacity.org

To whom it may concern;
I know money helps the economy and this building of apartments and condos is going to be good for a select few but not for those of us who are already overwhelmed with the increased traffic and traffic slowness caused by the metro at grade. Not to mention the increased numbers of vehicles coming through our neighborhoods caused from the Fox Studios, century city and enlarged century city westside mall!
The Santa Monica airport has. Whim a few years back to increase the air traffic and size of the planes.
I ask you, please reconsider the ideas of allowing a large project of condos and apartments in this westside development
Thank you!
M Nataf
Sent from my iPhone

60-1

COMMENT LETTER NO. 61

EXPC

STREETSCAPE

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: CARRIE NEDROW

Email: exposition@tonnesen.us

Mailing Address: 11756 Exposition Blvd, LA, CA 90064

Phone: 408-858-8992

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

(1) Street Scape Plan: it appears there are no bike lanes for ~~at~~ the Bundy (Bundy/Expo), Olympic plans. Doesn't that defeat the "last mile" challenge? ~~[illegible]~~ 61-1

(2) Pico Blvd between Bundy to Sepulveda is impassible during rush hour 7:30 AM - 9:30, 4:30 - 6:30 PM. Are plans being considered for that street? 61-2

(3) Barrington ~~between~~ Santa Monica Blvd – Pico is grid locked w/ Traffic. The crossing bars make it even worse. Are there plans to address this extremely challenging street?

(4) ~~[illegible]~~ where the bicycle path on Exposition crosses Pico (Gateway) ~~[illegible]~~ the signage for bicycles is extremely poor. 61-3

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 62

Lameese Chang
City Planning Department
200 North Spring Spring Street Room 667
Los Angeles, CA 90012

May 29, 2017

RE: Zoning of West L.A. Pico Boulevard

Dear Lameese Chang,

I was disappointed that I could not attend this hearing because Iman Center's parking lot had filled up so quickly and there was no parking available on the surrounding streets.
City Planning Department should have anticipated the crowds for such an important hearing, and arranged for a location with larger parking facilities such as the Westside Pavilion, or the LA City Parking Structure at Exposition and Sepulveda. Residents and other interested attendees also suggested a later time such as 6:30 as many of us come from work in outer areas. 62-1

Nevertheless, I would like to offer my viewpoints as a long time resident just behind Pico, between Sepulveda and Overland.

While we residents understand that City Planning is trying to increase housing, simply packing the density of areas in the general proximity of public transportation by approving high-rise apartment or condo buildings will quickly lead to severe pitfalls for the following reasons:

1. Our local schools are already maxed in their attendance and class sizes, and families are confused for their children's education as school boundaries are threatened. For instance, Westwood School has needed to send kindergarteners who are not yet five years old on September 1 to another school. Whether those children will attend a private school or another public school in a different neighborhood, all those parents will need to drive their kids thereby increasing already tight traffic. 62-2

2. Emergency services will be strained. How often has City Planning been stuck in our gridlock traffic while a firetruck or ambulance is trying to squeeze by in the narrow streets of this neighborhood? Pico and Olympic are actually known for sirens day and night as two fire stations are already struggling to save lives. 62-3

3. Parking shortage, traffic and pollution are already overwhelming the neighborhood and its residents.
The City Planning Department was too eagerly forecasting that the newly developed public transportation will ease our problems with parking, traffic and pollution even with increased population density, because City Planning is simplistically assuming that many or most residents will readily use public transportation.

However, even if we would love to, life happens and life is never that simple, especially when you have a family. The following will happen as residents, new and old settle in their lives: 62-4

a. Unfortunately, many of us still need to drive because of our work location, or our work hours, or we need to carry computers and heavy materials, or we need to drive to meetings to see clients, etc...

b. Except for families living within a few blocks of their schools, more parents will crowd the streets to

take their children to school, then pick them up. Then many children are also driven to after-school activities.

c. Even if you a lone resident, grocery shopping is difficult on public transportation. Families will surely drive their cars to load their groceries. Remember this is an activity we repeat every few days.
Ditto, when you need to go shopping and expect to carry back heavy or cumbersome bags or boxes.

d. All residents will have various family members, friends, business associates who come from places not accessible to public transportation. All residents also routinely have business services visit them. Let us not forget the many delivery services! Where will everyone park? Currently, we already have difficulty finding parking, even though each resident is allocated 2 permanent street parking permit hangtags and 2 visitor street permit hangtags. Our family gave up wasting our money for permits when we can barely use the one we renew.
Thus, even in the ideal City Planning world where we are able to use public transportation for work, we will still need to drive for those above purposes. Families with young children also need to drive their cars to secure car seats and toddler boosters for their children's safety.

City Planning needs to remember that Los Angeles is not New York where everything is close and tight, and is all connected by public transportation, and New Yorkers have always taken public transportation. Over many past decades, Los Angelenos have stretched their residential roots out to countless surrounding suburbs, and they will continue to commute or drive to areas not conveniently accessible to public transportation. Families want to visit friends and relatives in other cities.
Even the elderly resident who does not drive has many visitors and service providers such as assistants, nurses, medical technicians, therapists.
We learned this the hard way when City Planning assured us that the newer retirement housing at the corner would only need a small parking lot, and turned the facility down for its request to build underground parking. The retirement facility ended up flooding our streets, as most of the retirees found it easier to drive than walk with their canes and walkers and bags, and many social workers and other service providers are constantly visiting their clients.

62-4
cont.

We, residents of West LA near Pico, urge City Planning not to rush and pack housing density in this already crowded area, and wreck this tightly built neighborhood. We already have to live with past City Planning mistakes like the corner mini-malls with insufficient main street level parking that blocks and backs into the main streets as cars wait in line to enter, and all those businesses without their own parking facilities that the City approved. There will always be cars in LA even with public transportation, and PARKING will always be a major issue, especially as housing density increases.

Cosmopolitan developments often go through boom and bust cycles.
So now, City Planning perceives that all those tech companies are charging into our areas. However, when these companies jump elsewhere because of high cost of living and business, what will we do with those vacated apartment or condo buildings, like those empty malls and mega stores? Tear them down and build some other vision?

Sincerely,

Minhlinh Nguyen
2363 Greenfield Avenue
Los Angeles, CA 90064

Thank you for considering my viewpoints as a local resident of this area -

COMMENT LETTER NO. 63

Lameese Chang <lameese.chang@lacity.org>

Zoning plan Overland and Sepulveda.

irene <ireneolav@gmail.com> Tue, May 9, 2017 at 9:33 PM
To: lameese.chang@lacity.org

We have been home owners in West L.A for over forty years. To be exact, we live on Midvale Ave. between Westwood and Sepulveda.Blvd. In the last several years the traffic in our area has become intolerable. Traffic on Pico Blvd. and Olympic barely moves. Alternate streets, such as Midvale and Glendon Ave. are used to avoid traffic jams on the Boulevards. Our lives have been impacted in a very negative way.
The proposed additional housing and increase in height of future buildings on these streets will be a catastrophe to our little neighborhood.Taller and more buildings/housing will increase traffic. The streets are all ready destroyed from over use. We are requesting that you protect our rights to live in our homes without an increase in traffic and pollution. To keep the small neighborhood feeling we have support small business owners and resist over building just for financial profit.
Please exclude Overland - Sepulveda from any future increase in building heights.
Respectfully,
Irene Olavarria and family

63-1

COMMENT LETTER NO. 64

Exposition Corridor Transit Neighborhood Plan
CPC-2013-621-ZC-GPA-SP
ENV-2013-622-EIR
Comment Form

Name: IRENE OLAVARRIA
Email: Ireneolav@gmail.com
Mailing Address: 3242 Midvale Ave LA. 90064 CA
Phone: (310) 8501173

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

2 major concerns!!

(1) Building height limit to 2 stories!!
Building height will impact our homes greatly. Our homes back into Westwood Blvd. no alley between our house on Midvale Ave and Westwood Blvd! Our bedrooms face Westwood Blvd. Impact our sleep and deprivation of sunlight. Quality of life! The little old houses have been there for almost 100 years. Buildings facing backyards and bedrooms will be impacted by noise + Privacy! 64-1

(2) Rezoning! We want to remain a neighborhood of homes not 2 story mansions and or multi use = business + living! More cars, more pollution, more traffic 64-2

Please return completed form to Planning Staff or email, mail, or fax the form to:
Lameese Chang, Department of City Planning
200 N. Spring Street, Room 667, Los Angeles, CA 90012
Lameese.chang@lacity.org
Phone (213) 978-1178 / Fax (213) 978-1477

This is about Coexistence and consideration for others!

COMMENT LETTER NO. 65

Lameese Chang <lameese.chang@lacity.org>

comments on the ECTNP

Jim <jamesos@aol.com> Tue, Jun 6, 2017 at 4:14 PM
To: lameese.chang@lacity.org
Cc: laura.lake@gmail.com, meveloff@gmail.com

The City of Los Angeles cannot study a Specific Plan covering 3 Community plan areas in a vacuum. This is not virgin territory where nothing else exists except Policies and goals for each community plan. Each Plan area already contains Specific plans and the impact of this ECTNP on these specific plans must be studied and mitigated. These include the **West Los Angeles Traffic Improvement and Mitigation Specific Plan, Sepulveda Corridor Specific Plan, Century City South specific Plan, Century City North Specific Plan, Glencoe Maxella Specific Plan, Coastal Transportation Corridor specific plan, Playa Vista: Area C Specific Plan.**

65-1

The DEIR needs to be recirculated while all 3 community plans are updated.

Likewise the impacts of projects already planned like the Fox Studio Expansion for one must also be incorporated into this plan.

2013 population numbers are about 30% higher than California Dept. of Finance Figures.

Please acknowledge receipt of this email.

James O'Sullivan
Fix The City
213-840-0246 - Cell

COMMENT LETTER NO. 66

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: Andrew Park

Email: B. Andrew. Park@gmail.com

Mailing Address: 12100 W Olympic Blvd #350, LA, CA 90064

Phone: 213-626-9594

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

As an employee near the Olympic/Bundy station, I understand the importance of zone change to support the Metro station. However, there needs to be more housing near Olympic/Bundy station since there will be more office/commercial buildings. I recommend that RAS4 zoning to expand more west since there has been more offices that has been increasy work population near Centinela. Also, the 'Alternative Compliance Zoning' located at Martin Expo Development site should be their plans allocated elsewhere since they have already finalized ~~developer~~ to develop. I recommend to allocate the 'Alternative Zoning' to underutilized space like the Sports Chalet near Trader Joe's to provide opportunity for owners to build more housing. Finally, I must address the lack of retail along Olympic corridor. There should not be a maximum retail space of 5,000 SF for New Industry zoning to provide landlord an option to provide more retail options for the community.

66-1

66-2

66-3

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 67

Lameese Chang <lameese.chang@lacity.org>

Pico Blvd. development

Ellen Perlmutter <eperlmutter@gmail.com> Tue, Jun 6, 2017 at 8:58 AM
To: lameese.chang@lacity.org, faisal.alserri@lacity.org, jack.sripoona@lacity.org

To whom it may concern:

I am writing today to express grave concerns about plans to develop Pico Boulevard. There are many reasons why our community cannot sustain an influx of residents–school availability, emergency resources, already inadequate attention to homelessness and petty crime--but I will limit my comments to the traffic issues WHICH ARE ENOURMOUS. 67-1

I have lived on Veteran Avenue for 30 years. I now am unable to get out of my driveway safely at rush hour due to relentless traffic. I have taken steps to adjust–I back into my driveway in order to be able to pull out forward (although this is difficult due to traffic) and have taken to parking on the street. Unfortunately, we have only 2 hour parking on our block and one of my neighbors called my car in yesterday resulting in a parking ticket. The car was also either hit or vandalized–obviously, I would prefer to be able to park in my driveway but I cannot due to the challenges of dealing with so much traffic. An expansion of the population in the neighborhood will increase automotive density which will inevitably make life on Veteran difficult and will spill over to surrounding streets making our residential neighborhood more difficult. 67-2

Let me share one more example. I was driving west on Olympic and wanting to make a left-hand turn onto Sepulveda. I waited through three lights before I could turn, and when I looked behind I saw that there was so much traffic that the left turn lane was full and the people wanting to turn left had blocked the left-hand lane as well. My point is that the automotive density is already too great to be sustained, and additional drivers and cars in the neighborhood will not only impact the quality of life in our residential community but will be dangerous.

Please keep our neighborhood safe!

Ellen Perlmutter
2234 Veteran Avenue

COMMENT LETTER NO. 68

Exposition Corridor Transit Neighborhood Plan
CPC-2013-621-ZC-GPA-SP
ENV-2013-622-EIR
Comment Form

Name: Galen Pindell
Email: gpindelle gmail.com
Mailing Address: 1856 Brockton Avenue
Phone: 415-572-4263

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

I think the height allowances for Missouri Avenue are much too high. Allowing 7-12 story towers across the street from R-1 single family residences is unheard of. Even w/ the 50' set-back these towers will block views & destroy the privacy of these residences. Would like to see the height for these R-1 bordering and adjacent lots reduced to 3 stories. This would be a true transition to the residential neighbors

68-1

This added density is sure to negatively impact quality of life for these residences. Air Quality, Traffic, and Privacy will all be drastically effected by having buildings of this size directly across the street from R-1 homes.

68-2

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning
200 N. Spring Street, Room 667, Los Angeles, CA 90012
Lameese.chang@lacity.org
Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 69

Lameese Chang <lameese.chang@lacity.org>

Pico Up Zoning

BEN REFUERZO <refuerzo@ucla.edu> Sat, May 27, 2017 at 10:38 AM
To: lameese.chang@lacity.org

Hello Chang,
I just became aware of the proposal to upzone Pico Blvd and wanted to voice my concern about this new proposal, as a long term resident and Professor of Architecture at UCLA (35+ years) I am vehemently against this proposal to upzone this area.
I understand the principles of FAR and while it may be appropriate in some instances our neighborhoods seem to be under constant attack from developers wanting to increase density at the expense of quality of life for people that are impacted by these new changes.
This neighborhood is already overly congested with traffic from Century City, Westwood and the surrounding areas trying to have access to the major freeways bounding this enclave.
We have new developments in the works along the Sepulveda Corridor which will continue to exacerbate traffic and existing neighborhood amenities well beyond their limits etc.
With the loss and still at question Westside Pavillion the area is still in limbo...If the upzoning occurs along Pico it will only magnify the problems we are already facing.
While moving into the future is important, so is the quality of life, planners are an important part of maintaining and standing vigilant to this right....developers look at the bottom line and will often push to the limit and beyond....witness the congestion in Playa Vista.
We need your support in this struggle.... I AM AGAINST THE PICO UPZONING.
Regards, Ben Refuerzo
"STAND UP FOR WHAT IS RIGHT EVEN IF YOU ARE THE ONLY ONE STANDING"

69-1

Ben J Refuerzo, *Professor AUD*
Associate Dean for Diversity, Equity & Inclusion
School of the Arts & Architecture
Broad Art Center
Box 951427, Room 8260
Los Angeles, CA 90095-1427
310 267-4326
310 403-1230 cell
310 206-8504 fax
refuerzo@ucla.edu

COMMENT LETTER NO. 70

Exposition Corridor Transit Neighborhood Plan
CPC-2013-621-ZC-GPA-SP
ENV-2013-622-EIR
Comment Form

Name: MITCHELL RICE
Email: MRICE3@SBCGLOBAL.NET
Mailing Address: 10634 VALPARAISO ST. #26
Phone: 310-882-1954

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

THE AREA(S) OF PALMS AND EXTENDING INTO MARVISTA, THAT ARE POPULATED BY APARTMENT BUILDINGS HAVE RUN OUT OF STREET PARKING. A SIX STORY APARTMENT REPLACED PIPER'S AUTO BODY ON OVERLAND AVE., WHICH WAS ONE STORY. THE SAME OVER-DEVELOPMENT IS HAPPENING AT OVERLAND AND CHARNOCK.* CAR LANES HAVE BEEN REDUCED TO TRY TO EVENTUALLY GET PEOPLE ONTO MASS TRANSIT. [redacted] WHY DON'T THEY PUT THE INFRASTRUCTURE IN FIRST? A MONORAIL SYSTEM WOULD HAVE BEEN A FAR MORE INTELLIGENT OPTION THAN THE METRO; THE METRO BEING A 19TH CENTURY DESIGN. AND [redacted] THE METRO INSTEAD OF AN OVERPASS CUTS THROUGH OVERLAND AV. & WESTWOOD BLVD. THIS TYPICALLY CREATES A LINE OF TRAFFIC FROM THE METRO TO THE 10 FREEWAY IN 2 MINUTES.

* OVER-DEVELOPMENT IS OCCURRING THROUGHOUT 90034 & 90066

70-1

Please return completed form to Planning Staff or email, mail, or fax the form to:
Lameese Chang, Department of City Planning
200 N. Spring Street, Room 667, Los Angeles, CA 90012
Lameese.chang@lacity.org
Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 71

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR Exposition Corridor Transit Neighborhood Plan

Erika Rich <erika.rich.phd@gmail.com> Mon, Jun 5, 2017 at 12:52 PM
To: lameese.chang@lacity.org
Cc: Erika Rich <erika.rich.phd@gmail.com>

May 5, 2017

RE: ENV-2013-622-EIR
Exposition Corridor Transit Neighborhood Plan

Dear Ms. Chang:

Please accept my comments on the above-referenced plan. As a resident of the area north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations), just north of Pico Blvd., I wish to submit my strong support for the revised plan for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

The EXPO TNP Specific Plan with its revisions to remove Pico Blvd. between Sepulveda and Overland from "upzoning" addresses our community's strong opposition to the plan as originally proposed. We are supportive of the revisions along Pico Blvd. that acknowledge the fact that our community already has significant density coupled with crippling traffic. We have large employment centers in this area including UCLA, the UCLA Medical Center, Westwood Village and Century City. These centers more than justify the investment made in the EXPO Line and serve commuters as well as local residents. Our area was long overdue for a major public transit investment given our congestion, the growing density of our housing stock, and the many jobs and educational opportunities provided in our area.

The Pico Blvd. business corridor is the center of our community. We frequent the businesses along Pico and Westwood Blvds. The rezoning of Pico would doom the overwhelming majority of the existing shopkeepers – many independent business owners.

Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. One case in point is our local elementary school. We have a high proportion of renters already, many drawn to this area to be in the Westwood Charter Elementary School enrollment area. Westwood Charter Elementary School wavers between being at enrollment capacity or over capacity. Just 2 years ago, 30 eligible families were initially denied enrollment until a work around utilizing the library as a classroom, was implemented at the 11th hour

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide low income housing. This area has grown in population and continues to do so. With the completion of the former "Casden" funded/led project at Exposition and Sepulveda, we will add nearly 600 new units nearby. That is happening now, independent of any re-zoning on Pico. There are also multi-family projects in various stages of development (along Sepulveda just south of the Exposition, and just east of Pico on Gateway). While outside of Westwood Charters enrollment area, the impact on our community due to these projects is concerning. Adding more multi-family residences will only exacerbate these concerns. 71-1

As is well known, our area suffers from significant traffic congestion. Some of that congestion relates to the fact that there are nearly no north-south through arterials to carry traffic (and/or transit). Sepulveda Blvd. is one of the few and is also the 405 freeway alternative route; it will be further slowed with the addition of new development along its street. We have long requested DASH transit service from LA DOT but have been refused for many years as the priority for DASH goes to "transit dependent" areas. While we understand the need to prioritize, it seems to us that additional value can be realized from the EXPO line if more people were easily able to access its stations. Having reliable transit connections to EXPO from throughout our community (which goes north to Santa Monica Blvd.) would better spread development instead of creating a bottleneck/canyon along Pico Blvd.

Further, as the EXPO Line has been open only a year in our area, we believe it wise to consider where added development should occur after additional time has passed, and best to consider it when the WLA Community Plan is re-written and all our community assets and resources can be reviewed. 71-1 cont.

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

Sincerely,

Erika Rich
2336 Camden Ave, 90064

COMMENT LETTER NO. 72

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: STEPHEN ROGERS

Email: steve@rogersacoustics.com

Mailing Address: 2255 PELHAM AVENUE

Phone: (310) 266-3918

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

I OPPOSE INCREASED DENSITY IN OUR AREA BECAUSE THERE IS SIMPLY NOT THE INFRASTUCTURE TO SUPPORT IT. OUR STREETS, POLICE OFFICERS, SCHOOLS AND UTILITIES ARE STRAINED TO BREAKING POINT, EVEN THE EXPO LINE ITSELF IS CLOSE TO CAPACITY - NO NEED TO ARTIFICIALLY STIMULATE DEVELOPMENT... THE TRANS WILL FILL UP ALL ON THEIR OWN! 72-1

I DO SUPPORT THE PLANNING DEPT'S DECISION TO REMOVE MOST OF PICO BETWEEN SEPULVEDA AND OVERLAND FROM THE PLAN, HOWEVER I FEAR THAT WILL NOT BE ENOUGH... I URGE THAT WESTSIDE PAVILION PROPERTY BE REMOVED FROM THE PLAN TOO. THAT IS THE ONLY WAY TO AVOID INFRASTRUCTURE OVERLOAD 72-2

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 73

June 4, 2017

Lameese Chang
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012
lameese.chang@lacity.org

Re: **Exposition Line Transit Neighborhood Plan and DEIR**

Dear Ms. Chang:

I very much appreciate the opportunity of submitting the following general comments on the Exposition Line Transit Neighborhood Plan as it relates to our Westside South/Rancho Park area, together with some specific comments on the DEIR for the Expo TNP dated March 2017.

GENERAL COMMENTS ON THE EXPO TNP

- I oppose any plan that would increase density in the Westwood South/Rancho Park area because there is simply not the infrastructure here to support it. In fact, signs of the City's lack of investment in our infrastructure are plainly obvious to those of us who call this neighborhood home: our streets are in disrepair, we don't have enough police officers, our schools are overflowing and supply of basic utilities such as water and power is strained. 73-1

- Traffic flows on our streets - especially Pico, Westwood, Sepulveda and Olympic Boulevards and Overland Avenue - are amongst the most congested in the City and near-gridlock conditions are a regular occurrence on weekday afternoons. We really can't take any more cars, buses or trucks… so the additional 8% increase in volume that the Expo TNP is expected to introduce to our area would surely bring traffic here to a standstill. 73-2

- At the current rate of ridership growth (which has outpaced original projections), even the Expo Line itself will very soon be at capacity, so there is no need to artificially stimulate development in our area to be sure of filling the trains. To be viable, any plan - such as the Expo TNP - that promotes greater density in our area MUST include expansion of the capacity of the Expo Line (more frequent service, longer trains and platforms, additional track etc.). Since there is no plan to expand the Expo Line in the foreseeable future, the whole premise of the Expo TNP is flawed… or, at the very least, a decade or two premature. 73-3

COMMENTS ON THE DEIR

NOTE: My comments are based on the understanding that the project description in the DEIR is out-of-date. Specifically, I understand that most of Pico Boulevard between Sepulveda and Overland has been removed from the Expo TNP, but the Westside Pavilion property (on Pico between Westwood and Overland) is now included as an Expo Corridor Sub-Area. 73-4

- Pico/Westside Pavilion

  I strongly support the Planning Department's decision to remove most of Pico Boulevard between Sepulveda and Overland from the Proposed Project; this is an important first step towards avoiding infrastructure, traffic and transit overload. THANK YOU!

  However, the Proposed Project now includes the Westside Pavilion property which is slated for upzoning that would allow a major multi-family development, introducing hundreds of new dwelling units to the neighborhood, not to mention a significant increase in building height, shade and aesthetic impacts on the nearby single-family streets.

  For all the reasons I gave in the preceding comments, this added density/population is something that our neighborhood cannot absorb without unacceptable impacts. We are already bracing for the construction of 600 new homes at the Casden site at Sepulveda and Pico, so the proposal to green-light yet another increase in residential density at the Westside Pavilion site (which is just a few blocks east of the Casden development) seems at best ill-considered, and at worst irresponsible.

  I urge that the Westside Pavilion property be removed from the Proposed Project, in addition to the rest of Pico Boulevard between Sepulveda and Overland (which has already been removed).

73-5

- Alternative Compliance Scenario

  The Alternative Compliance Scenario - which would allow increased residential development and reduced commercial/jobs in certain eligible areas - is much more than a "scenario". In fact, it is part-and-parcel of the Proposed Project. If we give developers the option to build more apartments/condos and less commercial space, they surely take it because residential development is a bigger profit opportunity for them in the current market. Needless to say, the Alternative Compliance Scenario would compound the (already significant) impacts of the Proposed Project.

  I request that the Alternative Compliance options be removed from the Proposed Project.

