

8.0 COMMENTS and RESPONSES

CEQA Guidelines Section 15088 requires that the lead agency evaluate public comments on environmental issues included in a Draft EIR and prepare written responses to those comments. Pursuant to *CEQA Guidelines* Section 15088(c), “[t]he written responses shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency’s position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted.” The *CEQA Guidelines* call for responses that contain a “good faith, reasoned analysis” with statements supported by factual information.

The City of Los Angeles received six comment letters on the Draft EIR for the Mangrove Estates Site Mixed Use Development Project. The comment letters that the City received are listed below. The letters and responses follow.

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NATIVE AMERICAN HERITAGE COMMISSION

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February 2, 2010

Mr. Steven Wechsler, Planner

LOS ANGELES CITY PLANNING DEPARTMENT

200 North Spring Street, #667 Mail Stop 395
 Los Angeles, CA 90012

Re: SCH#2009101091 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Mangrove Estates Site Mixed-Use Development Project; located in the Central City North Community Planr Area; City of Los Angeles; Los Angeles County, California

Dear Mr. Weschsler:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources.. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3rd 604) The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amended in 2009) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural resources were not identified within one-half mile of the APE. Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP) Coordinator's office (at (916) 653-7278, for referral to the nearest OHP Information Center of which there are 11.

Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f] *et seq*), 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. .

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of 'historic properties of religious and cultural significance' may also be protected the under Section 304 of the NHPA or at the Secretary of the Interior' discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C, 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

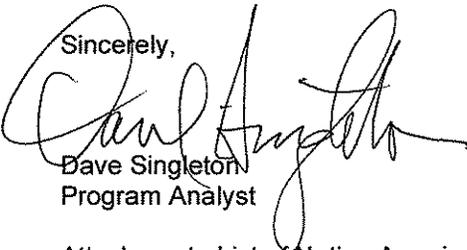
CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Again, Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

Native American Contacts
Los Angeles County
February 2, 2010

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Gabrielino Tongva Indians of California Tribal Council
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Gabrielino-Tongva Tribe
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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106, and federal NAGPRA.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2009101091; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Mangrove Estates Mixed-Use Development Project; located in the Central City North Community Plan Area; City of Los Angeles; Los Angeles County, California.

Native American Contacts
Los Angeles County
February 2, 2010

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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106, and federal NAGPRA.

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Letter 1

COMMENTER: Dave Singleton, Program Analyst, Native American Heritage Commission

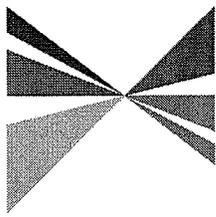
DATE: February 2, 2010

Response

The commenter states that the Native American Heritage Commission (NAHC) performed a Sacred Lands File search and Native American Cultural resources were not identified within one-half mile of the project site. The commenter further states that early consultation with Native American tribes in the area is the best way to avoid unanticipated discoveries once a project is underway. The commenter lists names of the nearest tribes and interested Native American individuals.

As discussed in Section 4.3, *Cultural and Historic Resources*, there is no evidence that archaeological resources are present onsite. Nevertheless, activities associated with construction of onsite development could potentially expose previously unknown, buried archaeological resources and human remains at the project site. Mitigation measures CR-2(a-d) would reduce impacts to cultural resources. The mitigation required during construction of the project includes consultation with NAHC if resources are found on the project site.





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- Transportation
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March 1, 2010

Mr. Steven Wechsler
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Los Angeles, California 90012
steven.wechsler@lacity.org

RE: SCAG Comments on the Draft Environmental Impact Report for the Mangrove Estates Site Mixed Use Development [SCAG No. I20100017]

Dear Mr. Wechsler,

Thank you for submitting the **Draft Environmental Impact Report for the Mangrove Estates Site Mixed Use Development [SCAG No. I20100017]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act (CEQA) Guidelines, Sections 15125 and/or 15206. The proposed project is an expected mixed use development encompassing up to 1.2 million square feet, located at the northeast corner of Alameda Street and First Street on the edge of the Little Tokyo community, in the City of Los Angeles.

We have evaluated this project based on the policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Vision (CGV) that may be applicable to your project. The RTP and CGV can be found on the SCAG web site at: <http://scag.ca.gov/igr>. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. Please send a copy of the Final Environmental Impact Report (FEIR) ONLY to SCAG's main office in Los Angeles for our review. If you have any questions regarding the attached comments, please contact Bernard Lee at (213) 236-1895. Thank you.

Sincerely,

Jacob Lieb, Manager
Environmental and Assessment Services

DOCS# 155411

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE MANGROVE ESTATES SITES MIXED USE DEVELOPMENT
[SCAG NO. I20100017]**

PROJECT LOCATION

The project site encompasses 5.66 acres at the northeast corner of Alameda Street and First Street on the edge of the Little Tokyo community, in the City of Los Angeles, County of Los Angeles. The site is immediately adjacent to the new Little Tokyo/Arts District Metro Gold Line Station.

PROJECT DESCRIPTION

The City of Los Angeles owns the 5.66-acre project site, which is occupied by a surface parking lot and a 19,500 square foot (sf) medical office building. The City plans to sell the site to a private developer. In March 2008, the City issued a Request for Proposal (RFP) for a private developer to secure the right to develop the site. In response to the RFP, the City received several proposals for various development ideas. Each of the proposals differed in design, size, and scale. However, the common theme in each of the proposals was that of a mixed use development. The EIR was prepared in anticipation of the sale of the project site by the City to a private owner for the development of a mixed use project.

The proposed project involves a General Plan amendment, zone change (including height district change) and other necessary approvals to allow for the development of mixed retail, office, community space, creative live/work units and residential development. Although no specific development is proposed at this time, it is anticipated that the project site could accommodate a maximum of 1.2 million square (sf) feet of floor space that includes a variety of uses. The maximum amount of each specific use that could be accommodated at the site is as follows:

- Retail: 200,000 sf
- Office: 500,000 sf
- Community Space: 25,000 sf
- Creative Live/Work: 75,000 sf (83 units)
- Residential: 400,000 sf (445 units)

Project approval may entail the approval of:

- General Plan Amendment
- Zone Change (including Height District Change)
- Tract Map/Subdivision
- Street Vacations (The segment of Turner Street in the northern portion of the site, which is currently closed to traffic, would be vacated. In addition, portions of Banning Street may also require vacation.)
- Site Plan Review
- Variances for Parking Reductions
- Other entitlements as necessary

CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

Regional Growth Forecasts

The Draft Environmental Impact Report (DEIR) should reflect the most current SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion, and city are as follows:

2.1

Adopted SCAG Regionwide Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

Adopted City of Los Angeles Subregion Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	4,140,516	4,214,082	4,292,139	4,367,538	4,440,017	4,509,435
Households	1,386,658	1,445,177	1,506,564	1,554,478	1,600,754	1,638,823
Employment	1,860,672	1,905,337	1,933,860	1,967,393	2,003,196	2,037,472

Adopted City of Los Angeles Forecasts¹

	<u>2010</u>	<u>2015</u>	<u>2020</u>	<u>2025</u>	<u>2030</u>	<u>2035</u>
Population	4,057,484	4,128,125	4,204,329	4,277,732	4,348,282	4,415,773
Households	1,366,985	1,424,701	1,485,519	1,532,998	1,578,850	1,616,578
Employment	1,820,092	1,864,061	1,892,139	1,925,148	1,960,393	1,994,134

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008.

SCAG Staff Comments:

Population is briefly discussed under Growth Inducing Effects in Section 5.0 and the growth inducing impacts are deemed less than significant as the projected population growth falls well within SCAG's RTP growth forecast for the City of Los Angeles.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

- RTP G1** *Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2** *Ensure travel safety and reliability for all people and goods in the region.*
- RTP G3** *Preserve and ensure a sustainable regional transportation system.*
- RTP G4** *Maximize the productivity of our transportation system.*
- RTP G5** *Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6** *Encourage land use and growth patterns that complement our transportation investments.*
- RTP G7** *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

SCAG Staff Comments:

SCAG staff finds that the proposed project meets consistency with RTP G6, and meets partial consistency with RTP G1, G4 and G5. RTP G2, G3, and G7 are not applicable to this project since it is not a transportation project.

The proposed project partially meets consistency with RTP G1. Mobility pertains to the speed at which

2.1

2.2

one may travel and the delay, or difference between the actual travel time and travel time that would be experienced if a person traveled at the legal speed limit. Per Table 4.11-7 (Project Impact Summary), eight out of the 22 analyzed intersections would operate at an unacceptable level of service (LOS) of E or F during either the AM or PM peak hour. Five out of the 22 intersections would have a significant impact after mitigation measures are applied. Accessibility measures how well the transportation system provides people access to opportunities, such as jobs, education, shopping, recreation, and medical care. The proposed project offers regional auto access via US Highway 101, Interstate 110/State Route 110, and Interstate 10, local auto access via several roadways including Alameda Street, 1st Street, and Temple Street, and is well-served by public transit including a Metro Gold Line light rail stop adjacent to the site and three Metro bus routes.

2.2

With regard to RTP G4, the proposed project partially meets consistency. Productivity is a system efficiency measure that reflects the degree to which the transportation system performs during peak demand conditions. As indicated previously, eight out of the 22 analyzed intersections would not meet an acceptable LOS of D or better in either the AM or PM peak hour.

The proposed project meets partial consistency with RTP G5. Per page 4.2-23, the project would exceed SCAQMD thresholds for ROG and NOx, after mitigation measures have been applied.

The proposed project meets consistency with RTP G6. As mentioned previously, the site offers good auto access and is conveniently located next to a Metro Gold Line light rail station, which provides service to Union Station.

GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

- GV P1.1** *Encourage transportation investments and land use decisions that are mutually supportive.*
- GV P1.2** *Locate new housing near existing jobs and new jobs near existing housing.*
- GV P1.3** *Encourage transit-oriented development.*
- GV P1.4** *Promote a variety of travel choices*

SCAG Staff Comments:

The proposed project meets consistency with Principle 1.