73-6

- Bonuses

  The Expo TNP offers significant "bonus" increases in FAR in exchange for features that are characterized as "Public Benefits". For example, the proposed bonus program would raise the allowable FAR for the proposed new Mixed Use: Commercial/Residential zone from 2.0 to as much as 3.6, which equates to a whopping 80% increase in development size - with a corresponding increase in impacts such as strain on infrastructure, traffic congestion, air quality, visual blight, shade etc.

  Without doubt, the bonus component of the Expo TNP is a gift to would-be developers. However, the pay-back to the neighborhood (and city as a whole for that matter) seems almost insignificant - because the so-called Public Benefits themselves are so trivial.

73-7

I request that the Bonus component be eliminated from the Proposed Project. Alternatively, Public Benefits could be included as a pre-requisite; in other words, a would-be developer of a site with the new Mixed Use: Commercial/Residential zoning would need to score a certain minimum number of Public Benefit points in order to qualify for an FAR of 2.0.

73-7 cont.

- Noise (Section 4.9)

The DEIR correctly identifies "significant and unavoidable impacts" with noise and vibration. However, the analysis in Section 4.9 downplays the true extent of these impacts in several key ways.

Firstly, the analysis has been done without a single ambient noise or vibration measurement in the Project Area. Instead, the preparers have relied on assumptions (such as the "presumed" ambient noise levels in the LAMC). This approach seems substandard and less than is required for good faith compliance with the CEQA guidelines. **For the Final EIR, the impact analysis should be supported by actual measured ambient noise and vibration data to better quantify these important impacts.**

Secondly, the DEIR proposes no clear significance criteria for vibration, arguing that "there are no adopted City standards for vibration". This is inadequate. Normal practice would be to fall back on the County Code in any areas not adequately covered by the LAMC. So, for better compliance with CEQA guidelines and to better quantify the vibration impacts, **the analysis in the FEIR should reference the LA County Code vibration limit.**

73-8

Thirdly, the DEIR misrepresents the vibration acceptability criteria published by the FTA, by quoting a vibration limit of 85 VdB. That figure is incorrect; according to the FTA publication "Transit Noise and Vibration Impact Assessment" (2006) the impact criterion for residential property is 80 VdB for infrequent events (fewer than 30 per day). For more frequent vibration events - such as those associated with heavy construction work, which could occur more than 70 times per day - the FTA criterion is 72 VdB. **The analysis in the FEIR should include correct references to the FTA criteria.**

And finally, the proposed zone change (from commercial to mixed-use) for the Westside Pavilion property would permit/encourage new residential development that would be incompatible with existing ambient noise levels, which exceed 70 dBA (CNEL) on the Overland side of the site and almost certainly also exceed 70 dBA (CNEL) on the Pico and Westwood sides too (this should be verified by long-term noise monitoring on all three sides of the site). Such a high noise exposure level exceeds the upper limits for residential land use compatibility prescribed by Federal, State and Local agencies - namely: HUD, State Department of Health Services, State Department of Housing and Community Development, City of Los Angeles (General Plan). In other words, this site is simply too noisy to be compatible with the proposed residential use/zoning. **Yet another compelling reason to remove the Westside Pavilion site from the Plan.**

- Transportation and Traffic (Section 4.12)

  The DEIR correctly identifies "significant and unavoidable impacts" with traffic circulation in the Project Area, concluding that the Proposed Project would increase traffic volumes to levels above applicable thresholds (Impact 4.12-2).

  The traffic analysis in the DEIR underscores yet again the flawed thinking behind the Expo TNP, because the claimed objective is to reduce vehicle miles traveled (VMT) per capita, rather than reduce total VMT. So, while the Proposed Project is projected to result in a modest (3.1%) reduction in VMT per capita, the total VMT is expected to increase by 8.9%.

73-9

- 4.13 - Utilities & Service Systems

  In its analysis of impacts on the water supply and wastewater infrastructure, the DEIR notes that Proposed Project would result in increased demand - necessitating new water and waste line capacity - but nonetheless concludes that these impacts are less than significant.

  The DEIR logic is that any future developments would need to comply with existing City policies and, specifically, that "each Applicant/Contractor would be required to identify specific on- and off- site improvements needed to ensure that impacts related to water (and wastewater) conveyance… are addressed prior to issuance of a certificate of occupancy". This approach seems backwards and irresponsible. Surely, the City must put the water supply and wastewater infrastructure needed to support the Proposed Project in place BEFORE implementing zoning changes etc., rather than "kicking-the-can-down-the-road" and hoping that developers/contractors (who will be looking for the cheapest and most expedient way to get their projects approved) will solve the issues with increased demand as they arise in the future.

73-10

  The DEIR also notes that "the Proposed Project would exceed 20,000 gpd, which is the BOS criterion for necessitating detailed gauging to determine whether the sewer conveyancing system is capable of safely accommodating the total flow generated by the Project". However, the DEIR does not propose or even suggest implementing any such gauging as a mitigation - relying instead on future developers/contractors of future developments to "coordinate with LASAN" to solve capacity problems as they surface.

  The analysis in the FEIR should be revised to include the necessary upgrades to water supply and wastewater conveyance infrastructure as required mitigations, and then Impacts 4.13-2 and 4.13-6 should be revised to read "less than significant with mitigation". It is essential that the costs of required infrastructure upgrades to support the Proposed Project are factored into the impact analysis.

  The DEIR states that the existing sewer infrastructure in the Project Area is in "good to very good" condition. According to Table 4.13-11, sewer pipes in "good" condition have only light, localized cracks, corrosion or root damage, while pipes in "very good" condition are "almost like-new". Neither of these descriptions seems to align with the reality of the

sewer pipe network in our Westwood South area, much of which is over 80 years old and in need of frequent repair.

(LA Times article from 2015: http://graphics.latimes.com/la-aging-water-infrastructure/).

The DEIR should be revised to more accurately describe the aging sewage conveyance systems in our area, which are not compatible with the increased demand that would be precipitated by the Proposed Project.

73-10 cont.

Electricity supply: the DEIR shows that the Proposed Project would increase demand for electricity in the Project Area by 52%. However, the analysis concludes that this increase is less than significant because it translates into an increase of only 0.4% citywide, which - according to the analysis in the DEIR - can easily be accommodated by existing electricity infrastructure. This is encouraging, but doesn't seem to jibe with recent experience of power outages and brownouts (which seem to occur every summer) not to mention the billboards and radio ads which tell us to avoid running air-conditioners and the like at times of peak demand.

73-11

- Alternative 2 - Reduced Project Alternative

  My serious misgivings about the Expo TNP notwithstanding, Alternative 2 (the Reduced Project Alternative) is the only variant of the Plan that comes even close to making sense for the Westside. The 25% reduction in allowable FAR (with commensurate reductions in height, increased setbacks, etc.) would provide at least some relief from the serious negative impacts of the Proposed Project.

73-12

- Alternative 3 - Increased Residential Reduced Employment Alternative

  The far-reaching negative impacts caused by the Proposed Project would be exacerbated by the Alternative 3 variant, by minimizing job creation and maximizing residential density (and thereby strain on infrastructure, increased traffic etc.). **It is difficult to overstate how damaging Alternative 3 would be to the Westside.**

73-13

Many thanks again for your consideration,

Steve Rogers
2255 Pelham Avenue
Los Angeles, CA 90064

COMMENT LETTER NO. 74

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR Exposition Corridor Transit Neighborhood Plan

Elisabeth Frank Rosenson <erosenson@yahoo.com> Wed, May 24, 2017 at 4:10 PM
Reply-To: Elisabeth Frank Rosenson <erosenson@yahoo.com>
To: "lameese.chang@lacity.org" <lameese.chang@lacity.org>

Dear Ms. Chang,

Please accept these comments regarding the plan noted above. As a 12-year resident of the neighborhood north of the Exposition Light Rail Corridor, I wish to express my **STRONG SUPPORT** for the revised plan, particularly related to the areas around the Westwood and Sepulveda Expo stops.

74-1

The revisions to the plan to remove Pico Blvd between Sepulveda and Overland from upzoning are the right approach, and they address our community's strong opposition to the original plan.

These changes acknowledge the reality that our community is quite dense already, but more importantly, faces overwhelming traffic congestion. UCLA, Westwood, Century City and Fox Studios draw large volumes of traffic into (and through) our neighborhoods already and the Expo Line was an important step in helping to provide another option for those commuters.

However, we do not have the infrastructure to support the construction that would have been encouraged by the development density bonuses in the original plan. As it is, the Casden project will result in 600 additional units, and our low-density residential continues to be replaced with larger multi-family buildings at an overwhelming pace.

74-2

As the parent of a Westwood Charter School student, I see every day how full the school is already (800+ students on a one-block square campus in a building that's nearly 100 years old!!). In fact, TK had to be moved to Nora Sterry Elementary last year to ensure there was sufficient room for incoming kindergartners. There is **NO** room for a large influx of additional students at Westwood.

74-3

I very much appreciate that you and the Planning Department listened to our concerns and incorporated our feedback into this revised plan and encourage you to hold firm against those who may try to persuade you to revert to the original, extremely dense plan.

74-4

Thank you again for your hard work on this plan.

Sincerely,
Elisabeth Rosenson
Midvale Ave

COMMENT LETTER NO. 75

Exposition Corridor Transit Neighborhood Plan
CPC-2013-621-ZC-GPA-SP
ENV-2013-622-EIR
Comment Form

Name: Cynthia Saffir
Email: csaff@yahoo.com
Mailing Address: 2266 Pelham Ave LA 90064
Phone:

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

I am sorry to say that many of the assumptions this plan is based upon are pure fantasy. The fact that it is assumed that the people who move into the new housing will work in the new jobs is ridiculous. Those jobs by & large will not pay sufficient wages for the workers to live in the new housing ~~which will~~ the rents for which will mirror current rents in the area. ~~Social ser~~ Thus traffic that is already a mess on Olympic, Pico, Sepulveda, Overland, etc & will only get worse. Public services are already wholly inadequate & the assumption that the schools police, fire, water, electric gas etc are sufficient to accomodate the increase in density without significant 75-1

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning
200 N. Spring Street, Room 667, Los Angeles, CA 90012
Lameese.chang@lacity.org
Phone (213) 978-1178 / Fax (213) 978-1477

funds being made available to increase & improve the services is wholly irresponsible.

The fact that the Planning Commission developed & promoted this plan without greater/complete interaction between other departments who are working on the various aspects of this plan & its impact on traffic, public services etc is completely incomprehensible & irresponsible.

The traffic will increase substantially as a result of workers coming into the area to fill the new jobs & for no additional parking to be included in the plan & NO FUNDING ~~for~~ TO PAY FOR THE INCREASED NEED FOR PUBLIC SERVICES is either insane or completely removed from reality. SHAMEFUL

75-1 cont.

COMMENT LETTER NO. 76

Lameese Chang <lameese.chang@lacity.org>

EXPOSITION CORRIDOR TRANSIT NEIGHBORHOOD PLAN comment

1 message

cynthia s. <csaff@yahoo.com> Wed, May 24, 2017 at 6:26 PM
Reply-To: "cynthia s." <csaff@yahoo.com>
To: "lameese.chang@lacity.org" <lameese.chang@lacity.org>

I recently heard a presentation at the Westside Neighborhood Council about the EXPOSITION CORRIDOR TRANSIT NEIGHBORHOOD PLAN. I also attended a meeting last night that had been billed as a "public hearing" on the plan. It certainly was not a "public hearing" in any sense of the word that the vast majority of attendees were familiar with. It was extremely disappointing.

It is my strong belief that the Plan is based on a number of incorrect assumptions which, when I have tried to discuss them with personnel from the planning department, have been told are not within their purview. That is quite disturbing since it seems that there are many different departments stirring this pot, with little coordination between them such that certain considerations are not being taken into consideration in formulating this plan. 76-1

One of the assumptions that I believe is wholly incorrect is that the development plan will encourage and in fact engender shorter vehicle trips, at least in part because at least some of the people who will move into the new housing will also work in the jobs created by the new commercial and industrial development. HOW COULD THAT BE? West Los Angeles is a very expensive place to live. Rents are very high, and anyone who thinks that the increased density will somehow drive down the rents in the area is living in a fantasy world. I have lived in this area for nearly 25 years. Housing prices only went down one time (possibly two times) to the best of my recollection, both caused 76-2

by severe economic downturns. The people who are likely to work in the new industrial and commercial jobs that are supposed to be created will never receive sufficiently high wages to afford rents in the area. Given that, how will that shorten the duration of vehicle trips when those who will take those jobs will have to come from the valley, or further north, or from the San Gabriel Valley. And, as you know there are no metro trains that service the West Los Angeles area that run north/south. People will be driving in with the cars.

76-2 cont.

Traffic on Pico, Olympic, Sepulveda and Overland has gotten really terrible and not only during traditional rush hour times. It can take a very long time to traverse from Barrington to Beverly Drive on Pico or Olympic, or to get from National to Sunset on Sepulveda much of the day. How are these streets going to accommodate the cars of hundreds of additional residents?

76-3

Additionally, we have been told that little additional parking has been built into the plan, with the belief that if residents and visitors to the area cannot find parking, they simply won't drive cars. Right. Los Angeleans are chomping at the bit to get right of their cars. Add to that the ever increasing cost of public transportation and the investment of time it takes to use public transportation to get across the city and you couldn't possibly believe that the number of people driving vehicles will decrease. This is culture change that Los Angeles has not yet been able to produce and that is so unlikely to happen any time soon. Residential streets will be clogged with parked vehicles, unless they are able to obtain permit parking, and those coming to the area to visit, or moving into the area to live, will end up being angry and will be forced to circle streets without permit parking to find a space to park their cars.

76-4

When asked at the meeting last night about the need for more schools, more public services such as police and fire, we were told that those departments are aware of the plan and will plan for the increased demand on their services. The chief of police has already publicly stated the need for a significant increase in patrol officers -- but there isn't money in the City budget to pay for those officers. How is that going to change once the population in this area increases significantly where we already have an ever increasing crime rate to which the police are almost never able to respond unless a life is threatened. People in this community are increasingly frightened about the increasing crime. This plan will only make this worse without a significant increase in policing and police presence. 76-5

Where are these residents' children supposed to go to school. I asked about this to one of the planning commission employees at the meeting last night. Her response was that, as far as Westwood Charter goes, "it's a charter school; we are only looking at public schools." HUH??? WESTWOOD CHARTER IS OUR COMMUNITY SCHOOL AND IT IS A LAUSD SCHOOL, albeit it is a "charter" school. It is over crowded and is likely to have to start turning away children who would normally go there as their home elementary school. How is that supposed to work when a significant number of new residents come to this area and expect to be able to send their children to schools that will not be able to accommodate them? 76-6

As I see it, the ramifications of this plan are being minimized and there is a whole lot of fantasy going on about how the car culture will change, how rents will somehow become affordable to retail workers, clerical workers, and any body other than the highest paid executives in the local business that are expected to come in as a result of the plan. 76-7

This is a very short sighted plan. I think the plan is being misrepresented to the public and it is going to significantly decrease the quality of life for current residents and those residents that will move into the new housing. It is a shame.

And to have "public hearings" such as the one last night at the Iman Center, are terribly disrespectful of the public. Yes oral comments were taken -- behind a curtain where no one else could hear them, no responses to were offered to concerns, and when no microphones were use so it was nearly impossible to hear the woman call the names of the people who had turned in speaker cards and who were waiting for their turn to speak into the shroud recorder. I can tell you there were a lot of angry residents that came to what they believed would be a presentation, a chance to ask questions and get some answers, and for those questions and answers, as well as their statements to be heard by the public.

76-7 cont.

Sincerely and with grave disappointment,
Cynthia Saffir
2266 Pelham Ave.
Los Angeles, CA 90064
(310) 694-1455

COMMENT LETTER NO. 77

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR Exposition Corridor Transit Plan

1 message

Genie Saffren <gsaffren@gmail.com> Mon, Jun 5, 2017 at 12:54 PM
To: lameese.chang@lacity.org

Dear Ms. Chang~

Please accept my comments on the above referenced plan. As a long time resident of the area just north of the Exposition Light Rail Corridor, I wish to submit my STRONG SUPPORT for the revised plan in our WSSM community which is adjacent to the Sepulveda and Westwood EXPO stops.

The EXPO TNP Specific Plan with its revisions to remove Pico Blvd. between Sepulveda and Overland from "upzoning", addresses our community's strong opposition to the plan. We are supportive of the revisions along Pico Blvd. that acknowledges the fact the our community already has significant density coupled with crippling traffic that unfortunately hasn't diminished since the extension of the EXPO Line. We have large employment centers in our area including UCLA, Westwood Village and Century City. These centers more than justify the investment made in the EXPO Line and serve commuters as well as local residents. Our area was long overdue fro a major public transit investment given our congestion. 77-1

However, our community does not have adequate infrastructure to support the construction that would be created by providing added development density bonuses. Those bonus opportunities would have served to create a "land rush" along Pico - further inflating already expensive land. No affordable housing would have resulted from such upzoning. With the completion of the Casden project, we will have nearly 600 new units nearby. Our low density residential blocks have been and continue to be developed. Duplex, triplex and small older apartment buildings have been and are being torn down for much larger projects with many units. For example, on a former duplex property, now stands a condo building with 30 units. Water mains, sewers, utility lines are maxed out. Our local public elementary school, Westwood Charter, is way over capacity. I wonder where new influxes of students will go to school. Our residential streets are choked with the parked cars and trucks of employees who work in the area. 77-2

I realize with progress, there is always growth but I worry that no plan for sustained maintenance for these changes has been factored in. I have witnessed over the years many improvement projects: widened boulevards, newly planted trees, trash receptacles, benches etc. but only to see pot holes, dead, dying trees, overflowing trash cans, a very few years later. This is our community.

I am grateful that the Planning Department heard the overwhelming community input that opposed the initial EXPO TNP plans. Thank you for listening. 77-3

Sincerely,

Genie Saffren

COMMENT LETTER NO. 78

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR Exposition Corridor Transit Neighborhood Plan

1 message

Lisa Schechter <lisaschechter@aol.com> Wed, May 31, 2017 at 5:59 PM
To: lameese.chang@lacity.org

Lameese Chang
LA City Planning Dept.
Via email: lameese.chang@lacity.org

RE: **ENV-2013-622-EIR**
Exposition Corridor Transit Neighborhood Plan

Dear Ms. Chang:

Please accept my comments on the above-referenced plan. As a resident of the area north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations), just north of Pico Blvd., I wish to submit my **strong support** for the revised plan for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

The EXPO TNP Specific Plan with its revisions to remove Pico Blvd. between Sepulveda and Overland from "upzoning" addresses our community's strong opposition to the plan as originally proposed. We are supportive of the revisions along Pico Blvd. that acknowledge the fact that our community already has significant density coupled with crippling traffic. We have large employment centers in this area including UCLA, the UCLA Medical Center, Westwood Village and Century City. These centers more than justify the investment made in the EXPO Line and serve commuters and students, as well as local residents. Our area was long overdue for a major public transit investment given our congestion, the growing density of our housing stock, and the many jobs and educational opportunities provided in our area.

The Pico Blvd. business corridor is the center of our community. We frequent the businesses along Pico and Westwood Blvds. Our Westside Neighborhood Council has invested significant time and resources in the improvement of Pico Blvd. and will soon be implementing a new streetscape plan from Sepulveda to Patricia Ave. And just this month we celebrated the fifth "Pick Pico" event to promote local businesses and organizations. The rezoning of Pico would doom the overwhelming majority of the existing shopkeepers – many independent business owners. The rezoning would usher in a period not unlike the urban renewal of the 1960's—where entire neighborhoods were demolished. We do not wish to invite that kind of destruction here. 78-1

Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. Those added development opportunities would have served to create a "land rush" along Pico—further inflating already expensive land. No affordable housing would have resulted from such upzoning. Adjacent properties would be severely negatively impacted.

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide low income housing. This area has grown in population and continues to do

so. With the completion of the Casden project at Exposition and Sepulveda, we will add nearly 600 new units nearby. We have a high proportion of renters – many of whom have located to be in the Westwood Charter Elementary School area. That said, our local Westwood Charter Elementary School is at capacity.

As is well known, our area suffers from significant traffic congestion. Some of that congestion relates to the fact that there are nearly no north-south through arterials to carry traffic (and/or transit) thus placing tremendous burdens on those few streets that do provide north-south access. Sepulveda Blvd. is one of the few and is also the 405 freeway alternative route; it will be further slowed with the addition of new development along its street. We have long requested DASH transit service from LA DOT but have been refused for many years as the priority for DASH goes to "transit dependent" areas. While we understand the need to prioritize, it seems to us that additional value can be realized from the EXPO line if more people were easily able to access its stations. This particularly true for those who wish to give up their vehicles and for the young and elderly. Having reliable transit connections to EXPO from throughout our community (which goes north to Santa Monica Blvd.) would better spread development instead of creating a bottleneck/canyon along Pico Blvd. The reality is that EXPO will not even be able to resolve the **current** traffic issues—much less absorb all the traffic to be created by new development, a great deal of which will occur*without* any upzoning to our community. And, we must remember that EXPO's capacity to carry passengers is limited due to the sharing of track with the Blue Line as the train nears downtown.

78-1 cont.

Further, as the EXPO Line has been open only a year in our area, we believe it wise to consider where added development should occur after additional time has passed, and best to consider it when the WLA Community Plan is re-written and all our community assets and resources can be reviewed.

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

Sincerely,

Lisa Schechter
Resident Westwood South of Santa Monica

COMMENT LETTER NO. 79

Lameese Chang <lameese.chang@lacity.org>

Expo Corridor Plan

Frederick Schmitt <fkschmitt@yahoo.com> Mon, Jun 5, 2017 at 4:45 PM
Reply-To: Frederick Schmitt <fkschmitt@yahoo.com>
To: "lameese.chang@lacity.org" <lameese.chang@lacity.org>

June 5, 2017

Lameese Chang
LA City Planning Dept.
Via email: lameese.chang@lacity.org

RE: ENV-2013-622-EIR
Exposition Corridor Transit Neighborhood Plan

Dear Ms. Chang:

Please accept my comments on the above-referenced plan. As a resident of the area north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations), just north of Pico Blvd., I wish to submit my **strong support** for the revised plan for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

The EXPO TNP Specific Plan with its revisions to remove Pico Blvd. between Sepulveda and Overland from "upzoning" addresses our community's strong opposition to the plan as originally proposed. We are supportive of the revisions along Pico Blvd. that acknowledge the fact that our community already has significant density coupled with crippling traffic. We have large employment centers in this area including UCLA, the UCLA Medical Center, Westwood Village and Century City. These centers more than justify the investment made in the EXPO Line and serve commuters as well as local residents. Our area was long overdue for a major public transit investment given our congestion, the growing density of our housing stock, and the many jobs and educational opportunities provided in our area.

The Pico Blvd. business corridor is the center of our community. We frequent the businesses along Pico and Westwood Blvds. Our Westside Neighborhood Council has invested significant time and resources in the improvement of Pico Blvd. and will soon be implementing a new streetscape plan from Sepulveda to Patricia Ave. And just this weekend we celebrated the fifth "Pick Pico" event to promote local businesses and organizations. The rezoning of Pico would doom the overwhelming majority of the existing shopkeepers – many independent business owners. The rezoning would usher in a period not unlike the urban renewal of the 1960's—where entire neighborhoods were demolished. We do not wish to invite that kind of destruction here. 79-1

Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. Those added development opportunities would have served to create a "land rush" along Pico—further inflating already expensive land. No affordable housing would have resulted from such upzoning.

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide low income housing. This area has grown in population and continues to do so. With the completion of the Casden project at Exposition and Sepulveda, we will add nearly 600 new units nearby. We have a high proportion of renters – many of whom have located to be in the Westwood Charter Elementary School area. That said, our local Westwood Charter Elementary School is at capacity.

As is well known, our area suffers from significant traffic congestion. Some of that congestion relates to the fact that there are nearly no north-south through arterials to carry traffic (and/or transit). Sepulveda Blvd. is one of the few and is also the 405 freeway alternative route; it will be further slowed with the addition of new development along its street. We have long requested DASH transit service from LA DOT but have been refused for many years as the priority for DASH

goes to "transit dependent" areas. While we understand the need to prioritize, it seems to us that additional value can be realized from the EXPO line if more people were easily able to access its stations. Having reliable transit connections to EXPO from throughout our community (which goes north to Santa Monica Blvd.) would better spread development instead of creating a bottleneck/canyon along Pico Blvd.

Further, as the EXPO Line has been open only a year in our area, we believe it wise to consider where added development should occur after additional time has passed, and best to consider it when the WLA Community Plan is re-written and all our community assets and resources can be reviewed. 79-1 cont.