2.3

The proposed project meets consistency with GV P1.1. As mentioned previously, the project site offers convenient regional and local auto access, along with a light rail station immediately adjacent to the site.

With regard to GV P1.2, the proposed project meets consistency. The project site offers convenient access to job centers in Downtown Los Angeles and Pasadena. In addition, the mixed-use nature of the project will provide employment-generating uses in addition to housing.

The proposed project meets consistency with GV P1.3. The site is located immediately adjacent to the Metro Gold Line Little Tokyo / Arts District station.

With regard to GV P1.4, the proposed project meets consistency. In addition to auto and public transit, the project provides provisions for pedestrians and bicyclists such as enhanced pedestrian and bicycle pathways, centrally-located bicycle parking, and shower and locker facilities. The project would also encourage car sharing, taxi services, and a guaranteed ride home program for those who use a commute mode other than driving.

Principle 2: Foster livability in all communities.

- GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2 *Promote developments, which provide a mix of uses.*
- GV P2.3 *Promote "people scaled," walkable communities.*
- GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

2.3

SCAG Staff Comments:

Where applicable, the proposed project meets consistency with Principle 2. GV P2.4 is not applicable since no single-family homes would be removed as part of the development.

The proposed project meets consistency with GV P2.1, as it is located in a strong infill location.

With regard to GV P2.2, the proposed project meets consistency, as it would offer a mix of residential and commercial uses.

The proposed project meets consistency with GV P2.3, as the project's design incorporates pedestrian connectivity.

Principle 3: Enable prosperity for all people.

- GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.2 *Support educational opportunities that promote balanced growth.*
- GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
- GV P3.5 *Encourage civic engagement.*

SCAG Staff Comments:

Principle 3 cannot be assessed based on the information provided in the DEIR.

2.4

Principle 4: Promote sustainability for future generations.

- GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
- GV P4.2 *Focus development in urban centers and existing cities.*
- GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 *Utilize "green" development techniques*

SCAG Staff Comments:

Where applicable, SCAG staff finds that the project is consistent with Principle 4. GV P4.4 is not explicitly discussed.

The proposed project meets consistency with GV P4.1 and P4.2 since it is a redevelopment within an urban area.

With regard to GV P4.3, the proposed project generally meets consistency. Section 4.12 (Utilities) discusses water saving features and measures to reduce waste during construction and operation, while Section 4.2 (Air Quality) discusses TDM measures that the project may implement to reduce air pollution.

2.4

CONCLUSION

Where applicable, the proposed project partially meets consistency with SCAG Regional Transportation Plan Goals and meets consistency with Compass Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here: http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf

2.5

When a project is of statewide, regional, or areawide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21018.7, and CEQA Guidelines Section 15097 (g).

Letter 2

COMMENTER: Jacob Lieb, Manager, Southern California Association of Governments

DATE: March 1, 2010

Response 2.1

The commenter states that the DEIR should reflect the most current SCAG forecasts, which are the 2008 Population, Household and Employment forecasts, and notes that the population growth associated with site development is well within SCAG forecasts. The DEIR discusses project consistency with the 2008 forecasts and, as the commenter notes, concludes that population growth is within forecasts. Please see Section XII, *Population and Housing*, in the Initial Study for the project (Appendix A) as well as the discussion of growth inducing impacts in DEIR Section 5.0.

Response 2.2

The commenter lists Regional Transportation Plan goals and states that the proposed project is consistent with RTP G6 and partially consistent with RTP G1, G4, and G5. The partial inconsistency refers to the traffic impacts of the proposed project. As discussed in Section 4.11, *Traffic*, eight of the intersections would operate at LOS D or worse. In addition, the project would exceed SCAQMD thresholds for ROG and NOx. As discussed in Section 4.2, *Air Quality*, impacts would be significant and unavoidable. Therefore, the project is partially consistent with RTP goals.

Response 2.3

The commenter lists Growth Visioning principles and states that the project is consistent with Principle 1, GVP1.1, GVP1.2, GVP1.3, GVP 1.4, GVP2.1, GVP2.2, and GVP2.3. As discussed in the comment letter, the project offers convenient auto access to job centers in Los Angeles and Pasadena. In addition, the project is near a metro line. The project is located in an infill location and offers a mix of land uses. In addition, the project supports pedestrian connectivity.

Response 2.4

The commenter states that the project is consistent with Principle 4 where applicable. The commenter states that GVP4.4 (Utilize “green” development techniques) is not explicitly discussed. The proposed project would be required to comply with the City of Los Angeles’ 2008 Green Building Ordinance, which would require the project to utilize green development techniques.

The commenter states that the project is consistent with GVP4.1, GVP4.2, and GVP4.3. The project involves redevelopment in an urban area. In addition, water saving measures and waste reduction measures would be implemented during construction and operation of the project. Measures for reducing air pollution are in Section 4.2, *Air Quality*.



Response 2.5

The commenter states that all feasible mitigation measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA, and should be submitted to SCAG.

A Mitigation, Monitoring, and Reporting Program (MMRP) will be prepared for the proposed project. This MMRP will include all mitigation measures applicable to the proposed project as well as the person responsible for implementing the mitigation.



Letter 3

>>> Joyce Dillard <dillardjoyce@yahoo.com> 3/1/2010 4:13 PM >>>
Comments to ENV 2009-3345-EIR Mangrove Estates due 3.1.2010

As stated in the report:

"Section 4.4 GEOLOGY

Underlying bedrock is moderately cemented siltstone of marine origin.

According to California Department of Water Resources Bulletin 104, bedrock lies beneath alluvium at a depth of approximately 80 to 100 feet. Union Station Oil Field is immediately south or west of project site components. Therefore, bedrock in the area could be petroliferous, exhibiting a natural oily stain and odor."

The Oil Fields and cement filled Underground Storage Tanks need to be addressed in a comprehensive, long-term plan for Health and Safety issues and Homeland Security issues.

The health hazards should be addressed to methane and other gases leaking and affecting both the health of the residents, businesses and transiting MTA passengers. Mitigation measures should be in a plan if adults and children are overcome with fumes. How would the dense traffic situation be monitored? Where is the adopted Traffic Congestion Plan?

3.1

Public services should be in line and a long-term plan must be in place, especially with the intended City budget cuts.

A Methane Prevention Detection and Monitoring Program (Mitigation Plan) needs to be submitted with properly trained personnel to oversee, scientifically report and monitor. The proper City and County agencies need to be part of the Plan as well as the State and the Federal. The City of Los Angeles has failed to implement Ordinance 175790 to properly protect the Health and Safety of its citizens. There is no alternative plan.

Water Supply Assessment is not a factual document but a projection of plans, not yet enacted.

Water conservation has been enacted in the City of Los Angeles. This project cannot take demand water while other customers conserve and get charged for excess water use. Recycled water is not on line and should not be considered until proper measures update the plants needed to treat the water. Before that time, any plan is just a wish list and not a reality for use. If other entities such as West Basin Water District or the City of Burbank process water for re-sale, then the City needs to go through the legislative process to enact those services.

3.2

The Department of Water and Power cannot guarantee supply on a long-range term until studies are executed for rainfall into the Owens Valley system.

The California State Project and the Metropolitan Water District do not have the supply to fulfill the water needs for the region.

Spreading grounds have not been enacted and should not be considered until they are online. The LA River region is being planned for real estate build-out through the Los Angeles River Revitalization Corporation and not being planned for water supply and water quality.

The Los Angeles Basin needs groundwater monitoring wells, with a defined plan and regular scientific reporting.

OTHER CEQA:

What are the Greenhouse Gas Emission effects on the forests and the oceans? What plan has been adopted by the City of Los Angeles to cover the effects?

What measures are being taken to provide Scientific Data and Factual Reports to the public? Please list the Plans that have been adopted to mitigate any measure in this document. Are they easily available to the public?

What peer review procedures have been enacted for any data presented?

What is the adopted maintenance plan?

What potential city liability will be incurred by building housing over a Methane Zone and Underground Storage Tanks?

Who holds the oil and mineral rights? What mitigation is planned for liabilities incurred by that ownership?

Why did the City apply for this CEQA document and not the potential builders as approved in Council File 07-0891 August 15, 2008, Kaji, Little Tokyo Service Center, Urban Partners? Is the sale still pending?

What is their liability and what mitigation measures, reporting and adopted plans will they employ?

What is the impact on the long-term revenue loss on the sale of the parking lot including replacements? What traffic plans have been adopted?

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

Letter 3

COMMENTER: Joyce Dillard

DATE: March 1, 2010

Response 3.1

The commenter states an opinion that a long-term plan should be written for the oil fields and cement filled underground storage tanks. The commenter also suggests that mitigation should address potential methane impacts.

As discussed in DEIR Section 4.5, *Hazardous Materials*, there are no oil fields or underground storage tanks on the project site. The Union Station Oil Field is south or west of the project site. Mitigation measures identified in Section 4.5 would address potential methane impacts. This mitigation includes the following:

- HAZ-4(a) Explosion/Release Methane Gas.** Environmental impacts may result from development of the site due to its location in an area of potential methane gas zone. However, this potential impact would be mitigated to a level of insignificance by the following measures:
- *All commercial, industrial, and institutional buildings shall be provided with an approved Methane Control System, which shall include these minimum requirements; a vent system and gas-detection system which shall be installed in the basements or the lowest floor level on grade, and within underfloor space of buildings with raised foundations. The gas-detection system shall be designed to automatically activate the vent system when an action level equal to 25% of the Lower Explosive Limit (LEL) methane concentration is detected within those areas.*
 - *All commercial, industrial, institutional and multiple residential buildings covering over 50,000 square feet of lot area or with more than one level of basement shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. In addition to the other items listed in this section, the owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.*
 - *All multiple residential buildings shall have adequate ventilation as defined in Section 91.7102 of the Municipal Code and a gas-detection system installed in the basement or on the lowest floor level on grade, and within the underfloor space in buildings with raised foundations.*



HAZ-4(b) Site Testing. Prior to the issuance of a building permit, applicant shall comply with the City Methane Seepage Regulations as outlined in Municipal Code Section 91.7103. Site testing of subsurface geological formations shall be conducted in accordance with the Methane Mitigation Standards. The site testing shall be conducted under the supervision of a licensed architect or registered engineer or geologist and shall be performed by a testing agency approved by the Department of Building and Safety.