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

Sincerely,

Frederick K. Schmitt
2337 Camden Avenue

COMMENT LETTER NO. 80

Lameese Chang <lameese.chang@lacity.org>

RE: ENV-2013-622-EIR Exposition Corridor Transit Neighborhood Plan

1 message

Linda Smedley <lsmedley@nu.edu> Thu, Jun 1, 2017 at 2:42 PM
To: "lameese.chang@lacity.org" <lameese.chang@lacity.org>

Lameese Chang
LA City Planning Dept.

RE: **ENV-2013-622-EIR**
Exposition Corridor Transit Neighborhood Plan

As a long time resident of the area north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations), just north of Pico Blvd., I wish to submit my **strong support** for the **revised plan** for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

The EXPO TNP Specific Plan with its revisions to remove Pico Blvd. between Sepulveda and Overland from "upzoning" addresses our community's strong opposition to the plan as originally proposed. We are supportive of the revisions along Pico Blvd. that acknowledge the fact that our community already has significant density coupled with crippling traffic. We have large employment centers in this area including UCLA, the UCLA Medical Center, Westwood Village and Century City. These centers more than justify the investment made in the EXPO Line and serve commuters and students, as well as local residents. Our area was long overdue for a major public transit investment given our congestion, the growing density of our housing stock, and the many jobs and educational opportunities provided in our area. 80-1

The Pico Blvd. business corridor is the center of our community. We frequent the businesses along Pico and Westwood Blvds. Our Westside Neighborhood Council has invested significant time and resources in the improvement of Pico Blvd. and will soon be implementing a new streetscape plan from Sepulveda to Patricia Ave. **The rezoning of Pico would doom the overwhelming majority of the existing shopkeepers – many independent business owners. The rezoning would usher in a period not unlike the urban renewal of the 1960's—where entire neighborhoods were demolished. We do not wish to invite that kind of destruction here.**

Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. Those added development opportunities would have served to create a "land rush" along Pico—further inflating already expensive land. No affordable housing would have resulted from such upzoning. Adjacent properties would be severely negatively impacted.

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide low income housing. This area has grown in population and continues to do

so. With the completion of the Casden project at Exposition and Sepulveda, we will add nearly 600 new units nearby. We have a high proportion of renters – many of whom have located to be in the Westwood Charter Elementary School area. That said, our local Westwood Charter Elementary School is at capacity.

As is well known, our area suffers from significant traffic congestion. Some of that congestion relates to the fact that there are nearly no north-south through arterials to carry traffic (and/or transit) thus placing tremendous burdens on those few streets that do provide north-south access. Sepulveda Blvd. is one of the few and is also the 405 freeway alternative route; it will be further slowed with the addition of new development along its street. We have long requested DASH transit service from LA DOT but have been refused for many years as the priority for DASH goes to "transit dependent" areas. While we understand the need to prioritize, it seems to us that additional value can be realized from the EXPO line if more people were easily able to access its stations. This particularly true for those who wish to give up their vehicles and for the young and elderly. Having reliable transit connections to EXPO from throughout our community (which goes north to Santa Monica Blvd.) would better spread development instead of creating a bottleneck/canyon along Pico Blvd. The reality is that EXPO will not even be able to resolve the **current** traffic issues—much less absorb all the traffic to be created by new development, a great deal of which will occur *without* any upzoning to our community. And, we must remember that EXPO's capacity to carry passengers is limited due to the sharing of track with the Blue Line as the train nears downtown.

80-1 cont.

Further, as the EXPO Line has been open only a year in our area, we believe it wise to consider where added development should occur after additional time has passed, and best to consider it when the WLA Community Plan is re-written and all our community assets and resources can be reviewed.

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

Sincerely,

Linda Smedley

40 Year Community Resident

COMMENT LETTER NO. 81

Exposition Corridor Transit Neighborhood Plan
CPC-2013-621-ZC-GPA-SP
ENV-2013-622-EIR
Comment Form

Name: Ellen Smucker
Email: Reeltran@aol.com
Mailing Address: 2363 Selby Ave 90064
Phone: 310-606-8831

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

(Nice presentation, although difficult to understand all the boards with all the crowd noise and demands on the facilitators.) 81-1

Concerns — encouraging increased residential w/o considering sufficiently the impact on infrastructure; schools, emergency response, etc. 81-2

Also - there is a strong neighborhood feeling in the residential areas that could be negatively impacted by increases in population, both residential and from businesses' employment increases 81-3

Please return completed form to Planning Staff or email, mail, or fax the form to:
Lameese Chang, Department of City Planning
200 N. Spring Street, Room 667, Los Angeles, CA 90012
Lameese.chang@lacity.org
Phone (213) 978-1178 / Fax (213) 978-1477

Also — traffic - especially impact on quiet neighborhood streets, safety ⇒ 81-4

of children and elderly populations.

81-4
cont.

COMMENT LETTER NO. 82

MAY. 24 2017

DEAR MR LAMEESE CHANG - CITY PLANNING

REF: PICO BLVD USP GRADING - ZONING

I HAVE LIVED IN MY HOUSE ~~OF~~ FOR 30~~R~~+ YEARS AND ON MY STREET THERE ARE 3 MANSION & HOUSES WITH THE HEADACES OF PARKING..

WE DO NOT NEED UPZONING AND TALLER 3 OR 5 STORIES BUILDING. BECAUSE THAT WILL BRING ADDITIONAL TRAFFIC + PARKING NIGHTMARES TO OUR COMMUNITY. 82-1

IF I RECALL, THE VOTERS PASSED PROP U. IN WHICH WE HAD A LIMIT ON ~~HEIGHT~~ OF BUILDING ALONG PICO BLVD. WHAT EVEN HAPPENED TO PROP U.? 82-2

PLEASE CHECK WITH THE POLICE AND FIRE SERVICES AS TO HOW THEY FIND TRAFFIC ON PICO BLVD.. THEY WILL TELL YOU THAT AT TIMES THEY CAN NOT MOVE THE TRAFFIC TO DO THEIR JOB. THEY ARE STUCK IN TRAFFIC.. 82-3

SINCERELY
H Stoller

Mr & Mrs Herman Stoller
2351 Kelton Ave.
Los Angeles, CA 90064-2101

COMMENT LETTER NO. 83

Lameese Chang <lameese.chang@lacity.org>

Pico Upzoning

Nancy Rae Stone <firstlightfilmsla@gmail.com> Thu, May 18, 2017 at 3:00 PM
To: lameese.chang@lacity.org

LAMEESE CHANG
CITY PLANNING DEPARTMENT
200 No. Spring St. ; 667
LA 90012

Dear Ms. Chang:

I am writing to state my support to keep the Pico Upzoning plan to no more than 3 stories between Sepulveda and Overland Avenues.

We want to retain the character of the neighborhood, as well as try and prevent a complete gridlock on the artery streets (which now are already completely clogged at rush hours). We do not have the infrastructure, including elementary schools, for more housing. 83-1

Thank you,

NR Stone
10641 Missouri AVe
LA CA 90025

COMMENT LETTER NO. 84

Lameese Chang <lameese.chang@lacity.org>

Please stop the over development on the westside

Lauren and Blake Thomas <thomasesbl@gmail.com> Thu, Jun 8, 2017 at 6:01 PM
To: lameese.chang@lacity.org

WE need to see how these developments affect the area BEFORE WE CONSIDER NEW DEVELOPMENTS. THE CONSTRUCTION AT SEPULVEDA AND PICO IS GOING TO BE ENORMOUS!!!!! Traffic here is already horrendous. How about more focus on SAFE bike trails. I think you all did a pretty good job with that, but we are at DENSITY HERE!!!!!!!!!!

84-1

COMMENT LETTER NO. 85

Lameese Chang <lameese.chang@lacity.org>

Exposition Light Rail Corridor Concerns

khemist@aol.com <khemist@aol.com> Mon, Jun 5, 2017 at 3:53 PM
To: lameese.chang@lacity.org

RE: ENV-2013-622-EIR
Exposition Corridor Transit Neighborhood Plan

Dear Ms. Chang:

We are writing with much concern as 45-year residents of 2300 block of Camden Ave, the community just north of the Exposition Light Rail Corridor (and Westwood and Sepulveda EXPO stations). We wish to submit our strong support for the revised plan for the areas adjacent to these two key EXPO stations that serve our Westwood South of Santa Monica Blvd. (WSSM) community.

The EXPO TNP Specific Plan with its revisions to remove Pico Blvd. between Sepulveda and Overland from "upzoning" addresses our community's strong opposition to the plan as originally proposed. We are supportive of the revisions along Pico Blvd. that acknowledge the fact that our community already has high density coupled with slow moving or jammed traffic.

The Pico Blvd. business corridor is the center of our community. We frequent the businesses along Pico and Westwood Blvds. Our Westside Neighborhood Council has invested significant time and resources in the improvement of Pico Blvd. and will soon be implementing a new streetscape plan from Sepulveda to Patricia Ave. And just this weekend we celebrated the fifth "Pick Pico" event to promote local businesses and organizations. We are much concerned and fearful that the rezoning of Pico at this time would place hardship on the overwhelming majority of the existing shopkeepers - many independent business owners. The rezoning would also cause the deterioration of our neighborhoods. 85-1

Our community does not have adequate infrastructure to support the construction that would be created by providing added development with a Pico Blvd. RAS 4 zone. Those added development opportunities would serve to create a "land rush" along Pico—further inflating already expensive land.

Our existing multi-family zoned blocks have been and continue to be developed; duplex, triplex and fourplex buildings have been and are being torn down for much larger projects with many more units—some taking advantage of bonus densities to provide low income housing. This area has grown in population and continues to do so. With the completion of the Casden project at Exposition and Sepulveda, we will add soon add nearly 600 new units nearby.

As we mentioned, our area suffers from significant traffic congestion. Some of that congestion relates to the fact that there are few north-south through arterials to carry traffic (and/or transit). Sepulveda Blvd. is one of those but is also the 405 freeway alternative route that will be further slowed with the addition of new development. We have long requested DASH transit service from LA DOT but have been refused for many years as the priority for DASH goes to "transit dependent" areas. While we understand the need to prioritize, it seems to us that additional value can be realized from the EXPO line if more people were easily able to access its stations. Having reliable transit connections to EXPO from throughout our community (which goes north to Santa Monica Blvd.) would better spread development instead of creating a bottleneck along Pico Blvd.

85-1 cont.

Further, as the EXPO Line has been open only a year in our area, we believe it wise to consider where added development should occur after additional time has passed, and best to consider it when the WLA Community Plan is re-written and all our community assets and resources can be reviewed.

We are grateful that the Planning Dept. heard the overwhelming community input that opposed initial EXPO TNP plans. We thank you for listening. We look forward to our continuing communication.

Sincerely,

William and Karen Timberlake
2320 Camden Ave
LA 90064

COMMENT LETTER NO. 86

NOTE: These comments are in addition to the public testimony provided to the Public Hearing Officer and should be combined

86-1

Exposition Corridor Transit Neighborhood Plan
CPC-2013-621-ZC-GPA-SP
ENV-2013-622-EIR
Comment Form

Name: Grace Ting, owner/resident 2331 Greenfield A. Los Angeles, CA 9006
Email: ghting@gmail.com
Mailing Address: 2331 Greenfield Ave. Los Angeles, CA 90064
Phone: 310 - 824 - 3613

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

P As a CD5 owner/resident for over 15 years, I am adamantly opposed to any upzoning and exception of increased Commercial/residential upzoning along the Pico corridor between Overland and Barrington.

86-2

P The current roads, education, and safety resources are overtaxed. My two school aged children are packed into Westwood Charter School, nearing 1,000 students, when surrounding schools like Overland, Fairburn and Wayburn are closer to 500 - 600 students.

86-3

P I work in health insurance and work closely with senior executives at UCLA Health System and Providence (St. John). The local hospitals are maxed out at the census and elective admissions for surgeries are difficult to schedule.

86-4

P Driving anywhere (1 - 2 miles) on the major arteries Westwood Blvd., Sepulveda Blvd., Pico, Olympic, Wilshire, Motor Ave during rush hour takes 30 - 40 minutes.

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning
200 N. Spring Street, Room 667, Los Angeles, CA 90012
Lameese.chang@lacity.org
Phone (213) 978-1178 / Fax (213) 978-1477

86-5

This area cannot take more density. Just because there is light rail does not mean people will give up their cars, because they need to drive to other parts of SoCal.

COMMENT LETTER NO. 87

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: Pat Tobias

Email: pattobias@msn.com

Mailing Address: 1927 Thayer Ave LA 90025

Phone: 310 869-5236

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

As a resident of the neighborhood 5 blocks from the Pico Exposition Corridor, I would like to see the Pico POD designation kept. My husband & I have lived in this neighborhood for 43 years & have watched the auto congestion become impossible for emergency vehicles to pass at peak traffic times. 87-1

We appreciate your diminishment of a solid canyon of 55' high buildings uninterrupted from Overland to Sepulveda. We, who live in this neighborhood, want to keep the POD designation for Pico.

Thank you for your consideration.

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 88

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: ROBERT TOBIAS

Email: Bob_Tobias@msn.com

Mailing Address: 1924 THAYER AVE LA, CA 90025

Phone: 310-474-4223

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

Our neighborhood has become swollen with auto traffic on Pico, Olympic and S.M Blvd. making Pico Exposition Corridor more dense would destroy what little quality of life we have left. 88-1

Please keep the Pico POD designation for our neighborhood 88-2

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 89

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR

Nancy Walch <nwalch@walchconsulting.com> Mon, Jun 5, 2017 at 3:04 PM
To: lameese.chang@lacity.org
Cc: rwalch@walchconsulting.com

I want to express my concern for increased congestion already existing in our neighborhood. While I welcome opportunities for

additional low income housing and job opportunities, I am concerned that the existing density of traffic, congestion, pollution is already too high. 89-1

I am in full support of improving existing commercial spaces, many which are empty, to productive sites for jobs and services for the local community. 89-2

At the same time, I am concerned about the fact that there are already too many cars rerouting through our neighborhoods because

Pico and Olympic are jammed and the fact that either before 9:00 am or beginning after 2 pm. it's really difficult to go anywhere. 89-3

I am also concerned about the level of pollution as result of the existing plan. In addition, in the last several months there have been 3 incidents of

neighbors on our street hit by cars. 89-4

Thank you for your work and your consideration.

My best,

Nancy

Nancy Walch

Walch Consulting, LLC

Philanthropic & Nonprofit Consultants

Coaching & Strategy for Good

t 310 475-6254

f 310 474-5964

nwalch@walchconsulting.com

www.walchconsulting.com

COMMENT LETTER NO. 90

Exposition Corridor Transit Neighborhood Plan

CPC-2013-621-ZC-GPA-SP

ENV-2013-622-EIR

Comment Form

Name: MARY ANN WARD

Email: WPDMARAND@aol.com

Mailing Address: 2606 TILDEN AVE 90064

Phone: 310-473-2384

Please provide comments on the Exposition Corridor Transit Neighborhood Plan and/or Draft Environmental Impact Report (EIR):

FIRST— A different venue would have been nice & better parking

- Who is going to maintain all the "green spaces"! Most of these areas are poorly cleaned (maintained) now 90-2
- Can't something be done to improve some of the areas without causing more traffic and congestion? 90-3
- A speaker would have been helpful! 90-4
- What happens to the businesses on Pico if you start constructing multiple story buildings? 90-5
- Are you trying to eliminate "neighborhoods" with single family homes? That eliminates a sense of community. 90-6
- I suppose once plans are made and rules laid out, YOU will be sure there is plenty of "wiggle room" for the big developers to get what they want beyond the rules!! 90-7

Please return completed form to Planning Staff or email, mail, or fax the form to:

Lameese Chang, Department of City Planning

200 N. Spring Street, Room 667, Los Angeles, CA 90012

Lameese.chang@lacity.org

Phone (213) 978-1178 / Fax (213) 978-1477

COMMENT LETTER NO. 91

Lameese Chang <lameese.chang@lacity.org>

problems with upzoning - pico boulevard

JANET WHITE <jywhite@ucla.edu> Sat, May 20, 2017 at 10:24 AM
To: lameese.chang@lacity.org

Please consider the nature of the neighborhood. There is already a lot of traffic - not just cars but pedestrian, as well. Building height greater than 3 stories will add to the congestion. Congestion will lead to loss of revenue to the city (loss of business by consumers who will stay away from congested areas = less $ for the city). 91-1

Also consider the damages caused by delayed response time by emergency services (again, more $ for law suits). 91-2

Bad idea to have area from Overland to Sepulveda to be taller than 3 stories.

This homeowner voter is imploring - KEEP THE 3 STORY HEIGHT LIMIT 91-3

COMMENT LETTER NO. 92

Subject: Timed statement for Public Hearing - Exposition Corridor Transit Neighborhood Plan 5/23/7

From: "Jay Zimmerman" <JZimmerman@realtyrentalsco.com>

Sent: 5/23/2017 7:21:49 PM

To: "shanbergb@roadrunner.com" <shanbergb@roadrunner.com>

CC: "Stanley Zimmerman" <Stanleyz@realtyrentalsco.com>

We only heard about this plan 3 weeks ago, and were not properly noticed as owners of an affected property. We consider these comments incomplete because of the time limit.

1.No parking *should* be permitted on the Active Streets of Olympic and Pico between Sepulveda and the 405 freeway. There will be buses making turns, plus the present traffic coming from Century City, and south bound traffic on Sepulveda turning right adds to that. Additional traffic will occur because of increased automobile trips to the newly developing Hybrid Industrial Zone Sub-Area 5. 92-1

2.The 40' wide former Southern Pacific Railroad Right of Way should be returned to the zoning classification of the adjacent properties, along with an appropriate set-back for any future property development. The zoning of Q / P-1 was originally done for improper purposes, and presently impairs the future development of the adjoining properties.

Many court cases have held that such rezoning constitutes a taking of the the property, and owners should be compensated. The City of Los Angeles is at risk if the property is not returned to its previous zoning. 92-2

The Improper re-zoning was apparently done for the purpose of reducing the value of the property for potential acquisition by the City for future street widening, rapid transit, and a light railway system; all of which are no longer feasible necessary, or contemplated by the City with the exception of 5 feet for street widening on each side of Sepulveda contemplated by this Plan. The dedication of more than 5 feet along the West side of Sepulveda is not feasible because of existing buildings north of the OdysseyTheatre, and a permanent high rise just north of Santa Monica Blvd.

3.The Urban Design Standards of the Plan should not require a minimum Streetwall Height of 4 stories along any side of an Active Streets which is not adjacent to Plan Subareas. In the specific case of the north side of Olympic Blvd west of Sepulveda Blvd, the 4 story minimum is prohibitively expensive to re-develop, without benefitting from the rezoning of the Plan. 92-3

COMMENT LETTER NO. 93

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR

Amy Zone <zoneamy@gmail.com> Mon, Jun 5, 2017 at 10:25 PM
To: lameese.chang@lacity.org

I'd like to let you know that increasing the density the area around Pico and Overland will also increase the number of auto accidents and car and pedestrian accidents.

93-1

Right now Overland is unsafe for residence turning on from side streets and there have been 2 near misses with children near
Overland elementary school. It is a little freeway that has been created by adding an extra lane.

The idea of adding more traffic to this already dense area with such a small local police force is also a bad idea. 93-2

I completely object to the idea of changing the zoning to allow multi story condos on the south side of Pico. 93-3

Amy Zone Miller
213-840-9386
Sent from my iPhone

COMMENT LETTER NO. 94

Lameese Chang <lameese.chang@lacity.org>

ENV-2013-622-EIR, Exposition Corridor Transit Neighborhood Plan

Tom Stemnock <tms@pai-la.com> Thu, Jun 1, 2017 at 5:05 PM
To: Lameese Chang <lameese.chang@lacity.org>
Cc: Barry Maiten <barry65@dslextreme.com>, Jeff Allen <jja@pai-la.com>

Lameese,

This email is written to comment on the Draft Environmental Impact Report and the proposed Exposition Corridor Transit Neighborhood Plan (ECTNP).

My client owns the properties located on the southeast corner of Exposition Boulevard and Sepulveda Boulevard. The properties are legally described as a portion of Lot 94, Arb 1 and Arb 2 of Tract 7417, and are both within Assessor's Parcel 4256-016-032. The property addresses are 2500 and 2510 S. Sepulveda Boulevard. The property is located directly south of the Exposition/Sepulveda Metro Rail Station, now operating on the northeast corner of Sepulveda and Exposition Boulevards.

The properties were originally zoned C2-1 and were both developed with commercial and retail uses in 1940. The properties were downzoned to R3-1, in connection with an AB 283 rezoning under Ordinance No. 166,311 on October 10, 1990, in conformance with the West Los Angeles Community Plan even though they were still being used for commercial purposes. The property is currently designated for Medium Residential uses by the West Los Angeles Community Plan and is shown as Medium Residential on the proposed Exposition Corridor Transit Neighborhood Plan (ECTNP).

The subject property continues to be used for commercial purposes as permitted by Section 12.23 of the Zoning Code (Non-conforming uses). Given its location immediately south of the Sepulveda Metro Station, the property will always be used for commercial purposes, but cannot be improved as long as the Land Use designation remains as Medium Residential and the Zoning designation remains as R3-1. 94-1

The property should be redesignated to Neighborhood Commercial, the zoning changed back to C2, the Floor Area Ratio changed back to 3.0:1.0, and the height increased to 3 stories, 45 feet to allow the redevelopment of the site for a neighborhood serving commercial use such as a grocery store, restaurant, small professional offices, a pharmacy or dry cleaning business, with residential uses above the ground floor. Otherwise, the existing 77-year old buildings will have to remain as is and will detract rather than enhance the character of the area immediately adjoining the station site.

Redesignating the property to Neighborhood Commercial and the C2 zone would be in conformance with the Objectives of the Exposition Corridor Transit Neighborhood Plan to encourage growth to be directed to transit-oriented areas; foster more sustainable, mixed-use development patterns that improve mobility options and reduce auto dependence; focus residential development and new job-generating uses around transit stations; increase the generation of tax revenue, reduce vehicle miles traveled, and ensure a more pedestrian-oriented development adjacent to the Sepulveda/Expo station.

Further, the existing buildings are located on the east right-of-way line of Sepulveda Boulevard. Any additional widening of Sepulveda Boulevard must occur within the existing right-of-way since the existing property is only approximately 36 feet in depth along the Sepulveda Boulevard frontage. The existing right-of-way dedication of Sepulveda Boulevard is 90 feet. The designation of Sepulveda Boulevard as a Boulevard II street would require the dedication of 10 additional feet which would make the existing property only 26 feet deep and significantly impact the buildability of the remaining portion of the property.

94-1 cont.

On page 4.8-8, the description of the Sepulveda Station and surrounding area does not mention the existing commercial property (furniture store) located at the southeast corner of Exposition and Sepulveda Boulevards, directly south of the new station. The EIR should be corrected to recognize the existing commercial use and address the need to change the land use designation to Neighborhood Commercial and the zoning back to C2, with a 3.0:1.00 Floor Area Ratio and a maximum height of 45 feet.

94-2

Please call or email me with any questions or comments.

Tom Stemnock, President

Planning Associates, Inc.

4040 Vineland Avenue, Suite 108

Studio City, CA 91604

Phone: (818) 487-6789

Fax: (818) 487-6760

Email: tms@pai-la.com

PUBLIC HEARING

EXPO TNP HEARING OFFICER NOTES (Priya)

1. Debbie Miller
- Happy that the Pico Blvd. upzone has been removed.
- She's concerned about the Westside Pavilion - what is proposed for this site?
LA can't be compared to NYC or Chicago, unlike them LA doesn't have the transit infrastructure, access to public open space like Central Park. LA isn't ready for that type of density without the infrastructure in place.
- Has a concern about public benefits - she believes that developers will always opt to get the maximum density and the public benefits currently proposed offer too little benefit to the community.

PH-1

2. Kalani
- Progress is needed, but this plan is a utopian pipe dream. Similar to decades ago when GM and Firestone told us to trade in the Red Car trolley for cars and highways.
- The average rent in LA is $2100/month so there's a need for more housing. But she's skeptical that with the cost of living so high, how industry will be attracted to such a place.
- Also went into how difficult it is to qualify for affordable housing through the voucher system for people who have disabilities.

3. Bruce Beach
- He owns a M1 zoned property (the SF Saloon) and is interested in redeveloping his site with a mixed use project. However, he can't do that since it is zoned industrial. Doesn't understand the industrial zoning because the commercial use (bar) has been there for years. He wants his property to be rezoned to commercial.

4. Irene Olavarian
- She lives on Midvale and her lot also fronts on Westwood (no alley separates Midvale and Westwood). She is concerned about the impact of new development on Westwood Blvd., particularly as it relates to height and noise. Building heights are a major issue for her - she believes that SF homes need to coexist with this commercial properties but that their quality of life needs to be protected. For example, her bedroom faces Westwood so in the future taller building could block sunshine coming through her windows.