The licensed architect, registered engineer or geologist shall indicate in a report to the Department of Building and Safety, the testing procedure, the testing instruments used to measure the concentration and pressure of the methane gas. The measurements of the concentration and pressure of the methane gas shall be used to determine the Design Methane Concentration and the Design Methane Pressure which will be used determine the Site Design Level as stated in Table 4.5-1.

These mitigation measures would reduce the risk of methane to residents, businesses, and transit passengers to below a level of significance.

Response 3.2

The commenter states a concern about water supplies in the City of Los Angeles. The commenter states an opinion that the Department of Water and Power (DWP) cannot guarantee supply until rainfall in the Owens Valley is studied. The commenter further states an opinion that the Metropolitan Water District (MWD) does not have the supply to fulfill the water needs of the region.

As discussed in Section 4.12, *Utilities*, the anticipated water demand associated with the project falls within the Urban Water Management Plan's (UWMP's) projected water supplies for normal, single-dry, and multiple-dry years through the year 2030 and within the UWMP's 25-year water demand growth projection. As discussed in the Setting section of Section 4.12, in response to water supply uncertainties, including those affected MWD, the Mayor and LADWP released a Water Supply Action Plan (Action Plan) on May 17, 2008. The plan, entitled "Securing L.A.'s Water Supply," serves as a blueprint for creating sustainable sources of water for the future of Los Angeles to reduce dependence on imported supplies. It is an aggressive multi-pronged approach that includes: investments in state-of-the-art technology; a combination of rebates and incentives; the installation of smart sprinklers, efficient washers and urinals; and long-term measures such as expansion of water recycling and investment in cleaning up the local groundwater supply. The Action Plan also takes into account the realities of climate change and the dangers of drought and dry weather.

The premise of the Action Plan is that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. In total, the City will conserve or recycle 32.6 billion gallons of water a year. By the year 2019,



half of all new demand will be filled by a six-fold increase in recycled water supplies and by 2030 the other half will be met through ramped-up conservation efforts.

The Action Plan also specifically addresses current and future State Water Project (SWP) supply shortages. The California Department of Water Resources estimates that the December 15, 2008, U.S. Fish and Wildlife Service's Biological Opinion on Delta Smelt will limit MWD exports of their anticipated SWP supply by up to 50% in a normal year. The Action Plan concludes, however, that MWD's actions in response to this threat will ensure continued reliability of its water deliveries. The Action Plan further states that "despite concerns about ongoing water shortages and higher costs, MWD has upheld its pledge to plan for emergencies and natural disasters throughout this region." MWD's calendar year 2009 non-emergency storage was 1,072,000 acre-feet (AF) in surface and groundwater storage accounts - including Diamond Valley Lake near Hemet - plus an additional 670,000 AF of storage reserved for emergencies. MWD estimates its calendar year 2010 non-emergency storage is currently projected to be 935,000 AF. In total, this reserve of water supplies will be utilized to buffer the severity of a potential shortage. Furthermore, by focusing on demand reduction, implementation of the Action Plan will ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages.

The Action Plan includes a range of key short-term and long-term strategies to secure water supply. These strategies are described in detail in the Water Supply Assessment (WSA) in Appendix H (beginning on page 11).

The commenter also states an opinion that spreading grounds should not be considered until they are online. The commenter states an opinion that the LA River region is being planned for real estate buildout and not for water supply and water quality. The commenter states an opinion that the Los Angeles Basin needs groundwater monitoring wells. It is unclear how these comments pertain to the content of the DEIR or the currently proposed project. As such, a meaningful response is not possible.

Response 3.3

The commenter asks about the greenhouse gas effects on forests and oceans.

The greenhouse gas emissions generated by the proposed project are quantified in Section 5.0, *Other CEQA-Required Discussions*. As discussed in Section 5.0, the annual emissions of greenhouse gases would be 33,566 metric tons carbon dioxide equivalents (CDE). The effects of greenhouse gas emissions on the environment are discussed in detail in Section 5.0. Sea level rise may be a product of global warming through two main processes: expansion of sea water as the oceans warm and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events. Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of greenhouse gases (GHGs) are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise as discussed previously: 1.0-4.5°F (0.6-2.5°C) in the next 50 years, and 2.2-10°F (1.4-5.8°C) in the next century, with substantial regional

variation (EPA 2000). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as two feet along most of the U.S. coast. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan, 2004; Parmesan, C. and H. Galbraith 2004.)

The purpose of the EIR greenhouse gas analysis is to determine whether emissions of greenhouse gases generated by the proposed project would be cumulatively considerable. It is not the purpose of the EIR to determine the cumulative impacts of greenhouse gas effects on oceans and forests. As discussed in Section 5.0, the contribution of onsite development to cumulative global climate change impacts would be less than significant.

The commenter also asks what plan has been adopted by the City to cover the effects of greenhouse gases. The City has not adopted a specific plan to address greenhouse gases, though it has become standard City practice to address greenhouse gas-related impacts in CEQA environmental documents.

Response 3.4

The commenter asks what measures are being taken to provide reports, plans, and mitigation to the public. For the proposed project, the DEIR is the report that analyzes the environmental impacts and requires mitigation measures. Plans that were used in the DEIR analysis include the City of Los Angeles General Plan, the Los Angeles River Master Plan, SCAQMD's Air Quality Management Plan, the Congestion Management Plan (CMP) for Los Angeles County, the Central City North Community Plan, and the City of Los Angeles Citywide General Plan Framework Element, which establishes the broad overall policy and direction for the entire General Plan. These plans are available to the public at City Hall and on the City's website (<http://cityplanning.lacity.org/>).

Response 3.5

The commenter asks what peer review procedures have been used. The DEIR is available for review during the public comment period. Any member of the public has the opportunity to comment during this time. In addition, the DEIR was sent to interested public agencies, which were given the opportunity to review and comment on the document. Agencies that commented on the DEIR include the Native American Heritage Commission, the Southern California Association of Governments, the California Department of Transportation (Caltrans), and the Los Angeles County Metropolitan Transit Authority.

Response 3.6

The commenter asks what the adopted maintenance plan is. It is unclear to which plan the commenter is referring. A mitigation monitoring and reporting plan (MMRP) will be prepared in conjunction with the Final EIR. The MMRP outlines the methods by which implementation of EIR mitigation measures will be assured.



Response 3.7

The commenter asks what potential City liability will be incurred by building housing over a methane zone and underground storage tanks. The commenter also asks who holds the oil and mineral rights and what mitigation is planned for liabilities incurred by that ownership. There are no known underground storage tanks or oil or mineral deposits at the project site. Impacts associated with methane are addressed in DEIR Section 4.5, *Hazardous Materials*, and in Response 3.1. The question regarding liability does not pertain to the DEIR or the adequacy of the environmental analysis.

Response 3.8

The commenter asks why the City completed the EIR instead of the potential developers and asks again if the sale is still pending. Sale of the project site to a developer is pending. A developer has not yet been selected. The City is preparing the EIR to ensure that development of the site is consistent with the City's vision and to include as conditions of future development mitigation measures that will enhance any onsite project and create a transit-oriented, pedestrian-friendly infill project that is consistent with the City's General Plan. It should also be noted that it is the City's responsibility to act as lead agency for the EIR since it has primary responsibility for approving any development on the project site.

The commenter again asks what the liability of the potential developers includes. Please see Response 3.7.

The commenter asks what mitigation measures the potential developer would be required to comply with. All DEIR mitigation measures adopted by the City would become requirements for any future onsite development.

Response 3.9

The commenter asks what the long-term revenue impact is from sale of the existing onsite parking lot. Revenue loss does not pertain to the DEIR or the adequacy of the environmental analysis. However, one of the City's goals for the project is to generate revenues from the sale of the currently underutilized property.

The commenter asks what traffic plans have been adopted. It is unclear to what plans the commenter is referring. The traffic impacts of future onsite development are addressed in DEIR Section 4.11, *Transportation and Circulation*. A number of mitigation measures have been identified to address the impacts of onsite development; nevertheless, impacts to five intersections would be unavoidably significant because mitigation that would reduce impacts to below a level of significance is not available.





Metro

Letter 4

February 25, 2010

Steven Wechsler, Community Planner
Department of City Planning, Mail Stop 395
200 North Spring Street, Room 667
Los Angeles, CA 90012

Dear Mr. Wechsler:

Los Angeles County Metropolitan Transportation Authority (Metro) is in receipt of the Draft EIR for the Mangrove Estates Site Mixed Use Development project. This letter conveys recommendations concerning issues that are germane to Metro's statutory responsibilities in relation to the proposed project.

Although no specific development is proposed at this time, due to the project site's proximity to the Metro Gold Line Little Tokyo Station and planned Regional Connector Transit Corridor the following comments are provided:

- | | |
|---|-----|
| 1. While Hewitt Street may be extended north of 1 st Street to Temple Street as proposed, it is possible the intersection could be closed if the Fully Underground Alternative of the Regional Connector Transit Corridor Study is selected as the Locally Preferred Alternative. | 4.1 |
| 2. The project proponent should consider integrating an open space element such as a plaza with landscaping and/or a water feature at the northeast corner of 1 st and Alameda as well as pedestrian access to the Little Tokyo Gold Line Station. The existing building at the southeast corner of 1 st and Alameda is very close to the street with narrow sidewalks and is not conducive to pedestrian activity. | 4.2 |
| 3. Metro has reviewed the proposed development in relation to the Regional Connector Transit Corridor alternatives, and provided estimates of potential encroachments into the project site north of 1 st Street and east of Alameda Street. | 4.3 |
| 4. Pedestrian access to the project site from any planned Regional Connector station should be reviewed by Metro. | 4.4 |

Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, please call me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