PH-2

5. Tracy Landworth
- Major concern is impact of future development on: traffic, schools and water.
- Concerned about traffic impact at National and Manning, there is already traffic impact from the Expo line. There is currently a signal issue at the intersection.
- If the infrastructure isn't already in place we can't have increased density. What will it do to our already crowded schools and lack of water?
- The proposal for affordable housing is a misnomer. We're shoving more people in limited amount of space. There are clear quality of life impacts.

PH-3

6. Craig Rich
- West LA already has a good mix of single family and commercial uses.
- We should address the concerns of current residents rather than catering to future residents.
- He was and is supportive of the Expo, it's already well used.
- We don't need more housing. There are current infrastructure issues (limited schools, water), police response times are already poor. It's nonsensical to have more density without infrastructure.
- Also why not have more affordable housing requirements for the change areas to the west.
- Likes the current mix of commercial uses on Pico Blvd. Wants to keep the character of local and neighborhood serving businesses. With future mixed use project, there will most likely have a chain store on the first floor retail space. Will become like everywhere else.

PH-4

7. Gary Tanaka
- Owns 2235 Amherst. Proposed zone is RD1.5 and he wants the City to consider RAS4.
- They will be on the back side to RAS4 zoned properties. Him and his RD1.5 zoned neighborhoods will get all the impacts from the RAS4 zoned properties without any of the benefits. His property is located within the same proximity to the Bundy station as the RAS4 zone.

8. Petrula Vrontikis
- First issue was the format of the hearing. We need to have a more formal hearing with a microphone and one speaker. The current format inhibits speakers since they can't hear other people's opinions.

-Lives on Westwood, she sees the beautification projects going on for the corridor but we also need to fix the sidewalks. People need to be able to walk on sidewalks that aren't crumbling especially along the main corridors. They are dangerous, non-Ada compliant, and long overdue.

9. Jerry Padilla (and 2 other neighbors)
- Supports the zone change on Granville-Westgate - 70% of their neighbors are in support, too.

10. Grace Ting
- She thinks we need to be realistic about the future of LA. She lives on Greenfield/Pico near the new Zev Yaroslavsky Senior Housing project that was built with limited parking because seniors don't drive. But they do. People need parking.
- Concern about homeless encampments near metro stations. They create a safety issue. People may choose not to use transit as a result.
- Address infrastructure such as water and schools and hospitals.
- LA is not NYC or San Francisco.

PH-5

11. Pat Tobias
- Pleased with the reduced density of this proposal from what was originally proposed. She's lived in her home (south of Santa Monica Blvd) for about 44 years.
- The area is already overburdened with traffic. Emergency access vehicles can't even get through during rush hour
- If more RAS3 and RAS4 projects (from Sepulveda to Overland) are built, her neighborhood will have to deal with all the construction impacts from all the construction. Streets will be reduced to two lanes.
- Lack of school capacity – charter schools in the area are already at capacity.
- Mainly concerned about the price she'll have to pay during construction – quality of life and sound issues

PH-6

12. Peggy Yamada
- Has lived here since the late 1960s. Property owner near the Bundy station. She and some of her neighbors are getting many inquiries from developers. She would like to see RAS4 zoning for the commercial properties on her side of the street.
- She has already submitted a letter signed by many of her neighbors in support of the RAS4 zoning for their properties.

13. Kimberly Christensen
- Represents the Westwood Homeowner's Association
- Supports some aspects of the Plan: good that the R2 zone has been retained and doesn't want the R3 subarea to be restored. Also wants the zoning and land use designations for properties on Pico and Overland to be retained – doesn't want the RAS4 zone.
- Likes the regulations that address shade and shadow impacts
- Doesn't agree with the proposed density between Sepulveda and the 405 Freeway
- Has concern about the Westside Pavilion site – wants the residential density to be reduced and would like to see more neighborhood serving commercial
- Don't allow reduced parking
- Concern about the SE corner of Sepulveda and Expo (Anawalt property) – specifically concerned about transitional height requirements and traffic impacts.
- The Westwood HOA will be submitted a letter that includes all of their comments on the Proposed Plan and the DEIR.
- Thinks that the Alternative Compliance process is too generous. It gives DCP too much authority to approve additional density without public input. The guidelines need to be clearer and the process needs to be more transparent.
- Was very upset with the format of the hearing. Thinks that it should have been a traditional hearing where speakers stood in front of a mic and stated their comment. This format doesn't seem transparent.

PH-7

14. Joanne Dorfman
- VP of the Westwood Homeowner's Association
- Upset that the public hearing wasn't an open format
- She likes that the area near Pico/Bentley hasn't been upzoned – happy that it the C2 zone is maintained and not changed to RAS4.
- Supports retention of the R2 zone

-Supports transitional height regulations.
- Doesn't think that unbundled parking will work in practice.
- She works for the Riddick Youth Center (2634 Overland), which provides youth programming and hosts community events. She'd the center to be a repository for some of the public benefits mentioned in the plan.

THE EXPO TRANSIT NEIGHBORHOOD PLAN

OPEN HOUSE/PUBLIC HEARING

TRANSCRIPTION OF ORAL COMMENTS

TUESDAY, MAY 23, 2017

6:00 P.M.

SHANBERG SHORTHAND REPORTERS
4771-H La Villa Marina
Marina del Rey, California 90292
(310) 306-6149

Reported by:

BARBARA J. SHANBERG, CSR 4537

Transcription of Oral Comments, taken on behalf of the City of Los Angeles, City Planning Department, commencing 6 p.m. and ending at 8:30 p.m. at Iman Cultural Center, 3376 Motor Avenue, Los Angeles, California 90034.

Before Designated Public Hearing Officer:

Lakisha Hull, Department of City Planning, Los Angeles.

Public Comments made by:

Margaret Healy

Dianne Gregora

Steve Elkins

Daniel J. Gonzalez

Rich Cahalan

Alan Hunt

Stephen Rogers

Jacob Cherub

Jay Zimmerman

Stanley Zimmerman

Carrie Nedrow

Heather Moch

Bruce Campbell

Andrea Leon-Grossmann

Andrew B. Park

Barbara Broide

Mitchell Kasdin

Ann Pittel

Susan Umeda

LOS ANGELES, CALIFORNIA; TUESDAY, MAY 23, 2017

6:00 P.M.

MS. HEALY: My name is Margaret Healy. My address is 2370 Midvale Avenue, Los Angeles 90064. I fully support the plan that's been proposed.

Thanks to Lameese Chang, her team and Paul Koretz for his support of the community in this. Keeping three stories along Pico is the right decision because, one, the infrastructure is not there to accommodate five or more stories. PH8a

Two, lots along Pico are not deep enough to allow for setbacks from the single-family homes. PH8b

Three, ridership on Expo exceeds expectations and people now taking the train clearly are already in homes, and we know that will be getting increased density. 600 units from Casden, plus the increased number of units called for in the plan.

Four, there is a limit to the number of new passengers Expo can take on because at the point where the Expo Line and the Blue Lines share a track, there are increasingly longer delays, causing some to wonder if they're really saving time by taking the train. PH8c

Two recent articles in the LA Times attest to this.

Finally, I would like to enter into the record a petition with 790 signatures opposing RAS-4 between Overland and Sepulveda.

I want to turn this in. It's 790 signatures from the neighborhood of people opposing the plan, people opposing five stories. PH8d

MS. HULL: They're against the RAS-4 zoning. So 790 signatures against that zone.

You are providing how many documents?

MS. HEALY: We are providing 37 pages with signatures.

MS. HULL: Thank you.

MS. HEALY: So back in the envelope. And that goes to you.

MS. HULL: Thank you, Ms. Healy.

MS. HEALY: Thank you very much.

***

MS. GREGORA: My name is Dianne Gregora. I live at 2237 Prosser Avenue, Los Angeles 90064.

I am requesting to keep Pico to Sepulveda at three stories. Anything larger is just too big. PH-9

The Casden project adds 600 units. Expo, Big Blue Bus, Metro, already are operating at capacity.

The infrastructure will not support any more.

The setbacks, it's about the setbacks, the city water pipes. Apparently 400 have already leaked.

More than three stories blocks the sun. It creates a canyon between two canyons. We already have gridlock getting on the freeway, particularly at rush hour.

Okay? That's it.

PH-9 cont.

***

MR. ELKINS: I'm Steve Elkins, E-l-k-i-n-s. My address is 3220 Cheviot Vista Place, Los Angeles 90034. My phone number is (310) 339-3093.

My concerns are as follows:

Parking in all of the neighborhoods affected by the plan is already terrible. Anything the City can do to increase the availability of parking at ideally very little or no cost to the consumer is something that desperately needs to be done in this neighborhood. Even without the Expo, we need to improve access availability and affordability of parking. With the Metro stations added and the other plans, it just increases the need for more parking, not only at the Metro stations but throughout the neighborhood.

That's item one. Item two: At the Palms Station, there is a sidewalk which moves, I think it is west, from Palms Boulevard -- maybe north from Palms Boulevard.

That sidewalk goes for a little while, and then it disappears. So pedestrians who are walking on the side of, let's see, that is National Boulevard, next to the station, if you are walking along National Boulevard, next to the station, you get to a certain point where there is no more sidewalk.

Let's see. There is a self-storage place. There's a number of other businesses along there. There is no place for pedestrians to walk.

So we need to add the sidewalk there, so people have a sidewalk to walk upon.

Sounds like my time is up.

MS. HULL: Yes. Thank you so much for coming out.

MR. ELKINS: Thank you.

***

MR. GONZALEZ: My name is Daniel J. Gonzalez. My address is 2351 Veteran Avenue, Los Angeles 90064.

I support the scale-back proposal that I understand is now on the table.

PH-10

I oppose the original proposal. In particular I opposed the suggestion to up-zone between Sepulveda and Westwood Boulevard, along Pico Boulevard, to allow higher density and to increase the height to, I believe, four or five stories.

I have an observation, that between Sepulveda and Westwood Boulevard, it is currently zoned for three story buildings.

And in the 40 years that I have lived on Veteran Avenue, there has been only two buildings that have gone up along that stretch that have met the three-story limit.

PH-10 cont.

One is an office building at the corner of Veteran and Pico, and the other is the Landmark Theater.

The other three-story building replaced the Social Services building that existed.

That demonstrates to me that there is no pressing need to increase the existing three-story height limitation.

If property owners in 40 years haven't already undertaken to take advantage of the zoning that already exists, there is no need to increase it by another two stories.

I think our neighborhood has done its part by accepting the Casden project into the community. That

was a major impact on all of our lives as residents.

And, of course, I'm also concerned about the problems of traffic, the burden on schools, et cetera.

PH-10 cont.

MS. HULL: Thank you so much for coming out tonight.

***

MR. CAHALAN: My name is Richard Cahalan, C-a-h-a-l-a-n.

I live at 2336 Greenfield Avenue, Los Angeles 90064, which is about a half block north of Pico.

My particular testimony tonight is to implore the commission to keep the pedestrian-oriented district zoning overlay that runs from -- along Pico that runs from Sepulveda to Overland, and it runs up Westwood, north of Pico. And it has various regulations and restrictions on zoning for height limitations and uses.

And this was something that was -- a lot of people spent a lot of time over many years to get that in place, and monitoring it and have it evolve.

And it's working for our district. And we wanted to make sure that that is maintained and enforced as part of this new plan.

I understood that currently it is part of the existing plan.

Is that correct?

MS. HULL: It's been updated; yes.

MR. CAHALAN: Meaning the P.O.D. rules for that area are --

MS. HULL: We are not allowed to answer questions like that.

MR. CAHALAN: Sorry about that. But I wanted to make sure that the plan has the P.O.D. rules folded into that area on Pico.

It's very important to our district. And that was really the gist of my testimony today.

I would like to add one thing: I don't want to get her name wrong.

But the lady -- Lameese Chang, who gave a presentation at the West Side Neighborhood Council in the last couple of weeks -- a week or two ago -- she did a great job. It was a very good presentation, very informative and very helpful.

That's it.

MS. HULL: Thank you so much for coming out tonight.

***

MR. HUNT: My name is Alan Hunt, 11811 West Olympic Boulevard, West Los Angeles 90064.

Good evening, ladies and gentlemen of the Commission. I'm Alan Hunt. I am here to speak on the Wildwood School.

Wildwood School is a progressive independent school serving 750 Los Angeles children and their families.

We are a 46-year-old nonprofit educational institution with a public purpose, offering just over 3.7 million dollars in annual financial aid to area families.

We also employ about 200 people in the community. We are generally supportive of the Expo TNP, and we are cautiously optimistic about its hope-for benefits.

But we have a technical concern and we ask for your help.

Our middle school and high school occupy 11811 West Olympic Boulevard, where we operate under a conditional use permit, or CUP. And we have a long-term lease.

We also own a small building at 11800 West Olympic Boulevard, where we also have a conditional use permit and a plan for a future school building.

Both of our Olympic Boulevard locations fall into the New Industry zone of your plan in height area ten.

Based on table B of the plan, allowable uses and limitations, schools are not an allowable use in our new zone.

We have been assured in various meetings, and by our land use attorney, that our CUPs in their current form will stand, and we are grateful for that.

We respectfully request, however, that such assurances be incorporated formally into the plan in one way or the other.

Also, our land use attorney cautions us that the plan in its current form makes no explicit provision for existing schools in the zone to apply for, modify, or extend the conditional use permit.

We respectfully request that such an explicit provision be incorporated into the plan, so that we can be assured of continued operation in our existing building, develop our 11800 Olympic site in the future, and still have the flexibility to adapt to future conditions which are yet unknown.

Thank you for hearing me and for helping us to continue to keep serving the children, families and employees of Wildwood School and the City of Los Angeles.

MS. HULL: Thank you, Mr. Hunt.

***

MR. ROGERS: My name is Stephen Rogers. I live at 2255 Pelham Avenue, which is just north of the Westwood Expo station.

I oppose increased density in our area, because there is simply not the infrastructure here to support it.

Our streets are in disrepair. We don't have enough police officers. Our schools are overflowing. And supply of basic utilities, such as water and power, is already strained to breaking point. PH-11a

At the current rate of growth, even the Expo Line itself will soon be at capacity.

So there is no need to artificially stimulate development in our area, to be sure of filling up the trains.

That said, I do support the Planning Department's decision to remove most of Pico Boulevard, between Sepulveda and Overland, from the plan. PH-11b

This is an important first step toward avoiding infrastructure overload.

However, I fear it's not enough and urge that the Westside Pavilion property, which is on Pico between Westwood and Overland, also be removed from the plan. PH-11c

I have some other comments about the DIR as well, if I have time.

One is these bonuses for public benefits seem disproportionate. It seems that the developers would get an enormous increase in the FAR they can build and therefore their profits in return, for very trivial benefits to the community.

PH-11c cont.

My suggestion would be to make the public benefits a prerequisite for development, not something that the developers can use to buy bonuses with.

I have similar concerns about alternative compliance. Anything that involves discretionary decisions behind closed doors, I think is going to be wide open for abuse. And we've seen that all over the city.

PH-11d

MS. HULL: Thank you very much, Mr. Rogers, for coming out tonight.

***

MR. JACOB CHERUB: The first thing is, and you may have heard this from others, I'm a property owner. And I have not gotten notice of this until three weeks ago.

My understanding is that this has been going on since 2012. I have looked at the records that go back to 2014.

There are years and years that have gone by, and

we knew nothing about it. And the property that I have is on the border of the radius of Bundy Station.

And the -- so some of the material says, "The Transit Neighborhood, What Does It Mean?" It says, "Our design for pedestrians and bicyclists, while still accommodating cars and are within an easy walk of a transit stop."

We are as far away as you can get. The corner of the radius of the Bundy property. We are on Stone (sic) Avenue -- sometimes they don't show it. I think that's us right there (indicating). We are at the edge of that. So we are at the end.

So two things. One, there is no one that is going to be riding a bicycle without potential loss of life and limb, on either Olympic Boulevard or Bundy.

I just drove around there to see what was going on. I talked to some of the planners. They say, "Well, these things are going to be taken care of eventually."

And "eventually" is, you know -- on Bundy, there is no room for a bike lane.

These streets -- Olympic is the next best thing to a freeway. You cannot ride a bicycle on that. You cannot ride a bicycle on Bundy without being possibly killed.

The arbitrariness of the radius does not take

into account realities. So they have just drawn a circle, using a compass, and said, "Well, you know, everything on this side is one thing."

So I think it needs to be fine tuned, and my property contains a tenant who is a school.

MS. HULL: Your time is up.

MR. CHERUB: Let me finish quickly with this point.

So when I bought the property in the 1980s there was a school as a tenant. I'm onto my third regime of schools since the 1980s.

And this is a blessing for the neighborhood. The current school that is in there, half of the students have paid tuition, and cover the scholarship for the other half. It's brilliant.

When they say that it can be grandfathered, it's a very dubious thing to say, that it's not going to change unless, until, that sort of thing.

I'm very nervous about that.

MS. HULL: Thank you for coming out tonight. I appreciate it. Have a wonderful evening.

***

MR. JAY ZIMMERMAN: My name is Jay Zimmerman.

We only heard about this plan three weeks ago.

And we were not properly noticed as owners of an affected property.

We consider these comments incomplete because of this time limit.

Number 1, no parking should be permitted on the active streets of Olympic and Pico, between Sepulveda and the 405 freeway.

There will be buses making turns, plus the present traffic coming from Century City and southbound traffic on Sepulveda turning right adds to that.

Additional traffic will occur because of increased automobile trips to the newly developing Hybrid Industrial Zone, sub area 5.

PH-12a cont.

Two, the 40-foot-wide former Southern Pacific Railroad right of way should be returned to the zoning classification of the adjacent properties, along with an appropriate setback for any future property development.

The zoning of Q P-1 was originally done for improper purposes, and presently impairs the future development of the adjoining properties.

PH-12b

Many court cases have held that such rezoning constitutes a taking of the property, and owners should be compensated.

The City of Los Angeles is at risk if the property is not returned to its previous zoning.

The improper rezoning was apparently done for the purpose of reducing the value of the property, for potential acquisition by the City for future street widening, rapid transit and light railway system, all of which are no longer feasible, necessary or contemplated by the City, with the exception of five feet for street widening on each side of Sepulveda, contemplated by this plan.

PH-12b cont.

The dedication of more than five feet along the west side of Sepulveda is not feasible because of existing buildings north of the Odyssey Theater and a permanent highrise just north of Santa Monica Boulevard.

Three, the urban design standards of the plan should not require a minimum street wall height of four stories along any side of an active street, which is not adjacent to plan sub areas.

PH-12c

In the specific case of the north side of Olympic Boulevard, west of Sepulveda Boulevard, the four-story minimum is prohibitively expensive to redevelop without benefitting from the rezoning of the plan.

MS. HULL: Now we have one more minute.

MR. STANLEY ZIMMERMAN: He covered it all.

MS. HULL: So Jay spoke.

MR. STANLEY ZIMMERMAN: I do want a record that I

was here, so I can appear, should there be --

My name is Stanley Zimmerman. I'm a property owner on the northwest corner of Olympic and Sepulveda, at 11111 West Olympic Boulevard.

PH-13

I concur in the comments of Jay Zimmerman and adopt them as my own.

MS. HULL: Thank you, gentlemen, for coming out.

***

MS. NEDROW: This is Carrie Nedrow. And I have questions about the development opportunities on the properties that are being rezoned.

And my main focus is on: What is the role of the City of Los Angeles in selecting and approving a development proposal for those areas?

And then as that moves forward, the question is can current property owners develop their own property to the new zoning standards on their own lots?

And the third would be: Are there resources -- Oh, sorry.

The third aspect is: If Los Angeles approves a comprehensive development project with a single developer, are there resources, guidelines or archived documents available for property homeowners through the

land sale process?

***

MS. MOCH: My name is Heather Moch. The address I'm speaking about is 1801 South Bundy.

And my family owns the building there. And we have been considering all types of development over the years and have not done anything yet.

We are anxious to see the development. We heard about the potential of increased floors, like four floors to 12 stories.

We have heard possible mixed use, where residential might be included. And we are ready for the development.

We are for it. We would like to see our chances of developing the building and increasing the stories and creating a mixed-use-type building.

MS. HULL: Can you point to which area?

MS. MOCH: It's near the Bundy Station.

MS. HULL: So it's near the Bundy Station?

MS. MOCH: And even in speaking with other businesses that were interested in our property and developing it, one of the main interests they had was to create housing for their employees.

That is something that we would be interested in doing for them. They have a lot of commuters from very far away. And this would be -- having a mixed use or having residential would be helpful to the businesses in the area.

MS. HULL: Your time is up. Thank you so much for coming in.

***

MR. BRUCE CAMPBELL: All right. So I took a Greyhound through the Central Valley this past weekend. And there is more construction within a few blocks of me on Overland Avenue than in all of Fresno, Bakersfield and ten other Central Valley towns combined, that I saw outside the window of the "hound."

My apartment, the property owner installed a sturdy steel thing where I park my car, so the apartment won't fall down during a quake.

So I needed a place to park during that two-week period they were putting it up.

And I mostly found a place on Glendon, a little bit over two blocks to the west.

However, they're building this huge thing at Tabor and Overland right now. And they have one planned

PH-14a

a block or two west of Overland on Venice Boulevard.

So if I was displaced and had to find a place to park or had someone to visit, I couldn't find one two blocks over anymore.

PH-14a cont.

And then the very -- the traffic jams are so intense on Overland and Motor, heading to Century City and back. And those seem to be the exact place they want to focus more development.

PH-14b

And seems like the area is growing a bit too fast already. We do not need developer greed on steroids through giving them special zoning.

Also, it seems to be sort of a bait and switch, as far as housing near transit. As people got in their heads it makes sense to build housing near transit, the developers instead are proposing luxury developments, with very little affordable housing, while many would not consider even what they call affordable housing actually affordable, and probably would just be a unit or two.

PH-14c

Seeing that we are near the Expo Line, it should be 95 percent actually affordable housing, if they're going to build anything concentrated.

MS. HULL: Thank you so much for coming out this evening.

***

MS. LEON-GROSSMANN: My name is Andrea Leon-Grossmann. My address is 10757 Ashby Avenue. And my zip code is 90064.

I'm opposed to this project. I'm not opposed to density. But I am opposed to unsustainable density.

The problem is right now our water infrastructure is crumbling. PH-15a

We have -- we are on track to replace our water pipes every 300 years, when the life span is a hundred years. So that's an issue.

Right now, even with the capacity we have, we are really in bad shape with our infrastructure.

We also have budget cuts that have impacted first responders. We lost a fire truck in West LA. And we are also helping address the first responders in Century City.

So that's an issue too. That fire truck that was cut from West L.A. has not been replaced. So we have fewer first responders. PH-15b

We can't have more density if we don't have first responders to help us with that.

We also have converted libraries in public schools into classrooms. We don't have enough capacity in our schools. PH-15c

I did not see anything in here that supports

increasing classroom capacity or school capacity.

I did not see anything about first responders and anything about water either. PH-15c cont.

I did not see anything about widening our roads or anything to deal with gridlock.

If you try to drive right now between 2:00 and 7:00 on West Side, you will go nowhere fast. PH-15d

I did not see anything about expanding the capacity for the Expo Line or public transit in general.

If you try to go and use public transit during peak hours, it's really hard. PH-15e

Is that it?

MS. HULL: Yes.

MS. LEON-GROSSMANN: And then, I think the most interesting part is that mostly big developers are behind this program. I think the community should have a word behind this proposal. PH-15f

That's my take. Again, I'm not opposed to density. It just has to be sustainable.

MS. HULL: Thank you so much for coming out.

***

MR. PARK: Thank you.

My name is Andrew Park.

I'm an employee at 12100 West Olympic Boulevard, Los Angeles 90064.

I want to make a statement about my experience as an employee in the West L.A. area by Olympic and Bundy Station.

As an employee, I feel like there is lack of retail space along the Olympic corridor. The New Industry zoning prohibits the owners from building more retail space, and I think that 5,000 square feet maximum should be increased to at least 10,000 square feet, to provide landlords some options and flexibility to provide more food and shopping options.

And then as an employee in the West L.A. area, I feel like there has been a lack of housing near my work. And I fully support this plan, and especially the Olympic and Bundy Station.

There are some homes behind my work that seems like it could be rezoned. I know that RAS-4 is proposed at -- between Amherst and Bundy. I think that should be expanded westward of Amherst to accommodate the increase of employment base in the West L.A. area.

Also, last by not least, I feel that the alternative compliance zoning on the Martin Cadillac development site should be allocated to other underutilized development sites along the Olympic

corridor.

I say this --

MS. HULL: Thank you for coming out.

***

MS. BROIDE: Thank you.

My name is Barbara Broide, 2001 Malcolm Avenue, Los Angeles 90025.

I want to thank the Planning Department for listening to the community's input and for removing the RAS upzoning of Pico Boulevard from the Expo Plan. PH-16a

Today I just want to talk about one idea or one issue related to traffic and transportation in our area.

Many people are telling us that we need to accept increased density to justify the expenditures and investments made on the Expo Line.

I want to say that our area is long overdue for investment in transit. PH-16b

Century City was built many years ago, and continues to be increased, with the understanding there would be a Beverly Hills freeway along Santa Monica Boulevard.

That freeway, although it is on a number of my map books, does not exist. It was never built.

But the traffic came. The workers came. The community became one of our 20 city centers as was proposed by Calvin Hamilton in the early City Planning documents.

So, when we talk about transit on the West Side, we are severely underserved. The subway to the sea has not come yet. It will come, hopefully, soon. But it does not exist. To upzone now, before it comes, is folly.

PH-16b cont.

There are no north/south connectors in our area that go through to the Valley. Traffic is stuck at the 405.

We have terrible traffic. We don't have the ability to meet the current capacity. Expo doesn't even address the current capacity, because the hoped-for improvements on the 10 freeway are really fairly illusory.

So we are thrilled to have transit. We supported transit in our neighborhood. But it cannot be used as an excuse for destroying what is left of our community.

We have plenty of traffic. We have a nice neighborhood, and we want to preserve it.

MS. HULL: Thank you so much.

MS. BROIDE: Did you know about the Beverly Hills?

Freeway?

MS. HULL: Yes.

***

MR. MITCHELL KASDIN: I am vehemently opposed to the proposal and the redevelopment surrounding the Bundy Station.

It simply increases the tax revenue for the City at the expense of the residents and increases the overall density, that would require more cars, because not everyone is going to drive -- or rather take the train.

At the corner of Bundy and Olympic, you have Martin Cadillac that is proposing to build a huge commercial/residential project that will substantially increase the amount of traffic.

Currently, the traffic is overwhelming during rush hour times.

Furthermore, by having that area around Bundy, south of Olympic, that will also burden the existing infrastructure. Currently we are at a chokehold and -- how much time do I have -- and it takes 20 minutes to go from Bundy to the freeway.

I can't see this working in favor of the residents in the vicinity. This is an unsustainable plan. People will not give up their cars in favor of the

PH-16b cont.

PH-17

train.

And the City needs to wake up. This is a plan that is ill-conceived and its current form it's too hard for it to actually work in total.

That's it.

PH-17 cont.

***

MS. PITTEL: My name is Ann Pittel. I live at 11880 Nebraska Avenue, Los Angeles 90025.

I was born -- I'm a native Angeleno. I have seen a lot of growth and a lot of interesting things happening.

And I live about a block away from all the new developments. I own a business in West Los Angeles near Pico and Bundy.

PH-18

On Saturday mornings, it takes me two minutes to drive to my business. It's .7 tenths of a mile between my business and my home. I do not use very much gas.

On the weekdays, it could take me up to 25 minutes for the same ride, the same direction, because of traffic.

My quibble with all the development that is happening is I think we should be looking -- before we make any definite plan, we have to get our traffic under

control.

We have seen the Metro Rail go in. It's been in for three years. And to me, there is no improvement in the horrible traffic jams.

Getting to my work, it's a school, an after-school program, people are always complaining how long it takes. And it hasn't improved.

So I think that it's a backward thing. First, figure out the traffic, like perhaps three lanes one way, one lane the other way, and then reverse it for the rush hour on the other end of the day.

PH-18 cont.

Some kind of plan. Toronto has that kind of plan.

No. It's been two minutes? Okay.

Can you mention the tree down the middle of Olympic?

Thank you. Number 19.

***

MS. UMEDA: My name is Susan Umeda. I live at 1827 Brockton Avenue, Los Angeles 90025. I want to talk about the medians. And they want to put trees in there, that will take up very valuable -- wait a minute.

I want to talk about the medians on Olympic

Boulevard. I don't think there should be trees or any planting to take the valuable driving space.

The other thing I want to talk about are the transitional buildings. They should be 100 feet from the single-family home property line, 25 feet, 100 feet from that line. Then, you could go 50 feet and then after that, you could have it -- whatever it's zoned.

The other thing I want to talk about is Bundy Drive is not walkable. It needs better lighting. Wider sidewalks. You have to make all of these street walkable if you want people to take the transit.

If people think they are going to get run over every time they walked down the street, because the sidewalks are too narrow, it's probably not going to enhance walkability and people will not be taking that transit. They will take their cars everywhere.

Thank you very much.

MS. HULL: Thank you.

(Proceedings concluded at 8:30 p.m.)

C E R T I F I C A T E

STATE OF CALIFORNIA:

LOS ANGELES COUNTY:

I HEREBY CERTIFY THAT THE FOREGOING TRANSCRIPT WAS TAKEN DOWN, AS STATED IN THE CAPTION, AND THE COMMENTS THERETO WERE REDUCED TO PRINTING UNDER MY DIRECTION; THAT THE FOREGOING PAGES REPRESENT A TRUE, COMPLETE, AND CORRECT TRANSCRIPT OF THE EVIDENCE GIVEN UPON SAID HEARING, AND I FURTHER CERTIFY THAT I AM NOT OF KIN OR COUNSEL TO THE PARTIES; AM NOT IN THE REGULAR EMPLOY FOR ANY OF SAID PARTIES; NOR AM I IN ANYWISE INTERESTED IN THE RESULT OF SAID HEARING.

THIS, THE 5TH DAY OF JUNE, 2017.

_____

BARBARA J. SHANBERG CSR 4537

APPENDIX B

CEQA Findings of Facts and Statement of Overriding Considerations

EXPOSITION CORRIDOR TRANSIT NEIGHBORHOOD PLAN

Final Environmental Impact Report
CEQA Findings of Facts and Statement of Overriding Considerations

SCH NO. 2013031038
LA CITY EIR NO. ENV-2013-622-EIR
CASE NO. CPC-2013-621-ZC-GPA-SP

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SECTION 1 – INTRODUCTION

California Environmental Quality Act (CEQA) – Having received, reviewed, and considered the following information as well as the other information in the Record of Proceedings (described below) on this matter, the City Council of the City of Los Angeles finds, determines, and declares as follows:

PROJECT DESCRIPTION

The Los Angeles County Metropolitan Transportation Authority (Metro) Exposition (Expo) Light Rail Transit (LRT) is a 15.2-mile-long transit line running between downtown Los Angeles and the City of Santa Monica. The majority of the line runs along the Expo right-of-way, roughly parallel to the Santa Monica Freeway (I-10). Phase I of the line was completed in 2012; it extends from downtown Los Angeles to Culver City. Phase II, extending 6.6 miles from the Phase I terminus in Culver City to the planned Colorado/4th Street Station in Santa Monica, was completed in 2015. The Exposition Corridor Transit Neighborhood Plan (ECTNP, Proposed Plan, or Proposed Project) would establish a Specific Plan and a variety of land use regulatory changes to guide future development in areas primarily along the Expo Phase II LRT Corridor, encompassing five station areas within the City of Los Angeles boundaries. These stations are: Exposition/Bundy (Bundy), Exposition/Sepulveda (Sepulveda), Westwood/Rancho Park (Westwood), National/Palms (Palms), and Culver City. The Specific Plan would include General Plan amendments and zone changes that encourage infill development and a mix of uses within the identified areas to promote transit ridership, reduce automobile dependence, and create vibrant neighborhoods around the transit stations.

The Proposed Plan: (1) creates four new zones and one new land use designation, and changes zoning and land use designations within specified portions (Change Areas) of the Project Area; (2) includes public benefit requirements associated with tiered floor area ratios (FAR) in the new zones; (3) creates streetscape plans for identified street segments in the Project Area; and (4) requires design standards for new development within the Project Area (excluding R1 and R2 zones). The Proposed Plan also includes new open space regulations and parking regulations for select properties within the Project Area.

The Proposed Plan would guide future development in the Change Areas by specifying use limitations, maximum allowable FAR, and other development requirements and design standards that would apply. The Proposed Plan encourages new development near transit station areas with the goal of promoting transit ridership and creating an active, mixed use environment in the station areas.

The Proposed Plan would establish a Specific Plan; initiate zone changes and General Plan amendments; and introduce development and urban design standards. The Proposed Plan would also involve new streetscape plans, and parking strategies that together would enhance the pedestrian experience, promote transit ridership, and encourage a variety of mobility options. Zone changes and General Plan amendments would not affect every parcel within the Project Area; changes would only occur within specific "areas of proposed change."

ENVIRONMENTAL REVIEW PROCESS

In accordance with the procedural requirements of CEQA, a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) was prepared for the Proposed Plan. The NOP was published and distributed to the State Clearinghouse, trustee agencies, responsible agencies, and other interested parties on March 14, 2013 by the City for a 30-day public review period (State

Clearinghouse No. 2013031038). A public scoping meeting was held on April 10, 2013. The Draft EIR was prepared and circulated for a 60-day review period. The comment period opened on April 6, 2017 with a closing date of June 5, 2017. An open house/public hearing for the Proposed Plan was held on May 23, 2017.

CUMULATIVE ANALYSIS

The potential for overlapping or cumulative impacts is evaluated in the EIR in the discussion of each environmental issue area. Cumulative impacts occur where project impacts overlap with impacts of other projects (primarily growth anticipated by the Southern California Association of Governments [SCAG] and as a result of other community plans). The primary concern of the analysis of cumulative impacts is to determine whether there is the potential for the project to have a less than significant impact by itself but to make a cumulatively considerable contribution to a significant cumulative impact. A cumulatively considerable impact results when the following occurs:

1. The project could result in a substantial (or considerable) but still less than significant impact;
2. Project impacts would overlap with impacts of other projects (in this case from growth in other community planning areas); and
3. The resultant overlapping or cumulative impacts would be significant.

This EIR found that the project would result in a number of significant impacts (see Section 2 below) as well as a number of less than significant impacts as well as areas where the project would have no impact (see Sections 3 and 4). For issue areas where project impacts are found to be significant, project impacts could overlap with impacts from other projects. However, this EIR does not identify any less than significant impacts that would represent a cumulatively considerable contribution to a significant impact.

RESPONSES TO COMMENTS AND FINAL EIR

The City evaluated comments on the environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the City prepared written responses to comments regarding the physical environmental issues that could result from the Proposed Plan, that identify the disposition of any significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments received. The City reviewed the comments received and the responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts. The City Council finds that all information added to the EIR after public notice of the availability of the Draft EIR for public review but before certification simply clarifies or amplifies or makes minor modifications in an adequate EIR and does not require recirculation. The City Council has based its actions on a full evaluation of all comments in the Record of Proceedings, concerning the environmental impacts identified and analyzed in the EIR.

MITIGATION AND MONITORING PROGRAM (MMP)

CEQA requires the Lead Agency approving a project to adopt a MMP for the Proposed Plan which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation.

In accordance with CEQA, the MMP prepared for the Proposed Plan, and located in Chapter 4.0 of the Final EIR, provides the means to ensure that the mitigation measures are fully enforceable. The final mitigation measures are described in the MMP. Each of the mitigation measures identified in the MMP and contained in the EIR are incorporated into the Proposed Plan. The City

Council finds that the impacts of the Proposed Plan have been mitigated to the extent feasible by the mitigation measures identified in the MMP, and contained in the EIR.

SUBSTANTIAL EVIDENCE

The City Council finds and declares that substantial evidence for each and every finding made herein is contained in the Draft EIR and Final EIR, and other materials found in the Record of Proceedings. Moreover, the City Council finds that where more than one reason exists for any finding, the City Council finds that each reason independently supports such finding, and that any reason in support of a given finding individually constitutes a sufficient basis for that finding.

RECORD OF PROCEEDINGS

For purposes of CEQA and these findings the Record of Proceedings for the Proposed Plan consists of the following documents, which includes, but is not limited to the following:

(1) The Notice of Preparation for the Project (the "NOP"), and all other public notices issued by the City in connection with the Project;

(2) The Draft EIR and all technical appendices, dated March 2017;

(3) All written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR;

(4) All written and verbal public testimony presented during noticed public hearings for the Proposed Plan (consistent with City Council policy) at which such testimony was taken, including without limitation, the Recommendation Report to City Planning Commission, Report to Council, including all attachments, any and all presentations by City staff, the City's consultants, the public, and any other interested party;

(5) The Final EIR, its corrections to the Draft EIR, and all technical appendices, dated May 2018;

(6) The Mitigation Monitoring Program for the Project (the "MMP"); which is located in Chapter 4.0 of the Final EIR;

(7) The reports, studies and technical memoranda included and/or referenced in the Draft EIR and the Final EIR and/or their appendices;

(8) All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR and the Final EIR;

(9) The Department of City Planning Recommendation Report and Determination Letter to City Council;

(10) All Ordinances and Resolutions presented to and/or adopted by the City in connection with the Project and all documents incorporated by reference therein;

(11) Any documents or materials presented by the City at any public meeting on the Proposed Plan or the EIR;

(12) Matters of common knowledge to the City, including but not limited to federal, state, and local laws and regulations, adopted City plans, policies (including but not limited to the City of Los Angeles General Plan, and General Plan Framework), and the professional qualifications of its staff members and consultants; and

(13) Any other relevant materials required to be in the Record of Proceedings under Public Resources Code (PRC) Section 21167.6(e).

CUSTODIAN OF DOCUMENTS

The custodian of the documents or other material which constitutes the record of proceedings upon which the City Planning Commission and City Council's decision is based is the City of Los Angeles, City Clerk, City Hall located at 200 North Spring Street, Los Angeles, California 90012; all other record of proceedings shall be kept with the Department of City Planning, and the Director of Planning shall be the custodian of the documents.

INDEPENDENT JUDGMENT

CEQA requires that the lead agency exercise its independent judgment in reviewing the adequacy of an EIR and that the decision of a lead agency in certifying an EIR and approving a project not be predetermined. The City Council finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City Council has conducted its own review and considered the Draft EIR, Final EIR, Appendices and the rest of the Record of Proceedings and determines that the analysis and conclusions in the EIR reflect the independent judgment and analysis of the City Council and the City Council is exercising its independent judgment in adopting these Findings of Fact and Statement of Overriding Considerations.

RELATIONSHIP OF FINDINGS TO EIR

These Findings are based on the most current information available. Accordingly, to the extent there are any apparent conflicts or inconsistencies between the Draft EIR and the Final EIR, on the one hand, and these Findings, on the other, these Findings shall control and the Draft EIR and Final EIR or both, as the case may be, are hereby amended as set forth in these Findings.

FINDINGS OF FACTS REGARDING ENVIRONMENTAL IMPACTS

The City Council makes the following findings in response to the potentially significant effects on the environment identified and analyzed in the EIR for the Proposed Plan.

PRC Section 21081 and Section 15091 of the CEQA Guidelines requires that no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental impacts of the project unless the public agency makes one or more written findings for each of those significant impacts, accompanied by a brief explanation of the rationale for each finding. The possible findings are provided below and will be used hereinafter and referenced as identified below:

1. **CEQA FINDING 1**. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. (CEQA Guidelines Section 15091(a)(1));
2. **CEQA FINDING 2**. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (CEQA Guidelines Section 15091(a)(2));
3. **CEQA FINDING 3**. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR. (CEQA Guidelines Section 15091(a)(3)).

These Findings herein incorporate the facts and discussions of the significant environmental impacts that may occur as a result of the Proposed Plan, and in accordance with the provisions of CEQA and CEQA Guidelines, the City of Los Angeles hereby adopts these Findings. For each of the significant environmental effects found to be significant and unavoidable, the City makes the finding under PRC Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), as set forth in greater detail in Section 2 of these Findings. For each of the significant environmental effects found to be less than significant after mitigation, the City makes the finding under PRC Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), as set forth in greater detail in Section 3 of these Findings.

Section 15091 of the CEQA Guidelines does not require specific findings to address environmental effects that an EIR identifies as having "no impact" or a "less than significant" impact. Nevertheless, Section 4 in the Findings fully accounts for all resource areas, including those identified in the EIR as less than significant.

SECTION 2 – ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE

The Proposed Plan would result in the following impacts, which are found to be significant and unavoidable:

AESTHETICS

Senate Bill 743 (PRC Section 21099 (d)(1)) states that the aesthetic impacts of a residential, mixed use residential, or employment center project on an infill site within a Transit Priority Area (TPA) shall not be considered significant impacts on the environment. Such projects are typical of the kinds of projects anticipated by the Proposed Plan. Although a majority of the Project Area is located in a TPA, a portion of the Project Area is not. Therefore, a discussion of aesthetic impacts is provided within.

Visual Character (Draft EIR pages 4.1-40 to 45)

Description of Significant Effects

In general, changes in visual character would be potentially significant within existing areas currently designated for low density residential use, where rezoning to RD1.5, R3 or RAS4 is proposed, and where increases in height and density would occur. Rezoning of low-density residential areas would occur in the Bundy Station Area, south of the Expo LRT Line, and in the Sepulveda and Westwood Station areas, along either side of the Expo LRT Line.

Compliance with existing development regulations and proposed design standards would help establish consistency in the visual character of the Project Area, which is currently lacking in industrial areas and commercial corridors. The Proposed Project would also introduce new streetscape plans that aim to improve the visual character of streets for all users. However, the proposed land use and zoning changes that allow increases in height, scale and density in the Project Area would represent a significant change in the visual character in some portions of the Project Area, particularly in the limited single-family zoned and low density multifamily zoned areas that are proposed to have land use and zoning changes. Therefore, impacts related to visual character under the Proposed Plan would be ***significant and unavoidable***.

Mitigation Measures

Beyond the proposed design standards, no feasible mitigation measures have been identified to reduce the significance of this impact.

Finding: **The City adopts CEQA Findings 1 and 3.**

Rationale for Finding

The Proposed Plan establishes design standards for all properties within the Project Area, excluding properties in the R1 and R2 zones. The design standards would help minimize the effects of land use and zone changes on the existing character of the area, and would also enhance visual character and quality through transitional height requirements, massing restrictions, requirements for use of high quality materials as well as high levels of ground floor transparency and façade articulation to improve the pedestrian orientation of new buildings.

The design standards include requirements for the following:

- Setbacks and Yards
- Streetwall
- Massing and Lot Coverage
- Building Orientation and Entry
- Ground Floor Treatment
- Active Ground Floor Uses
- Architectural Treatment
- Windows and Doors
- Open Space
- Parking and Access

Although the implementation of the proposed design standards would reduce impacts related to visual character, impacts may not be fully offset or avoided altogether. Reducing the building heights or adopting an alternative to avoid causing impacts related to visual character would not be feasible as it would not meet the underlying objectives of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas consistent with the growth strategies of the General Plan Framework, the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans. Furthermore, as discussed in the Draft EIR, there are no project alternatives that would result in a less-than-significant impact related to visual character. However, the Proposed Plan includes objectives that aim to promote well-designed, cohesive, and sustainable neighborhoods. Specifically, the Proposed Plan would ensure new development is pedestrian-oriented, acknowledges the transit stations, and is compatible with surrounding neighborhoods through the improved design of buildings, streets, and the public realm. The Proposed Plan would also stimulate vibrancy and activity and create a unique sense of place within each station area through the tailored design of buildings, streets, and the public realm.

Shade and Shadow (Draft EIR pages 4.1-47 to 50)

Description of Significant Effects

Shade and shadow impacts may be considered significant when they cover shadow-sensitive uses for a substantial amount of time (three to four hours depending on the time of the year). Shadow-sensitive uses generally include routinely useable outdoor spaces associated with residential and recreational land uses.

If buildings were to be constructed to the maximum heights allowable under the Proposed Plan, the areas which would be the most vulnerable to shade and shadow impacts would include the following single-family residential neighborhoods:

- Bundy Station Area: Northeast and northwest of the areas of proposed change
- Sepulveda Station Area: Northeast of areas of proposed change between Olympic Boulevard and Exposition Boulevard
- Palms Station Area: Between Manning Avenue and the I-10 Freeway
- Culver City Station Area: Northeast of the areas of proposed change

Although implementation of existing development regulations and proposed design and environmental standards would serve to reduce or eliminate impacts related to shade and shadows, it is infeasible to locate development in the highly-urbanized Project Area in such a way that shade and shadow impacts would be avoided altogether. Therefore, impacts related to shade and shadows under the Proposed Plan would be ***significant and unavoidable***.

Mitigation Measures

Beyond the proposed design standards, no feasible mitigation measures have been identified to reduce the significance of this impact.

Finding: **The City adopts CEQA Findings 1 and 3.**

Rationale for Finding

The Proposed Plan establishes design standards for all properties within the Project Area, excluding properties in the R1 and R2 zones. These design standards would help minimize shade and shadow impacts through transitional height requirements, massing restrictions, façade articulation, etc. Additionally, height limits for the new zones created by the Proposed Plan are tailored, concentrating height near stations and away from adjacent R1 and R2 zoned neighborhoods. However, impacts related to shade and shadows may not be fully offset or avoided altogether. Reducing the building heights or adopting the other alternatives to avoid causing shade and shadow impacts in the Project Area would not be feasible as it would not meet the underlying purpose of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas consistent with the growth strategies of the General Plan Framework, the SCAG RTP/SCS, and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans. Furthermore, as discussed in the Draft EIR, there are no project alternatives that would result in a less-than-significant impact related to shade and shadows. However, the Proposed Plan includes objectives that aim to promote well-designed, cohesive, and sustainable neighborhoods. Specifically, the Proposed Plan would ensure new development is pedestrian-oriented, acknowledges the transit stations, and is compatible with surrounding neighborhoods through the design of buildings, streets, and the public realm. The Proposed Plan would also stimulate vibrancy and activity and create a unique sense of place within each station area through the design of buildings, streets, and the public realm.

AIR QUALITY

Air Quality Standard - Construction Emissions (Draft EIR pages 4.2-21 to 26)

Description of Significant Effects

Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and construction worker commute trips. Exhaust-related NO_X emissions could exceed the South Coast Air Quality Management District (SCAQMD) regional significance threshold, depending primarily on truck activity. In addition, it is likely the construction of individual projects would generate emissions exceeding the SCAQMD's regional Volatile Organic Compounds (VOC) significance threshold (related to architectural coatings). SCAQMD also has established localized thresholds that are dependent on the size of the project site and the distance from emissions to sensitive land uses. Depending on the specifics of individual projects, it is anticipated that emissions from construction activities would exceed the localized thresholds due to the dense nature of development and the associated proximity of existing sensitive land uses. It is also likely that specific projects constructed within the Project Area would have overlapping construction activities and combined emissions that exceed the thresholds.

Mitigation Measure **AQ1** would reduce emissions generated by various construction activities; however, a reduction in emissions below SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. It is reasonable to assume that the construction of individual projects under the Proposed Plan would generate emissions that

would exceed the significance thresholds despite Mitigation Measure **AQ1**. Therefore, impacts related to construction emissions under the Proposed Plan would be ***significant and unavoidable***.

Mitigation Measures

AQ1 The City shall require all applicants to include in the agreements with contractors and subcontractors the following best management practices in contract specifications:

- Use properly tuned and maintained equipment.
- Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations.
- Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g., engine catalysts) to the extent they are readily available and feasible.
- Use heavy duty diesel-fueled equipment that uses low NO_X diesel fuel to the extent it is readily available and feasible.
- Use construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible.
- Maintain construction equipment in good operating condition to minimize air pollutants.
- Project applicants shall ensure that all construction equipment meets or exceeds equivalent emissions performance to that of U.S. Environmental Protection Agency (USEPA) Tier 4 standards for non-road engines. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine, or an engine that is equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides and diesel particulate matter to no more than Tier 3 levels unless certified by engine manufacturers or the on-site air quality construction mitigation manager that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices is "not practical" for the following, as well as other, reasons:
  - There is no available retrofit control device that has been verified by either the CARB or USEPA to control the engine in question to Tier 3;
  - The construction equipment is intended to be on site for five days or less; or
  - Relief may be granted from this requirement if a good faith effort has been made to comply with this requirement and that compliance is not practical.
- The use of a retrofit control device may be terminated immediately, provided that a replacement for the equipment item in question meeting the required controls occurs within ten days of termination of the use, if the equipment would be needed to continue working at this site for more than 15 days after the use of the retrofit control device is terminated, if one of the following conditions exists:
  - The use of the retrofit control device is excessively reducing the normal availability of the construction equipment due to increased down time for maintenance, and/or reduced power output due to an excessive increase in back pressure;
  - The retrofit control device is causing or is reasonably expected to cause engine damage;
  - The retrofit control device is causing or is reasonably expected to cause a substantial risk to workers or the public; or
  - Any other seriously detrimental cause which has the approval of the project manager prior to implementation of the termination.
- Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible.

- Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic.
- Construction contractors shall utilize super-compliant architectural coatings as defined by the South Coast Air Quality Management District (Volatile Organic Compound standard of less than ten grams per liter).
- Construction contractors shall utilize materials that do not require painting, as feasible.
- Construction contractors shall use pre-painted construction materials, as feasible.