Sincerely,

Susan F. Chapman
Program Manager, Long Range Planning

cc: Aspet Davidian
Eric Carlson

Letter 4

COMMENTER: Susan F. Chapman, Program Manager, Long Range Planning,
Metropolitan Transit Authority

DATE: February 25, 2010

Response 4.1

The commenter notes that the Hewitt Street/1st Street intersection may be closed if the Fully Underground Alternative of the Regional Connector Transit Corridor Study is selected. The site planning for the Mangrove Estates site would be affected if the Fully Underground Alternative is selected as north/south traffic through the intersection may be limited. If the Fully Underground Alternative is selected and north/south movement through the Hewitt Street/1st Street intersection is limited due to the transit line, additional traffic analysis may need to be conducted to determine whether or not such a change would create additional significant traffic impacts. If the change would create new significant impacts, preparation of additional environmental documentation would be needed in conformance with CEQA.

Response 4.2

The commenter suggests integrating an open space element at the northeast corner of 1st and Alameda as well as pedestrian access to the Metro Gold Line Station. Mitigation Measure AES-2(g) in Section 4.1, *Aesthetics*, requires a landscaped focal point onsite to serve as an amenity for residents and the public that provides useable open space for outdoor activities. In addition, Measure T-2(a) in Section 4.11, *Transportation and Circulation*, requires the project developer to provide a financial contribution and rent-free space needed to implement a new integrated mobility hub kiosk that is open and clearly visible to the public. This integrated mobility hub could be incorporated into a publicly accessible plaza located on the project site, near transit portals at 1st Street and Alameda Street and/or Temple Street and Alameda Street. Pedestrian access to the Metro Gold Line Station will be provided as development of the site is specifically intended to take advantage of the site's proximity to transit options.

Response 4.3

The commenter notes that Metro has reviewed onsite development in relation to the Regional Connector Transit Corridor alternatives. This is noted. Any future site development will be coordinated with the Metropolitan Transit Authority and will consider the selected alternative of the Regional Connector Transit Corridor Study.

Response 4.4

The commenter notes that Metro should review pedestrian access to the project site from any planned Regional Connector station. As noted above, any future site development will be coordinated with the Metropolitan Transit Authority.



DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF PUBLIC
TRANSPORTATION AND REGIONAL PLANNING
 IGR/CEQA BRANCH
 100 SOUTH MAIN STREET
 LOS ANGELES, CA 90012
 PHONE (213) 897-6696
 FAX (213) 897-1337

Letter 5



Flex your power!
Be energy efficient!

February 26, 2010

IGR/CEQA DEIR CS/100129
 City of Los Angeles
 Mangrove Estates Site Mixed-Use
 Development, Case No. ENV-2009-3345-
 EIR, Alameda St./First St.
 Vic. LA-101-S0.9, SCH# 2009101091

Mr. Steve Wechsler
 City of Los Angeles
 Department of City Planning
 200 N. Spring Street, 7th Floor
 Los Angeles, CA 90012

Dear Mr. Wechsler:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Mangrove Estates Site Mixed-Used Development Project. The project site is located at the northeast corner of Alameda Street and First Street in the City of Los Angeles in the Little Tokyo Arts District. The anticipated development would include up to 743,750 sq. ft. of non-residential space including 200,000 sq. ft. of retail space, 500,000 sq. ft. of office space, 25,000 sq. ft. of community space, and 18,750 sq. ft. of commercial space within live-work units. The residential component would consist of up to 445 multiple family residences with additional 83 live-work units. Based on the information received, we have the following comments:

The future year 2015 with project traffic for the AM peak hour LOS (level-of-service) for the US-101 Freeway on and off-ramps for First Street is LOS E. This is a significant impact at this location. A queue length analysis and HCM operational analysis should be performed for the off-ramps. The project should contribute to the funding of any Traffic signal upgrades.

5.1

We acknowledge that the project will implement an on-site transportation demand management (TDM) program to achieve a maximum reduction in peak hour vehicular trips by promoting rideshare and transit activities. TDM measures would be extremely important due to the proximity of the project site to the Metro Gold Line station and the future Metro Regional Connector Transit Corridor Project if built, would link the Metro Gold Line with the Metro Blue Line.

5.2

We recommend that the City of Los Angeles implement a fair-share funding program to finance regional transportation improvement projects especially since the Los Angeles CMP debit/credit system has been suspended for some time. | 5.3

Since the project is considered a regionally significant project under CEQA, the nearby mainline US-101 Freeway and I-10 San Bernardino Freeway facilities should be analyzed. Appropriate studies would include existing and future year traffic volumes and level-of-service (LOS) analysis, HCM operational analysis, micro-simulation modeling, etc. | 5.4

If you have any questions, you may reach me at (213) 897-6696 and please refer to our record number 100129/CS.