***Finding*: The City adopts CEQA Findings 1 and 3.**

Rationale for Finding

Mitigation Measure **AQ1** would reduce regional and local emissions generated by various construction activities, including equipment operation, truck trips, and painting. However, a reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. No additional mitigation measures were identified to reduce the significant impacts related to construction emissions. Changing the Proposed Plan to avoid impacts related to construction emissions would not be feasible as it would not meet the underlying purpose of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas consistent with the growth strategies of the General Plan Framework, the SCAG RTP/SCS, and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans. Furthermore, as discussed in the Draft EIR, any project alternative identified that involves accommodating growth would foreseeably result in significant and unavoidable impacts related to construction emissions.

Sensitive Receptors during Construction (Draft EIR pages 4.2-26 to 28)

Description of Significant Effects

The greatest potential for toxic air contaminant (TAC) emissions would be diesel particulate emissions associated with heavy-duty equipment operations and truck traffic during construction. According to the SCAQMD, health effects from carcinogenic air toxics are described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. The SCAQMD has stated that the incremental cancer risk should not exceed 10 persons in one million, and the chronic and acute risks should not exceed a calculated Hazard Index value of 1.0.

There are no specific planned development projects as a part of this Proposed Plan. There is no construction schedule or phasing, and it is difficult to accurately characterize emissions from the wide range of projects that may be constructed under the Proposed Plan. Depending on the specifics of future development projects (i.e., diesel particulate emissions and sensitive receptor locations), it is anticipated that emissions from construction activities would exceed the health risk significance thresholds established by the SCAQMD. It is also likely that specific development projects constructed within the Project Area would have overlapping construction activities and combined emissions that exceed the thresholds. Mitigation Measure **AQ1** would reduce TAC emissions generated by various construction activities. However, a reduction in emissions below SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. Therefore, the Proposed Plan would result in a ***significant and unavoidable*** impact related to exposing people to substantial pollutant concentrations during construction.

Mitigation Measures

Refer to Mitigation Measure **AQ1**, above.

***Finding*: The City adopts CEQA Findings 1 and 3.**

Rationale for Finding

Mitigation Measure **AQ1** would reduce TAC emissions generated by various construction activities. However, a reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. No additional mitigation measures were identified to reduce significant impacts related to pollutant concentrations impacting sensitive receptors. Adoption of the alternatives in the Draft EIR or otherwise changing the Proposed Plan to avoid impacts related to localized construction emissions would not be feasible as it would not meet the underlying purpose of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas consistent with the growth strategies of the General Plan Framework, the SCAG RTP/SCS, and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans. Furthermore, as discussed in the Draft EIR, any alternative identified that involves accommodating growth would foreseeably result in significant and unavoidable impacts related to exposing people to substantial pollutant concentrations during construction.

CULTURAL RESOURCES

Historical Resources (Draft EIR pages 4.3-21 to 23)

Description of Significant Effects

The Proposed Plan includes standards that protect historical and potentially historical resources by requiring review by either the Cultural Heritage Commission or the Office of Historic Resources for any project located on sites with historical resources designated at the federal, State, or local level, including potentially historical resources identified in the City of Los Angeles' SurveyLA report. Nonetheless, over time, it is possible that demolition and/or significant alteration to some historical resources in the Project Area may occur. Therefore, impacts related to historical resources under the Proposed Plan would be ***significant and unavoidable***.

Mitigation Measures

No feasible mitigation measures have been identified to reduce the significance of this impact.

***Finding*: The City adopts CEQA Finding 3.**

Rationale for Finding

When compared to current processes, the Proposed Plan is expected to have a neutral or beneficial impact to designated historical resources and a beneficial impact to non-designated resources, due to these plan standards. The Proposed Plan includes mandatory regulations that provide additional protections for historical resources and would not introduce any features that would preclude implementation of, or alter the policies or procedures of the City's Cultural Heritage Ordinance. However, the Cultural Heritage Ordinance cannot completely prevent a property from being demolished and the property being redeveloped or structures being altered so long as an Applicant has gone through all necessary processes, including environmental review. There is no process, including the CEQA process that would ensure that historical resources may not be lost over the course the life of the Proposed Plan. Furthermore, as

discussed in the Draft EIR, there are no project alternatives that would result in a less-than-significant impact related to historical resources.

NOISE

Noise Levels - Construction Noise (Draft EIR pages 4.9-14 to 22)

Description of Significant Effects

Construction noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. The loudest noise levels are typically generated by impact equipment (e.g., pile drivers) and heavy-duty equipment (e.g., scrapers and graders).

Construction noise levels are regulated through the provisions of Section 41.40 and Section 112.05 of the Los Angeles Municipal Code (LAMC). Section 41.40 states that construction activities may only occur between the designated hours (7:00 a.m. to 9:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays). Section 112.05 establishes performance standards for powered equipment or tools. The maximum allowable noise level for most construction equipment within 500 feet of any residential zone is 75 dBA measured at 50 feet from the noise source. This restriction holds unless compliance is not technically feasible even with the use of noise "mufflers, shields, sound barriers, and/or other noise reduction devices or techniques."

Construction noise associated with individual projects under the Proposed Plan would be experienced by sensitive uses located in and around the Project Area. As specific development plans have not yet been determined at individual sites, it is assumed that sensitive receptors could be as close as 50 feet from where construction would take place. Therefore, sensitive receptors in the Project Area could experience noise levels from construction equipment ranging from 68 to 107 dBA Leq. Although LAMC regulations place limits on construction noise levels, there is still a possibility that typical construction noise levels could exceed the LAMC standard of 75 dBA Leq at 50 feet due to technical infeasibility of further reducing noise impacts. Details about future development projects and their ability to incorporate noise reduction devices or techniques per LAMC Section 112.05 are not known at this time.

Mitigation Measure **N1** would help to reduce this impact, but not necessarily to a less-than-significant level, because certain construction activities may still be required in proximity to nearby sensitive receptors and construction-related noise levels could exceed the 75 dBA threshold. Therefore, impacts related to construction noise under the Proposed Plan would be ***significant and unavoidable***.

Mitigation Measures

N1 The City, as a condition of any approval for applicable projects within the ECTNP, shall require all contractors to include the following best management practices in contract specifications:

- Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences.
- The construction contractor shall locate construction staging areas away from sensitive uses.

- When construction activities are located within 500 feet of noise-sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses.
- Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving.
- Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.
- The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.

***Finding*: The City adopts CEQA Findings 1 and 3.**

Rationale for Finding

Mitigation Measure **N1** would reduce construction noise levels at existing and future noise-sensitive receptors during construction activities. Construction activity would be short-term and temporary at each location; however, noise levels from various mechanized construction equipment would exceed 75 dBA at distances of 50 feet from the equipment which could exceed the limitations established in LAMC Section 112.05. No additional mitigation measures were identified to reduce significant impacts related to construction noise. Adoption of the alternatives in the Draft EIR or otherwise changing the Proposed Plan to avoid impacts related to construction noise would not be feasible as it would not meet the underlying purpose of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas consistent with the growth strategies of the General Plan Framework, the SCAG RTP/SCS, and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans. Furthermore, as discussed in the Draft EIR, any alternative identified that involves accommodating growth would foreseeably result in significant and unavoidable impacts related to noise construction.

Noise – Operational Noise (Draft EIR page 4.9-21)

Description of Significant Effects

The greatest potential for operational noise impacts would be related to changing zoning adjacent to existing sensitive land uses. As specific development plans have not yet been determined at individual sites, the operational noise analysis assumptions are based off the compatibility of land uses. Depending on the specific land uses proposed at a specific location, operational activities could potentially increase noise levels at adjacent receptors by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories, or could increase any ambient noise level by 5 dBA or more, above the City's operational noise threshold criteria.

While difficult to quantify noise reduction associated with Mitigation Measure **N2**, implementing these conditions would reduce noise levels. However, depending on the specific land uses proposed at a specific location, operational activities could still potentially increase noise levels at adjacent receptors by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories, or could increase any ambient noise level by 5 dBA or more, above the City's operational noise threshold criteria. Therefore, impacts related to operation noise under the Proposed Plan would be ***significant and unavoidable***.

Mitigation Measures

N2 The following conditions shall apply to future development within New Industry, Hybrid Industrial: Jobs Emphasis, Hybrid Industrial-Residential Emphasis, and Mixed Use: Commercial/Residential zones with direct line-of-site to adjacent residential and other sensitive land uses:

- Industrial activity yards that include the operation of heavy equipment shall be shielded by sound barriers that block line-of-sight to sensitive receptors.
- Mechanical equipment (e.g., HVAC Systems) shall be enclosed with sound buffering materials.
- Truck loading/unloading activity shall be prohibited between the hours of 10:00 p.m. and 7:00 a.m. when located within 200 feet of a residential land use.
- Parking structures located within 200 feet of any residential use shall be constructed with a solid wall abutting the residences and utilize textured surfaces on garage floors and ramps to minimize tire squeal.

Rationale for Finding

While difficult to quantify noise reduction associated with Mitigation Measure **N2**, implementing these conditions would reduce noise levels. However, depending on the specific land uses proposed at a specific location, operational activities could still potentially increase noise levels at adjacent receptors above the City's operational noise threshold criteria. No additional mitigation measures were identified to reduce significant impacts related to operational noise. Adoption of the alternatives in the Draft EIR or otherwise changing the Proposed Plan to avoid impacts related to construction noise would not be feasible as it would not meet the underlying purpose of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas consistent with the growth strategies of the General Plan Framework, the SCAG RTP/SCS, and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans. Furthermore, as discussed in the Draft EIR, any alternative identified that involves accommodating growth would foreseeably result in significant and unavoidable impacts related to noise construction.

Vibration - Construction (Draft EIR page 4.9-24)

Description of Significant Effects

Construction activity can result in varying degrees of ground vibration depending on the equipment and methods employed. Buildings founded on the soil in the vicinity of the construction site respond to these vibrations with varying results ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight building damage at the highest levels. The type of low- or mid-rise buildings anticipated to be built under the Proposed Plan would typically be constructed with loaders and bulldozers. However, it is possible that pile driving would be necessary depending on site-specific geologic conditions. Construction equipment would typically generate vibration levels up to 87 Vdb at 25 feet, although pile driving could generate a vibration level of 112 Vdb at 25 feet. Without detailed project-specific construction plans, it is possible that heavy equipment could operate within 25 feet of, or adjacent to, nearby buildings. The vibration levels associated with this equipment could exceed the 90 VdB threshold for buildings extremely susceptible to building damage (e.g., historic structures) and 98 VdB threshold for engineered concrete and masonry buildings without plaster (e.g., typical urban development). Mitigation Measure **N3** would substantially reduce/control construction vibration. However, in the absence of construction details associated with specific projects and without knowing the proximity of construction

activities to specific receptors, it is anticipated that construction vibration levels at adjacent buildings could exceed the thresholds of significance. Therefore, impacts related to construction vibration under the Proposed Plan would be ***significant and unavoidable***.

Mitigation Measures

N3 As part of project conditions for new development within the ECTNP Area, the City shall require all contractors to include the following best management practices in contract specifications:

- The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment where possible to avoid construction vibration impacts.
- The construction contractor shall utilize alternatives to impact pile drivers, such as sonic pile drivers or caisson drills. If geotechnical limitations require the use of pile driving, control measures shall be used to reduce vibration levels. These measures may include, but are not limited to:
  - Predrilled holes;
  - Cast-in-place or auger cast piles;
  - Pile cushioning (i.e., a resilient material placed between the driving hammer and the pile);
  - Jetting (i.e., pumping a mixture of air and water through high-pressure nozzles to erode the soil adjacent to the pile); and
  - Non-displacement piles (i.e., piles that achieve capacity from the end bearing rather than the pile shaft).

***Finding*: The City adopts CEQA Findings 1 and 3.**

Rationale for Finding

While difficult to quantify the vibration reduction associated with Mitigation Measure **N3**, implementing caisson drilling instead of impact pile driving would reduce vibration levels by approximately 87 Vdb at 25 feet. It is anticipated that mitigation would substantially reduce/control construction vibration. However, in the absence of construction details associated with specific projects and without knowing the proximity of construction activities to specific receptors, it is anticipated that construction vibration levels at adjacent buildings could exceed the thresholds of significance.

No additional mitigation measures were identified to reduce significant impacts related to construction vibration. Adoption of the alternatives in the Draft EIR or otherwise changing the Proposed Plan to avoid impacts related to construction vibration would not be feasible as it would not meet the underlying purpose of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas consistent with the growth strategies of the General Plan Framework, the SCAG RTP/SCS, and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans. Furthermore, as discussed in the Draft EIR, any alternative identified that involves accommodating growth would foreseeably result in significant and unavoidable impacts related to construction vibration.

PUBLIC SERVICES

Parks and Recreational Facilities (Draft EIR pages 4.11-32 to 33)

Description of Significant Effects

Increased development in the Project Area would increase the demand for parks and recreational facilities. This increased demand would be met in part through compliance with City requirements and through the public benefits required by the Proposed Plan of commercial and mixed use projects, as well as the new open space around Westwood Station. However, it is anticipated that these requirements would be insufficient to meet the demand from new development and that the increased demand would exacerbate the existing park deficit in the Project Area.

Based on the Public Recreation Plan standards, the existing (2013) demand for parks and recreational facilities (all types) serving the Project Area is 202.38 acres; when taking into account acres of recreational space available, the existing deficit of parks and recreational facilities is 48.6 acres. In 2035 with the Proposed Project, demand for parks and recreational facilities would be up to 251.24 acres; this represents an increase of 48.86 acres beyond the existing deficit, to a total deficit of 97.46 acres.

Future development under the Proposed Plan would be subject to LAMC Sections 12.33 and 17.12, which are part of the City's implementation of the Quimby Act. These ordinances require developers of residential projects to dedicate land for park and recreation purposes, or pay a fee in lieu thereof, prior to obtaining a building permit. The dedication of land for park and recreation purposes or payment of fees and implementation of Proposed Plan development standards would slightly offset the demand created by future development under the Proposed Plan. However, population growth associated with the proposed increase in housing capacity would create additional demand for parklands that cannot be accommodated in the Project Area. Therefore, impacts related to parks and recreational facilities under the Proposed Plan would be ***significant and unavoidable***.

Mitigation Measures

No feasible mitigation measures were identified that could reduce the significant impact to parks and recreational facilities to less than significant.

***Finding*: The City adopts CEQA Finding 3.**

Rationale for Finding

Compliance with existing regulations, including the payment of Quimby Act and park facility fees could help relieve the demand on existing parks through the provision of new parks. However, population growth associated with the proposed increase in housing capacity would create additional demand for parklands that cannot be accommodated in the Project Area. The following issues were identified as barriers to the provision of new parks: (1) existing citywide open space ratios are suburban in nature and do not reflect the constraints of a dense, urban environment; (2) acquisition of new public land for parks and open space is extremely expensive in the Project Area; and (3) vacant or underused land in the Project Area is scarce and purchasing land for the provision of open space would compete with other identified community priorities such as providing housing and non-residential, job-generating uses.

No mitigation measures were identified to reduce significant impacts related to parks and recreational facilities. Adoption of the alternatives in the Draft EIR or otherwise changing the Proposed Plan to avoid impacts related to parks and recreational facilities would not be feasible

as it would not meet underlying purpose or the primary objectives of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas. Furthermore, as discussed in the Draft EIR, any alternative identified that involves accommodating growth would foreseeably result in significant and unavoidable impact related to parks and recreational facilities.

TRANSPORTATION & TRAFFIC

Circulation System (Draft EIR pages 4.12-45 to 69)

Description of Significant Effects

Of the 47 total study intersections identified with potential impacts under 2015 conditions without mitigation, significant impacts would remain at 42 study intersections with mitigation. Of the 56 total study intersections identified with potential impacts under 2035 conditions without mitigation, significant impacts would remain at 50 study intersections after mitigation. A summary of the total number of significantly impacted intersections before and after feasible mitigation measures for 2015 and 2035 is provided in Table 4.12-13 in the Draft EIR. As noted, since the City of Los Angeles has no ability to implement mitigation measures in other jurisdictions, all intersections that are not fully controlled by the City of Los Angeles are considered significantly impacted after mitigation for purposes of the EIR.

Transportation Demand Management (TDM) strategies and trip reduction for certain commercial projects, which are requirements of the Proposed Plan, could mitigate some of the intersection-level impacts. However, at this time it is not possible to estimate the effectiveness of these TDMs without additional detail on the selected TDM strategies and their application to individual development projects. Therefore, impacts related to the circulation system under the Proposed Plan would be ***significant and unavoidable***.

Mitigation Measures

TR1 A trip generation analysis, as well as a site access and circulation plan per LADOT guidelines, will be required as part of the development application for projects within the Specific Plan boundary that result in net new square footage for purposes of determining consistency of the project with the transportation assumptions in the EIR. The Specific Plan area is divided into five ECTNP station segments, as shown in Figure 3-2 in the Project Description. To be consistent, a project cannot cause the total estimated 2035 trip forecasts (for the station segment in which it is located) to exceed the number of either AM or PM peak hour net new external trips analyzed in the EIR (see Table 4.12-5). If a project is determined to be consistent, no further traffic analysis will be required. However, if a project causes the number of either AM or PM peak hour net external trips to exceed the cumulative total number of trips in the corresponding station segment analyzed in the EIR, then a project-specific traffic analysis per current LADOT Guidelines will be required.

The City will revise this vehicle trip generation analysis methodology, if appropriate, to reflect new traffic impact guidance mandated by the State of California, Office of Planning and Research in response to SB 743.

2015 Intersection Improvement Mitigation Measures. The following mitigation measures would partially or fully mitigate the significant impacts for 10 of the intersections identified in the 2015 impact analysis.

TR2 **Centinela Avenue & Exposition Boulevard (Intersection 6)**. Signalize the intersection.

TR3 **Bundy Drive & Olympic Boulevard (Intersection 16)**. Restripe the northbound and southbound approaches. The northbound restriping would add one northbound left-turn lane. This would result in a northbound approach of one right-turn lane, two through lanes, and two left-turn lanes. The southbound restriping would add one southbound left-turn lane and change one through lane and the right-turn lane into a shared through/right lane. This would result in a southbound approach of one shared through/right lane, one through lane, and two left-turn lanes.

TR4 **Barrington Avenue & Pico Boulevard (Intersection 27)**. Restripe the existing northbound curb lane to provide one through lane and one right-turn lane. This improvement would require the removal of one on-street parking space.

TR5 **Barrington Avenue & Gateway Boulevard (Intersection 28)**. Restripe the existing northbound shared through/right-turn lane to provide one through lane and one right-turn lane. This improvement would require the removal of four on-street parking spaces.

TR6 **Sepulveda Boulevard & Exposition Boulevard (Intersection 43)**. Restripe the existing eastbound shared left/through/right lane to provide one shared through/left-turn lane and one right-turn lane.

TR7 **Sepulveda Boulevard & Palms Boulevard (Intersection 46)**. Restripe one existing northbound shared through/right-turn lane to provide one through lane and one right-turn lane. This improvement would require the removal of two on-street parking spaces.

TR8 **Military Avenue & National Boulevard (Intersection 47)**. Restripe one existing southbound shared through/right-turn lane to provide one shared through/left-turn lane and one right-turn lane. This improvement would require the removal of four on-street parking spaces.

TR9 **Overland Avenue & National Boulevard / I-10 Westbound On- and Off-Ramp (Intersection 53)**. Restripe the existing eastbound shared through/left-turn lane to a shared left-/through/right-turn lane.

TR10 **La Cienega Boulevard & Venice Boulevard (Intersection 76)**. Remove the median to provide a second westbound left-turn lane.

TR11 **Sepulveda Boulevard & Venice Boulevard (Intersection 84)**. Remove the medians on Venice Boulevard and restripe both the eastbound and westbound approaches to add one left-turn lane to each approach.

2035 Intersection Improvement Mitigation Measures. The following mitigation measures would partially or fully mitigate the significant impacts for 12 of the intersections identified in the 2035 impact analysis.

TR12 **Stewart Street & Olympic Boulevard (Intersection 3)**. Modify the existing signal phasing to change eastbound left-turn signal phasing from permitted to protected and change westbound left-turn signal phasing from protected/permitted to protected.

Centinela Avenue & Exposition Boulevard (Intersection 6). Mitigation Measure **TR2** would also mitigate impacts in 2035.

Bundy Drive & Olympic Boulevard (Intersection 16). Mitigation Measure **TR3** would also mitigate impacts in 2035.

TR13 **Barrington Avenue & Mississippi Avenue (Intersection 25)**. Restripe the existing eastbound shared left/through/right lane to provide one shared through/left-turn lane and one right-turn lane. This improvement would require the removal of two on-street parking spaces.

Barrington Avenue & Pico Boulevard (Intersection 27). Mitigation Measure **TR4** would also mitigate impacts in 2035.

Barrington Avenue & Gateway Boulevard (Intersection 28). Mitigation Measure **TR5** would also mitigate impacts in 2035.

Sepulveda Boulevard & Exposition Boulevard (Intersection 43). Mitigation Measure **TR6** would also mitigate impacts in 2035.

Sepulveda Boulevard & Palms Boulevard (Intersection 46). Mitigation Measure **TR7** would also mitigate impacts in 2035.

Military Avenue & National Boulevard (Intersection 47). Mitigation Measure **TR8** would also mitigate impacts in 2035.

Overland Avenue & National Boulevard/I-10 Westbound On- and Off-Ramp (Intersection 53). Mitigation Measure **TR9** would also mitigate impacts in 2035.

La Cienega Boulevard & Venice Boulevard (Intersection 76). Mitigation Measure **TR10** would also mitigate impacts in 2035.

Sepulveda Boulevard & Venice Boulevard (Intersection 84). Mitigation Measure **TR11** would also mitigate impacts in 2035.

Finding: **The City adopts CEQA Findings 1, 2 and 3**.

Rationale for Finding

Based on the foregoing, the City finds that the Proposed Plan would have significant and unavoidable impacts related to the circulation system. Specific economic, legal, social, technological, or other considerations, including considerations identified in the Statement of Overriding Considerations, make infeasible additional mitigation measures or project alternatives relative to transportation and traffic identified in the EIR. Beyond conflicting with Project Objectives, mitigation measures involving street widening were deemed infeasible since it was not considered practical or desirable to widen streets at the expense of reduced sidewalk widths or lost on-street parking spaces. The City of Los Angeles has no ability to implement mitigation measures in other jurisdictions.

Adoption of the alternatives in the Draft EIR or otherwise changing the Proposed Plan to avoid impacts related to the circulation system would not be feasible as it would not meet underlying purpose or the primary objectives of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas and increase mobility choices. Furthermore, as discussed in the Draft EIR, any alternative identified that involves accommodating growth would foreseeably result in significant and unavoidable impact related to the circulation system.

Neighborhood Intrusion (Draft EIR pages 4.12-69 to 70)

Description of Significant Effects

Along roadways where the Proposed Plan would cause significant traffic congestion, diversion of trips could occur onto adjacent parallel routes. It is anticipated that diversion would not occur on streets that operate at Level of Service (LOS) D or better during peak periods because the average

delay is not substantial. However, for the street segments where the LOS would degrade from D to E or F, some trips could divert to adjacent streets to avoid longer travel times through congested locations. Travel route changes on the City's arterial and collector roadways have been captured through the travel model's peak hour forecasts and LOS results. The extent to which trips would divert to adjacent local residential roadways is not reasonably foreseeable given the broad scope of the Project and the uncertainty around the specific location of individual development project driveways, and, therefore, impacts cannot be precisely determined. However, it is anticipated that increased traffic could occur on these roadways. Therefore, impacts related to neighborhood intrusion under the Proposed Plan would be ***significant and unavoidable***.

Mitigation Measures

TR14 In areas where implementation of the Proposed Project could result in diversion of traffic to adjacent residential streets, LADOT shall monitor traffic on identified residential streets, upon request submitted through the Council Office, to determine if traffic diversion occurs. If traffic on residential streets is found to be significantly impacted in accordance with current LADOT guidelines, LADOT will work with the project applicant and neighborhood residents to survey and monitor the residential street segment/s before and after project occupancy to assess the need for appropriate traffic calming measures. These measures could include the following (but are not limited to):

- Traffic circles
- Speed humps
- Roadway narrowing effects (e.g. raised medians, traffic chokers etc.)
- Landscaping features
- Roadway striping changes
- Stop signs

In addition to the aforementioned traffic calming measures, neighborhood improvements can offset the effect of adding traffic. These could include (but are not limited to) measures such as street trees, sidewalks, landscaping, neighborhood identification features, and pedestrian amenities. It would be the project applicant's responsibility to implement any of the approved measures through the Bureau of Engineering's permit process.