Sincerely,



ELMER ALVAREZ
IGR/CEQA Program Manager
Office of Regional Planning

cc: Scott Morgan, State Clearinghouse

Letter 5

COMMENTER: Elmer Alvarez, IGR/CEQA Program Manager, Office of Regional Planning, California Department of Transportation, District 7

DATE: February 26, 2010

Response 5.1

The commenter notes that the future year 2015 with project traffic for the AM peak hour LOS (Level-of-service) for the U.S. 101 on and off-ramps for First Street is E, indicating that this is a significant impact. The commenter suggests that a queue length analysis and Highway Capacity Manual (HCM) operational analysis should be performed for the off-ramps, and states an opinion that the project should contribute to the funding of any traffic signal upgrades.

LADOT recognizes that the strategic placement of signal upgrades to the CCTV camera system would afford LADOT with the ability to monitor vehicles and buses, and respond to incidents that cause excessive delays. Their policy is that if any of traffic signal upgrades are needed as mitigation to offset the significant traffic impacts of a development project, such upgrades may be required not only at the impacted intersections, but also any intersections in the immediate vicinity, as determined by LADOT, to qualify for the intersection V/C reduction of 0.01. LADOT will monitor the impacts of this project to determine whether signal system upgrades are justified and, if so, will require the site developer to contribute to feasible future traffic signal upgrades at this location.

Response 5.2

The commenter acknowledges that the site developer will implement an on-site transportation demand management (TDM) program to achieve a maximum reduction in peak hour vehicular trips by promoting rideshare and transit activities. The commenter states that TDM measures would be extremely important due to the proximity of the project site to the Metro Gold Line station and the future Metro Regional Connector Transit Corridor Project if built, would link the Metro Gold Line with the Metro Blue Line.

The EIR preparers agree with the commenter. The City is looking to find non-auto oriented measures such as transit, bike, pedestrian, first/last mile enhancements, and other strategies to reduce the impacts of this and other developments by capitalizing on the expanding transit system serving downtown and surrounding areas.

Response 5.3

The commenter recommends that the City of Los Angeles implement a fair-share funding program to finance regional transportation improvement projects, especially since the Los Angeles CMP debit/credit system has been suspended for some time.

The recommendation is noted. However, Caltrans does not currently have an adopted plan or mechanism necessary to apply fair share contribution requirements for the cumulative traffic



increases at the identified freeway monitoring locations. Consequently, there is no basis for determination of such a contribution. If any applicable funding plan or other mechanism has been adopted at such time as the project site is developed, the site developer would be required to participate. The City will meet with Caltrans staff when a developer is ready to proceed with the project to determine whether an applicable funding mechanism is in place at that time.

Response 5.4

The commenter indicates that since the project is considered a regionally significant project under CEQA, the nearby mainline U.S. 101 Freeway and I-10 Freeway facilities should be analyzed. The commenter states that appropriate studies would include existing and future year traffic volumes and level-of-service (LOS) analysis, HCM operational analysis, micro-simulation modeling, etc.

Based on the project trip generation/distribution and the distance of these CMP freeway monitoring locations from the project site, it is not expected that onsite development would generate 150 or more new trips per hour to these freeway segments. Based on the adopted CMP guidelines, further analysis of these freeway monitoring locations is not warranted.





STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
GOVERNOR

March 1, 2010

CYNTHIA BRYANT
DIRECTOR

Steven Wechsler
City of Los Angeles
200 N. Spring Street
City Hall Office 667, MS 395
Los Angeles, CA 90012

Subject: Mangrove Estates Site Mixed Use Development
SCH#: 2009101091

Dear Steven Wechsler:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 26, 2010, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Acting Director, State Clearinghouse

Enclosures

cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2009101091
Project Title Mangrove Estates Site Mixed Use Development
Lead Agency Los Angeles, City of

Type EIR Draft EIR
Description The development of mixed retail, office, community space, creative live/work units and residential development. Although no specific development is proposed at this time, it is anticipated that the project site could accommodate a maximum of 1.2 million square feet (sf) of floor space. Anticipated development on the project site includes an estimated 200k sf of retail space, 500k sf of office space, 25k sf of community space, 18.75k sf of commercial space within 83 live/work units and 445 multiple family residences.

Lead Agency Contact

Name Steven Wechsler
Agency City of Los Angeles
Phone 213-978-1163 **Fax**
email
Address 200 N. Spring Street
 City Hall Office 667, MS 395
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long 34° 02' 58" N / 118° 14' 12" W
Cross Streets North Alameda Street ad East First Street
Parcel No. multiple
Township **Range** **Section** **Base**

Proximity to:

Highways State Route 110
Airports
Railways Metrolink, Amtrak
Waterways Los Angeles River
Schools LA Universal Preschool
Land Use PLU: parking lot
 Zoning: Commercial and Heavy Manufacturing
 GP Des: Regional Commercial and Heavy Manufacturing

Project Issues Air Quality; Archaeologic-Historic; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; 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; Aesthetic/Visual; Forest Land/Fire Hazard

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Department of Housing and Community Development; Resources, Recycling and Recovery; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 01/13/2010 **Start of Review** 01/13/2010 **End of Review** 02/26/2010

Letter 6

COMMENTER: Scott Morgan, Acting Director, State Clearinghouse

DATE: March 1, 2010

Response

The commenter acknowledges that the City has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA. No response is necessary.