Finding: **The City adopts CEQA Finding 1 and 3**.

Rationale for Finding

Based on the foregoing, the City finds that the Proposed Plan would have significant and unavoidable impacts at related to neighborhood intrusion. Specific economic, legal, social, technological, or other considerations, including considerations identified in the Statement of Overriding Considerations, make infeasible additional mitigation measures or project alternatives relative to congestion management program impacts identified in the EIR.

Adoption of the alternatives in the Draft EIR or otherwise changing the Proposed Plan to avoid impacts related to neighborhood intrusion would not be feasible as it would not meet underlying purpose or the primary objectives of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas and increase mobility choices. Furthermore, as discussed in the Draft EIR, any alternative identified that involves accommodating growth would foreseeably result in significant and unavoidable impact related to neighborhood intrusion.

Congestion Management Program (CMP) Arterial Intersection Analysis (Draft EIR pages 4.12-73 to 75)

Description of Significant Effects

The Proposed Plan results in a volume-to-capacity (V/C) ratio increase greater than 0.02 with LOS F at CMP Arterial Monitoring Stations #62 Santa Monica Boulevard at Westwood Boulevard and #70 Venice Boulevard and Centinela Avenue. At Arterial Monitoring Station #62 (Santa Monica Boulevard at Westwood Boulevard), the only mitigation measures involve physical intersection improvements (such as widening the intersection) which would conflict with Project goals and are considered to be infeasible. Because Arterial Monitoring Station #70 (Venice Boulevard and Centinela Avenue) is under dual control by the City of Los Angeles and Caltrans, the City of Los Angeles does not have full control over modifications to the intersection. Therefore, impacts related to CMP arterial intersection analysis would remain **significant and unavoidable**.

Mitigation Measures

TR15 Arterial Monitoring Station #70 (Venice Boulevard and Centinela Avenue). Restripe one existing northbound shared through/right-turn lane to provide one through lane and one right-turn lane and restripe one existing shared through/right-turn lane to provide one through lane and one right-turn lane. This improvement would require the removal of four on-street parking spaces on Venice Boulevard and the relocation of the bus stop on Centinela Avenue from the south side to the north side of the intersection.

Finding: **The City adopts CEQA Finding 1, 2, and 3**.

Rationale for Finding

Based on the foregoing, the City finds that the Project would have significant and unavoidable impacts related to the CMP arterial intersection analysis. Specific economic, legal, social, technological, or other considerations, including considerations identified in the Statement of Overriding Considerations, make infeasible additional mitigation measures or project alternatives relative to congestion management program impacts identified in the EIR. Beyond conflicting with Project Objectives, mitigation measures involving street widening were deemed infeasible since it was not considered practical or desirable to widen streets at the expense of reduced sidewalk widths or lost on-street parking spaces. The City of Los Angeles has no ability to implement mitigation measures in other jurisdictions.

Adoption of the alternatives in the EIR or otherwise changing the Proposed Plan to avoid impacts related to CMP Arterial Analysis would not be feasible as it would not meet underlying purpose or the primary objectives of the Proposed Plan to direct projected population, housing, and employment growth to transit-oriented areas and increase mobility choices. Furthermore, as discussed in the Draft EIR, any alternative identified that involves accommodating growth would foreseeably result in significant and unavoidable impact related to CMP Arterial Analysis.

SECTION 3 – ENVIRONMENTAL IMPACTS FOUND TO BE LESS-THAN-SIGNIFICANT AFTER MITIGATION

The EIR identifies significant impacts, which are reduced to a "less-than-significant" level by the inclusion of mitigation measures identified in the EIR. It is hereby determined that the significant environmental impacts that these mitigations address will be avoided or substantially lessened by their inclusion in the project.

AESTHETICS

Light or Glare (Draft EIR pages 4.1-45 to 46)

Description of Significant Effects

Additional sources of nighttime lighting associated with increased development capacity, streetscape improvements, crime prevention strategies, and increased vehicle traffic can be anticipated under the Proposed Plan. The LAMC contains specific regulations with respect to lighting. LAMC Section 12.21 A.5 (k) (amended by Ordinance No. 171,858) states that all lights used to illuminate parking areas shall be designed, located and arranged so as to reflect the light away from any street and any adjacent premises. Additionally, any new lighting would be designed to conform to applicable standards including LAMC Sections 93.0117 and 12.21 A.5 (k), which pertains to outdoor lighting affecting residential property (no more than two foot-candles of lighting intensity from a light source is allowed on adjacent residential property). All new development under the Proposed Plan would be required to be consistent with these LAMC regulations to reduce impacts from light. In addition, due to proposed design standards and Title 24 energy standards, it is not anticipated that the Proposed Plan would result in development with extensive glazing that would generate substantial glare and annoyance. However substantial glare may still result due to building facades being constructed with other highly reflective materials. Therefore, glare impacts would be potentially significant without mitigation.

Mitigation Measures

AE1 The City shall require that glare effects be limited by using non-reflective building and construction materials, such as concrete, wood, composite materials, coated metal, non-reflective glass, and stone. This shall include, but not be limited to, art installations, fencing material, and recreational equipment.

Finding: **The City adopts CEQA Finding 1.**

Rationale for Finding

Compliance with the existing LAMC regulations pertaining to lighting and implementation of Mitigation Measure **AE1** would reduce impacts related to light and glare to less than significant. This mitigation measure will be enforced by the City as described in the MMP. Based on the foregoing, the City finds that impacts related to light and glare would be mitigated to a less-than-significant level.

CULTURAL RESOURCES

Archaeological Resources (Draft EIR pages 4.3-23 to 24)

Description of Significant Effects

The Project Area is highly disturbed and any archeological resources that may have existed at the surface have likely been disturbed by past development. Therefore, the uppermost sediments

are not anticipated to contain substantial numbers of archaeological resources. However, based upon the archaeological sensitivity of the surrounding area, buried prehistoric or historic cultural resources may be present within the Project Area. Consequently, the potential exists for new development or ground-disturbing activities within the Project Area to disturb or impact known or previously undetected archaeological resources. If archaeological resources are discovered during the construction of these future developments, these resources must be inventoried and evaluated. Consequently, without mitigation, the Proposed Plan would result in a potentially significant impact related to archaeological resources.

Mitigation Measures

CR1 A qualified archaeologist shall be required to monitor excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological resources or tribal cultural resources during construction. If archaeological resources or tribal cultural resources are uncovered (in either a previously disturbed or undisturbed area), the City Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the project shall not collect or move any archaeological materials resources, tribal cultural resources or associated materials. Construction activity may continue unimpeded on other portions of the project site as approved by the retained archeologist in consultation with the City's Office of Historic Resources. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a qualified archeologist.

CR2 The City shall require that all cultural resources, including archeological and tribal cultural resources, identified on a site be assessed and treated in a manner determined appropriate by a qualified archeologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition.

Finding: **The City adopts CEQA Finding 1**.

Rationale for Finding

Implementation of Mitigation Measures **CR1** and **CR2** would reduce the impacts related to archaeological resources to less than significant. This mitigation measure will be enforced by the City as described in the MMP. Based on the foregoing, the City finds that impacts related to archaeological resources would be mitigated to a less-than-significant level.

Paleontological Resources (Draft EIR page 4.5-24)

Description of Significant Effects

The Project Area is highly urbanized and any paleontological resources that may exist at the surface have likely been disturbed by past development. Accordingly, surface grading or very shallow excavations in much of the Project Area likely would not uncover significant vertebrate fossils. However, there is a reasonable potential that excavations, including excavations in the exposures of older Quaternary deposits in the Project Area, could encounter significant fossil vertebrate remains. As such, any future development occurring in the Project Area has the potential to significantly affect paleontological resources during construction-related earth moving

activities. If paleontological resources are discovered during the construction of potential future development, those resources would be inventoried and evaluated. Therefore, although compliance with applicable regulations would help to protect unknown and previously undetected paleontological resources, without mitigation, the Proposed Plan would result in a potentially significant impact related to paleontological resources.

Mitigation Measures

CR3 A qualified paleontologist shall be required to monitor excavation and grading activities in soils that have not been previously disturbed. If paleontological resources are uncovered (in either a previously disturbed or undisturbed area), the City Department of Building and Safety shall be notified immediately, and all work on the project site shall cease until a qualified paleontologist evaluates the find. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. Halted construction activities on the project site may commence once the identified resources are properly assessed and processed by a qualified paleontologist.

CR4 The City shall require that all paleontological resources identified on a project site be assessed and treated in a manner determined by a qualified paleontologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition. Any reports and surveys shall be submitted to the City's Office of Historic Resources and the Natural History Museum of Los Angeles County.

Finding: **The City adopts CEQA Finding 1**.

Rationale for Finding

Implementation of Mitigation Measure **CR3** and **CR4** would reduce the impacts related to paleontological resources to less than significant. This mitigation measure will be enforced as described in the MMP. Based on the foregoing, the City finds that impacts related to paleontological resources would be mitigated to a less-than-significant level.

HAZARDS AND HAZARDOUS MATERIALS

Hazardous Material Sites (Draft EIR pages 4.6-23 to 24)

Description of Significant Effects

The record search (Appendix D of the Draft EIR) conducted for the Proposed Plan identified numerous sites, including, but not limited to, cleanup sites and permitted underground storage tank (UST) facilities within the Project Area. Ten of the sites are located within the areas of proposed change, where zoning would change under the Proposed Plan. Although some of these sites either have been cleaned up or are in the process of being cleaned up, the potential remains for USTs or contaminated soils to be uncovered or encountered during construction activities. Future development on a site identified as previously occupied by hazardous materials generating facility would have the potential to create a significant hazard to the public or the environment unless an environmental site assessment is conducted to determine potential risks and to ensure appropriate remediation is implemented. Therefore, the Proposed Plan could result in a significant impact related to hazardous materials sites without mitigation.

Mitigation Measures

HM1 The City shall require that future development that involves new construction and soil disturbance document that the site is not on any government list of sites containing hazardous waste or hazardous materials (including lists prepared pursuant to Government Code, section 65962.5). A report setting forth the results of this database search (e.g. historical environmental reports prepared by Enviroscan, EDR, or similar firms) shall be provided to the City. If the report indicates the project site, or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, a Phase I Environmental Site Assessment (ESA) shall be prepared. The Phase I Assessment shall be prepared by an appropriately qualified individual (with experience in the identification and mitigation of hazardous materials and wastes) in accordance with state standards and guidelines to evaluate whether the site or the surrounding area is contaminated from the past or current uses including storage, use, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, state, and federal regulations and policies. Any further study found necessary by an appropriately qualified individual or relevant federal, state, or local agency shall be performed prior to project approval or made a condition of project approval. Prior to the Department of Building and Safety's issuance of any permits that allow for grading or construction on the project sites that were on a government list or within one-quarter mile of a site on a government list, the appropriately qualified individual or relevant agency shall provide written confirmation to the City that any necessary remediation has been completed to the satisfaction of the lead agency responsible for cleanup including confirmation that required site remediation was completed consistent with the relevant federal, state, or local requirements.

***Finding*: The City adopts CEQA Finding 1.**

Rationale for Finding

Implementation of Mitigation Measure **HM1** would ensure that potentially contaminated sites are fully inspected and if contaminated, remediated, prior to grading and construction. Adequate inspection and remediation will be determined by the City based on the advice of an Environmental Professional with adequate knowledge and skill to be familiar with all state and federal standards. This mitigation measure will reduce the impacts related to hazardous material sites to less than significant. This mitigation measure will be enforced as described in the MMP. Based on the foregoing, the City finds that impacts related to hazardous material sites would be mitigated to a less-than-significant level.

HYDROLOGY AND WATER QUALITY

100-Year Flood Hazard (Draft EIR page 4.7-24)

Description of Significant Effects

A small portion in the central part of the Project Area is located within a 100-year floodplain. More specifically, an area of proposed change on the north side of Pico Boulevard between Westwood Boulevard and Overland Avenue is located within a designated 100-year floodplain. Accordingly, redevelopment of these parcels could place housing within a 100-year flood hazard area. Therefore, the Proposed Plan could result in significant impacts related to placing housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map without mitigation.

Mitigation Measures

HWQ1 Buildings within a 100-year floodplain shall be designed and constructed a minimum of one foot above the 100-year flood water surface elevation to ensure the protection of structures from all flooding events.

***Finding*: The City adopts CEQA Finding 1.**

Rationale for Finding

Implementation of Mitigation Measure **HWQ1** would reduce impacts related to placing housing in a 100-year flood hazard area, as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map to less than-significant. This mitigation measure will be enforced as described in the MMP. Based on the foregoing, the City finds that impacts related to a 100-Year Flood Hazard would be mitigated to a less-than-significant level.

TRANSPORTATION AND TRAFFIC

Construction Activities within a Major or Secondary Highway ROW (Draft EIR page 4.12-70)

Description of Significant Effects

Construction-related impacts would generally be temporary. Because the study area represents a specific plan area relating to the build out of multiple parcels, construction-related impacts would depend on the approach to development of each parcel or development site. Although specific impacts related to construction cannot be known at this time, it is likely that construction activities could necessitate temporary lane, alley, or street closures or result in bus stop relocation or bus rerouting. Therefore, without mitigation, the Proposed Plan would result in a significant impact related to construction.

Mitigation Measures

TR16 Projects that require a worksite traffic control plan per current LADOT guidelines shall submit to LADOT for review and approval a plan that mitigates the impact of traffic disruption and ensures the safety of all users of the affected roadway. The plan shall address construction duration and activities and include measures, such as operating a temporary traffic signal, using flagmen adjacent to construction activities, or providing a dedicated pedestrian walkway, as appropriate.

***Finding*: The City adopts CEQA Finding 1.**

Rationale for Finding

Implementation of Mitigation Measure **TR16** would reduce the level of impact related to construction to a less-than-significant level. This mitigation measure will be enforced as described in the MMP. Based on the foregoing, the City finds that impacts related to construction activities within a major or secondary highway ROW would be mitigated to a less-than-significant level.

SECTION 4 – ENVIRONMENTAL IMPACTS FOUND TO BE LESS-THAN-SIGNIFICANT OR NO IMPACT

CEQA does not require findings to be adopted for impacts that are determined to be less than significant or no impact. Below is a list of the impacts found to be no impact or less than significant without mitigation in the EIR.

AESTHETICS

Scenic Vista/Obstruction of Views (Draft EIR pages 4.1-38 to 39): Less-than-significant impact.

Scenic Resources within State Scenic Hwy (Draft EIR pages 4.1-38 to 39): Less-than-significant impact.

Geological or Topographical Features (Draft EIR page 4.1-50): Less-than-significant impact.

AIR QUALITY

Conflict with Air Quality Plan (Draft EIR pages 4.2-19 to 21): Less-than-significant impact.

Violate Air Quality Standard - Operational Emissions (Draft EIR pages 4.2-21 to 26): Less-than-significant impact.

Objectionable Odors (Draft EIR page 4.2-29): Less-than-significant impact.

CULTURAL RESOURCES

Human Remains (Draft EIR page 4.3-25): Less-than-significant impact.

GEOLOGY AND SOILS

Rupture of a Known Earthquake Fault (Draft EIR pages 4.4-11 to 12): No impact.

Seismic Ground Shaking (Draft EIR page 4.4-12): No impact.

Liquefaction and Landslides (Draft EIR page 4.4-13): No impact.

Seismic Ground Failure (Draft EIR pages 4.4-13 to 14): No impact.

Landslide, Lateral Spreading, Liquefaction, Subsidence, or Collapse (Draft EIR page 4.4-14): No impact.

Expansive Soils (Draft EIR page 4.4-15): No impact.

Soil Erosion or the loss of topsoil (Draft EIR page 4.4-15): Less-than-significant Impact.

Septic Tanks and Waste Disposal Systems (Draft EIR page 4.4-15): No impact.

GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions (Draft EIR pages 4.5-18 to 24): Less-than-significant impact.

Conflict with Policy to Reduce GHG Emissions (Draft EIR pages 4.5-18 to 24): Less-than-significant impact.

HAZARDS AND HAZARDOUS MATERIALS

Transport, Use, and Disposal of Hazardous Materials (Draft EIR pages 4.6-21 to 22): Less-than-significant impact.

Upset Involving Hazardous Materials (Draft EIR page 4.6-22): Less-than-significant impact.

Hazardous Materials near Schools (Draft EIR page 4.6-23): Less-than-significant impact.

Safety Hazard near Public/Public Use Airport (Draft EIR page 4.6-24): Less-than-significant impact.

Safety Hazard in Vicinity of Private Airstrip (Draft EIR pages 4.6-25 to 26): No impact.

Emergency Response Plans (Draft EIR pages 4.6-25 to 26): Less-than-significant impact.

Wildland Fire (Draft EIR page 4.6-26): No impact.

HYDROLOGY AND WATER QUALITY

Water Quality Standards (Draft EIR pages 4.7-18 to 19): Less-than-significant impact.

Groundwater Supplies and Recharge (Draft EIR pages 4.7-19 to 20): Less-than-significant impact.

Existing Drainage Patterns, Erosion or Siltation (Draft EIR pages 4.7-21 to 22): Less-than-significant impact.

Existing Drainage Patterns, Flooding (Draft EIR page 4.7-22): Less-than-significant impact.

Stormwater Drainage System (Draft EIR page 4.7-23): Less-than-significant impact.

Water Quality (Draft EIR pages 4.7-23 to 24): Less-than-significant impact.

Structures Impeding Flood Flows (Draft EIR pages 4.7-24 to 25): No impact

Flooding Due to Levee or Dam Failure (Draft EIR page 4.7-25): Less-than-significant impact.

Seiche, Tsunami, or Mudflow (Draft EIR page 4.7-25): No impact.

LAND USE AND PLANNING

Division of Established Community (Draft EIR pages 4.8-13 to 22): Less-than-significant impact.

Conflict with Land Use Plan, Policy, or Regulation (Draft EIR pages 4.8-22 to 40): Less-than-significant impact.

Conflict with Habitat Conservation Plans (Draft EIR pages 4.8-40 to 41): No impact.

NOISE

Noise Levels - Operation (Draft EIR pages 4.9-14 to 21; 4.12-26): Less-than-significant impact.

Vibration or Groundborne Noise - Operation (Draft EIR pages 4.9-23 to 24): Less-than-significant impact.

Noise Exposure in Airport Land Use Plan (Draft EIR page 4.9-24-25): No impact.

Noise Exposure near Private Airstrip (Draft EIR page 4.9-25): No impact.

POPULATION, HOUSING AND EMPLOYMENT

Induce Substantial Population Growth (Draft EIR pages 4.10-16 to 17): Less-than-significant impact.

Displacement of Existing Housing (Draft EIR pages 4.10-17 to 20): Less-than-significant impact.

Displacement of People (Draft EIR pages 4.10-20 to 21): Less-than-significant impact.

PUBLIC SERVICES

Fire Protection and Emergency Services (Draft EIR pages 4.11-10 to 12; 4.14-8): Less-than-significant impact.

Police Protection (Draft EIR pages 4.11-16; 4.14-8): Less-than-significant impact.

Public Schools (Draft EIR pages 4.11-22 to 23; 4.14-8 to 9): Less-than-significant impact.

Libraries (Draft EIR pages 4.11-33 to 34): Less-than-significant impact.

TRANSPORTATION AND TRAFFIC

Disrupt Existing Public Transit, Bicycle, or Pedestrian Facilities (Draft EIR page 4.12-44): Less-than-significant impact.

Congestion Management Program Freeway Analysis (Draft EIR pages 4.12-70 to 73): Less-than-significant impact.

Congestion Management Program Transit Impact (Draft EIR pages 4.12-75 to 76): Less-than-significant impact.

Emergency Access (Draft EIR pages 4.12-77 to 79): Less-than-significant impact.

Hazards due to Design Feature or Incompatible Use (Draft EIR page 4.12-79): Less-than-significant impact.

UTILITIES AND SERVICE SYSTEMS

Construction/Expansion of New Water Treatment Facilities (Draft EIR pages 4.13-13 to 14): Less-than-significant impact.

Construction of New Water Lines (Draft EIR pages 4.13-14 to 15): Less-than-significant impact.

Water Supply (Draft EIR pages 4.13-15 to 18): Less-than-significant impact.

Exceed Wastewater Treatment Requirements (Draft EIR page 4.13-25): Less-than-significant impact.

Construction/Expansion of New Wastewater Treatment Facilities (Draft EIR pages 4.13-26 to 28): Less-than-significant impact.

Construction of New Wastewater Conveyance Systems (Draft EIR pages 4.13-28 to 30): Less-than-significant impact.

Construction of New Stormwater Conveyance Systems (Draft EIR pages 4.13-28 to 30): Less-than-significant impact.

Solid Waste Disposal (Draft EIR pages 4.13-35 to 38): No impact.

Compliance with Solid Waste Regulations (Draft EIR pages 4.13-35 to 38): Less-than-significant impact.

Electricity (Draft EIR pages 4.13-47 to 49): Less-than-significant impact.

Natural Gas (Draft EIR pages 4.13-50 to 52): Less-than-significant impact.

SECTION 5 – ALTERNATIVES TO THE PROJECT

PROJECT OBJECTIVES

The primary and secondary objectives of the Proposed Plan, as discussed in the Draft EIR (Chapter 3), are as follows:

Primary Objectives

Primary Objective 1: Implement the policies of the City of Los Angeles General Plan Framework, the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans that encourage growth to be directed to transit-oriented areas and foster more sustainable, mixed use development patterns that improve mobility options and reduce auto dependence.

Primary Objective 2: Accommodate employment, housing, and population growth projections forecasted through the planning horizon year of 2035 by focusing residential development and new job-generating uses around transit stations.

Primary Objective 3: Maintain and expand the City's jobs base and increase opportunities for economic development in the Expo Corridor in order to increase the generation of tax revenue in the City that will help pay for the provision of City services.

Primary Objective 4: Implement the General Plan Framework goal to capture a significant share of regional growth in emerging environmentally oriented and clean industries such as technology industry jobs, which are clustered on the Westside and comprise a growing industry sector, and institute zoning that accommodates and creates incentives for the location and continued clustering of these technology industry jobs in the Expo Corridor where they will benefit from the proximity to transit and mixed use environments.

Primary Objective 5: Create incentives for the provision of affordable housing in new residential development near the Expo LRT Line to enhance accessibility and housing options for core transit riders and increase transit ridership.

Primary Objective 6: Improve circulation within the station areas; increase mobility choices; promote transit ridership and use of other alternative transit modes; and reduce vehicle miles traveled per capita for those who live and/or work within the Expo Corridor.

Secondary Objectives

Secondary Objective 1: Ensure new development is pedestrian-oriented, acknowledges the transit stations, and is compatible with surrounding neighborhoods through the design of buildings, streets, and the public realm.

Secondary Objective 2: Stimulate vibrancy and activity and create a unique sense of place within each station area through the design of buildings, streets, and the public realm.

ALTERNATIVES

Based on the whole of the administrative record, the City finds that the EIR analyzes a reasonable range of project alternatives that would feasibly attain some of the basic objectives of the Proposed Plan, as described in Chapter 5 of the Draft EIR. **Table 1** compares the existing population, dwelling units, employment, and non-residential square footage to the reasonable expected development for the Proposed Plan, Proposed Plan with Alternative Compliance

scenario, and the three alternatives analyzed in the Draft EIR. The three alternatives analyzed in the EIR are described as follows:

Alternative 1 - No Project Alternative (Draft EIR page 5-7)

Description of Alternative

Alternative 1 reflects "no project" conditions (i.e., without the adoption of the Proposed Plan). Alternative 1 assumes reasonably foreseeable development under the current community plans including existing zoning, General Plan designations, and land use regulations, and assumes no discretionary actions such as site-specific zone changes. However, it is reasonable to expect continued market demand for housing and jobs in the area which could result in requests for General Plan Amendments and zone changes; thus development could occur in an uncoordinated fashion. Details about such potential requests for land use and zoning changes are not known, and therefore they are not incorporated into the population, housing, and employment estimates for the No Project Alternative.

Under Alternative 1, it is reasonably foreseeable that these existing land use regulations would allow for an increase of 1,054 dwelling units, 1,852 residents, 3,813 jobs, and approximately 2.30 million square feet of non-residential building area within the Project Area compared to existing conditions by the year 2035. Specifically, the No Project Alternative would result in a total population of 52,447 persons, 26,072 dwelling units, 37,755 jobs, and approximately 13.73 million square feet of non-residential building area by 2035.

Impact Summary

This alternative was selected to comply with CEQA's mandate to include a "no project" alternative. The current zoning does not respond to new market conditions created by the presence of convenient and reliable transit service. Alternative 1 would have greater impacts compared to the Proposed Plan in the area of cultural resources due to the lack of procedural requirements and mitigation measures that would address potential impacts on cultural resources.

Alternative 1 does not concentrate growth around transit or encourage mixed use development, and does not stimulate the creation of additional housing capacity to accommodate population growth. Therefore, unlike the Proposed Plan, this alternative would have significant impacts related to consistency with adopted City and regional plans and policies for land use and housing. Alternative 1 would result in uses and development patterns that could create barriers between the residential areas and the transit stations and are not supportive of a walkable, transit-oriented community due to the large, industrially zoned parcels which could be developed with heavy industry under current zoning. Therefore, unlike the Proposed Plan, Alternative 1 would cause impacts related to community division and barriers to be significant and unavoidable.

Alternative 1 does not aim to reduce emissions from automobiles, as it does not reduce VMT or expand mobility options, and thus would have significant impacts related to consistency with GHG emission reduction plans and policies, unlike the Proposed Plan. It would also have greater impacts with regard to transit, bicycle, and pedestrian plans and policies, as this alternative does not include new streetscape plans and does not include zoning that encourages transit- and pedestrian-oriented development.

The severity of some impacts, such as those related to public services, utilities, and traffic and transportation, would be reduced as a result of the reduction in reasonably expected development compared to the Proposed Plan. However, no significant and unavoidable impacts would be reduced to a less than significant level.

TABLE 1: ALTERNATIVES POPULATION, DWELLING UNITS, AND EMPLOYMENT CAPACITIES COMPARISON						
	Existing Conditions (2013)	Proposed Project	Proposed Project: Alternative Compliance Scenario	Alternative 1: No Project	Alternative 2: Reduced Project	Alternative 3: Increased Residential/ Reduced Employment
Housing (dwelling units)	25,018	29,441/a/	31,060/a/	26,072	28,336	32,578
Population (persons)	50,595/b/	59,571/c/	62,810/c/	52,447	57,326	65,835
Employment (jobs)	33,962/d/	48,296/e/	43,419/e/	37,775	44,712	39,693
Non-Residential Square Footage	11,424,485/f/	16,957,415	15,311,503	13,727,355	15,574,182	13,489,759

SOURCES and NOTES:
/a/Estimated number of dwelling units in Proposed Plan Reasonable Expected Development is based on a methodology using reasonably anticipated residential densities for each zone. See **Appendix F** of the EIR for further discussion about the methodology and how population, housing, employment, and nonresidential development were determined for the Proposed Project.
/b/Existing Population and Housing are estimates derived from the US Census (2010), adjusted to 2013 using average growth rates from the California Department of Finance. See Section 4.10 Population, Housing, and Employment and **Appendix F** of the EIR for detailed methodology.
/c/Population in Proposed Plan Reasonable Expected Development is derived from the estimated number of dwelling units multiplied by the SCAG estimated persons per household (by Community Plan Area) for 2035. DCP has considered SCAG 2012 RTP base year estimates and 2040 growth projections contained in the 2016 RTP/SCS and have concluded that the estimates in this table remain reasonable and consistent with the 2016 RTP/SCS estimates and projections. See **Appendix K** of the EIR for details.
/d/U.S. Census "On The Map" application, 2013.
/e/Employment in Proposed Plan Reasonable Expected Development is derived from the estimated square footage of non-residential use, using square foot per employee factors that reflect the types of land uses permitted by the proposed zoning.
/f/Existing non-residential square footage is derived from the existing number of jobs in each station segment, multiplied by an average square foot per employee factor that reflects the types of land uses in each area.

A complete summary of impacts is provided in Table 5-5 of the Draft EIR on pages 5-14 to 5-21.

Finding

It is found pursuant to PRC Section 21081(a)(3), that specific economic, legal, social and technological, or other considerations, make the No Project Alternative (Alternative 1) infeasible. Therefore, the City finds that this alternative is infeasible and less desirable than the Proposed Plan and rejects this alternative for any and all of the following reasons:

- Alternative 1 would not meet the majority of project objectives. Although Alternative 1 preserves existing industrial land around the stations for jobs, helping to maintain the City's jobs base and implementing the related community plan policies, overall development capacity would not be increased under this alternative, and therefore it would not accommodate projected population, housing, and employment growth for the area.

- Alternative 1 does not contain the diverse mix of uses and intensity of development, and therefore would not be transit-supportive or encourage walking and bicycling. Further, Proposed Plan components, such as new design standards and guidelines, streetscape plans, affordable housing incentives, and other public benefits proposed as part of the Proposed Plan, would not be implemented under Alternative 1. These components are essential in achieving the Proposed Plan's objectives related to improving circulation, encouraging an appropriate mix of uses and pedestrian oriented design, ensuring compatibility between uses, and creating vibrant neighborhoods around each station.

Alternative 2 - Reduced Project Alternative (Draft EIR page 5-11)

Description of Alternative

Alternative 2 would increase development capacity of the Project Area over the current community plans, similar to the Proposed Plan but to a lesser extent. This alternative would encourage infill development along transit corridors. Alternative 2 would partially achieve Proposed Plan objectives related to encouraging development near transit, increasing transit-ridership, improving circulation for all modes, and improving the pedestrian and bike environment. Proposed design standards and height regulations would be similar to those proposed under the Proposed Plan. Alternative 2 would include the same mix of land uses as included under the Proposed Plan; however the increase in development that would be reasonably expected to occur under this alternative, compared to the growth anticipated under the Proposed Plan (2035) over Existing Conditions (2013), would represent 25 percent less dwelling units, population, employment, and non-residential space.

Alternative 2 would result in 2035 Project Area totals of 28,336 dwelling units, 57,326 persons, 44,712 jobs, and approximately 15.57 million square feet of non-residential space. This would represent residential and non-residential growth by 2035 over existing conditions of approximately 3,300 dwelling units and 4.15 million square of non-residential space. The reduced number of dwelling units would also result in a reduced number of affordable units that would potentially be generated through the public benefit requirements of the Proposed Plan.

Impact Summary

Under Alternative 2, impacts would be similar to those identified for the Proposed Plan. The severity of some impacts, such as those related to public services, utilities, and traffic and transportation, would be reduced as a result of the reduction in reasonably expected development compared to the Proposed Plan. However, no significant and unavoidable impacts would be

reduced to a less than significant level. Alternative 2 would not result in any additional significant and unavoidable impacts beyond those resulting from the Proposed Plan.

A complete summary of impacts is provided in Table 5-5 of the Draft EIR on pages 5-14 to 5-21.

Finding

It is found pursuant to PRC Section 21081 (a)(3), that specific economic, legal, social and technological, or other considerations, make the Reduced Project Alternative (Alternative 2) infeasible. Therefore, the City finds that this alternative is infeasible and less desirable than the Proposed Plan and rejects this alternative for any and all of the following reasons:

- Alternative 2 would only partially meet the majority of project objectives. Alternative 2 would accommodate the appropriate mix of land uses to create new opportunities for jobs and housing, though to a lesser extent than the Proposed Plan. However, because this Alternative has reduced intensity of all uses, it does not meet project objectives associated with increasing the City's jobs and tax base and capturing a regional share of emerging environmentally-oriented and clean industries to the same extent as the Proposed Plan nor does it fully meet the SCAG projections for housing demand. Given the City's critical housing shortage, a primary objective of the project is to meet SCAG housing projections, including for affordable housing in transit accessible areas. Since the provision of public benefits relies on private development, there will be less housing, and consequently less affordable housing provided as a public benefit--which is not consistent with Plan Objectives.

- Alternative 2 would implement other components of the Proposed Plan including design standards, streetscape plans as well as requirements for other public benefits; however, streetscape improvements and other public benefits will also be reduced when compared to the Proposed Plan because less development will result in less public benefit requirements. Alternative 2 would also result in less transit use because of the reduced levels of development, and in particular jobs and affordable housing, both of which contribute to higher levels of transit ridership.

Alternative 3 - Increased Residential/Reduced Employment Alternative (Draft EIR page 5-12)

Description of Alternative

Similar to the Proposed Plan, Alternative 3 would increase development capacity of the ECTNP Area over the current community plans and would encourage infill development along transit corridors. Alternative 3 was chosen to respond to a citywide demand for additional housing and local residents' concerns about increased traffic congestion from commercial uses, as well as the potential for this Alternative to reduce impacts related to utilities and services systems. Alternative 3 would partially achieve the Proposed Plan objectives related to encouraging development near transit, increasing transit-ridership, improving circulation for all modes, and improving the pedestrian and bike environment. Due to decreased capacity for jobs, Alternative 3 is less likely to meet project objectives relating to economic development and job growth. The key component of this alternative would be to encourage increased residential development over non-residential development within the Project Area. In this context, Alternative 3 would be similar to the Proposed Plan Alternative Compliance scenario, but Alternative 3 represents a greater shift from non-residential to residential uses. Alternative 3 (2035), when compared to the growth proposed in the Proposed Plan (2035), represents an approximately 70 percent increase in dwelling units and population and an approximately 62 percent decrease in employment and non-residential square footage. Alternative 3 (2035), when compared to the growth proposed under the Alternative Compliance scenario of the Proposed Plan (2035), represents an approximately 25

percent increase in dwelling units and population, an approximately 39 percent decrease in employment, and an approximately 47 percent decrease in non-residential square footage. Alternative 3 would result in a total of 32,578 dwelling units, 65,835 persons, 39,693 jobs, and approximately 13.49 million square feet of non-residential space by 2035. Compared to the Alternative Compliance scenario, Alternative 3 by 2035 would provide an additional 1,518 units of housing, equating to approximately 3,025 persons, but would reduce the non-residential square footage by approximately 1.82 million, which would accommodate 3,726 fewer jobs.

Impact Summary

Because Alternative 3 would increase residential capacity and reduce non-residential capacity compared to both the Proposed Plan and the Proposed Alternative Compliance scenario, the severity of impacts to public services would be increased since residents demand public services at a greater rate than non-residential uses. Alternative 3 does not accommodate projected employment growth and thus would not be consistent with land use policies related to maintaining land for jobs and economic development goals of the General Plan. This results in a significant and unavoidable land use impact which does not occur under the Proposed Plan.

Although transportation impacts under Alternative 3 would be similar to the Proposed Plan due to a similar amount of development, they could potentially be greater than the Project for several reasons. Because the vehicle trip reduction requirements and associated TDM strategies apply only to commercial development, and Alternative 3 has less commercial development compared to the Proposed Plan, this alternative would not realize as much benefit from these strategies. Alternative 3 could also result in less transit use and increased number and length of vehicle trips, as there would be fewer jobs and retail/services located near the stations. Thus, although it was not analyzed to the same level of detail, Alternative 3 could have greater impacts on traffic and transportation compared to the Proposed Plan.

A complete summary of impacts is provided in Table 5-5 of the Draft EIR on pages 5-14 to 5-21.

Finding

It is found pursuant to PRC Section 21081 (a)(3), that specific economic, legal, social and technological, or other considerations, make the Increased Residential/Reduced Employment Alternative (Alternative 3) infeasible. Therefore, the City finds that this alternative is infeasible and less desirable than the Proposed Plan and rejects this alternative for any and all of the following reasons:

- Alternative 3 would reduce the amount of non-residential development while increasing the number of dwelling units that could be accommodated in the Project Area compared to Proposed Plan by allowing more residential use on currently industrial land. This difference in land use mix reduces the ability of this alternative to accommodate jobs around transit, thus failing to meet the objective of maintaining the jobs base, increasing economic development in the area and capturing a regional share of emerging environmentally oriented and clean industries such as the technology industry jobs that are clustered in the Exposition Corridor.

- Although Alternative 3 would typically result in less vehicle trips compared to the Proposed Plan due to the increased residential and reduced non-residential use, in this case Alternative 3 would not realize as much benefit from the vehicle trip reduction requirements and associated TDM strategies as the Proposed Plan which apply to commercial development. Alternative 3 could also result in less transit use because there would be fewer jobs located near the stations, since rail ridership among workers is dependent on proximity of workplace to a station. Similarly, the decreased amount of retail and services in the corridor under

Alternative 3 compared to the Proposed Plan could result in more vehicle trips, since less of these uses would be accessible by transit, walking, and other non-vehicular modes. Therefore, Alternative 3 would be less able to fully meet the objectives related to improving circulation and encouraging transit ridership and other alternative modes of transportation compared to the Project.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6 of the State CEQA Guidelines requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the No Project Alternative is identified as environmentally superior, then another environmentally superior alternative shall be identified among the other alternatives.

Based on the ability to result in reduced environmental impacts and meet project objectives, Alternative 2 is the Environmentally Superior Alternative. None of the Alternatives analyzed are capable of reducing or changing to a less than significant level any of the significant and unavoidable impacts that would occur under the Proposed Plan; however, Alternative 2 would reduce the severity of some of the impacts that would occur as a result of the Proposed Plan. Similarly, none of the Alternatives analyzed are capable of meeting all of the project objectives. Alternative 2 is most consistent with Project objectives, compared to the other two alternatives analyzed, however, Alternative 2, while potentially feasible, would not achieve all of the project objectives.

SECTION 6 – STATEMENT OF OVERRIDING CONSIDERATIONS

The California Environmental Quality Act (CEQA) requires the lead agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a project against its unavoidable environmental risks in determining whether to approve a project (PRC Section 21081 and CEQA Guidelines Section 15093(a)). CEQA also requires that when a public agency approves a project that will result in the occurrence of significant and unavoidable adverse impacts to the environment, the agency must state in writing the reasons to support its action based on the certified EIR and/or other information in the record (PRC Section 21081 and CEQA Guidelines Section 15093(b)). The EIR for the Exposition Corridor Transit Neighborhood Plan (Proposed Plan) identifies significant impacts that would result from implementation of the Proposed Plan. These Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Draft EIR, the Final EIR, and documents, testimony, and all other materials that constitute the Record of Proceedings.

The EIR concluded that, despite the adoption of all feasible mitigation measures, the Proposed Plan would result in the following potential unavoidable significant adverse impacts that are not mitigated to a less-than-significant level:

- Aesthetics (Visual Character and Shade & Shadow)
- Air Quality (Standards during construction and sensitive receptors during construction)
- Cultural Resources (Historical Resources)
- Noise (Construction Noise Standards and Vibration; Operational Noise)
- Public Services (Parks and Recreational Facilities)
- Transportation and Traffic (Circulation System; Neighborhood Intrusion; Congestion Management Plan Arterial Intersection Analysis)

- **Aesthetics (Visual Character and Shade & Shadow)**. SB 743 states that the aesthetic impacts of a residential, mixed use residential, or employment center project on an infill site within a Transit Priority Area (TPA) shall not be considered significant impacts on the environment. Such projects are typical of the kinds of projects anticipated by the Proposed Plan. Although a majority of the Project Area is located in a TPA, a portion of the Project Area is not. Therefore, a discussion of aesthetic impacts is provided within. The proposed land use and zoning changes that allow increases in height, scale, and density in the Project Area could substantially degrade the existing visual character or quality in various portions of the Project Area. Therefore, the Proposed Plan over time could result in a significant and unavoidable impact related to visual character. In addition, future development could cast shadows on shadow-sensitive land uses for a potentially significant period of time. Therefore, despite implementation of plan standards, the Proposed Plan could result in a significant and unavoidable impact related to shade and shadow.

- **Air Quality (Standards during construction and sensitive receptors during construction)**. During construction of development projects that are consistent with the Proposed Plan, regional and localized emissions could exceed the SCAQMD significance thresholds. Therefore, the Proposed Plan could result in a significant and unavoidable impact related to violating regional and localized air quality standards, or contributing substantially to existing violations, for construction emissions. Also during construction, sensitive receptors could be exposed to substantial pollutant concentrations. Therefore, despite compliance with standards established by federal, state, and regional regulations, and mitigation measures,

the Proposed Plan could result in a significant and unavoidable impact related to exposing sensitive receptors to substantial pollutant concentrations during construction.

- **Cultural Resources (Historical Resources)**. It is possible that demolition and/or significant alteration to some of the historical resources identified in this EIR may occur. Beyond the existing regulatory framework and the Proposed Plan standards that will assist in protecting both designated and eligible historical resources, no feasible mitigation measures have been identified to reduce the significant impact to less than significant. Therefore, the Proposed Plan could result in a significant and unavoidable impact related to historical resources.

- **Noise (Construction Noise and Vibration, Operational Noise)**. Noise levels from various mechanized construction equipment would exceed 75 dBA at distances of 50 feet from the equipment which could exceed the limitations established in LAMC Section 112.05. Therefore, despite the implementation of mitigations to reduce construction noise and vibration levels, the Proposed Plan would result in a significant and unavoidable impact related to construction noise and vibration (including excessive vibration or ground-borne noise levels, substantial temporary or periodic increases in ambient noise levels, and exceeding established standards). Additionally, new ambient noise sources, such as truck deliveries, at new commercial uses in mixed use developments and developments adjacent to sensitive uses may result in a substantial permanent increase in ambient noise levels in the Proposed Plan vicinity above levels existing without the project. Therefore, despite implementation of mitigation to reduce noise levels, the Proposed Plan could result in a significant and unavoidable impact related to a permanent increase in ambient noise.

- **Public Services (Parks and Recreational Facilities)**. There is an existing deficit in park spaces in the Project Area. Increased development in the Project Area would increase the demand for parks and recreational facilities. This increased demand would be met in part through compliance with City requirements and through the public benefits required by the Proposed Plan of commercial and mixed use projects, as well as new open space around Westwood Station. However, it is anticipated that these requirements would be insufficient to meet the demand from new development and that the increased demand would exacerbate the existing park deficit in the Project Area. No feasible mitigation measures were identified to reduce the significant impact to less than significant. Therefore, the Proposed Plan would result in a significant and unavoidable impact related to public parks.

- **Transportation and Traffic (Circulation System; Neighborhood Intrusion; Congestion Management Plan Arterial Intersection Analysis)**. Due to the increase in development capacity, significant impacts would occur to the circulation system and at individual study intersections as a result of the Proposed Plan. Specifically, the addition of the Proposed Plan would result in significant impacts at 47 intersections in 2015, of which 42 intersections would remain significant after mitigation, and 56 intersections in 2035, of which 50 would remain significant after mitigation measures are applied. Furthermore, increased development may cause some trips to divert to adjacent streets to avoid congested intersections, resulting in neighborhood intrusion impacts. Therefore, the Proposed Plan would result in a significant and unavoidable impact related to transportation and traffic.

The project alternatives would not satisfy the project objectives as effectively as the Proposed Plan. Accordingly, the City Council adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the Proposed Plan. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the Proposed Plan for the reasons discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Proposed Plan, including region-wide or statewide

environmental benefits, against the Proposed Plan's potential significant and unavoidable impacts, the City Council hereby finds that the benefits of the Proposed Plan outweigh and override the potential significant unavoidable impacts for the reasons stated below.

Reasons to Support Approval of the Proposed Plan

After balancing the specific economic, legal, social, technological, and other benefits of the Proposed Plan, the City of Los Angeles has determined that the unavoidable adverse environmental impacts identified above may be considered "acceptable" due to the following specific considerations, which outweigh the unavoidable adverse environmental impacts of the Proposed Plan. The City Council finds that each one of the following overriding considerations independently, grouped by overarching theme, or taken collectively, is/are sufficient to outweigh the significant and unavoidable impacts of the Proposed Plan:

1. The Proposed Plan is consistent with state, regional and local policies that promote a development pattern focused around transit that reduces vehicle miles travelled and therefore reduces associated GHG emissions. The more compact, mixed-use development pattern also results in more efficient use of land and natural resources as compared to a more dispersed development pattern on a regional scale.

2. Specifically, the Proposed Plan implements the policies of the City of Los Angeles General Plan Framework, the SCAG RTP/SCS, and the West Adams-Baldwin Hills-Leimert, Palms-Mar Vista-Del Rey, and West Los Angeles Community Plans that encourage growth to be directed to transit-oriented areas and foster more sustainable, mixed use development patterns that improve mobility options and reduce auto dependence consistent with the social, economic and aesthetic values of the community and the City as a whole.

3. The Proposed Plan accommodates employment, housing, and population growth projections forecasted through the planning horizon year of 2035 by focusing residential development and new job-generating uses around transit stations and allowing for the continued preservation of stable single-family neighborhoods as appropriate.

4. The Proposed Plan maintains and expands the City's jobs base and increases opportunities for economic development in the Expo Corridor in order to increase the generation of tax revenue in the City that will help pay for the provision of City services.

5. The Proposed Plan implements the General Plan Framework goals to capture a significant share of regional growth in emerging environmentally-oriented and clean industries, such as technology industry jobs, which are clustered on the Westside and comprise a growing industry sector, and to institute zoning that accommodates and creates incentives for the location and continued clustering of these technology industry jobs in the Expo Corridor where they will benefit from the proximity to transit and mixed use environments.

6. The Proposed Plan creates incentives for the provision of affordable housing in new residential development near the Expo LRT Line to enhance accessibility and housing options for core transit riders and to increase transit ridership.

7. The Proposed Plan improves circulation within the station areas; increases mobility choices; promotes transit ridership and other alternative transit modes; and reduces vehicle miles traveled per capita for those who live and/or work within the Expo Corridor.

8. The Proposed Plan ensures new development is pedestrian-oriented, acknowledges the transit stations, and is compatible with surrounding neighborhoods through the design of buildings, streets, and the public realm.

9. The Proposed Plan stimulates vibrancy and activity and creates a unique sense of place within each station area through the design of buildings, streets, and the public realm.

10. The Proposed Plan would protect the quality of life for existing and future residents and confer citywide benefits through goals and policies designed to incorporate smart growth principles. The Proposed Plan provides for concentrated, mixed-use development within the Expo Corridor in order to conserve resources, protect existing residential neighborhoods, and improve air quality by reducing vehicle miles traveled per capita. The Proposed Plan would foster thriving transit centers by focusing growth in major transit and commercial areas and by creating walkable, attractive and complete neighborhoods that provide a greater mix of jobs and housing for a range of income levels, especially affordable housing, and greater access to goods and services. This development pattern reduces vehicle mode share and vehicle miles traveled per capita emissions regionally, promoting sustainable development in support of Assembly Bill 32 and Senate Bill 375. The overall reduction in regional vehicle miles traveled per capita would contribute to lowered greenhouse gas emissions in the region.

11. The Proposed Plan implements a compact development pattern within the Expo Corridor, consistent with SB 375 and the Sustainable Communities Strategy, adopted by SCAG, and therefore would contribute to decreasing regional vehicle miles traveled and greenhouse gas emissions in the region.

12. The Proposed Plan is consistent with the Sustainable Communities Strategy, and contributes to increasing mobility and sustainability. The Proposed Plan will locate jobs and housing near transit in a manner that reduces traffic and commute times by focusing capacity in transit and mixed use environments.

13. The Proposed Plan supports policies and goals of the General Plan Framework Element by allowing the City to grow strategically, and by allowing for the conservation of existing low-scale residential neighborhoods. The benefits conferred by orderly, well-designed development that is served by existing infrastructure and services, as well as connected by transit, bicycle and pedestrian networks, outweigh the impacts anticipated with development allowed by the Proposed Plan.

14. The Proposed Plan would ensure that where new growth is anticipated, project features are incorporated to help minimize the impacts of new development. Through implementation of the design standards, new infill development will be regulated through varying levels of design regulations. The Proposed Plan will also regulate permitted uses to encourage a more diversified range of retail and neighborhood services.

15. The Proposed Plan would respond to the regional housing crisis, and the corresponding increasing cost of housing and increasing incidence of homelessness in the City of Los Angeles, by re-zoning targeted land within the Expo Corridor to allow for additional density, thereby increasing housing opportunities. In particular, the Proposed Plan attempts to address the housing crisis by increasing opportunities for new affordable and mixed-income housing through incentives offered.

16. The Proposed Plan would preserve the character of a vast majority of existing single-family and lower-density neighborhoods by maintaining lower density land use designations as appropriate.

17. The Proposed Plan is consistent with Sustainable City pLAn by accommodating growth while providing transportation options. The Proposed Plans would concentrate development around transit, allow for and encourage a wide mix of uses, and better accommodate pedestrians and bicyclists. This strategy would result in lower per capita GHG emissions than would a less dense growth strategy, and would contribute to the City reaching the 2025 Sustainable City pLAn reduction target of 45 percent below 1990 baseline GHG emissions. The Proposed Plan would be expected to contribute to decreasing regional vehicle miles traveled per capita and greenhouse gas emissions in the region over time.

18. The Proposed Plan improves local mobility through the development of a balanced, multi-modal transportation network, focusing new development near existing services and infrastructure. It emphasizes a multi-modal approach to mobility that recognizes the benefits (including health and traffic-alleviating benefits) of providing options that encourage walking, cycling, and transit use. These linkages will also enhance access to both passive and active open and green space amenities, thereby encouraging physical activity by all segments of the community, particularly youth and the elderly. All together these enhanced mobility options provide a better-connected, user-friendly transportation network representing a more diverse, sustainable transportation network.